



Esterad Bank B.S.C (c)

Customer Complaint Policies and Procedures Manual

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Version 2.0

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Version History

Version	Version Date	Revision Summary	Approved by
2.0	Feb 2025	Updated the Customer Complaint Policies and Procedures Manual to align with the CBB requirements and industry best practices.	Board

Glossary

Abbreviation	Details
BoD/Board	Board of Directors
CCO	Customer Complaint Officer
CBB	Central Bank of Bahrain
CCF	Customer Complaints Form
CEO	Chief Executive Officer
IA	Internal Audit

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1. Introduction

1.1. Overview

Esterad Bank B.S.C. (c) ('The Bank') has developed the Customer Complaint Policies and Procedures Manual ("Manual") in line with the Central Bank of Bahrain (CBB) requirements as stipulated in its Rulebook Volume 2 – Islamic Banks, Business and Market Conduct Module, "Customer Complaints Procedures" chapter, as well as the International best practices pertaining to Customer Complaints Handling procedures.

The Bank is committed to adopting the highest standards toward responding to its customer complaints, disputes and issues of dissatisfaction in order to ensure swift and transparent resolutions by treating each complaint fairly.

The Bank is dedicated to providing quick, accurate and satisfactory responses to all inquiries, questions and concerns brought to its attention.

The Bank on a continuous basis will take all necessary steps to improve its services by reviewing and modifying the existing policies and procedures in order to provide better services to its customers.

1.2. Objective and Scope

The objective of this Manual is to set forth the steps and procedures to be followed by the Bank's staff as well as the Bank's customers in handling complaints in a way that will enable the customers to raise their issues of dissatisfaction (if any) through a clear and transparent process, in addition, to enable the Bank to address these issues in an equitable, objective and unbiased manner.

The Bank's Customer Complaints Policies and Procedures Manual is documented appropriately to ensure that:

- The Bank's customers are treated fairly at all times.
- All complaints, critical requests and issues raised by the Bank's customers are handled effectively and promptly.
- All customers are made completely aware of their rights in case they are not fully satisfied with the Bank's response or remedies.
- Recurring systems failures are identified, investigated and remedied.
- The customer complaint officer has the necessary authority to investigate the complaints.
- The number of unresolved complaints referred to the CBB is minimized.

1.3. Frequency of Review and Approval

The Customer Complaint Officer (CCO) of the Bank is the owner of this Manual. The Manual should be reviewed by the owner at least on an annual basis. The Manual owner is responsible for updating the Manual as and when required to be in line with the legal, regulatory and operating environment.

Proposals for updates need to be shared by the Customer Complaint Officer to the Board of Directors of the Bank for approval.

1.4. Distribution

The Manual will be made available to all the Bank's Employees internally.

1.5. Effective date

This policy is effective from the date of its approval.

2. Roles and Responsibilities

2.1. Board of Directors

The Board is responsible for establishing a strong customer complaint management system. Key responsibilities include:

- The Board is responsible for the overall oversight of the customer complaint management process. This includes ensuring that the process is effective, efficient, and aligned with the bank's strategic objectives.
- The Board shall approve the Customer Complaint Policies and Procedures Manual and any subsequent revisions. This manual should outline the Bank's commitment to customer satisfaction, the process for handling complaints, and the standards for resolution.
- The Board should regularly monitor the performance of the customer complaint management system, including key performance indicators such as complaint volume, resolution time, and customer satisfaction.

2.2. Customer Complaints Officer

The CCO shall be a senior-level personnel at the Bank and shall be independent of the parties to the complaints in order to minimize any potential conflict of interest. The CCO must be appropriately qualified and experienced and must have adequate resources to carry out his duty. The position of CCO may be combined with that of the Head of Compliance.

The Bank's CCO is the authorized person to receive the written Customer Complaints Form ([Appendix-1](#)) and to initiate the investigation in line with its urgency. In order for the CCO to conduct the assigned investigations efficiently and effectively, the CCO should have access to all parties related to cases of the complaints along with all supporting documents.

The Bank's customer complaints contact details must be available on the Bank's website and to all the staff members of the Bank and should be updated immediately whenever any changes take place.

The Audit & Risk Committee shall appoint the CCO, who is responsible for overseeing the day-to-day operations of the complaint management and ensuring compliance with the established policies and procedures.

3. Customer Complaints Procedures

The Bank's Customer Complaints Policies and Procedures Manual will be provided to the relevant staff to help them familiarize themselves with the customer complaint procedures in order to assist the customers. A simple and easy-to-use guide (Guide) to these procedures is available to all customers in both English and Arabic languages on the Bank's website.

The Guide is designed to be easily accessible by all customers and flexible in terms of making the complaints as per the Bank's Manual. The customers are required to submit their complaints (if any) in writing by completing and signing the Customer Complaints Form ("Form" or "CCF") which is available also on the Bank's website in both English and Arabic.

The Bank's customers can obtain the CCF either by downloading it from the Bank's website (i.e. <https://www.esterad-bank.com/complaints>) or by contacting the Bank's CCO or any other relevant staff, accordingly a copy of the CCF will be sent to customer either by email, fax or registered mail as per their preference. If the customer desires he/she can personally visit the Bank, after arranging a meeting with CCO during the Bank's working hours.

