

PROCEDURE

Complaint management

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I. Introduction

This procedure details the specificities related to the Operations in implementation of the CPL0276 Policy for Protecting Customer Interests, which it does not replace.

BNP Paribas is "The Bank for a changing world" and aims to be a benchmark Banking Group in terms of customer satisfaction. This aim implies efficient processing of customer Complaints.

BNP Paribas knows how to listen to the customer's voice, whether it expresses a perception of satisfaction or a Complaint. In an increasingly demanding general context, the protection of the customers' interests is at the heart of the strategy of BNP Paribas and is not restricted to compliance with the legal and regulatory requirements, operational efficiency or development.

Effective processing of customer Complaints will serve several purposes:

- Brand differentiation goal on account of our customer relationship performance,
- An operational efficiency goal by implementing customer Complaint management practices, which can transform Complaint into a real opportunity for the Group to improve its relationship with the customers,
- A goal of improving the fit between the service expected by the customer and the service provided by the bank
- A goal of positive image on social media, place of handling the digital customer relationship by solving cases in public and in private.

The processing of customer Complaints fits coherently into an environment based on the Code of Conduct, our Values, our Management principles, the Policy on the Protection of Customer Interests / CSR pillar and our challenges of compliance with the relevant laws and regulations, including for France, the recommendation on Complaints handling 2016-R-02 of 14 November 2016 described by the ACPR ("Prudential Control and Resolution Authority").

Implementation of these principles should allow the Group Entities to make Complaints processing a customer loyalty lever and serve the development of the Company.

Likewise, the ACPR recommends good practices aimed at guaranteeing customers:

- Clear and transparent information on the Complaints processing modalities, as well as easy access to the Complaints processing system
- Effective, equal and harmonised processing of Complaints
- Implementation of possible corrective actions based on issues identified through the processing of Complaints

A. Purpose and scope of the document

According to the new Group Policy on the Protection of Customer Interests¹, "Each Business, Territory and Entity must have a consistent system for managing customer Complaints, in compliance with the standards in force"

The objectives of this document are:

- to define, in accordance with the principles of the Group Policy, the Complaints management norms and standards to be applied by all entities of BNPP Personal Finance and
- to give the organisation rules of operational Complaints management mechanism and relative permanent control

The main topics of relevance are:

- Process: How to handle the Complaints? How to qualify the Complaints? What are the resolution rules to be followed? How to manage the improvement actions? What are the indicators to control the process? what is the frequency of reporting and its content? who should be sent the quantitative and qualitative information about Complaints management and its permanent controls?
- Organisation: How to define the team in charge of the Complaints process? What is the position of this team within the company? What are the roles and responsibilities of each of the actors in the process?

Tool: What features are needed to manage this process? What are the recommendations of the central team?

This document does not cover:

- Internal complaints (e.g. from employees of BNP PARIBAS PERSONAL FINANCE organisation)

B. Definitions

A.C.P.R.:

"L'Autorité de Contrôle Prudentiel" ("*The Prudential Control and Resolution Authority*"): is the French supervisory and control authority for proper application of the Complaints handling standards, among others. BNP PARIBAS PERSONAL FINANCE must adapt its processes to the A.C.P.R. requirements in all entities in France and abroad (taking into account the specific local regulations)

Every year, French entities fill an ACPR questionnaire on the protection of customer interests, which includes a section dedicated to Complaints management (ref. appendix).

Cause of the Complaint:

Cause is the factor that initiated the customer's Complaint.

Commercial or goodwill gesture:

Benefit authorized by the entity to customers to compensate them for damage. The commercial gesture can be a discount, a gift or a loss (the loss represents the cost of a complaint, commercial gesture and staff costs excluded).

Contributor:

Person or organization that takes part in a project (Cardif, Cortal, Finance, IT etc...).

¹ See CPL 0276 "Customers' interests projection policy"

Controls

Controls must be structured in accordance with the Group's permanent control mechanism; They are based on the general principles of BNPP PF's internal organisation and have three levels:

▪ **First level of defence:**

Operational Management is responsible for controlling Complaints management within the scope of the activities for which it is responsible. In this context, this is one of its primary missions.

Therefore, the Internal Control mechanism must be largely integrated into the operational organisation of the central entities and functions. This first level of defence can be handled by dedicated or integrated operational teams within the Business lines/Functions.

▪ **Second level of defence:**

In each entity, the Compliance or other independent functions provide the second level of defence over the Complaints management process. The purpose is to check that the first line of defence controls have been performed properly; Controls that are both quantitative and qualitative as well as correct application of the group policy procedure and regulatory standards.

▪ **Third level of defence:**

Inspection Générale carries out ex-post independent controls on an entity/activity, including the effectiveness and quality of the permanent control mechanism relating to the Complaints management process.

Designation of entities:

Entity	Subsidiary of PF or an Entity of the BNP Paribas Fortis Group whose operational management has been entrusted to PF
"Group" or "BNP Paribas"	BNP Paribas S.A. and all of its direct or indirect subsidiaries, which can be consolidated by global or proportional integration, and all of its organisational, operational or functional Entities, taken together or individually.
PF	All of the Operational Divisions, Central Divisions and Functions, and PERSONAL FINANCE Entities, in France and abroad.

Criticality:

The level of criticality is related to the sensitivity of the complaint by its visibility and its virality especially on social media to any public (risk eReputation).

Criticality categories are defined by each entity based on:

- quality of the customer.
- purpose of the Complaint.
- presence of a potential conflict of interest.
- intervention of a Regulator.
- complexity of a relevant product or service.
- ... list non exhaustive.

Cause of the Complaint:

The cause of the Complaint is the reason, the cause why the customer is dissatisfied. Locally, a list of potential reasons (telephone inaccessibility, insurance termination, refusal dispute, etc.) must be drawn up in line with the causes defined by the A.C.P.R.

