

Complaint Response Policy

Introduction

In the normal course of business, customers may make inquiries or complaints either verbally or in writing.

- Additionally, a federal or state regulator or an attorney may lodge complaints with the Company.

Expedient resolution of complaints is a critical element of efforts to attract and retain customers, and to avoid costly litigation which might otherwise be brought against the Company.

- Prompt and accurate reporting and resolution of complaints assists Management in improving the products and services we offer.
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Policy

No complaint or inquiry should be taken lightly or dismissed without due consideration. Every inquiry or customer complaint should be received with courtesy and respect for the customer's feelings.

- The Company responds to all inquiries or complaints within certain specific time frames in accordance with this Dispute Response Policy.
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Definition: Complaint vs. Inquiry

Straightforward requests for information on loan rates, service charges and other Company services are not complaints. However, a request for information may be conveyed in such a manner as to indicate customer dissatisfaction with Company services.

- In responding to inquiries, the receiving employee should be sensitive to the possibility that the customer is dissatisfied.
 - If dissatisfaction appears to exist, whether expressed or only implied, the inquiry should be treated as a complaint.
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Responsibilities

Responsibilities

All Company personnel share responsibility for ensuring that complaints are addressed and resolved promptly, per Company policy.

- Specific responsibilities are outlined below.
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Main Office Responsibilities

Main Office personnel receiving a customer complaint are responsible as follows:

- The receiving employee must determine if a customer communication is a complaint or a request (see definitions, above).
 - The receiving employee is responsible for classifying the complaint (see Types of Complaints, below) and initiating response per these procedures.
 - The receiving employee is responsible for attempting to resolve the complaint within 24 hours.
 - If unable to resolve the complaint, or if the matter needs research, the receiving employee is responsible for referring the issue to appropriate Company representatives.
 - **Written complaints:** All written complaints must be forwarded immediately to the Manager.
 - **Retention and Maintenance of Complaint File.** The Main Office shall maintain the office's Complaint File in accordance with Company Records Retention Policy.
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**Manager
Responsibilities**

The Manager is responsible for:

- Written complaint from customer: Responding in writing as soon as possible but in no event later than one week from receipt.
 - Advising the customer, in writing, if response cannot be made within one week.
 - In such event, responding in writing no more than one additional week later.
 - Written complaint from regulatory agency or an attorney: Forwarding to the Compliance Officer no later than the business day after receipt.
 - Assisting the Compliance Officer as necessary and providing research and collateral material.
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**Compliance
Officer
Responsibilities**

The Compliance Officer is responsible for:

- Written complaint from regulatory agency or an attorney: Responding no later than one week from date of receipt.
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**Legal
Department
Responsibilities**

The Legal Department is responsible for assisting in responding to complaints, as requested by other Company personnel.

**Audit
Department
Responsibilities**

Audit is responsible for auditing the “Consumer Complaint” file at each office according to the Audit schedule. The audit will be used to determine that timely resolutions to complaints are afforded to all existing and potential users of Company services. Consumer Complaint files should also be made available to Administration and any outside auditors or regulatory agents upon request.

Procedures for Responding to Complaints

Verbal Customer Complaints

Take these steps when responding to verbal customer complaints:

- Resolve the complaint within 24 hours.
 - Complete the Complaint Reporting Form (see form for instructions).
 - File completed form in the office Complaint File.
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Referring Verbal Customer Complaints

If the receiving employee cannot resolve the complaint, refer the customer's complaint:

- Inform the customer that you will refer the complaint and have the Company representative contact them no later than the next business day.
 - Complete the Complaint Reporting Form (see instructions) and forward the form and any supporting documentation to the appropriate party for resolution.
 - Inform the individual that you have told the customer they will receive a response no later than the next business day.
 - When resolved, complete the Complaint Report Form (see instructions) and file in the office Complaint file.
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Written Customer Complaints

Take these steps when responding to written customer complaints:

- Give the complaint to the Manager.
 - The Manager may contact Legal Counsel if necessary.
 - **All written complaints must receive a written response.** Respond to the complaint as soon as possible but in no event later than one week from date of receipt.
 - Advise the customer, in writing, if response cannot be made within one week.
 - In such event, respond in writing no more than one additional week later.
 - Complete the Complaint Reporting Form (see form for instructions).
 - File completed form in the office Complaint File.
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