



# COMPLAINTS MANAGEMENT

## POLICY

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# 1 GENERAL PROVISIONS

## 1.1 PURPOSE AND SCOPE

The current Complaints Management Policy has been drawn up in compliance with the regulations in force for the banking activity, within the scope of the relationship between the Bank and its Customers, where there is a clear awareness of the interests entrusted to the Bank, and with the aim of ensuring the greatest clarity, due diligence, impartiality, loyalty, discretion, respect and efficiency. Thus, it presents itself as a confidence-building factor in the relationship with the Bank, in maintaining satisfaction, quality and institutional image as well as in mitigating the Bank's reputational risk.

The current document lays down the guiding principles for the Bank's relations with Customers or third parties for the handling of complaints.

The reporting of irregularities, commonly known as whistleblowing, is not within the scope of this document.

For this purpose, the Bank has a dedicated channel available (the Ethics Channel), through which reports of irregularities should be made under the terms of the Irregularities' Reporting Policy.

The current Policy is aimed at all Bank Employees as well as the general public, whether individuals or institutions, including Clients, Suppliers and Service Providers.

## 1.2 LEGAL, REGULATORY AND NORMATIVE FRAMEWORK

This document addresses the following Legislation, Regulations and Standards:

**Table 1— Legislation, Regulations and Standards addressed**

NAME	CLAUSE
Instruction N.º 6/2012, dated 18th September of the National Bank of Angola, on the terms, conditions and procedures for handling customer complaints.	
NOTICE N.º 12/2016 Consumer protection of financial products and services	
Directive N.º 01/DRO/DSC/2016, dated 18th April, Statistical reporting of complaints by Financial Institutions	
Law N.º 14/21, dated 19th May - Law on the Legal Framework of Financial Institutions.	Article 138.º

On table 2 - The reference table shows the documents referred to in this document:

**Table 2— References**

NAME	VERSION
N/A	N/A

On Table 3 – Relevant Internal Policies contain a list of Internal Policies that are important to the subject regulated in the current document.

**Table 3— Relevant Internal Policies**

NAME	VERSION
Data Protection Policy	1st Version
Regulation on Information Classification	1st Version
Regulation on Reporting to Regulatory/Supervisory Bodies	1st Version
Process Standard on Complaints Management	1st Version

### 1.3 DEFINITIONS E ABBREVIATIONS

The main definitions used in this Policy are described below:

#### 1.3.1 ABBREVIATIONS

Not Applicable

#### 1.3.2 DEFINITIONS

**Complaints** - Complaints are deemed to be claims or expressions of dissatisfaction or disagreement, made about (i) products and services provided by the Bank, (ii) the staff's actions at the service of and on behalf of the Bank, (iii) any contractual or legal non-compliance by the Bank, presented by anyone who feels aggrieved and, additionally, any expression of disagreement with the position taken by BFA, S.A.

### 1.4 REGULATORY REPEAL

This Policy repeals the following regulation:

- Complaints Policy – Vr. 1 de 26/09/2019

### 1.5 ACCOUNTABILITY

The current Policy shall be applied in accordance with the following obligations of the relevant stakeholders:

#### 1.5.1 COMMERCIAL NETWORK AND CENTRAL SERVICES

The Commercial Network and the Bank's Central Services are responsible for receiving written complaints from Customers or third parties and sending them, by e-mail or other electronic means available for this purpose, to the Organization and Quality Department - Complaints Unit, for due processing.

### 1.5.2 ORGANISATION AND QUALITY DEPARTMENT

The Organisation and Quality Department is responsible for managing, in coordination with all other areas of the Bank, all complaint cases in a centralised manner, and in accordance with the legal and regulatory requirements. Thus, it is this team's responsibility to receive from the Commercial Network and Central Services the complaints received by the Bank, to record and classify them for control purposes, to analyse them and to ensure their adequate follow-up and reply, in compliance with applicable legal time periods. Furthermore, it is responsible for preparing and submitting qualitative and quantitative reports, as provided for in the Bank's internal regulations, as well as proposing to the Bank's management bodies corrective measures or improvements to procedures arising from the assessment of the complaints received.

### 1.5.3 INTERNAL SUPERVISORY BODIES

In order to ensure compliance with legislation and BFA's commitment to Customers and society as a whole, the Bank's structural bodies identified hereunder deliberate, monitor and supervise the activity of the Bank's complaint handling area, with a view to providing an efficient, impartial and safe service:

- Board of Directors;
- Audit and Internal Control Committee;
- Executive Committee of the Board of Directors;
- Audit and Inspection Department;
- Risk Management Department.

### 1.5.4 EXTERNAL SUPERVISORY BODIES

In accordance with the Law, and in order to guarantee compliance with legislation and the commitment of the Angolan financial sector institutions with regard to the provision of services to Customers and society as a whole, the bodies identified hereunder monitor, supervise and deliberate on complaint handling activities, with a view to providing an efficient, impartial and safe service:

- National Bank of Angola (BNA) - Regulatory authority for the Bank's activity.
- External Auditors.

