



COMMERCIAL INTERNATIONAL BANK (CIB) KENYA LIMITED

CONSUMER PROTECTION POLICY

COMMERCIAL INTERNATIONAL BANK (CIB) KENYA CONFIDENTIAL INFORMATION

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DOCUMENT PURPOSE

This document contains the Consumer Protection policy of Commercial International Bank (CIB) Kenya Limited.

INTENDED AUDIENCE

This document is developed solely to be used by the Management and all staff of Commercial International Bank (CIB) Kenya Limited and its stakeholders.

DOCUMENT CONTROL

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1 OVERVIEW

The Consumer Protection Policy incorporates the rules and principles that the Bank complies with and abides by:

- In the provision of banking products and services to its customers.
- When giving them financial advice and information
- When advertising and launching such products or services
- In the treatment of the cases of complaints, grievances, and settlement of disputes and conflicts.

This policy is developed using guidelines provided by the Consumer Protection Act (No 46 of 2012) and Central Bank of Kenya Prudential Guidelines, which have stressed enhancing the concept of transparency and disclosure, protection of confidentiality and information secrecy, mechanism of handling Customers' complaints and spreading the awareness and financial education to Bank customers.

1.1 OBJECTIVES

- To protect the rights of consumers in all transactions and engagements with the bank.
- To ensure that consumers are informed of their rights and obligations and have access to grievance mechanisms.
- To promote ethical practices and safeguard consumers from fraud, unfair practices, and exploitation.
- To comply with the regulatory framework established by the Central Bank of Kenya (CBK) and relevant consumer protection laws.

1.2 SCOPE

This policy applies to all customers of the Bank and all products and services offered by the Bank.

1.3 RESPONSIBILITIES

1.3.1 BOARD OF DIRECTORS

The Board of Directors of the bank shall be responsible for:

1. Formulating policies that ensure that the bank's consumers' interests are safeguarded through adherence to the established laws and regulations.
2. Ensuring that the bank embraces ethical, transparent, and fair business practices.
3. Overseeing the consumer protection framework and ensuring that consumer complaints are attended to and addressed expeditiously

1.3.2 SENIOR MANAGEMENT

Senior management shall be responsible for:

1. Monitoring and implementation of the Consumer Protection Policy and shall in this



- regard report to the Board Risk Management Committee (BRMC).
2. Where applicable, formulate additional supporting documentation that guides its staff and management in enhancing customer protection.
 3. Ensuring that there is adequate bank staff awareness of customer protection program through training and cascading of the customer protection principles to bank staff across all branches.
 4. Ensuring, through the Compliance function, that tenets of customer protection are upheld and embedded in all the bank's product programs as well as procedures.

1.4 PRINCIPLES OF CONSUMER PROTECTION

1. Equal and Fair Treatment
 - All customers shall be treated fairly regardless of their financial background, gender, ethnicity, or any other status.
 - The bank will avoid practices that may exploit customers, including predatory lending, hidden fees, or unfavorable terms.
2. Disclosure and Transparency
 - The bank will provide clear, accurate, and timely information to consumers about the products and services they are subscribing to.
 - Key terms and conditions, including fees, charges, and penalties, will be disclosed in simple language.
 - Marketing and promotional materials will not be misleading or deceptive.
3. Professional Conduct
 - The Bank personnel will be keen to perform their work professionally, considering the achievement of the best interests of their customers in all the stages of their transactions.
 - All personnel shall ensure that they observe integrity, credibility, and verification of the products and services offered to the customer in terms of suitability to the customer's abilities and needs.
4. Responsible Lending
 - The bank will assess the financial situation of customers before offering credit products to ensure they are suitable and affordable.
 - Over-indebtedness will be discouraged, and responsible lending practices will be promoted.
5. Customer Privacy and Confidentiality
 - The bank will adhere to the Data Protection Act 2019 to ensure that customers' personal information is protected from unauthorized access, use, or disclosure.
 - Customers' consent will be sought for any data-sharing activities that go beyond the bank's regular services.
 - The Bank will establish regulatory and supervisory systems, mechanisms, and policies that ensure the protection of customers' financial and personal information under Kenyan laws.



