



**FirstCaribbean**  
International Bank

---

## **CIBC FirstCaribbean - Jamaica Complaints Management Policy & Procedures**

---

Approved:	Board of Directors
Effective:	September 1, 2017
Next Review:	August 31, 2020
Version:	1.0

## Table of Contents

---

<b>1</b>	<b>OVERVIEW</b> .....	<b>3</b>
<b>2</b>	<b>PURPOSE</b> .....	<b>3</b>
<b>3</b>	<b>DEFINITIONS</b> .....	<b>3</b>
<b>4</b>	<b>AUDIENCE &amp; SCOPE</b> .....	<b>4</b>
<b>5</b>	<b>POLICY REQUIREMENTS</b> .....	<b>4</b>
5.1	VISIBILITY AND ACCESS.....	4
5.2	ACCOUNTABILITY.....	5
5.3	ASSESSMENT AND ACTION.....	5
5.4	FEEDBACK.....	5
<b>6</b>	<b>OUR PROCESS FOR RESOLVING COMPLAINTS</b> .....	<b>5</b>
	<i>How we will handle a complaint</i> .....	6
<b>7</b>	<b>PROCEDURES</b> .....	<b>7</b>
<b>8</b>	<b>CENTRALIZED REPOSITORY</b> .....	<b>7</b>
<b>9</b>	<b>KEY RESPONSIBILITIES</b> .....	<b>8</b>
<b>10</b>	<b>MONITORING / OVERSIGHT MECHANISM</b> .....	<b>8</b>
<b>11</b>	<b>MAINTENANCE &amp; REVIEW PROCESS</b> .....	<b>9</b>
<b>12</b>	<b>LINKS</b> .....	<b>9</b>

The CIBC logo is a trademark of Canadian Imperial Bank of Commerce used by FirstCaribbean International Bank under license.

## 1 Overview

---

At CIBC FirstCaribbean Jamaica we take all feedback from our customers seriously, and are committed to doing everything we can to resolve any complaints or concerns that come to our attention as quickly as possible.

This policy provides an outline of how we will handle customer concerns and complaints to ensure that they are managed in a professional, accountable, responsive and efficient manner, and that this feedback is used to improve business processes.

## 2 Purpose

---

Our vision is to be the leader in customer relationships and the first choice for financial services in Jamaica. We will achieve this by listening to our customers and putting them at the centre of everything we do.

The Complaints Management Policy & Procedures Manual (the policy) is intended to ensure that the bank is in alignment with regulations and provides principles that guide the management of concerns and complaints. The policy principles outlined are consistent with and align to the bank's core values and corporate behaviours to ensure that the bank:

- a) Acknowledges the customer's right to complain when dissatisfied with any area of the bank's business, products, services or personnel;
- b) Promotes a culture that welcomes and encourages feedback;
- c) Establishes clear accountabilities and responsibilities for addressing complaints;
- d) Provides fair, objective and timely resolution of complaints;
- e) Integrates customer feedback into business improvement processes;
- f) Complies with regulations governing complaints management.

Contravention of any provision of the policy and its supporting documents by an employee may result in disciplinary action up to and including termination of employment for cause without notice or pay in lieu of notice. Such contravention may also affect individual performance assessments and compensation.

Contravention of any provision of the policy and its supporting documents by a contingent worker (i.e. consultants, contractors, independent contingent workers and temporary agency staff providing services to CIBC FirstCaribbean Jamaica) may result in action by CIBC FirstCaribbean Jamaica up to and including termination of his/her governing contract, without notice.

## 3 Definitions

---

Depending on the circumstances, it may be impractical to record a complaint every time an existing or prospective customer casually expresses dissatisfaction with an aspect of a service provided (or not provided) by the bank.

If the contact with the bank is a query i.e. seeking information or asking a question, a general concern or a request, then such contact is not regarded as a 'complaint' as defined below.

The CIBC logo is a trademark of Canadian Imperial Bank of Commerce used by FirstCaribbean International Bank under license.