A copy of the Bank's Customer Complaints Policies and Procedures Manual will be provided to all relevant staff. The Bank will continuously provide a sound training program on complaints handling in order to provide our customers with the highest level of satisfaction. The continuous training is necessary to

provide the required support and assistance to the Bank's customers in making and resolving their complaints.

The Bank is required to ensure all the financial services-related documentation (such as investment and financing proposals and other related documents) provided to the customer includes a statement informing the customer of the availability of a simple and easy-to-use guide on customer complaints procedures in the event the customer is not satisfied with the services provided.

The entire process pertaining to handling customer complaints along with all necessary support and assessment will be provided to the Bank's customers free of charge.

In the case of activating the Bank's Business Continuity Plan, the communications channels (e.g. email addresses) will not be impacted, except for the mailing address in which a notification will appear on the Bank's website that this channel is currently is not available.

3.1. Receiving and acknowledging Complaints

All written complaints must be received by the Bank's CCO, if any of the Bank's relevant staff receives a customer complaint he/she should immediately forward it to the CCO.

Once received, the CCO should immediately address the complaints in accordance with their urgency and must acknowledge in writing to the customer within 5 working days of the receipt.

As per the CCO initial assessment, the acknowledgement may include further instructions aiming to update the customer on his/her complaint, such as assigning a representative for follow-up and assistance or any other arrangement as may be necessary.

3.2. Investigating Complaints

Once a complaint has been lodged with the CCO, the investigation process will immediately start and due care will be given in line with the complaint's urgency. The CCO will establish the investigation by talking to both sides, in order to establish a common ground and to verify explanations by interacting with the staff that are involved with the complaint.

The CCO will assess if the complaint is against the Bank's staff, products or services, accordingly suitable arrangements will be taken.

The complaints officer must find the relevant facts, talk to both sides, establish common ground and verify explanations wherever possible.

Complaint handling procedures must ensure the equitability in treatment to all parties to the complaints and must pay due care to individual circumstances and each customer will be treated with due courtesy and each complaint will be treated based on its merit. Moreover, the complaints about need to be treated fairly which implies:

- Informing them immediately and completely on complaints about performance.
- Giving them an opportunity to explain and provide appropriate support.
- Keeping them informed of the progress and result of the complaint investigation.
- Full details of the complaint are given to those the complaint is made against prior to the interview.
- Personnel must be assured they are supported by the process and should be encouraged to learn from the experience and develop a better understanding of the complaint process.

The investigation should be focused and emphasis must be placed on resolving the matter of dissatisfaction, and not blaming any individual, the investigation's findings should play a key role in helping the Bank in its effort toward continual improvement of the Bank's complaints handling process and enhancing the quality of the Bank's products and services.

All measures need to be taken to protect the person the complaint is made against from bias.

The investigation should be established with the highest level of due care and confidentiality toward:

- The staff whom a complaint was made against him/her.
- The Customer who made the complaint.
- The details must only be known to those directly concerned.

The Bank will protect the customer and the customer's identity as far as is reasonable to avoid deterring complaints due to fear of inconvenience or discrimination

The information to the parties of the complaint must be protected and not disclosed, unless otherwise requested by a relevant regulatory body or the consent of the involved party has been obtained beforehand.

3.3. Decision-Making Process and Reporting

The CCO must document and report all relevant facts and findings pertaining to the customer complaints within 10 days of receiving the complaints to the Head of the concerned department and /or CEO based on the CCO's own judgement about the criticality and urgency of the complaint.

The concerned department Head or any other person as assigned by the Chief Executive Officer (CEO), within 10 days of receiving the CCO's report must evaluate and assess the situation and come out with the Bank's final position on the complaint and how they are proposing to resolve the complaint. The investigation must be carried out by a person independent of the person complained about.

The final report will be submitted to the CEO for the final decision. Certain cases maybe be escalated to the Board especially if they involve compensation. The Bank will treat each complaint on its merits and will pay due care to individual circumstances.

Redress may be provided in the following situations:

- If the Bank has broken any of its contractual terms;
- If the Bank has failed to disclose material information; or
- If the Bank has otherwise acted in an unreasonable manner.

Redress which is in the form of compensation is subject to the Board approval. However, redress in a form other than compensation is subject to the approval of the Bank's CEO. When the redress is in the form of compensation is appropriate, the Bank will provide the complainant with fair compensation and must comply with any offer of compensation made by it which the complainant accepts.

On a quarterly basis, the CCO shall provide the Board's Audit and Risk Committee with a summary report of the customer's complaints.

3.4. Responding to complaints

The Bank adheres to a well-defined schedule for handling customer complaints in line with the Central Bank of Bahrain's requirements. All customer complaints will be addressed in an equitable, objective, unbiased and efficient manner. A joint response will be made when the complaint affects different participants.