- All transactions conducted with the Bank are confidential and may only be disclosed in compliance with applicable laws and regulations.
- 6. Customer Protection Against Financial Fraud
 - The Bank shall safeguard customers' deposits, savings, and other financial assets by implementing robust internal control systems that are both efficient and highly accurate, aiming to minimize fraud, embezzlement, and the misuse of financial services.
 - The Bank will also ensure the ongoing effectiveness of these systems, keeping them up to date with evolving fraud techniques.
- 7. Accessibility
 - Services will be designed to be accessible to all customer segments, including persons with disabilities.
 - Branches and digital platforms will provide clear, user-friendly interfaces and customer support systems.
- 8. Protection Against Outsourcing Risks
 - If the Bank outsources operational services to external parties, it shall ensure (as part of the due diligence and contractual obligations) that these parties comply with the principles outlined in this Policy document and act in the best interests of the Bank's customers, including safeguarding the confidentiality of their banking information.
 - The Bank's responsibility for the products and services provided by external parties shall remain intact.

1.5 CONSUMER RIGHTS

Consumers have the right to:

1. Receive detailed and accurate information about the products and services offered.
2. Expect fair and reasonable terms in their agreements.
3. Have their personal information protected and only used for legitimate banking purposes.
4. Lodge complaints and have them resolved promptly through the bank's complaints management system.
5. Have a variety of banking services from which to choose without coercion.

2 COMPLAINTS MANAGEMENT

A complaint is any expression of dissatisfaction by a customer, whether verbally or in writing, about the bank's services, products, processes, or employees, which requires a response or resolution.

2.1 TYPES OF COMPLAINTS

1. Complaints related to the quality of customer service (service complaints).
2. Issues with banking products such as loans, accounts, or credit cards (product



- complaints).
3. Complaints related to banking processes such as delays or errors in transactions (operational complaints).
 4. Complaints relating to employee behavior or misconduct (employee complaints).
 5. Allegations of non-compliance with the law or CBK regulations (regulatory complaints).

2.2 COMPLAINT CHANNELS

The bank provides multiple channels for customers to lodge their complaints:

1. In person at any of the Bank branches or offices through the Relationship Managers / Officers, or any other bank official.
2. Telephone calls through contact center numbers (+254 703 053 100) or branch contacts (<https://cibke.com/branch-locator/>).
3. Email communication via the designated complaints email address: contactus@cibke.com or branch email addresses published on the website.
4. Online through the bank's website (webchat), or mobile and internet banking application.
5. Instant Messaging using the Bank's provided WhatsApp number +254 748 250 250 or the Telegram channel.
6. Direct messages using the bank's official social media platforms.
7. Letters addressed to the bank's head office.

2.3 COMPLAINT HANDLING PROCEDURE

All customers are expected to make a formal or informal complaint through any of the Bank's complaint channels. There are 5 generic steps in complaint resolution:

Table 1: Complaints Handling Process

| Step | Activity | Notes |
|------|---------------------|--|
| 1 | Acknowledgment | All complaints should be acknowledged within 24 hours of receipt, either verbally or in writing. |
| 2 | Recording (Logging) | Complaints must be logged into the bank's complaint management system. Details of the complaint, including the customer's contact information, the nature of the issue, and the date of receipt, should be documented |
| 3 | Investigation | The bank official will investigate the complaint, gather |



| Step | Activity | Notes |
|------|---------------------------------|---|
| | | facts, and assess the validity of the complaint. The customer will be kept informed of the progress, with a target resolution time of 2-14 working days depending on the complexity of the issue. |
| 4 | Resolution | Once the investigation is completed, a solution or resolution will be provided to the customer. If the customer is satisfied, the complaint will be closed. If the customer is dissatisfied, the issue will be escalated to a higher level of management or the complaints committee. |
| 5 | Escalation and External Redress | Unresolved complaints can be escalated to the Central Bank of Kenya, or the Consumer Protection Authority if needed. |

2.4 COMPLAINT RESOLUTION TIMEFRAMES

The Turn Around Time (TAT) for complaints resolution is 7 working days. Complaints resolution timelines however vary based on the severity or complexity.

