

# **Commercial Credit and Finance PLC**

## **Customer Accessibility Policy**

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## 1. Introduction

Commercial Credit and Finance PLC (CCFP) is unwavering in its commitment to fostering an inclusive and accessible environment for all stakeholders. This Accessibility Policy delineates our dedication as a company to ensuring accessibility and outlines the measures company undertaking to guarantee that our organization is accessible to everyone.

The primary objective of this policy is to provide a comprehensive guideline to CCFP for the design of products, services, or environments, ensuring the acceptability for individuals across diverse categories. The Company committed to collaborating with their employee networks to cultivate an environment where customers feels included and supported, devoid of any form of discrimination. This policy further aims to facilitate equal access for people with different physical abilities to information and resources, mirroring the opportunities available to individuals without disabilities.

Embraced by our unique culture based on purpose, shared values, and principles CCFP committed to foster an inclusive culture that extends to all our stakeholders, including people from diverse groups. The company belief is grounded in the idea that everyone should experience the freedom to be their authentic selves in our premises. This Accessibility Policy serves as a testament to CCFP commitment to build leaders who uplift the life of people by simple acts of love. By upholding these principles, CCFP strive to create a workplace that not only adheres to company shared values but also stands as a beacon of inclusivity and equality for everyone

## 2. Version Control

This policy will be reviewed once every two(2) financial years or in the event of any changes in the regulatory or environmental requirements. The updates will be recorded in the Version Control Section.

Version Code	Release Date	Prepared by	Approved by
1.0	31 <sup>st</sup> January 2024	Compliance Officer	Board of Directors

## 3. Scope

This policy applies to all stakeholders associated with CCFP. In instances where there may be inconsistencies between the requirements of the Consumer protection directives of the Central Bank of Sri Lanka (CBSL) and the policy outlined in this policy, the regulations set forth by CBSL shall take precedence.

## 4. Legal Framework

- a) The following legal provisions are applicable for this policy
  - i. The Financial Consumer Protection Regulation No. 01 of 2023 Issued by the Central Bank of Customer.
  - ii. Other relevant directions issued by the CBSL under the Finance Business Act No 42 of 2011.
  
- b) CCFP Polices and Procedures relevant to this policy
  - i. Anti Sexual Harassment Policy
  - ii. Complaint Handling Policy
  - iii. Information Security Policies and Procedures
  - iv. Web Site Privacy Policy
  - v. KBG Document
  - vi. Ethical Framework

## 5. Roles and Responsibilities

The management is responsible for formulating the Customer accessibility policy of the Company which should be approved by the Board.

The Location Head, Administrative Officer of the location or the head of the department/functions will be designated as the Accessibility coordinator of the location/department/functions. The coordinator will be responsible for coordinating on all accessibility measures at the branch / department/functions under his / her purview.

## 6. Customer Accessibility

CCFP should design products, services, information, and facilities that are accessible to individuals with diverse needs irrespective of the social status, physical ability, marital status, race, caste, gender, age, religion and financial literacy. The goal of an accessibility is to promote inclusivity and eliminate barriers that may prevent people from fully participating in various aspects of the company.

CCFP shall make sure that people with different social status, physical ability, marital status, races, caste, gender, age, religion and financial literacy have the same opportunities, rights, and access to their physical environment and required information. Inclusion means creating an environment where everyone is valued, respected, and able to fully participate. When interacting with customers with different physical abilities, it is important to remember to treat them with respect and dignity.

- CCFP shall Trained staff on how to effectively communicate and assist with customers specially for differently able and older customers.
  - Ensure employees are aware of the importance of inclusion, and are equipped to handle any situation that may arise with customers with relevant to accessibility.
- CCFP shall make sure that staff members are aware of the laws and regulations related to accessibility to ensure compliance.

## **6.2 Web accessibility**

CCFP shall make sure that Website and online platforms fully accessible to customers who are differently able and have different finance literacy level.

CCFP Web accessibility shall include but not limited to:

- Font size, colour and colour contrast adjustability.
- Full navigability and ability to function with the keyboard.
- Full readability with screen readers.
- All web elements shall be appropriately labeled or alternative text shall be used.
- All security, protection or safety features shall be provided in text
- Adequate time shall be provided to perform all functions.

## **6.3 Mobile applications accessibility**

CCFP Mobile applications accessibility shall include but not limited to:

- Font size, colour and colour contrast, and background colour adjustability.
- Full navigability when using mobile applications.
- Full readability with screen readers.
- All mobile application elements shall be appropriately labeled or alternative text shall be used.
- All security, protection or safety features shall be provided in text and audio options.
- Adequate time shall be provided to perform all functions.