Complaint:

A Complaint is a statement of dissatisfaction of an identified customer. Requests for information, advice, clarification, service or performance and instructions are not Complaints. The Complaint can be formulated in writing, in any form (letter, e-mail, social networks, forums, etc.) or orally (in which case it will be formulated in a traceable format so that it can be treated in the same manner as written Complaints).

A traceability of the Complaint is maintained at all stages.

A Complaint may be direct or indirect through a supervisory authority or a consumer association.

A Complaint may relate to the quality of service provided as well as to non-compliant practices in terms of Protection of Customer Interests (suitability of products to customer requirements, clarity of the communicated information, commercial practices, pricing, or discrimination), protection of the personal data relating to professional ethics or financial security.

Complaints must be identified, analysed and understood so as to determine the corrective measures to be implemented.

Complainant:

Complainant is an end customer of BNP PARIBAS PERSONAL FINANCE. She/He can make a Complaint directly to BNP PARIBAS PERSONAL FINANCE using all the channels available to her/him but also through a partner of BNP PARIBAS PERSONAL FINANCE who, in this case, will forward the Complaint to the Complaints Department of BNP PARIBAS PERSONAL FINANCE.

The term **customer** refers to any natural or legal person who:

- has a direct or indirect **business relationship** with an Entity;
- is likely to enter into a direct or indirect **business relationship** with an Entity (**potential customer**)

Handling:

- Immediate handling:
 - The complaint owner is capable of handling the complaint & replying to complainant immediately.
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- Deferred processing:
 - Processing of the Complaint is deferred when the Complainant contacts the entity by mail, fax or e-mail or where the Complaint requires special treatment due to the cause for the Complaint or the skill required to resolve it.

All Complaints must be recorded (immediate or deferred processing).

Mediation:

Aims to manage any dispute between the establishment (BNP PARIBAS PERSONAL FINANCE) and their Complainants, related to the products and services offered by the establishment (BNP PARIBAS PERSONAL FINANCE). The ombudsman is contacted directly by the Complainant.

Mediation charter:

The mediation charter describes how and under what circumstances mediation can be used by Complainants. It must clearly define the scope covered by the ombudsman.

Mediator / Ombudsman:

Is an independent person who is responsible for the mediation process. This person facilitates the resolution of problems between the customer and BNP PARIBAS PERSONAL FINANCE. The ombudsman is not mandatory. Local regulations must be followed in this case.

Owner of the Complaint:

Person or group of persons to whom the complaint is assigned. The complaint owner is responsible for the resolution and the closing of the complaint.

Product category:

Product category is a brief description of the product related to the dissatisfaction. The description must be chosen from a pre-established list related to BNP PARIBAS PERSONAL FINANCE product portfolio. For reporting purposes, the product category have to be linked to one of the A.C.P. product categories (cf list provided in this document).

Social Media:

Designates a set of services used to develop conversations and social interactions on the Internet. Each Internet user can send information and exchange it with other Customers. There are 8 types of community platforms (forum, blog, social networks, microblog, wiki, collaborative FAQ, sharing site, aggregator, social games, and geolocation).

Type of customer:

The customer type gives information about the origins of the complainant (private individual, local authorities, partner...). The description can be a pre-established list of customer groups in coherence with BNP PARIBAS PERSONAL FINANCE Customer portfolio. However for reporting purposes, the customer type must be directly linked to one of the A.C.P. customer type categories.

II. Complaint Management Framework

A. Management Commitment

BNP PARIBAS PERSONAL FINANCE is actively engaged in the efficient and effective processing of Complaints. It is especially important for the management of BNP PARIBAS PERSONAL FINANCE to promote it (at company and country level).

A strong commitment to responding to complaints should allow both employees and complainants to contribute to the improvement of BNP PARIBAS PERSONAL FINANCE's products, services and internal processes.

This commitment should be reflected in the definition, adoption and dissemination of policy and procedures for the resolution of complaints.

Management commitment should be shown by the provision of adequate resources, including training of the employees. Ensure that all staff in contact with complainants receive training enabling them to correctly:

- identify the complaints received
- apply the complaints management process

The position of the service or department in charge of complaints handling within the organisation can be source of conflicting interest, or an inequitable handling of the complaint. General Management should ensure that the service and/or process owner are positioned within the organisation in such a way to guarantee their independence.

B. Deployment of the procedure

The local General Management must establish an explicit customer-focused Complaints management procedure, which should be directly derived from the present Group Policy..

The local procedure must be made available to all employees.

When establishing the policy and objectives for the complaints management process, the following factors should be taken into account:

- any relevant statutory and regulatory requirements
- financial, operational and organizational requirements
- any input of customers, employees and other interested parties