## Complaints Management Policy and Procedures Manual- Jamaica

Term	Definition
Complaint	Any expression of dissatisfaction from an existing or prospective customer prompted by the bank's failure to meet their expectations in the area of products, services, process, policies, premises or people, where a response or resolution is explicitly or implicitly expected or required.
Concern	Customers may wish to express a concern they may have in relation to some aspect of the bank or the service it provides. A concern becomes a complaint when a customer: <ol style="list-style-type: none"><li>1. Indicates they wish to pursue the matter through the formal complaints process; or</li><li>2. The matter is not immediately resolved informally to the satisfaction of the customer and they indicate they wish to pursue it further.</li></ol>
Query	Information requested to clarify an issue or item in order to question its validity or accuracy.
Request	Expression of a desire for service (something to be given or done). A request for service may develop into a complaint where the provision or timeliness of the service is considered unsatisfactory (e.g. request for closure of a credit card that was not actioned).
Dispute	Any disagreement other than a complaint between the customer and the bank or any of its agents.

### 4 Audience & Scope

The policy and related documents apply to CIBC FirstCaribbean Jamaica existing or prospective customers and employees and must be followed by all regular and temporary full-time and part-time employees, as well as consultants, independent contractors and temporary agency staff providing services to CIBC FirstCaribbean Jamaica (collectively "contingent workers").

All complaints, as defined in Section 3 - Definitions; and received through any customer access point, whether written or verbal, with the exception of Credit Bureau disputes (which are covered under the Credit Bureau Operational Procedures) are within scope of this policy.

### 5 Policy Requirements

The policy requires that complaints management be guided by the following elements:

#### 5.1 Visibility and Access

The bank is committed to ensuring that the complaints process is easily accessible to the public. Information regarding where and how to report a complaint and expected resolution timeframes is readily available through channels such as CIBC FirstCaribbean's Jamaica website, branches or offices that are accessible by the public.

Complaints are accepted both verbally and in writing through a variety of channels such as face-to-face, by telephone, letter or email. Complaints about the bank's policies, products, services or personnel can be reported by any existing or prospective customer.

All CIBC FirstCaribbean Jamaica employees are able to inform customers how they can make a complaint and their options to escalate their complaint to higher internal and external levels, if they are dissatisfied with the outcome.

The CIBC logo is a trademark of Canadian Imperial Bank of Commerce used by FirstCaribbean International Bank under license.

## Complaints Management Policy and Procedures Manual- Jamaica

---

### 5.2 Accountability

Customer complaints are, wherever possible, resolved at the first point of contact. Employees receiving complaints take responsibility for ensuring resolution, whether directly or by referring to appropriate officers or support areas as required.

Employees receiving, managing and responding to concerns and complaints are provided with information, education and training through established mechanisms such as the Intranet, circulars, training and information sessions conducted by the bank's Learning & Development team and certification held to that effect. This ensures a consistent approach is followed in the management and resolution of complaints.

### 5.3 Assessment and Action

All complaints are managed in accordance with the policy principles referred to Section 2 - Purpose of the policy.

Upon receiving a complaint, employees will take reasonable steps to ensure that the complaint is properly understood, which includes seeking clarification or additional information from the customer where required.

- a) Complaints are recorded in a central complaints management system for monitoring and management;
- b) All complaints are handled fairly and objectively;
- c) Privacy and confidentiality are observed at all times; and
- d) Complaints received about the service or behaviour of a particular CIBC FirstCaribbean Jamaica employee are assessed and investigated in accordance with the bank's Code of Conduct for Employees which is available under the Corporate Governance section of the bank's website.

### 5.4 Feedback

The progress of the complaint is monitored until all reasonable avenues are exhausted and the outcome has been communicated to the customer.

Where a decision about a complaint is made, the officer owning the complaint clearly explains to the customer the action taken and factors considered in making the decision.

When the complaint is upheld the response to the customer will advise of actions taken to remedy the situation. If the complaint is rejected, a reason will be given to the customer and the regulator is informed in writing of the decision and the reasons for this conclusion.

