



## **COMPLAINTS POLICY**

POL/0001/2019

Approved:

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# 1. GENERAL

This section gives basic information on our complaints policy:

- Purpose and scope;
- Responsible body;
- The law and internal rules;
- Definitions, abbreviations and nomenclature;
- Regulation updates and cancellations;
- Rules.

## 1. Purpose and scope

Pursuant to the following banking laws and regulations, as part of the Bank's relations with its customers, in order to ensure that its relations are transparent to the market and to ensure it acts with all due diligence, neutrality, loyalty, discretion and respect, being aware of the interests its customers have entrusted to it, the Bank has adopted the present complaints policy:

- Law 12/15 of 17 June 2015 (Financial Institutions Act) - Chapter IV - Supervision, Section II - Supervision of conduct, Subsection I - Rules of conduct;
- Notice 12/16 of 5 September 2016: Establishing the rules and procedures for the marketing of financial products and services.

The complaints policy allows impartial assessment of complaints and Bank actions, contributing to the search for possible errors in operations, processes or new product or service design and therefore to continuous improvement.

This policy covers the receipt and assessment of complaints, expressions of dissatisfaction and suggestions from customers and other individual and collective entities, and helps preserve trust in relations with them, recover and maintain satisfaction, quality and image levels and mitigate risk to the Bank's reputation.

For the purposes of this document, a complaint or dissatisfaction is any expression of disagreement with the position adopted by BFA, S.A. or of dissatisfaction with its services and any allegation of default made by customers, beneficiaries of banking services or third parties who have been allegedly harmed.

Complaints, suggestions and expressions of dissatisfaction concerning Bank products and services and the actions of its staff during the delivery of Bank services will be accepted, subject to investigation.

## 2. Responsible body

The Marketing Department (**DMK**) is responsible for updating this complaints policy.

## 3. The law and internal rules

The following legislation and external regulations are relevant to this policy:

Law no. 12/15 of 17 June 2017 (Financial Institutions Act) - Chapter IV - Supervision, Section II - Supervision of conduct, Subsection I - Rules of conduct;

Notice 12/16 of 5 September 2016: Establishing the rules and procedures for the marketing of financial products and services.

## 4. Definitions, abbreviations and nomenclature

N/A.

## 5. Regulation updates and cancellations

### 5.1 Update history

Clique aqui para introduzir texto.

VERSION	DATE	AUTHOR	APPROVED	MAIN CHANGES
1	[Effective date]	DOQ	[Approval date]	1st publication

### 5.2 Regulation cancellation

N/A.

## 6. Rules

The complaints policy sets out the rules and guidelines for customer complaints.

## 2. COMPLAINTS POLICY

Complaints management applies the following rules:

1. Making a complaint - access to, and visibility of, information
2. Confidentiality
3. Recording and classification of complaints
4. Deadline for responding to complaints
5. Charge-free complaints process
6. Independence and impartiality
7. Responding to complaints
8. Continuous improvement

## 1. Making a complaint - access to, and visibility of, information

At the Bank's physical network of branches and offices and on its visual website, all of which are easy to access by customers, staff and the public in general, full information can be obtained on how to make a complaint or suggestion or register dissatisfaction.

## 2. Confidentiality

The Bank at all times, and particularly throughout its complaints, suggestions and registration of dissatisfaction procedure, protects the personal data of customers and/or complainants, their identities and the subject of their complaints and ensures that all information provided remains strictly confidential during and after investigation of the complaint in accordance with the basic principles of banking secrecy as set out in the Financial Institutions Act. The information provided is available only to the units involved in the procedure.

## 3. Recording and classification of complaints

Complaints, suggestions and registrations of dissatisfaction received by the Bank are recorded and given a consecutive number and are then classified by subject to ensure they can be properly examined and investigated and that communication procedures and statutory deadlines for response to the customer can be met.

## 4. Deadline for responding to complaints

Pursuant to **art. 23 of Notice 12/16 of 5 September 2016**, the Bank must respond to complaints by the following deadlines:

Number of financial institutions involved	*Statutory deadline
a) One	20 days
b) Two or more financial institutions in Angola	30 days
c) One or more financial institutions outside Angola	60 days

\*However, if for any specific and justified reason the above deadlines cannot be met, the Bank must inform the customer with explanations.

## 5. Charge-free complaints process

Complaints, suggestions and registrations of dissatisfaction will not attract commission, interest or any expense.

## 6. Independence and impartiality

BFA will treat all complaints received about units or staff impartially and prudently and will investigate them independently, transparently and objectively, protecting complainants' rights and providing a quality, high-value service.

## 7. Responding to complaints

A response will be given to all complaints made, irrespective of whether the conclusion is that they are justified or not. Responses must be brief and delivered by the method previously agreed with the customer.