Table 2: Complaints Resolution Timeframes

| Severity | Examples | Resolution |
|--|---|------------|
| <p>Simple Complaints:</p> <ul style="list-style-type: none"> Minor issues that can be addressed quickly and usually don't require in-depth investigation or multiple departments' involvement. They are straightforward and may often be resolved on the first contact. | <ul style="list-style-type: none"> Service-related issues such as delayed response, and minor customer service dissatisfaction (e.g., long wait times, simple information errors). Transaction errors such as wrong amount credited or debited but easily reversible Account issues like incorrect address details or missed notifications. Clarifications on fees or terms that can be easily explained. | 48 hours |



| | | |
|--|--|------------------------|
| <p>Moderate Complaints:</p> <ul style="list-style-type: none"> · Involve more complex issues that may require investigation across multiple departments, but they are not deeply technical or systemic. · They require a few days to gather relevant information and provide a resolution but can still be handled relatively swiftly. | <ul style="list-style-type: none"> · Loan issues such as delay in loan disbursement or errors in interest rate calculations. · Recurring transaction issues such as failed direct debits or standing orders. · Service downtimes like temporary unavailability of mobile or online banking services. · Complaints regarding unexpected charges or incorrect application of service fees | <p>7 working days</p> |
| <p>Complex Complaints</p> <ul style="list-style-type: none"> · Involve substantial investigation, multiple departments, and possibly external parties (such as regulatory bodies or third-party service providers). · These are often systemic issues, technical malfunctions, or legal matters that require more time for a thorough resolution. | <ul style="list-style-type: none"> · Unauthorized or fraudulent or disputed transactions that require investigation into security breaches or fraud, possibly involving law enforcement. · Major banking system errors leading to service disruption (e.g., core banking system failure affecting customer accounts). · Complaints involving allegations of regulatory non-compliance, breaches of contract, or data privacy issues. · Complex loan disputes or contested investment product outcomes. | <p>14 working days</p> |

2.5 COMMUNICATION OF OUTCOMES

Once a complaint has been resolved, the customer will be informed of the outcome through their preferred communication method (email, phone call, letter, etc.). A written explanation will be provided in complex matters or where the customer demands clarity on the resolution.

2.6 MONITORING AND REPORTING

- The bank will maintain the complaints register to monitor trends, resolution times, and common issues.
- Monthly reports on complaints will be submitted to NFRCC.



- Quarterly reports will be submitted to the Central Bank of Kenya as per regulatory requirements.

2.7 CONTINUOUS IMPROVEMENT

The bank will use the complaints data to identify areas for service improvement and implement corrective measures. Periodic reviews of the complaints management process will be conducted to ensure efficiency and compliance with regulatory standards.

2.8 REGULATORY COMPLIANCE

This policy complies with:

- The Central Bank of Kenya Act.
- The Consumer Protection Act.
- Relevant guidelines issued by the Kenya Bankers Association (KBA).

2.9 CONFIDENTIALITY

All complaints will be handled confidentially. Customer information will not be disclosed to unauthorized parties, and complaints data will be used solely to resolve issues and improve delivery service.

3 COMPLIANCE AND MONITORING

The bank's Consumer Protection Policy will be regularly reviewed to ensure compliance with Kenyan regulations. Periodic audits will be conducted to assess the bank's compliance with consumer protection laws and this policy. Non-compliance or breaches of consumer rights will be dealt with appropriately, including disciplinary actions against responsible staff.

4 EMPLOYEE TRAINING AND AWARENESS

Bank staff members will undergo regular training on consumer protection, ethical practices, and relevant legal requirements. The bank will run customer awareness programs on their rights, the importance of responsible borrowing, and understanding banking products.

5 REVIEW AND AMENDMENT OF THE POLICY

This policy will be reviewed annually or as required to reflect consumer protection laws or internal procedure changes. Any amendments to the policy will be communicated to all stakeholders promptly and subject to Board Approval.