

# **Commercial Credit and Finance PLC**

## **Complaint Handling Policy**

**(This replaces all previous documents covering the operating metrics of the policy on  
Complaint Handling)**

**Table of Content**

- Abbreviation List .....2
- 1. Introduction ..... 3
- 2. Version Update ..... 3
- 3. Objectives ..... 4
- 4.Scope ..... 4
- 5.Legal Framework ..... 4
- 6. The Guiding Principles ..... 5
- 7. Roles and Responsibility ..... 5
- 8. What is a Complaint? .....6
  - 8.1 Who can make complaints? ..... 6
  - 8.2 How to make a complaint? .....7
  - 8.3 Complainant’s/Customers rights .....7
- 9. Guidelines for the Procedure of the Company .....9
- 10. Protection of Financial Consumers’ Assets and information ..... 9
  - 10.1 . Confidentiality, Security and Integrity of Personal Information ..... 10
  - 10.2 Sharing of Financial Consumer Information .....10
- 11. Report to BIRMC .....10
- Contact Us ..... 11
- Call Center ..... 11

## **Abbreviation List**

- CCFP - Commercial Credit and Finance PLC
- CBSL - Central Bank of Sri Lanka
- BIRMC - Board Integrated Risk Management Committee
- KBG - Key Behavioral Guideline

## 1. Introduction

Complaint handling is a pivotal process encompassing the receipt, management, and resolution of complaints raised by the customers. This function plays a critical role in Company's commitment to customer service and relationship management.

A complaint is defined as an expression of dissatisfaction made to or about an organization, encompassing products, services, staff, or the handling of a complaint. This includes instances where a response or resolution is explicitly or implicitly expected, or legally required. Complaints serve as an essential avenue for Commercial Credit and Finance PLC (CCFP) management to be accountable to the customers while providing valuable prompts to continuously review and enhance organizational performance.

## 2. Version Update

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	Released Date	Process Owner	Approved BY
1.0	9 <sup>th</sup> June 2018	Complaint Handling Officer	Board of Directors
2.0	31 <sup>st</sup> January 2022	Complaint Handling Officer	Board of Directors
3.0	31 <sup>st</sup> January 2024	Complaint Handling Officer	Board of Directors

### 3. Objectives

To effectively address and resolve the grievances and complaints of customers enabling the Company to provide better solutions. To encourage the customers to seek a remedy through the internal complaints handling process of the company prior to opting for external support.

3. To standardize the complaints handling process within the Company.
4. To establish and maintain a database of all customer complaints.
5. To improve the efficiency and effectiveness of the current policies & procedures through customer feedback and complaints.
6. Fulfill the requirements under the Financial Consumer Protection Regulations No. 01 of 2023 (GAZETTE No. 2344/17) given by the CBSL.

### 4. 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.

### 5. Legal Framework

The following legal provisions are applicable for this policy

- The Financial Consumer Protection Regulation No. 01 of 2023 Issued by the Central Bank of Customer.
- Other relevant directions issued by the CBSL under the Finance Business Act No 42 of 2011.

CCFP Policies and Procedures relevant to this policy

- Complaint Handling Procedure Manual
- Customer Accessibility Policy
- Anti Discrimination Policy
- Ethical Framework
- Whistle blower policy

- Value Policy
- HR Policy and Procedure
- Key Behavioral Guideline (KBG) Document

## 6. The Guiding Principles

The employees when handling customers will adhere to the following guiding principles complaints.

- Every complaint should be addressed in an equitable, objective, and unbiased manner through the complaint handling process.
- Customers should be treated with utmost courtesy and mutually beneficial solutions reached whilst maintaining respect and trust.
- Ensure transparency throughout the decision-making process
- To establish a customer complaint handling mechanism that is free of charge, fair, accessible, transparent and independent from business operations
- Ensure that officers with conflicts of interest refrain from participating in the complaint resolution process, ensuring fair and unbiased outcomes for financial consumers.
- Ensure root cause analysis is conducted on complaint data and use of such analysis to improve their financial products and services, as a part of operational risk management duties

## 7. Roles and Responsibility

- The Board, through the Board subcommittees, will provide oversight to the Policy.
- The Management of the Company will be responsible for the implementation of this policy.
- A Complaint Handling Officer and Key Responsible Personnel (KRP) have been appointed to overlook the complaint handling process and customer protection policies and procedures.
- The Location Heads will be responsible for the handling of complaints received at their respective locations.
- If a complaint cannot be resolved by the location head, it will be escalated to the next level of authority.
- The Head of the Call Centre will be responsible to coordinate with the staff to resolve the complaints received to the call center.

The Complaint Handling Officer is responsible for the following;

- Ensure that the Complaint Handling Policy is implemented.
- To provide the necessary information and advice to the employees in handling customer complaints.
- Inform the Management, Risk Management, Responsible KRP and Compliance departments immediately if any serious complaint is received.
- Maintain a proper record and review of the complaints received by the call center and directly to the management.
- All employees should adhere to the policies and procedures for the protection of customer data and privacy when dealing with the customer to resolve complaints.

## **8. What is a Complaint?**

A complaint is a communication received by the company through any channel, which expresses dissatisfaction about any aspect of the company's products, services, delivery channels, employee behavior/attitude, processes or systems.

### **8.1 Who can make complaints?**

Following persons/entities who have a dissatisfaction about any aspect of the company's products, services, delivery channels, employee behavior/attitude, processes or systems can make a complaint.