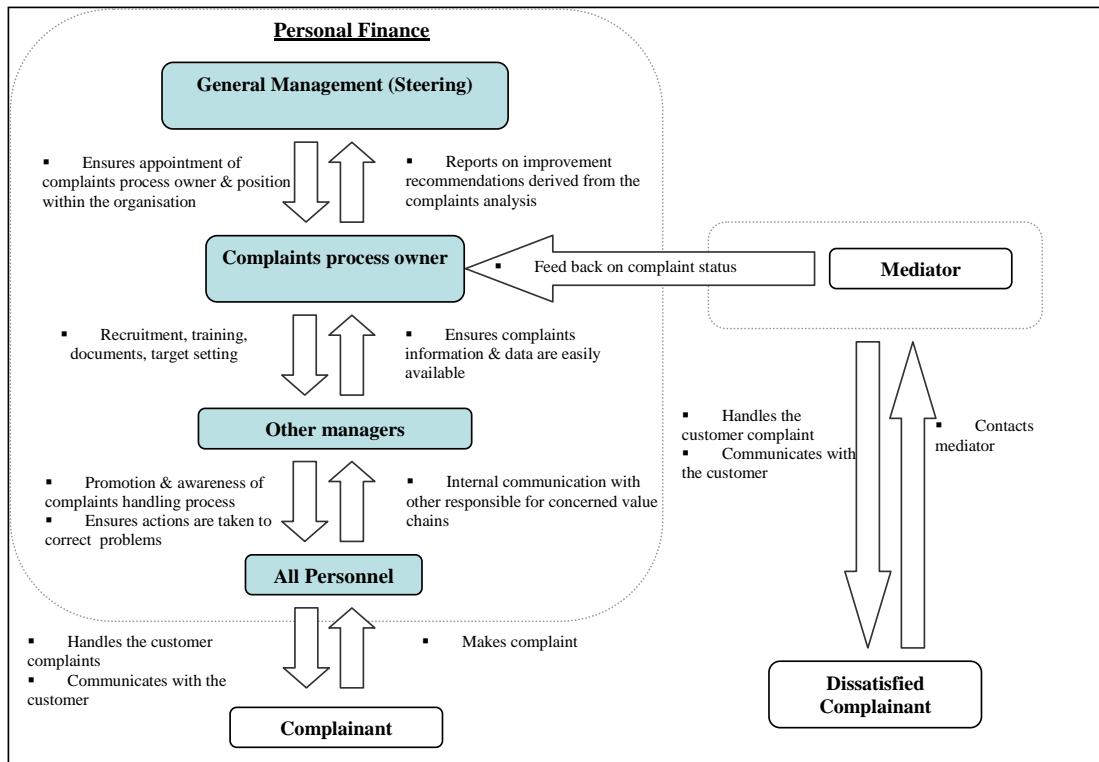
A periodic (*monthly or quarterly frequency*) local Committee including representatives of Operations, Compliance and Business is in charge of quantitative and qualitative monitoring of the Complaints:

- Check compliance with the Complaints procedure and follow the Complaints management procedures related to the regulatory conditions
- Ensure proper application of the Complaints procedure
- Ensure that the issues raised by the Complaints are corrected and track their progress

In addition, Compliance:

- takes into account in its risk control programme related to these issues;
- prepares possible regulatory reports due to the Authorities when it is within its competence.

C. Roles and responsibilities of each entity



The roles and responsibilities must be clearly described in the local operational procedure that describes this procedure and thereby this organisation.

General management must be responsible for:

- Appointing a complaints process owner and clearly defining his or her responsibilities and authority
- Ensuring that the position of the complaints management owner guarantees the independence of the function & the equitable handling of complaints
- Ensuring that the complaints management process is planned, designed, implemented maintained and continually improved in accordance with the complaints management policy of the BNP PARIBAS PERSONAL FINANCE entity
- Identifying and allocating the management resources needed for an effective and an efficient complaints process
- Ensuring that information about the complaints process is communicated to customers and complainants and where applicable, other stakeholders directly concerned in an easily accessible manner
- Periodically reviewing the complaints management process to ensure that it is effectively and efficiently maintained and continually improved
- Creating a culture where people are allowed to make mistakes

The Complaints process manager is responsible for:

- Establishing a process for performance monitoring, evaluation and reporting, derived from the recommendations made in this document
- Reporting to the General Management on the Complaints handling process with recommendations for improvement
- Ensuring that the Complaints process is operating efficiently, including recruitment, employee training, documentary requirements, compliance with deadlines and review of the processes
- Identifying the level of training and the skills required to handle Complaints of different types
- setting up a Complaints monitoring (quantitative and qualitative reasons) and their handling mechanism to ensure continuous optimisation of processes and practices to prevent repetition of Complaints already identified;
- identifying the issues or points of difficulty (processes, products, services, distribution channels, etc.) responsible for the Complaints in order to initiate corrective actions.
- making qualitative and quantitative reports to the General Management and to all the functions impacted (Operations, Marketing, Business, Compliance etc.)

Complaint Owner:

The owner of the Complaint may change during the Complaints handling process. Complaints management can be transferred from one person to another. Once assigned, the complaint owner is responsible for:

- Ensuring that the Complaint is qualified
- Identifying whether the employee is competent and authorised to handle the Complaint
- Else, identifying the competent employee
- Ensuring the identification of the cause
- Taking care of resolution and closing of the Complaint.
- Ensuring internal communication with the different departments impacted by the cause & action plan to resolve the problem
- If the Complaint pertains to an additional product (insurance, etc.), the owner of the BNP PARIBAS PERSONAL FINANCE Complaint is responsible for the transmission, quality of the response given to the customer and follow-up of the Complaints handling with the relevant organisation/supplier
- Transmitting information to the Risk department (ORC) and to Compliance in the event of a potential operational risk