If the customer is dissatisfied with the outcome of a complaint, they can escalate as outlined in section 6 of this policy. Any gap revealed by a complaint is communicated to the area responsible for systemic or process improvement of the particular issue.

## 6 Our process for resolving complaints

---

We take our customers' concerns and complaints seriously and are committed to doing everything we can to resolve them in the shortest possible timeframe. If they have a complaint we encourage them to let us know following the complaint procedure outlined here.

### Step 1: Tell us about it where they do their banking

Most concerns can be quickly resolved simply by bringing them to the attention of the Branch Manager or a member of the management team where the customer's account is held.

The CIBC logo is a trademark of Canadian Imperial Bank of Commerce used by FirstCaribbean International Bank under license.

### Step 2: Is there more we can do?

Should the complaint not be resolved to the customer's satisfaction where they do their banking, they may refer the issue to the Customer Relations Officer by email or telephone as follows:

Email: [customercare-jam@cibcfib.com](mailto:customercare-jam@cibcfib.com)

Tel: 876-935-4959

The customer should provide the following information:

- Name and contact information (including email address)
- The nature of the complaint
- Details relevant to the complaint and with whom it has already been discussed

### Step 3: Refer to the Managing Director's Office

We expect this to be the exception, but if the problem is not resolved following the steps above customers may consider escalating the matter, in writing, to the Managing Director as follows:

Managing Director's Office  
CIBC FirstCaribbean Jamaica  
23-27 Knutsford Boulevard  
Kingston 5  
Jamaica

### Step 4: Refer to the Regulator

In the unlikely event that a customer is dissatisfied with the decision taken they may refer the matter to the appropriate regulator for review.

### How we will handle a complaint

Our aim is to resolve all concerns and complaints as quickly as possible. We first need to be clear on the nature of the complaint and what resolution the customer is seeking. The more information that is given the better we will be able to assist our customers and bring about timely resolution.

If we are unable to resolve the concern or complaint immediately or within 5 business days we will:

- Acknowledge the complaint in writing within 5 business days of receipt
- Provide a reference number for tracking purposes and an expected resolution timeframe for the complaint

Occasionally, to ensure that the most appropriate person reviews the complaint, this may not be the person with whom the customer interacted initially.

We will keep the customer informed if resolution takes longer than anticipated. We expect the complaint to be fully resolved within 45 business days from receipt. However, we will update the customer on our progress within 10 business days and periodically thereafter, until there is final resolution.

When we have resolved the complaint we will give the customer written details of any actions proposed, or that have been taken to ensure that they are completely satisfied with the outcome.

The CIBC logo is a trademark of Canadian Imperial Bank of Commerce used by FirstCaribbean International Bank under license.

### 7 Procedures

---

There are internal procedures which guide the process when working with the customer to achieve effective complaints management and a satisfactory outcome for all parties.

1. Complaints should be resolved at the first point of contact wherever possible.
2. If the complaint cannot be immediately resolved then it is dealt with in a manner intended to lead to its effective resolution in as short a timeframe as practicable.
3. Every reasonable effort is made to investigate all the relevant circumstances and information surrounding a complaint in a timely manner with a view to achieving the resolution target timeframe of within 10 business days. The level of urgency and responsiveness may be elevated commensurate with seriousness or frequency of occurrence of the complaint.
4. Formal complaints taken through any means whether written or verbal are recorded in a complaints management system and given a unique identification number.
5. A written acknowledgment advising of the unique ID number and expected resolution timeframe is sent to the customer within 5 business days of receipt of the complaint, if it cannot be immediately resolved or will take longer than 5 business days.
6. A written response is provided to the customer as soon as the complaint is resolved, but within 45 business days of receipt, outlining the actions taken and confirming the final decisions and the reasons therefor.
7. If the customer is dissatisfied with the outcome of a complaint, they are advised of any internal or external escalation options that are available. This is communicated to the customer with appropriate contact details at the time when the officer becomes aware of the customer's dissatisfaction.
8. Once the customer accepts the proposed decision or action and the complaint is resolved, this is updated in the complaints management system and closed.
9. Where the complaint is referred to the regulator, the bank will co-operate fully and comply with any requests for information.
10. The complaint is tracked from initial receipt through the entire process until the customer is satisfied or the final decision is made. An up-to-date status is made available to the customer at regular intervals, at least by 10 business days from receipt, or upon request.
  - a) If the complaint cannot be resolved within 45 business days from receipt, the Customer Relations Officer will advise the customer in writing with a copy to the regulator, setting out the reasons for the delay and expected timeframe for full resolution.
  - b) When the complaint is resolved, the complaint record and associated correspondence are retained for 15 years from the date of account closure.