## **6.4 Information Accessibility**

- Company shall provide necessary documents in accessible and available formats at the request of the customer .
- Company shall grant permission to the customer to have assistance from a person who has been authorized by the financial consumer by way of a letter of authority, a power of attorney or a board resolution, as the case may be.
- The company need to have a plan to provide adequate facilities to use assistive technology and equipment in future transactions.

- Customer shall have a right to maintain their privacy on disability (special needs) and shall not use information related to any disability (special needs) of the customer for any purpose other than facilitating the customer or protecting customer's rights.
- In the event where a customer claims that any personal data held by the company is inaccurate or incomplete, CCFP shall take appropriate steps within a reasonable time, to review the claim, rectify it and inform any third party with whom the information had been shared previously.
- CCFP shall comply with data privacy and confidentiality requirements that limit the use of financial consumer data exclusively for the purpose for which data is collected.

## **6.5 Infrastructure Accessibility**

The Company Physical infrastructure facilities need to be designed and maintained to comply with relevant accessibility standards and regulations. The company should provide necessary provision when making any renovations or modifications in future location shifting. The company shall comply with general laws regarding accessibility, such as facilitating differently able and elderly customers, when constructing new buildings or renting.

### **6.5.1 Building Accessibility**

The company shall ensure that entrances to buildings have a adequate accessible pathways, stairs and ramps/slopes to accommodate individuals with different needs

### **6.5.2 Clear Pathways**

The company shall ensure that pathways leading to branch entrances are free of obstacles, ensuring a clear and safe route for everyone.

### **6.5.3 Accessible Door Hardware**

The company need to encourage choose door hardware that is easy to grasp and operate, accommodating individuals with various motor abilities.

#### **6.5.4 Signage**

Install clear and visible signage indicating and supporting the customers to easily accessible to the branch premises and required service .

#### **6.5.5 Lighting**

Adequate lighting is essential for safety and navigation. Ensure that entrances are well-lit to assist individuals with visual impairments.

#### **6.5.6 Proximity to Parking**

Accessible entrances should be located in close proximity to accessible parking spaces, allowing for convenient and barrier-free access.

#### **6.5.7 Seating Areas**

The CCFP branch locations shall facilitate the adequate seating areas for the customers. If there are waiting or seating areas near entrances, ensure that they are accessible and accommodate individuals with varying abilities.

#### **6.5.8 Restrooms**

All the branch locations need to have accessible restrooms. When setting up the restroom facilities for customers, it's important to prioritize accessibility, cleanliness, and convenience.

- **Separate Areas:** If possible, separate areas for men and women options may also be considered for inclusivity.

### **7. Accessible Products and Services**

The Company need to design and offer products and services that cater to the different needs of the diverse customer segments. This may include simplified account options, microfinance products, and digital financial services.



- Offer a diverse range of financial products tailored to the needs of various customer segments, including savings, credit and other relevant services.

## **8.Financial Inclusion**

The CCFP have extended opportunities to underserved women in Sri Lanka, facilitating their access to the financial system. The Company efforts are dedicated to enhancing their quality of life by empowering them to become income earners, capable of supporting their households. The Company aim to unlock their untapped potential through engagement in self-employment opportunities, thereby fostering economic independence and contributing to their overall well-being.

The Company need to take endeavor to make financial services accessible to individuals in remote areas and underserved communities through the establishment of branches, CSU and digital channels. The Company shall strives to remove barriers for individuals and businesses to participate in the formal financial sector and to use financial services to improve their sources of income and standards of living.

- Facilitate the company's Micro, Small, and Medium Enterprises (MSME) finance initiatives by identifying obstacles and opportunities relevant to each segment. Address these challenges and opportunities through necessary policy initiatives.

## **9.Financial Literacy and Education**

The company shall committed to enhancing financial literacy and education among the customers. This includes but not limited to :

- Conduct awareness sessions on financial literacy
- Offering training programs on financial management and over indebtedness

## 10. General Requirements

- CCFP shall regularly review and update company policies and practices to ensure that they are in compliance with applicable accessibility laws and standards.
- CCFP shall encourage feedback from individuals from different diverse groups and take their suggestions and concerns into account when making decisions about accessibility.

## 11. Conclusion

By adhering to this Accessibility Policy, CCFP seeks to create an inclusive and diverse workplace where all individuals are treated with dignity and respect. We are committed to fostering an environment that values the unique contributions of each person and promoting equal opportunities for all.

**End of the document**

**Recommended by the BIRMC on 11.01.2024**

**Approved by the BOD on 31.01.2024**