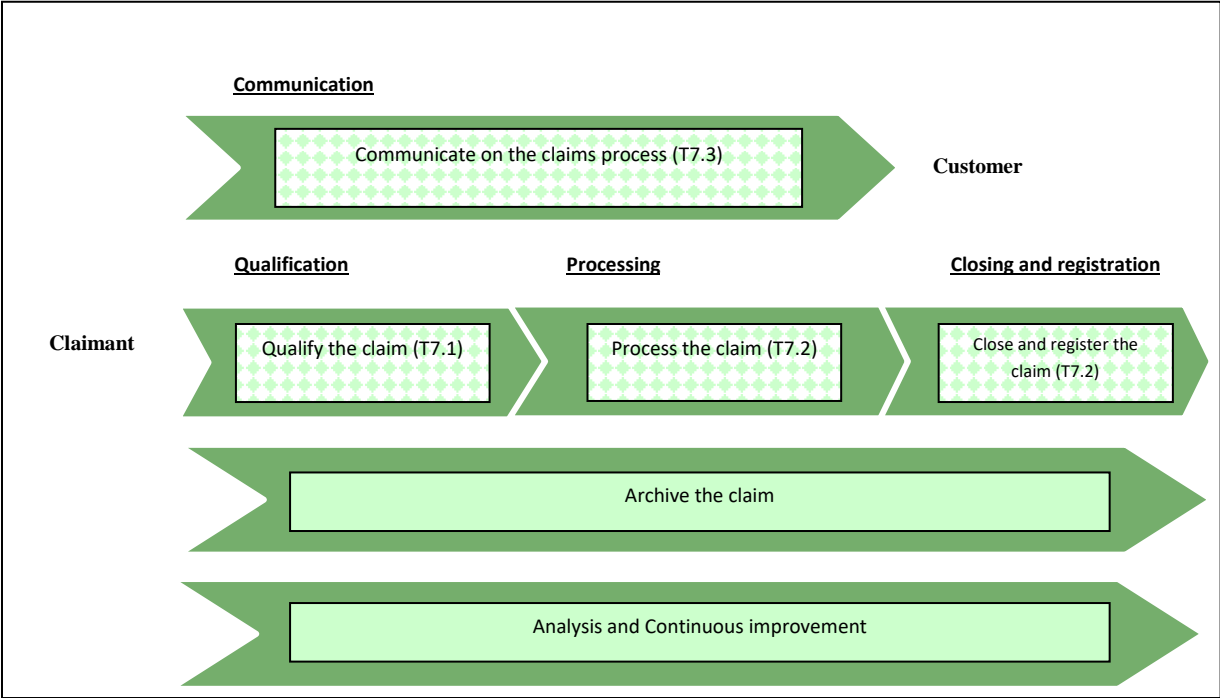
Any staff in contact with customers and Complainants must:

- Receive sufficient training on Complaints handling and the management tools used locally. The training is more in line with a PIC training program, set up, updated and adapted to the local context of the Entity. The target of the training must be clearly identified and updated.
- Treat customers courteously and respond quickly to the Complaints or direct them to the appropriate person

III. Complaints management process

This chapter describes recommendations of the process.

Note: In case of entities using Aris tool, level 5a of the Complaints management process is described in ARIS. The level 5b target processes must be entered in ARIS by the entity.



A. Communicate the Complaints management process to customers and Complainants

<p>Obligations</p>	<ul style="list-style-type: none"> ▪ The means available to make a Complaint are: <ul style="list-style-type: none"> ○ Mail ○ Fax ○ E-mail ○ Phone ○ Branch ○ Point of sale ○ Social media ○ Chat ▪ Communicate the following information to the customer: <ul style="list-style-type: none"> ○ details of the Complaints management process: address, telephone number (not surcharged) ○ information about the mediator, if one exists ○ the committed resolution deadline ▪ All the information must be available on the website, in the social media accounts, at the branch and the place of sale as well as in the contract ▪ Confirm the complaint reception in the expected time except if the answer is done before <p>Inform the customer about the status of the Complaint</p>
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Recommendations	<ul style="list-style-type: none"> ▪ Put the Complaints management procedure on-line on the BNP PARIBAS PERSONAL FINANCE website (internal and external) ▪ Use an e-mail address, a postal address, or a generic phone number to handle the received Complaint in standard format: [Translation of the term "Complaint" in the local language] + "@" + [Name of the local brand/entity] + ". "+ [local extension] (ex: fr, cz, it, etc.) <i>for example: reclamation@Cetelem.fr</i>. ▪ For social networks: Training support for customer relationship management on the social media
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B. Qualify the Complaint

Obligations	<ul style="list-style-type: none"> ▪ All Complaints must be automatically registered (immediate or deferred processing) ▪ A unique Complaint number (complaint ID) must be automatically assigned to each Complaint, including date of receipt ▪ Mandatory information to qualify the Complaint: <ul style="list-style-type: none"> ○ The media used by the Complainant to contact BNP PARIBAS PERSONAL FINANCE: oral Complaints (telephone and face-to-face), written Complaints (mail, e-mail, internet and fax), Complaints from social media ○ Contact details of the Complainant: including e-mail if possible ○ Date of the Complaint: record the date and the time ○ Type of customer* (see the A.C.P.R. list below) ○ The product category* (see the A.C.P.R. list below) : The product category of the BNP PARIBAS PERSONAL FINANCE entity must be able to match the A.C.P.R product category list. Other themes may be added to this list, and in can include, for example, the inclusion of subcategories. ○ The Complaint reasons based on 5 macro-categories * (see the A.C.P.R. list below): list of the BNP PARIBAS PERSONAL FINANCE reasons must be able to match the A.C.P.R. list Operationally, these reasons can be adapted to the local conditions but will have to match the generic PF classification. ▪ Qualify customer dissatisfaction: establish a first level analysis (pre-qualification) of the Complaint in order to assess the complexity and the extent of the Complaint and to identify a Complaints manager to follow-up the Complaints resolution. ▪ Reminder about confidentiality: The Complainant's personal information must be available if needed. However, the personal data must be protected in accordance with the local legal and regulatory requirements. ▪ On social media, the personal information is managed by private messaging on each platform ▪ A structure and a process for handling Complaints of additional BNP PARIBAS PERSONAL FINANCE product must be registered, processed and tracked (e.g. insurance) ▪ Employees in contact with potential Complainants (customers or partners) must be able to log Complaints into the BNP PARIBAS PERSONAL FINANCE IT system ▪ Notify the employee/group of employees to whom the Complaint has been transferred. This notification must obviously give access to all the details already registered about the Complaint (content, source, status, attachments, etc.)
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	<ul style="list-style-type: none"> ▪ Complaints from partners or suppliers must be handled with the same quality of service ▪ In the case of Complaints from social media, it is important to collect information through private messaging. And for managing the E-reputation, it is better to reword the correct resolution of the case in public mode
Recommendations	<ul style="list-style-type: none"> ▪ Criticality levels are defined by the entity ▪ Adjust the estimated resolving time (date for a response) depending on the complexity & importance of the problem or the segment of the client ▪ Enable the tracking of a complaint related to a previous complaint of the same type issued by the person / partner. Such complaints should be flagged and addressed in priority as they clearly illustrate the lacks in the existing complaint management process ▪ Provide customers / suppliers with a single point of contact (<i>there is nothing more frustrating for a customer than to re-explain their Complaint again and again</i>)