## 1.6 OMISSIONS

The cases of regulatory omission should be submitted to the Organisation and Quality Department (OQD) prior to the adoption of any measures.

## 1.7 NON-COMPLIANCE

The non-compliance with the provisions set forth in this document shall be subject to analysis by the Organisation and Quality Department and, whenever justified, by the Audit and Inspection Department. All cases of suspected non-compliance must be reported to the Organisation and Quality Department, which must keep an auditable record of all cases of non-compliance reported or identified, as well as the result of the analysis.

## 1.8 CONTACTS

Any queries regarding the contents of this document should be submitted to the Complaints Office:

- BFA e-mail address: [reclamacoes.bfa@bfa.ao](mailto:reclamacoes.bfa@bfa.ao)

## 2 CONTENT REGULATORY COMPLIANCE

### 2.1 GUIDELINES AND PRINCIPLES

The Bank considers that each complaint is an opportunity for ongoing improvement and in this regard can contribute to provide a high-quality standard service underpinned in the customer satisfaction.

The principles that guide the handling of complaints at the Bank are described hereunder.

#### 2.1.1 ACCESSIBILITY

- The Bank provides its Customers and third parties all the necessary information for filing a complaint in a transparent and user-friendly environment, as well as subsequent access to the complaint submitted along with the relevant channels provided for such procedure, within the section entitled 'Complaints' Submission Channels', as identified in this document.
- - The submission of a complaint does not imply any cost or charge for the Complainant.

#### 2.1.2 CONFIDENTIALITY

- The safeguard of the Complainant's data is guaranteed, namely his or her identity and the subject matter. For this purpose, an autonomous file is created separately from the Customer's file, when applicable;
- The information provided is kept confidential during the complaint handling until its resolution and, in a later moment, complying with the principles of bank secrecy and treatment of the Customer's data, laid down in the Legal Framework of Financial Institutions. For this purpose, the Bank classifies the information of all complaints received;
- Information is made available as strictly necessary and only to the relevant departments involved in the process.

#### 2.1.3 TRACEABILITY

- All complaints are registered in sequential numerical order and organised according to the subject or object of the complaint, with a view to guaranteeing the due treatment and response in due compliance with the applicable legal time periods.
- All complaints submitted are subject to the relevant handling.

#### 2.1.4 INDEPENDENCE AND IMPARTIALITY

- The complaints received shall be dealt with in an unbiased, impartial and independent way, with reference to the departments or persons against whom the complaint has been made, in order to preserve the rights of the Complainants and to avoid possible conflicts of interest;
- When the complaint is handled by a different department from the one that carried out the acts or omissions object of the complaint, it is ensured that this department gives its opinion on the matter.

#### 2.1.5 EXPERTISE

The management and handling of complaints is carried out by suitably qualified Bank Employees, with knowledge of the business, regulations and good practices, whose careful, impartial and diligent action aims to provide a service of high quality and excellence.

### 2.1.6 ONGOING IMPROVEMENT

- The root causes/origin of complaints are analysed in order to identify opportunities for improvement, namely to avoid reoccurrences and to increase the quality of the Bank's service. In this regard, possible or potential operational errors, process failures or errors in the design of new products or services are also considered;
- Indicators are developed to assess the complaints management process, which enable guiding the Bank towards continuous improvement of products and services, as well as the structures and activities inherent to complaint handling.

## 2.2 SUBMISSION OF COMPLAINTS TO THE BANK

### 2.2.1 REQUIREMENTS FOR SUBMITTING COMPLAINTS

Complaints may be submitted by the complainant himself or on his behalf, by third parties;

- In the event the complaint is presented by a third party and these are legal representatives of the Complainant, the reply to the complaint shall be addressed to the representative;
- In case the complaint is presented by third parties who are not legal representatives, there will be an assessment in order to determine the quality of the interested party and ensure that the eventual reply does not compromise banking secrecy and data protection issues, namely when the intervenient of the occurrence is a BFA Customer. In addition, an assessment is made of whether the intervenient itself should be approached for possible clarifications and response.

The minimum data for the submission of a complaint are described as follows:

#### 2.2.1.1 IDENTIFICATION AND CONTACT DETAILS OF THE COMPLAINANT

- When filing a claim, the Complainant must provide the following information: :
  - **Natural Person**
    - ID document number;
    - BFA account number (if BFA Customer);
    - Name as per ID document;
    - Full Address;
    - Tax Identification Number (TIN), optional
  - **Legal Person**
    - Corporate name or Business name;
    - Account Number (if BFA Customer);
    - Identification of the Legal Representative (name and ID document number);
    - Full Address of Head Office;
    - Tax Identification Number (TIN), optional
- Additionally, the Complainant must provide its updated contact details, indicating:
  - Telephone number / mobile phone number (mandatory);
  - E-mail address (preferential for natural persons and compulsory for legal persons);
  - Address for receiving physical mail for customers (optional).