The time frame for acknowledging, responding and assessing the customer in escalating the complaint is as follows:

- The written acknowledgement will be sent to the customer within 5 business days of receipt of the complaint.
- Within 4 weeks of receiving the written complaint, the Bank will respond in writing to a customer, explaining the Bank's position and how we propose to deal with the complaint along with the time

frame for resolving the complaint and the option open to the customer and the procedures necessary to obtain any redress if it is deemed suitable by the Bank.

- If the customer is not satisfied with the bank's response, the customer will be given the direction and the necessary information to escalate the complaint directly to the Bank's CEO.
- In the event that the customer is still not satisfied with the response provided by the Bank, the customer can escalate the complaints to the Consumer Protection Unit at CBB within 30 calendar days from the date of receiving the bank's response.

3.5. Recording of complaints

A complete record of all client complaints will be maintained by the CCO. The records will include:

- The identity of the complaint.
- The substance of the complaint.
- The status of the complaint, including whether resolved or not, and whether redress was provided.
- All correspondence in relation to the complaint.

Such records will be retained by the bank for a period of 5 years from the date of receipt of the complaint.

3.6. Reporting of Complaints

As per the Central Bank of Bahrain requirements, the Bank is required to submit to the CBB's Consumer Protection Unit, 20 days after the end of each quarter, a quarterly report summarizing the below:

- The number of complaints received.
- The substance of the complaints.
- The number of days it took the bank to acknowledge and respond to the complaints.
- The status of the complaints, including whether resolved or not, and whether redress was provided.

The CCO is responsible for preparing and submitting the above-mentioned report which will be submitted electronically to complaint@cbb.gov.bh. If no complaints have been received by the Bank within the quarter, a 'nil' report should be submitted to the CBB's Consumer Protection Unit.

3.7. Remedies for resolving complaints

The Bank will resolve complaints through the following means

- Through an appropriate means of redress (compensation) which will be agreed with the complainant.
- The Bank will follow up on the status of the Complaint to ensure that resolution has been done.
- The customer will be kept informed throughout the entire process of complaint resolution.
- The Bank will receive feedback from the customer on the process of complaint resolution and use it to improve the mechanism for resolving complaints.

3.8. Procedures for identifying system failure issues

The Bank will use the following means to identify system failures

- Continuous monitoring of systems to identify anomalies.
- Regular analysis of complaint data to identify any patterns.
- Root cause analysis to determine if any systemic failure is leading to customer dissatisfaction.
- Assessing the impact of system failures on customer experience to prioritize issues.

3.9. Independent Assessment

The Bank's Internal Audit (IA) department will be responsible for conducting periodic/random monitoring of the resolved complaints, as well as assessing the entire process of handling customer complaints procedures.

4. Appendix – 1: Customer Complaints Form



Customer Complaints Form

Customer Complaint Officer
Compliance Department
Venture Capital Bank
PO Box 11755
Manama, Kingdom of Bahrain

مسؤول شكاوى العملاء
دائرة الالتزام
فينشور كابيتال بنك
صندوق بريد 11755
المنامة، مملكة البحرين

Dear Sir,

تحية طيبة،

I enclose here with the information related to my complaint

ارفق لكم المعلومات المتعلقة بالشكوى

Client Information	معلومات عن العميل
Name: Mr. /Mrs.	الاسم السيد/ السيدة:
CPR/Identity/Passport Number:	الرقم الشخصي، الهوية/ جواز السفر:
Telephone Number Work/Home:	رقم هاتف العمل/ المنزل:
Mobile Number:	رقم هاتف الجوال:
Date of complaint:	تاريخ الشكوى:
Email Address:	البريد الإلكتروني:
Address:	العنوان:
Country:	البلد:
Are you a customer of Esterad Bank:	هل أنت عميل لدى استيراد بنك: <input type="radio"/> Yes / نعم <input type="radio"/> No / لا

Kindly Chose Type of Complaint	الرجاء اختيار نوع الشكوى
Complaint related to the Bank's investments:	شكوى متعلقة باستثمارات البنك:
Kindly specify the investment:	الرجاء تحديد الاستثمار:
Complaint related to the Bank's services:	شكوى متعلقة بخدمات البنك:
Kindly specify type of the service:	الرجاء تحديد نوع الخدمة:
Complaint related to the Bank's staff:	شكوى متعلقة بموظفين البنك:
Kindly specify the staff or department name:	تحديد اسم الموظف او الدائرة:

In order to conduct a thorough investigation to your complaint and to promptly conclude satisfactory results, we request you to provide us with detailed information pertaining to your complaint in the specified area below.

ي سبيل القيام بتحقيق واف في الشكوى المقدمة والوصول الى النتائج المرضية في فترة زمنية قياسية، نرجو تزويدنا بمعلومات مفصلة عن الشكوى المقدمة في المساحة المخصصة في الأسفل.

Complaint Details	تفاصيل الشكوى

Kindly attach the supporting documents if available

الرجاء ارفاق المستندات المتعلقة بالشكوى ان وجدت

1.		1.	
2.		2.	
3.		3.	

Client Signature	توقيع صاحب الشكوى
<div> <div></div> <div> </div> </div>	<div> <div></div> <div> </div> </div>