*A.C.P.R conditions

The lists below are recommendations from ACPR and are subject to an associated reporting. The lists defined by BNP PARIBAS PERSONAL FINANCE must match ACPR categories to achieve the reporting required.

A.C.P.R. PRODUCTS OR SERVICES CATEGORY

- Account
- Means of payment
- Savings products (regulated/other savings, financial instruments including OPCVM)
- Mortgage loans
- Consumer loans (personal loans, allocated loans, revolving loans)
- Equipment loans
- Other loans
- Distribution of insurance products
- Remote banking
- Automated banking services

A.C.P.R. CUSTOMER TYPE

- Individuals
- Professional individuals (independent professions, SME/SMI)
- Legal Entities/Companies

PURPOSE OF COMPLAINT OF THE A.C.P. R.

1. CROSS-FUNCTIONAL POINTS
 - Behaviour towards customers
 - Lack of Information/advice
 - Quality of the offer
 - Pricing
 - Defect or bad operation's execution
 - Operation handling delay
 - Files (FCC, FICP, FNCI)

2. ACCOUNTS AND MEANS OF PAYMENT

- Dysfunction
- Dispute in a transaction due to lack of permission (including fraud, loss or theft of the means of payment)
- Incidents on account
- Closing of the account
- Banking mobility or transfer request
- Access to banking services and basic banking service

3. SAVINGS PRODUCTS

- Dispute over taxation, transfer or closure of savings products

4. CREDIT

- Setting-up / Release of funds / Refusal to grant credit
- Breaking of credit or overdraft facilities
- Over-indebtedness, Debt restructuring request

5. OTHER

- Other

Recommendation: Define a reason related to data protection under the European regulation GDPR (General Regulation on Data Protection) coming into effect on 25 May 2018 => Grounds for Complaints subsequent to:

- Application for the exercise of rights (Access, Correction, Deletion, Portability, Restriction of processing, opposition to automatic marketing processing)
- Breach of data

C. Handling the Complaint

Must have	<ul style="list-style-type: none">▪ Update Customer information or ensure that customer contact details are up to date▪ Using the customer's preferred media,▪ Inform on the specific issues raised by the complaint, rather than provide a standard process▪ Communicate with the customer on the next actions
Recommendations	<ul style="list-style-type: none">▪ A local procedure of commercial gestures must be defined▪ As part of Complaints on the social media, it is useful to have a simple and customised vocabulary in a clear and understandable language

The Entity must implement a system that helps in respecting the processing times that have been communicated to the customer, i.e. (in the absence of standards imposing shorter deadlines):

- maximum ten working days from receipt of the Complaint, to acknowledge its receipt, unless the answer itself is provided to the customer within this period;
- maximum two months between the date of receipt of the Complaint and the date of sending the response to the customer, except under special circumstances that are duly justified

D. Close and register the Complaint

<p>Must have</p>	<ul style="list-style-type: none"> ▪ Record the decisions or actions that must be performed <ul style="list-style-type: none"> ○ Response of the Complaint (positive or negative for the customer) ○ Responsibility <ol style="list-style-type: none"> 1. BNP PARIBAS PERSONAL FINANCE 2. Partners 3. Suppliers 4. Third party 5. Customer ▪ Update the status and the closing date of the Complaint ▪ If an operational risk is identified, inform the Risk department that will record the Complaint in Forecast, in line with the procedures for reporting the Operational risk incidents ▪ In case of sensitive Complaints, even if the customer has requested a oral response, a formal written response must be sent ▪ The Complaints management tool must identify, monitor and track all Complaints whose resolution date has passed ▪ Access to the Complaints system must be free, so that the customer does not have to pay in any way for processing a Complaint
<p>Recommendations</p>	<ul style="list-style-type: none"> ▪ Automatic notification to all contributors involved in the closing of the complaint ▪ As often as possible, contact the customer after the resolution to ensure he is agree with the BNP PARIBAS PERSONAL FINANCE's solution. ▪ Ensure that the customer's complaint is considered in a future marketing campaign ▪ A summary of the probable cause and actions taken must be recorded

E. Mediation

Where local regulations so require or on its own initiative, the Entity shall develop a mediation mechanism that enables customers or some customer categories to have an independent and impartial body, governed by rules of professional conduct and whose mission is to provide a response to the disputes between them and the FP Entity in terms of cost and speed more favourable than legal proceedings, decide on the Complaints.

Mediation is encouraged as an alternative way of dealing with disputes between the FP Entity and the customer when necessary due to lack of amicable agreement with the customer.