### 2.2.1.2 COMPLAINT DATA

The following are the minimum requirements in terms of information to be made available when filing a complaint:

- Date and place of the complaint;
- Date and time of the incident or when the facts took place, if possible;
- Location of the incident (e.g. branch) with identification of possible intervening parties (perpetrators and witnesses), if possible;
- Factual description of the incident or the cause of the source of dissatisfaction, or the background for the submission of the complaint;
- Support documents that it considers relevant for the analysis of the complaint.

### 2.2.2 COMPLAINTS SUBMISSION CHANNELS

The Bank has established channels and means to receive complaints, which are described below in table 4.

**Table 4— Channels and Means to submit complaints to BFA**

CHANNEL	MEAN	CONTACT
Telephone	BFA Service Line	(+244) 923 120 120
In Person (Always requires a formal complaint in writing)	BFA Commercial Network	Branches / Investment Centres / Corporate Centres / Private Banking
Written	Letter	BFA Post Office Box – 458 (BFA Rua Amílcar Cabral, 58, Maianga – Luanda)
E-mail	E-mail	bfa@bfa.ao
Internet	BFA Public Website	www.bfa.ao

### 2.2.3 APPEAL TO THE NATIONAL BANK OF ANGOLA FOR SUBMITTING COMPLAINTS

In accordance with article n.º 27 of Notice n.º 12/16, dated 5th September - Consumer Protection of Financial Products and Services, Complainants may appeal to the BNA, without prior communication to the Bank, namely through the channels and means described on the site of the National Bank of Angola (BNA): (<https://www.bna.ao/#/supervisao/supervisao-conduta/recepcao-reclamacoes>).

## 2.3 COMPLAINTS HANDLING

- The Bank shall acknowledge receipt of all the Complaints, informing in the communication the estimated time for replying to the complaint;
- The Bank shall register all the Complaints in a proper support system, for due control and follow-up purposes. In addition, a single process shall be created, which includes all the data and relevant support documents, in case they have been sent;
- Within the scope of the analysis carried out to the complaint it may be necessary to obtain additional clarifications from the Complainant or internally resorting to other departments of the Bank's structure.

## 2.4 REPLY TO COMPLAINTS

- The Bank guarantees a response to all customers' complaints, which will be sent or informed to the complainant through the channel previously agreed with him/her;
- The reply to the Claimant shall present the reference number and date of receipt of the claim and must be complete and justified, presented in a clear and simple manner, susceptible of being understood by the Claimant..

## 2.5 DEADLINE FOR REPLYING TO COMPLAINTS

- The Bank guarantees the Claimant the deadlines for replying to the claims identified in Table 5 below, in accordance with the legal and regulatory time limits;
- When for reasons deemed justifiable it is not possible to comply with the time limits defined herein, the Bank shall send the Complainant the appropriate clarification communication.

**Table 5— Deadlines for replying to complaints**

FRAMEWORK	RESOLUTION TERM*
Complaints involving an <b>Institution</b>	20 Days
Complaints involving <b>two or more Institutions in Angola</b>	30 Days
Complaints involving <b>one or more Institutions outside Angola</b>	60 Days

\* Number of days from the date of receipt of the complaint.

- In addition, the Bank guarantees a response within a maximum of 10 (ten) days in the following cases:
  - To the Credit Institutions that contact the Bank in connection with complaints received by them;
  - To the National Bank of Angola (BNA), whenever it requests clarification within the scope of a complaint that has been answered by the Bank and in respect of which the Complainant submits a request for review to the BNA..

## 2.6 EXCEPTIONS

Not applicable

## DOCUMENTARY CONTROL

### DOCUMENT PROPERTIES

Table 6— Document Properties

DOCUMENT PROPERTIES					
<b>Name</b>	Complaints Management Policy				
<b>Type</b>	Policy	<b>Classification</b>	Public		
<b>Version</b>	2	<b>Catalogue Reference</b>	POL/DOQ/001/V02	<b>Reference SG</b>	2022-613-BFA CECA DOQ
<b>Author</b>	OQD	<b>Approved By</b>	Board of Directors (BoD)		
<b>Approval Date</b>	28/06/2022	<b>Effective Date</b>	01/07/2022		
<b>Publication Date</b>	01/07/2022	<b>Review Date</b>	27/06/2023		
<b>Document Holder</b>	Organisation and Quality Department (OQD)				
<b>Target Audience</b>	Bank employees and general public				
<b>Availability</b>	This document is available and updated on BFA's website and on the Bank's intranet				
<b>Main amendments</b>	Modification of the Bank's complaints-handling department. Updating of occasional information, adapting it to the internal and external environment.				

### VERSIONS RECORD CONTROL

Table 7— Versions Record

VERSION	APPROVAL DATE	APPROVED BY	EFFECTIVE DATE	MAIN AMENDMENTS
2	28/06/2022	Board of Directors	01/07/2022	Modification of the Bank's complaints-handling department. Updating of occasional information, adapting it to the internal and external environment.
1	26/09/2019	Board of Directors	26/09/2019	First publication of the Complaints Policy.