## **8. Continuous improvement**

Complaint indicators are used by the Bank to ensure the continuous improvement of its products and services and of all aspects of complaint management

## **3. MINIMUM INFORMATION REQUIREMENTS**

Complaints must give the following details:

1. Complainant details
2. Current contact details
3. Date of the event
4. Place of occurrence and alleged witnesses or persons involved
5. Factual description of the event

## **1. Complainant details**

The written complaint must include the following details:

- Identity card (BI) number (Angolan nationals) or passport number (foreigners)
- BFA account number (BFA customers)
- Name and address on identity card
- Tax ID (NIF) (optional)

## **2. Current contact details**

The written complaint must include the following details:

- Land line/mobile telephone number (mandatory)
- E-mail address (optional)
- PO box/fax number (optional)
- Postal address (optional)

## **3. Date of the event**

The written complaint must include the following details:

- Day, month and year
- Time (optional)

## **4. Place of occurrence and alleged witnesses or persons involved**

The written complaint must include the following details:

- Name of branch, address or place of the event
- Names of alleged witnesses or persons involved

## **5. Factual description of the event**

The written complaint must include the following details:

- Reason for contacting or visiting the Bank
- Reason for the dissatisfaction expressed

## 4. DEALING WITH COMPLAINTS

This section covers the following topics:

1. Specialist complaints team
2. Internal supervisory bodies
3. External supervisory bodies

### **1. Specialist complaints team**

The Bank has a specialist complaints unit within the Marketing Department that works with other Bank units to investigate complaints centrally and in accordance with legal requirements.

### **2. Internal supervisory bodies**

To ensure compliance with legal requirements and BFA's commitments to its customers and society as a whole, the following bodies are responsible for deciding, monitoring and supervising the complaints unit to ensure it provides an efficient, impartial and secure service:

- Executive Committee of the Board of Directors
- Compliance
- Audit and Inspection
- General Risk

### **3. External supervisory bodies**

As legally required and in order to ensure compliance with legislation and the service commitments given by Angola's financial sector to the customer and society as a whole, the following body monitors, supervises and makes decisions concerning the handling of complaints to ensure an efficient, impartial and secure service is provided:

- National Bank of Angola (BNA)
- External auditors

## 5. DEADLINES

This section regulates the deadlines for responding to complaints:

1. Deadlines

## 1. Deadlines

Pursuant to **art. 23 of Notice 12/16 of 5 September 2016**, the Bank must meet the following response deadlines:

- a) Claims involving one Angolan financial institution
- b) Claims involving two or more Angolan financial institutions
- c) Claims involving international financial institutions

<b>Number of financial institutions involved</b>	<b>*Statutory deadline</b>
a) One	20 days
b) Two or more financial institutions in Angola	30 days
c) One or more financial institutions outside Angola	60 days

\* However, if for any specific and justified reason the above deadlines cannot be met, the Bank must inform the customer with explanations.

## 6. COMPLAINT METHODS

This section sets out how to make complaints and suggestions and register dissatisfaction:

1. How to make complaints and suggestions and register dissatisfaction

## 1. How to make complaints and suggestions and register dissatisfaction

BFA customers may make complaints as follows:

- a) BFA help line
  - Personal service: 06:00 to 23:59
  - Automated service (IVR): 00:00 to 05:59
- b) BFA's network of service desks and call centres
- c) Letter to BFA
- d) E-mail
- e) Public website

Channel	Method	Contact
Telephone	BFA help line	<u>923 120 120</u>
In person	Network of service desks and call centres	Branches/service desks, investment centres, business centres
Mail	Letter	Caixa Postal do BFA C.P - 458 (BFA Rua Amílcar Cabral, 58, Maianga - Luanda);
e-mail	E-mail/form	<u><a href="mailto:bfa@bfa.ao">bfa@bfa.ao</a></u>
Internet	BFA public website	<u><a href="http://www.bfa.ao">www.bfa.ao</a></u>

## 7. APPEAL TO BNA

This section sets out how to appeal to BNA:

1. Appeal

## 1. Appeal

Pursuant to **art. 27 of Notice 12/16 of 5 September 2016** (Protection of consumers of financial products and services) complainants may appeal to BNA without previously informing the Bank, via any of the following methods:

- a) Financial product and services consumer portal
- b) BNA's public website
- c) Bank Customer Ombudsman/Conduct Supervisory Department
- d) E-mail

Channel	Method	Contact
Internet	Financial product and services consumer portal	<a href="http://www.provedoriadoclientebancario.bna.ao">www.provedoriadoclientebancario.bna.ao</a>
Internet	BNA's public website	<a href="http://www.bna.ao">www.bna.ao</a>
Mail	Letter	Av. 4 de Fevereiro nº 151 - Luanda - Angola Caixa Postal 1243
E-mail	E-mail	atendimento.reclamacoes@bna.ao
In person	Banco Nacional de Angola	Av. 4 de Fevereiro nº 151 - Luanda - Angola