<p>Recommendations</p>	<ul style="list-style-type: none"> ▪ A mediation charter must be defined ▪ The mediation charter must be published on the internet and communicated to the general public ▪ The entity must define its own mediation procedure in accordance with that of the BNP PARIBAS PERSONAL FINANCE group and local legal obligations ▪ The number of Complaints sent to the mediator as well as the decisions taken must be recorded ▪ The name and contact details of the mediator must be made available to the general public ▪ The mediators report must be published to the public
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	<ul style="list-style-type: none"> ▪ The entity must be able to locally communicate the following information to the compliance department: <ul style="list-style-type: none"> ○ Number of Complaints sent to the mediator ○ Percentage of Complaints ineligible for mediation ○ Number of opinions given by the mediator ○ Number of favourable replies to the Complainant ○ Number of favourable replies to the PERSONAL FINANCE entity ○ Number of shared responsibilities ▪ The report of the mediator can be used as input into the entities complaints continuous improvement process
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F. Archive the Complaint

Must have	<ul style="list-style-type: none"> ▪ The duration is defined by the entity ▪ Establish a procedure to specify the steps for identifying, gathering, classifying, maintaining, storing and disposing of records
Recommendation	Use the CRM platform including social media management

IV. Analysis and continuous improvement

Closing a Complaint is an important milestone in the handling process but complaint management does not stop at this stage. Our organisation has to put in place adequate research and analysis to make sure that all preventive and improvement initiatives and action are implemented to improve our customer satisfaction

These actions, complementary to the handling process, are described below:

A. Roles and responsibilities

Must have	<ul style="list-style-type: none"> ▪ The entity must clearly identify the person (s) or service responsible for: ▪ The analysis of complaints related data & information ▪ The definition of associated action plans ▪ The monitoring of the process, KPI's & actions plan ▪ The auditing of the complaints continuous improvement process ▪ All complaints addressed to the entity are concerning.
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B. Analysis and evaluation of the Complaints

Must have	<ul style="list-style-type: none"> ▪ All Complaints addressed to the entity must be classified and then analysed in order to identify the issues and remove the causes that initiated the Complaints. ▪ Make the Complaint data easily available to all authorised BNP PARIBAS PERSONAL FINANCE members (quality managers, team leader) so that they can be processed ▪ Structured analysis should be used with tools such as: <ul style="list-style-type: none"> ○ Classification ○ Pareto (Motive, cause, etc.) ○ Statistical analysis, etc.
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	<ul style="list-style-type: none"> ○ Practical Problem Solving ("5 Why" Analysis, etc.) ○ Lean management <ul style="list-style-type: none"> ▪ Use quality tools to find root causes of the problems and thus avoid repeating the problems
Recommendations	<ul style="list-style-type: none"> ▪ Use outcome of the Pareto analysis and statistical analyses conducted by the ACE-type workshops to identify the root causes and set-up an action plan ▪ Inform the General Management and the related divisions, including Compliance, identified weaknesses, implemented improvement actions and their state of progress

C. Monitor the Complaints management process

Must have	<ul style="list-style-type: none"> ▪ Prepare a report regularly (at a frequency defined by the entities) and at least the report as required by the Regulator (<i>ACPR for the French entities - see ACPR Reporting in appendix</i>) ▪ Total number of Complaints: <ul style="list-style-type: none"> ○ Number of written Complaints <ul style="list-style-type: none"> ▪ Including Number of Social Media Complaints (To be spread over the various platforms (Forum, social networks, etc. and by type of request) ○ Number of oral Complaints ▪ Complaint response time: <ul style="list-style-type: none"> ○ Time to answer to written Complaints <ul style="list-style-type: none"> ▪ Including response time for social media Complaints ○ Time to answer to oral Complaints ○ Time to answer from Customer point of view ▪ By product category*: <ul style="list-style-type: none"> ○ Number of customer Complaints ○ Number of positive responses to customer Complaints ○ Number of negative responses to customer Complaints ○ Number of Complaints that resulted in an appearance before the courts ▪ By customer type*: <ul style="list-style-type: none"> ○ Number of customer Complaints ○ Number of positive responses to customer Complaints ○ Number of negative responses to customer Complaints ○ Number of complaints having given rise to seized by the courts ▪ By motive of Complaint*: <ul style="list-style-type: none"> ○ Number of customer Complaints ○ Number of positive responses to customer Complaints ○ Number of negative responses to customer Complaints ○ Number of Complaints that resulted in an appearance before the courts ▪ The objectives** are: <ul style="list-style-type: none"> ○ <= 10 days to confirm receipt of a Complaint ○ <= 2 months to close the Complaint
Recommendations	<ul style="list-style-type: none"> ▪ Number of Complaints / Total outstanding ▪ Number of Complaints / Total number of customers ▪ Number of Complaints / Contract ▪ Amount of commercial gestures ▪ Number of Complaints / Total number of commercial gestures ▪ Implementation of a satisfaction barometer of the Complaints management

*: The report must be able to provide the above indicators based on both the values chosen by BNP Paribas Personal Finance and the A.C.P.R. values

** : Deadlines provided by A.C.P.R. The BNP Paribas Personal Finance requirement is more stringent: a Complaint must be processed within 5 business days.

D. Controls on the Complaints management process

Each entity should perform regular controls to assess the performance of the Complaints management process.

The result of these controls should provide information on:

- Compliance with the Complaints management procedures
- Process suitability to achieve complaints objectives
- Identification of any risks subjected to the customer in relation to the rules & regulations concerning customer protection.

Results of the various controls must be taken into consideration during management review to identify and implement improvement actions of the Complaints management process.

Controls must be performed by persons not involved in the activity being checked.

The generic transaction control plan identifies the major level 1 controls related to the Complaints. This is the base of minimal controls that the Central Transactions Division defines for covering the main risks, identified according to

- the generic risk mapping of Transactions
- the historic and potential incidents recorded in the Forecast tool
- the failures possibly highlighted by the Periodic Control.

In addition, a level 2 generic control plan is implemented by Compliance / PIC

For more information, refer to the associated control plan and control forms.

