

## INTRODUCTION

This Policy is designed to ensure that customer complaints about its products, services and / or employees are managed through an effective and consistent process that meets the requirements of the Banking Rule BR/22, issued by the Malta Financial Services Authority.

## PURPOSE OF THE COMPLAINTS MANAGEMENT POLICY

The Bank aims at providing a high standard of service to its customers while also protecting their interest. At the forefront of its corporate values, the Bank is committed to encourage customers to provide it with constructive feedback in order to enable the Bank to improve its services. Feedback received serves as a means of monitoring and improving service delivery to customers, as well as enhancing organisational effectiveness and efficiency. However, feedback may not always be positive and may therefore result in a complaint.

This Policy sets out the Bank's procedures to be undertaken in the event that a complaint is received by any of its customers, with respect to any of the Bank's products, services or employees.

The Board of Directors and the Chief Executive Officer are responsible for the administration of the Policy. This includes the implementation of this Policy (when applicable) and effective assessment, fair management and mitigation of complaints in order to prevent damage to the Bank's reputation.

## WHAT IS A COMPLAINT?

A 'complaint' can be defined as a verbal or written statement of dissatisfaction received by the Bank from any of its customers, about any aspect of the Bank's products, services, employee behaviour/attitude, processes and systems.

## WHO MAY COMPLAIN?

Any customer of the Bank or their representative/s, who is dissatisfied with the Bank's products or services, for any reason, may submit a complaint (hereinafter referred to as the "Complainant").

## COST

There is no charge to the complainant for submitting a complaint.

## HOW TO COMPLAIN

A complaint may be made in English language and is to be addressed to the Chief Executive Officer (CEO) who will then decide the appropriate matter as to how to handle/route the complaint for further investigation.

Complaints may be submitted by following either of the following procedures:

- a) a formal telephone call to one of the executive secretaries within the CEO Office; or
- b) an email is sent to [info@eccm.com.mt](mailto:info@eccm.com.mt); or
- c) a formal letter is addressed to the CEO and sent to the registered office of the Bank, that is:

ECCM Bank plc  
230/231 'The Adelaide'  
Tower Road,  
Sliema, SLM 1601  
Malta

### WHAT INFORMATION SHOULD BE INCLUDED WHEN LODGING A COMPLAINT?

When making a complaint, a customer is requested to briefly set out all the facts regarding the issue and provide the following information:

- Name, I.D. Card number or Passport number, and contact details of the person filing the complaint;
- The name of the Company in whose name the complaint is being made;
- Name of the Bank employee who received the complaint;
- Copies of any documentation supporting the complaint.

Information and personal data provided in lodging a complaint, shall be treated in accordance with the Data Protection Act (Chapter 586 of the Laws of Malta) and other applicable legislation.

The Bank reserves the right to provide information on complaints and complaints-handling to the Malta Financial Services Authority (MFSA) and, to an alternative dispute resolution entity in the case that a dispute remains unresolved.

### DATA PROTECTION

The Bank shall ensure that when handling complaints in terms of Banking Rule BR/22, it complies with all applicable data protection laws, including Regulation (EU)

2016/679 of the European Parliament and of the Council of 27 April 2016 (the General Data Protection Regulation), the Data Protection Act (Chapter 586 of the Laws of Malta), and any regulations or subsidiary legislation issued thereunder, as amended from time to time.

### ACKNOWLEDGMENT OF COMPLAINTS

Once a complaint is received in line with Section 4 above, the Bank commits itself to acknowledge receipt in writing of the complaint within 2 working days. If a complaint is made verbally, the employee dealing with such complaint is to summarise this in writing and request the complainant to confirm in writing such summary by endorsing the respective document.

Such written acknowledgement should include confirmation to the complainant that:

- a) the Bank will investigate the complaint;
- b) the Bank will, on completion of the investigation and without unnecessary delay, inform the complainant, in writing, about the outcome of the investigation and describing its proposed course of action; and
- c) if the investigation is not completed within 15 working days from the date of receipt of the complaint, the Bank shall inform the complainant of such fact before the end of this period.

## RESPONSE TO A COMPLAINT

In normal circumstances, the Bank should be in a position to process the complaint and respond within 15 working days from receipt of the complaint.

If due to a valid reason, the Bank anticipates that the investigation of a complaint will not be completed within 15 working days from receipt of the complaint, the Bank shall immediately:

- a) inform the complainant that the investigation will not be completed within 15 working days from the receipt of the complaint;
- b) inform the complainant about the reasons of the causes of the delay;
- c) provide an indication as to when the investigation is likely to be completed, and by not later than 35 days from date of receipt of complaint; and
- d) inform the complainant that, if the complainant is not satisfied with the progress of the investigation, it has a right to refer to other Alternative Dispute Resolution forums including referring the matter to the Office of the Arbiter for Financial Services,

N/S in Regional Road  
Msida, MSD 1920  
Malta  
Telephone: +356 21249245  
Email: [complaint.info@af.s.mt](mailto:complaint.info@af.s.mt)

Further information may be obtained through the official website: [www.financialarbiter.org.mt](http://www.financialarbiter.org.mt).

## RIGHTS OF A COMPLAINANT DURING THE COMPLAINT PROCESS

The complainant has the right to enquire as to the status of their complaint and also the right to withdraw the complaint by a notification in writing to the Bank's CEO, highlighting the reason for the withdrawal.

## RIGHTS OF A COMPLAINANT AFTER THE COMPLAINT PROCESS

When providing a final decision that does not fully satisfy the complainant's demand, the Bank shall, to the extent possible, include a thorough explanation of its position on the complaint and that the complainant may refer to other Alternative Dispute Resolution forums, including complaints with the Arbiter for Financial Services under the Arbiter for Financial Services Act (Chapter 555 of the Laws of Malta).

**ECCM**  
Bank plc

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