### 8 Centralized Repository

---

Details of complaints are recorded in a complaints management system that assigns each complaint a unique identification number for tracking and reference purposes and provides a centralized repository which is accessible by all units. This repository provides the ability to monitor resolution timeframes and helps the bank to analyze and identify systemic or ongoing issues that may impact customers.

The CIBC logo is a trademark of Canadian Imperial Bank of Commerce used by FirstCaribbean International Bank under license.

## Complaints Management Policy and Procedures Manual- Jamaica

---

### 9 Key Responsibilities

---

CIBC FirstCaribbean Jamaica Board of Directors approves the CIBC FirstCaribbean Jamaica Complaints Policy and Procedures Manual.

**Senior Leadership Team** has the day-to-day responsibility and accountability for maintaining compliance with the policy in the Jamaica business segments.

**Customer Feedback Team** monitors complaints resolution timeframes and supports the Customer Relations Officer in advising appropriate courses of action.

**Branch / Business Unit leaders** are responsible for:

- a) Implementing the policy and procedures in their areas and ensuring that their employees adhere to the process and are empowered to resolve customer concerns and complaints at the first point of contact, wherever possible
- b) Monitoring and ensuring that complaints are managed and resolved within established resolution timeframes and providing coaching to resolving officers, as required, on effective complaints handling

**Customer Relations Officer**

- a) Supports the business in complaint resolution and manages complaints that are:
  - Escalated from frontlines where first point of contact resolution could not be provided, or where complaints are of a serious or complex nature and require further investigation and/or management to achieve resolution
  - Escalated by non-customer-facing staff who take a complaint directly from a customer
  - Received by the Managing Director's office, through the email Customer Care mailbox or via Social Media
- b) Liaises with the regulator with respect to all stipulated complaints management requirements.
- c) Reviews complaints data to assess the effectiveness and timeliness of resolution, identifies key trends, themes or systemic issues and feeds this information into the continuous improvement process cycle.

**Learning & Development** is responsible for ensuring the establishment of programs for training and education on this policy on an on-going basis and that these are fully and effectively implemented and certification held to that effect.

**All other officers / staff** are responsible for complying with this policy and its related procedures including completing training as designated by their role.

### 10 Monitoring / Oversight Mechanism

---

The Customer Feedback Team will periodically conduct self-assessments to continually improve the effectiveness and efficiency of the complaints management process.

Complaint data is recorded, analyzed by the Customer Feedback Team and Customer Relations Officer and reported to the business on a monthly basis. Insights from complaints data are used by the bank to identify any complaint trends or systemic issues and feed these into the continuous improvement lifecycle.

The CIBC logo is a trademark of Canadian Imperial Bank of Commerce used by FirstCaribbean International Bank under license.



## Complaints Management Policy and Procedures Manual- Jamaica

---

### 11 Maintenance & Review Process

---

The policy is owned by the Managing Director, CIBC FirstCaribbean Jamaica who is accountable for its overall content and for monitoring adherence to the components of the policy throughout the business.

The continued relevance and effectiveness of the policy will be reviewed and assessed every three years by the Customer Feedback Team and revised as required.

The Policy is reviewed and approved by the Board of CIBC FirstCaribbean Jamaica.

Next review date is August 2020.

### 12 Links

---

[BOJ Code of Conduct on Customer Related Matters](#)

[Code of Conduct for Employees](#)

[Complaints Brochure](#)

The CIBC logo is a trademark of Canadian Imperial Bank of Commerce used by FirstCaribbean International Bank under license.