E. Management review of the Complaints management process

- The BNP PARIBAS PERSONAL FINANCE general management should regularly review the Complaints management process (*at least 18 months*) with the aim of:
 - Ensuring compliance, relevance and effectiveness of the process
 - Identifying and addressing instances of non-compliance related to customer protection, regulations and other legal requirements
 - Identifying and correcting product failures
 - Identifying and correcting process failures
 - Evaluating improvement opportunities and the need for change in the Complaints and product management process
 - Evaluating potential changes in the Complaints management procedure and objectives
 - Taking the local culture into account

- The management review input data must include:

- Internal factors such as changes in the policy, objectives, BNP PARIBAS PERSONAL FINANCE structure, resources available, products offered or provided and operational risk (Forecast)
- External factors such as changes in legislation, competitive practices or technological innovations
- The overall performance of the complaints management process, including customer satisfaction surveys and the results of the continuous monitoring of the process
- The results of audits
- The status of corrective and preventive actions
- Follow up actions from previous management reviews
- Recommendations for improvement
- Output from the mediator reports *
- The management review output data must include:
 - Decisions and actions related to improving the efficiency of the Complaints management process
 - Decisions and actions related to improving the effectiveness and efficiency of the Complaints management process
 - Proposals for improving the product and processes
 - Decisions and actions for identifying the necessary resources.
 - Decisions and actions for identifying the resource needs (training programmes, for example)

- Management review documents should be recorded and used to identify opportunities for improvement.

*Mandatory A.C.P.R. recommendations for the France entity (excluding major CMV and Domofinance partners)

V. Process for Insurance related complaints

A. CONTEXT

RCS Cards (Pty) Ltd (“RCS”), a Financial Services Provider licensed in terms of the Financial Advisory and Intermediary Services Act, No. 37 of 2002 (“the FAIS Act”), as amended (licence number FSP no. 44481), is committed to giving an excellent insurance service to our customers. We therefore treat any complaints that we may receive very seriously and aim to resolve these as expeditiously as possible.

As an authorised financial services provider, we are required to have a complaints management framework in writing, which must be accessible to our customers.

B. TYPES OF COMPLAINTS

- 1 Only complaints by customers who have chosen to take out insurance through RCS are covered by this policy.

- 2 A complaint may relate to one or more of the following issues, as defined in terms of the FAIS Act:
 - 2.2.1 An alleged contravention of the FAIS Act resulting in the complainant suffering or being likely to suffer financial prejudice or damage;

 - 2.2.2 The wilful or negligent rendering of a financial service that has caused or is likely to cause prejudice or damage; and

2.2.3 Unfair treatment

2.3 Complaints may also relate to the handling of a claim and/or the rejection or unsatisfactory outcome thereof.

2.4 Complaints are to be categorised as follows:

- Design of a policy or related service (including premiums or other fees or charges);
- Information provided to policyholders;
- Advice;
- Policy performance;
- Service to policyholders (including complaints relating to premium collection or lapsing of policies);
- Policy accessibility, changes or switches;
- Complaints handling;
- Complaints relating to insurance risk claims, including non-payment of claims; and
- Other complaints.

C INSURANCE COMPLAINTS PROCEDURE

1 All complaints must be lodged in writing with RCS. A letter of complaint may be delivered to RCS by hand, post, fax or email to the RCS contact details below.

RCS

Insurance Department

Liberty Grande Building, Corner of Voortrekker Road &

Vanguard Drive, Goodwood, 7460

P. O. Box 6020, Parow East 7501

Fax: (021) 012 597 4727

E-mail: claims@rcsgroup.co.za

- 2 When a customer lodges a complaint, the customer is to be advised of the following:
 - The type of information required from such customer;
 - Where, how and to whom a complaint and related information must be submitted;
 - Expected turnaround times in relation to complaints; and
 - Other relevant responsibilities of the customer.

- 3 The Insurance department is responsible for handling complaints lodged directly by the customer. The complaint may be escalated to the Compliance Department, where necessary. In cases where the complaint is lodged with a regulatory body, the Compliance Department will investigate the complaint, following which the results of the investigation will be sent to the insurer so that they may respond to the regulatory body, should the insurer deem this necessary.

- 4 After receiving the customer's complaint, we will acknowledge receipt thereof as soon as possible and, if applicable, request further information in order for us to attend to and consider the complaint.

- 5 The complaint will be recorded and allocated to the appropriate staff member to attend to in consultation with our underwriters, where applicable. RCS will ensure that the complaint receives proper consideration in accordance with the management controls implemented to effectively control and supervise the consideration process.

- 6 We will attempt to resolve the complaint as soon as possible, but in any event within 6 weeks of receipt of the customer's complaint. If the complaint is resolved in the customer's favour, they will be notified hereof in writing and an appropriate level of redress will be offered to them for their acceptance thereof.

- 7 If the complaint is not resolved in the customer's favour, the customer will be notified hereof in writing, together with written reasons for our decision. If the customer is not

satisfied with the decision, they may, within 6 months, pursue the matter with the relevant Ombudsman, whose details appear below. Customers may approach the Ombudsman in cases where they are not satisfied with the outcome of the complaint.

FAIS Ombudsman

Eastwood Office Park, Baobab House, Ground Floor, Lynnwood Ridge, 0081
P. O. Box 74571, Lynnwood Ridge 0040

Sharecall: 0860 324 766

Fax: (012) 348 3447

E-mail info@faisombud.co.za

The Long Term Insurance Ombudsman

Postal Address: Private Bag X45, Claremont, 7735

Tel: (021) 657 5000

Fax: (021) 674 0951

E-mail: info@ombud.co.za

Website: www.ombud.co.za

- 8 In the event that that the complaint is not resolved within 6 weeks, the customer will be notified of the delay, the reason for such delay and the revised timeframe in which the complaint will be resolved.

D DATA RETENTION AND REPORTING

- 1 The Insurance Claims Department and Compliance Department are to retain a register of complaints received. A record of the customer's name and surname, ID and/or account

number and nature of the complaint. A report on complaints analysis shall be provided to the executive management during committee meetings and to the board.