- Customers
- Non - customers
- Commercial Credit Staff
- Central Bank of Sri Lanka
- Ministries and other Government Institutions
- Any other person/ entity/Stakeholder

## 8.2 How to make a complaint?

The above mentioned parties can lodge their complaints with regard to our products or services, delivery channels, employee behavior/attitude, processes or systems using the following methods.

- a) Over the Phone -
  - Contacting our hotline 0112 000 000
- b) Via social media such as Whats App and Facebook
  - Whats App to call center manager on telephone number: +94 0765171362
- c) Via Corporate website and web chat
  - <https://www.cclk.lk/>
- d) Via an Email
  - Emailing to: [ccl@cclk.lk](mailto:ccl@cclk.lk)
- e) Written via general post or registered post
  - Write to: Head Office - No. 106, Yatinuwara Veediya ,Kandy  
City Office - No 165, Kynsey Road Colombo 08.
- f) Customer complaints can come through the CBSL.
- g) Via Staff Members
- h) Any other medium

## 8.3 Complainant's/Customers rights

- Complainants can inquire about the current status of the complaint by contacting the initial place where they lodge the complaint or the person handling the complaint or Complaint Handling Officer.
- Complainant will get the final response within 21 working days after considering all aspects.
- However, if the Company is unable to resolve a complaint within 21 calendar days, the customer should be notified before the expiration of 21 calendar days, giving reasons for the extension [maximum of three (03) months] and measures taken to resolve the matter.



- If the complainant is dissatisfied with the response provided by the company, option is available to forward the complaint to the Chairman of the Board or the Chairman of the Board Integrated Risk Management Committee of the CCFP for re-consideration.
  - Customers can write the complaint and send the respective letters to the CCFP City Office, addressing the Chairman of the Board or the Board Integrated Risk Management Committee Chairperson, or reach them using the common email reserved for complaints.
- If company's resolution does not meet the relevant parties expectations, a direct complaint can be addressed to the Financial Ombudsman who is available for redress. He/she has the power to inquire and resolve any complaints and disputes between customers and financial institutions covered by the Ombudsman Scheme.

➤ The Current Financial Ombudsman:

Office: 43A Vajira Road, Colombo 5

Tel: +94 11 259 5624 Tel/Fax: +94 11 259 5625

Email: fosril@sltnet.lk

The Central Bank shall attend to complaints and grievances of financial consumers as an alternative dispute resolution mechanism. However, financial consumers or Financial Service Providers are not restricted from pursuing legal proceedings or any other dispute resolution mechanism at any time during the process.

Complainant may submit a complaint to the Central Bank when he/ she is not satisfied with the Financial Service Provider's response or the complaint has not been attended to in the manner provided under Regulations. However, in any case, the complaint shall be submitted to the Central Bank within a period not later than one (01) year from the date of submission of the complaint to the Financial Service Provider.

The Central Bank shall cease processing the complaint if the customer or the company

- i. Files a case in the Court of Law in connection with the complaint.
- ii. Uses undue influence or duress and in such case the Central Bank may take regulatory/ legal action, as applicable.

## **9. Guidelines for the Procedure of the Company**

The procedure should cover the following areas at a minimum.

- Multiple Channels or the methods to receive a customer complaint
- Acceptance of the complaints
- Record keeping of customer complaints
- Acknowledgment
- Resolving
- Reviewing

## **10. Protection of Financial Consumers' Assets and information**

The company should ensure that the comprehensive protection of customers' assets and confidentiality, security, and integrity of the customer information is safeguarded.

This entails being liable for losses incurred due to fraud, misappropriation, or misuse of customers assets, unless proven otherwise. The company is committed to taking disciplinary action against employees involved in such activities, promptly reporting incidents to the respective regulatory department/s of the Central Bank.

Additionally, the company needs to promote awareness of fraudulent practices and the responsibilities of customers, providing measures for safeguarding against potential threats.

To enhance protection, customers are required to regularly update their records, and the company needs to establish a convenient avenue for them to make necessary updates.

## **10.1 . Confidentiality, Security and Integrity of Personal Information**

The Company has formulated and implemented comprehensive policies and procedures to ensure the confidentiality, security, and integrity of customers' personal information. This includes preventing misuse by employees or any third party acting on behalf of the company.

To safeguard customer data, the company has established appropriate policies, procedures, data protection measures, and staff training programs to prevent unauthorized access, alteration, disclosure, accidental loss, or destruction of information.

Regarding the protection of customers' personal information, the CCFP has implemented security and control measures, retaining personal information for a minimum of six years from the termination/expiration of contracts. The company refrains from sharing such information with third parties without the financial consumer's consent or as mandated by law.

Additionally, the company will retain key information, contractual documents, transaction history, and source documents for a minimum of six years unless otherwise required by law.

## **10.2 Sharing of Financial Consumer Information**

The Company is bound not to share customers information with third parties for any purpose, such as marketing, promotion, or advertisement, unless under specific circumstances. These include disclosing information for its original collection purpose, with informed consent from the customer, or as required/permitted by regulations, a court of law, or other written laws.

Furthermore, customers have the right to access and rectify their personal information upon request. The company is obliged to furnish this information in an understandable form within a reasonable time and at minimal or no cost to the customer. If a customer asserts that their personal data is inaccurate or incomplete, the Provider must promptly review the claim, rectify it, and inform any third parties previously shared with.

## **11. Report to BIRMC**

The status of complaints should be reported to the BIRMC on a regular basis.

## Contact Us

### Call Center

Hotline : +9411 2 000 000

Email : ccl@cclk.lk

Fax : +94 11 2 327 882

### End of the Document

**Recommended by the BIRMC on 11.01.2024**

**Approved by the BOD on 31.01.2024**