

## PROCEDURES IN HANDLING COMPLAINTS

All complaints from customers and intermediaries including those from PNB branches should be dealt with in accordance with the following guidelines.

Each manager is responsible for maintaining a file incorporating records of all complaints received which fall within the definition detailed below.

### Complaints Definition

*A verbal or written statement from a client (including a prospective or ex-client) or an intermediary (broker or agent) or a PNB bank personnel, or a supplier (other insurers, reinsurers or reinsurance brokers, loss adjuster, etc.) expressing dissatisfaction with the level of service provided either by us or by others where we are responsible for monitoring performance.*

All complaints must be investigated and dealt with immediately according to the procedures detailed below:

1. New complaints which may be resolved promptly (i.e., within three working days) by the staff member handling the complaint and to the full satisfaction of the complainant will be actioned as follows:
  - maintain a complaint Register
  - record comprehensive details of the complaint in a Complaint Register,
  - investigate the circumstances taking into consideration the following:
    - nature of the complaint
    - determine the names of the staff involved
    - identify control lapses, procedural gaps, operational lapses, etc.others
  - formulate, implement and record any necessary corrective action, (please fill-up the attached form Annex – 1)
  - provide a written follow-up to the complainant incorporating and acknowledgement, confirmation and action taken and a request that we be advised if the outcome is not satisfactory,
  - pass a copy of the follow-up to the President for information and retention in the complaints file.
  
2. Other complaints or those where the actions detailed above prove to be ineffective must be actioned as follows:
  - record comprehensive details of the complaint in a Complaint Register,
  - send a written acknowledgement incorporating a copy of the complaints procedure notice within one working day of receipt of the escalation of a complaint handled as per 1 above,

- the President to assign a senior staff member, who is not implicated in the complaint, as investigator,
  - formulate, implement and record any necessary corrective action,
  - provide regular progress reports, as appropriate, to the complainant detailing the action being taken,
  - final follow-up contact by the nominated investigator to ensure that the complainant is satisfied with the way in which the matter has been resolved,
  - ensure that the complainant report record is completed and the original retained in the complaints file.
3. Any complaints which upon the investigation or review by the concerned assigned investigator result to fraudulent transaction/s being uncovered should be referred to the Internal Audit Division for further investigation and review. Should there be any penalty/sanction that will be imposed against the involved parties, the provisions of the PNB Gen HR Manual and Code of Conduct shall be considered.
  4. As soon as we become aware that the complainant has or intends to involve another party (e.g., Insurance Commission, courts, etc.), immediate notice must be given to the President.
  5. The Company is required to monitor and review all complaints at least quarterly to address any trends identified. Accordingly, details of all new entries must be entered in the complaints file/register.