- 2 Copies of all relevant evidence, correspondence and decisions must be retained, together with a progress and update status of complaints (including whether such progress is within or outside the set timelines).

- 4 The following data must be maintained on an going basis:
 - a) Number of complaints received;
 - b) Number of complaints upheld;
 - c) Number of rejected complaints and reasons for the rejection;
 - d) Number of complaints escalated by the complainants to the internal complaints escalation process;
 - e) Number of complaints referred to a regulatory body and their outcome;
 - f) Number and amounts of compensation payments made;
 - g) Number and amounts of goodwill payments made; and
 - h) Total number of complaints outstanding.

VI. Tools

- BNP PARIBAS PERSONAL FINANCE has many CRM tool. We don't have an unique solution to track and monitor the complaints.

<p>Must have</p>	<ul style="list-style-type: none"> Multiple contact management to process a Complaint A single tool for all channels (e-mail, phone, mail, etc.) Links to all channels (phone, e-mail, fax, etc.) Implemented in all the activities Being able to qualify the type of Complaint Being able to use all channels to give an answer Being able to change the processing status (start, processing, etc.) Being able to view the history of all the channels Implementation of the electronic documents process for all incoming and outgoing channels. Establish a link to the script database and the standard written answers Being able to assign, alert, transfer, resume a Complaint being processed, send a message to inform about the processing. Measure the processing time Provide reports (especially that of the ACPR provided in the appendix) Make reports for the employee: stock, open, processed, transferred, waiting for agreement, etc. Make reports for the manager: alert if resolution delayed, rate by status, cost of processing, alert, etc.
<p>Recommendations</p>	<ul style="list-style-type: none"> Automatic information exchange with the main system (back office) Workflow tools Capable of automatically managing the priority treatments Attach or link all correspondence documents in an electronic format Set up priority levels to monitor validation of the processing Predefine the workflow (to regulate the steps of the process specify the Complaint type). Allow standard responses following standard requests Explore various processing steps to improve the future process Link the Complaints (e.g. use the proposed solution when processing another Complaint, or find critical points) Assign multiple tasks of the Complaint at the same time, identify the task status. For managers, receive regular reports and alerts

Below, we list the main options to help the entity to define its solution.

	Process	Tool Option 1	Tool Option 2
Must have	Manage Complaint (Qualify, Handle, Closed)	CRM tool deployed in the country	Akio Interaction Center + customer relationship management tool 2.0
	Complaint communication	Operational CRM deployed in the country linked with customer interaction tools (Cisco UCCEE for telephony, SMS and email solutions)	Akio interactive centre (SMS, e-mails) and Cisco UCCE (calls)
	Analysis and continuous improvement	Operational CRM tool deployed in the country	Akio Interaction Center
Recommendations	Analyse the conversations	Verint Speech Analytics (depends on the selected on-site solution)	Nice (depends on the selected on-site solution)

VII. Appendices

A. ACPR Report

COMPLAINTS HANDLING MECHANISM

1. Customer information and accessibility to the Complaints handling circuit

	yes	no	Number / Percentage
1.1 Is there customer information on the steps/procedures to be followed in the event of a Complaint?			
1.1.1 in the contracts			
1.1.2 in the reception areas			
1.1.3 on the website including social media			
1.2. Resources available to the claimant to make his complaint			
1.2.1 mail			
1.2.2 telephone			
1.2.3 internet including social media			
1.3.1 Existence of a mediation charter			
1.3.2 Availability of the charter on the Internet including social media			

2. Organization complaint processing

2.1 Are the Complaints acknowledged?			
2.2 Is there a commitment on the processing time of the Complaints?			
2.2.1 Is the commitment on the Complaints processing time communicated to the customer?			
2.2.2 What is this time (in business days)?			
2.3 Contact details of the department in charge of processing Complaints:			

2.3.1 Contact details of the Complaints department manager:

Last name/First name;

2.3.2 Telephone:

2.3.3 E-mail address:

2.3.4 Address of the Complaints department:

2.4 Reporting line of the department in charge of processing Complaints:

2.4.1 internal control division

2.4.2 compliance division

2.4.3 legal division

2.4.4 commercial division

2.4.5 general division

2.4.6 other

2.5 Percentage of Complaints handled by the Complaints processing department in relation to the total number of Complaints received by the establishment

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2.6 Complaints department workforce (in terms of full-time agent equivalent)

yes	no	Number / Percentage

2.7 Existence of single tool for computerised Complaints management

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2.8 Co-existence of several management tools

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2.9 If yes, percentage of Complaints monitored through the tool(s)

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2.10 If a product is being marketed under a mandate, then on behalf of the principal are you in charge of handling the Complaints?

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3. Complaints verification and monitoring

3.1 Inclusion of risks identified through Complaints by internal control

3.1.1 at the level of compliance control or permanent

3.1.2 at the level of the controls of any subcontractors

3.1.3 at the level of risk mapping

3.2 Date of the last internal audit control on Complaints handling:

3 Date of the last internal audit control on the department responsible for Complaints handling:

4. Mediation mechanism

	Name of the mediator / Federation	Contact details
4.1.1 Mediator specific to the establishment [1]		
4.1.2 Mediator of a professional federation		

[1] Attach the mediator's report, if any

4.1.3 Publication of the mediator's report on the website

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4.2.1 Number of Complaints submitted to the mediator

4.2.2 Percentage of Complaints ineligible for mediation

4.2.3 Number of the mediator's opinions

4.2.4 Does the establishment systematically follow the mediator's opinions?

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4.2.5 Number of the opinions favouring the Complainant:

4.2.6 Number of the opinions favouring the establishment:

4.2.7 Number of opinions shared:
