



GUIDELINES ON HOW TO HANDLE COMPLAINTS ORCO BANK N.V.

Definition of a complaint:

An expression of dissatisfaction with a product or service, either orally or in writing, from an external customer. A customer may have a genuine cause for complaint, although some complaints may be made as a result of a misunderstanding or an unreasonable expectation of a product or service.

Examples might be a transfer that has not been processed, no follow up on a certain matter, automatic services not functioning.

Reporting a complaint:

A complaint will normally be received through the following channels:

- Reception;
- Account Manager;
- Head of departments or Managing Directors;
- Through website.

It can be either orally (in person or phone) or in writing (letter or email).

Internal handling of the complaint:

How a customer complaint is handled will affect the overall level of customer satisfaction and may affect long-term customer loyalty. It is important for the Bank to have clear procedures for dealing rapidly with any customer complaints, to come to a fair conclusion, and to explain the reasons for what may be perceived by the customer as a negative response.

To be able to achieve this customer satisfaction and guarantee a follow up is done on a complaint, it has been decided to channel all complaints through the Customer Support department. They will get a complaint register in which all complaints with all necessary data are gathered. They will be responsible to assign and follow up with the designated department or person and update this information in this file. In certain cases they will contact the customer themselves and in other cases the designated department or Account Manager are requested to contact the customer.

This information will be reported on a weekly basis to Head Operations. On a quarterly basis Head Operations reports the complaints to the Managing Directors.

An example:

An Account Manager receives a complaint via email. The email is sent together with a filled out "Service enhancement" form to the Customer Support department. This can be an original or through email. This form is filled in the majority of cases by the person who received the complaint and consists of all the information necessary for the Customer Support department to have a thorough idea of the issue to be able to assign it to the correct person or department.



The complaint is sent to the assigned person or department and a follow up deadline will also be mentioned. In all cases the person assigned should contact the customer within 24 hours to inform the customer that he/she will be handling the case and ask additional information if necessary. The customer should be informed when he can expect a reaction of the Bank. If this time limit appears not to be feasible, the customer will be notified hereof timely stating the reason of the delay and the time limit within which the Bank will respond. The employee who receives the complaint should inform the customer of the internal complaints procedure. The Customer Support department must be updated regularly of the progress by the designated person.

The assigned person:

- Studies the file the complaint relates to and further collects all relevant information;
- Requests further information from the customer if necessary;
- After examining the issue adopts and informs the customer of this position;
- Informs the Customer Support department of the outcome and gives additional documentation or correspondence for filing and further processing in the Complaint registry;

Dispute settlement:

Give the customer who does not agree with the position adopted by the Bank the opportunity to give a reaction.

The moment of the “closing of the exchange of positions” is not a static fact. It can be after two or three reciprocal reactions, for instance.

Give all persons in the organization who are involved in the handling of complaints of customers a description of the procedure for the handling of those complaints to be followed.

Administration:

Save the data of the complaints file, including the Record of Complaints, for at least ten years after the complaint has been handled by the company.

An annual report has to be prepared, containing all complaints and an analysis hereof, meant to use the experience gained as much as possible to improve the organization, working method, and products of the organization.

Central Bank requirement:

The central registration of complaints is a new requirement of our Central Banks to enhance the service offered by the local banks.