

# **STAKEHOLDER GRIEVANCE MANAGEMENT POLICY**

**AUGUST 2024**

**RISK RATING: MODERATE**

**RETURN THIS POLICY TO CONDUCT & COMPLIANCE AFTER APPROVAL**

## DOCUMENT OWNER

This document is owned by the Sustainability Unit with support from The Ombudsman ([cc-Ombudsman@accessbankplc.com](mailto:cc-Ombudsman@accessbankplc.com)) team of the Bank. The Unit is responsible for ensuring that the policy is reviewed in line with the requirements of the Policy Approval, Broadcast, and Administration Framework.

Role	Date	Version
Unit Head, Sustainability	August, 2024	1.0

## DOCUMENT HISTORY

Prepared By	Date	Version	Comment
Odunayo Moyinwin	August, 2024	1.0	This is the maiden version of the Grievance Management Policy. It shall be reviewed on a three-yearly basis or on a need basis.

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**1. Introduction**

## **1.1 Purpose**

Access Bank Grievance Management Policy (GMP) outlines the principles of grievance management and defines the organizational structure and processes required to implement a functional, effective and culturally appropriate grievance mechanism that is responsive to stakeholder needs. The purpose of this document is to explain how grievance management can be integrated into business processes and to guide in setting up detailed grievance management procedures. The Policy describes the steps in the grievance management process, recommends timeframes and required resources, and describes key roles and responsibilities in grievance management by Access Bank Plc. The Policy recognizes that there may be different national regulatory and/or cultural requirements, specific types of community and public concerns as well as internal organizational arrangements. It provides flexibility for in-country teams in how they address those differences through the third-party and employees' grievance procedures.

## **1.2 Scope**

This document details the scope, principles, responsibilities and processes associated with the Third Party and Employees Grievance Mechanisms. This Policy will also be used to guide Access Bank to implement, monitor and evaluate their specific best practice compliant grievance management mechanisms. The "Third Party" definition is inclusive but not limited to members of the public, customers, investors, residents of impacted communities, Project affected people (PAPs), institutional stakeholders and other parties that wish to address their concerns and complaints to Access Bank. The Third Party and Employees' Grievance Procedures are two different business processes and are managed by different work streams inside Access Bank. The Third Party and Employees Grievance mechanisms do not replace any national and international recourse channels including independent legal advice, national judicial system and any other alternative complaint and dispute resolution mechanisms available to project affected people and other stakeholders.

The Grievance Management Policy provides Access Bank with a defined basis from which to implement this business process including:

- Public information disclosure of Access Bank grievance management process
- Receipt and acknowledgement of complaints and concerns that are classified as grievances by Access Bank GMP
- First Tier or Internal Grievance Resolution process
- Second Tier or External Grievance Resolution process also known as process of mediation or arbitration
- Reporting, monitoring and evaluation of addressed grievances and
- Process of periodic reviews of Access Bank GMP and grievance procedures

### **1.2.1 Scope inclusions**

The grievance management Policy outlines the grievance mechanism to be implemented in the workplace, marketplace and communities. It applies to all Access Bank's activities in all the markets where we operate. This document gives an overview of the Access Bank third party and employees general grievance management processes and describes the requirements for the implementation of the third party and employees grievance mechanisms.

### **1.2.2 Scope exclusions**

The detailed third party and employees grievance procedures to be implemented by Access Bank across all operating countries are separate documents and not included here, nor are these documents referenced.

### **1.3 Periodic Review**

This Policy will be reviewed on a three yearly basis with the aim of adhering to best practices in the market and ensuring it remains relevant to the Bank's business and strategic goals.

## **2. Key principles and guiding standards**

The key principles followed in implementing Access Bank GMP are:

- **Appropriateness:** The Grievance Management Policy must be normalized in proportion to the level of potential risks and potential adverse impacts on affected communities, stakeholders and employees;
- **Culturally appropriate:** to Access Banks' operating Countries and reflecting the ways in which each community handles their concerns;
- **Accessible:** to all workers through Worker Grievance mechanism and to all members of the public, project affected people, individual and institutional stakeholders through Third Party grievance mechanism at no cost and with no retribution and with possibility to access all available alternative grievance resolution remedies recognized by national and international legal systems.
- **Clearly communicated:** the GMP and associated grievance procedures will be communicated through appropriate and relevant channels in the operating countries.
- **Transparent, fair and with clear grievance resolution accountabilities.**

All grievance resolution processes shall be aimed at effective grievance response based on the above principles.

However, if complainants are not satisfied with the outcomes of the Tier 1 resolution of medium or high severity grievances, their grievances may be referred to an External Review Panel (ERP) for additional review. Stakeholders may appeal to independent legal advice or approach any other third-party complaint mechanisms to address their grievances at any time. These third-party mechanisms may include the legal system of the operating country, industry ombudsman and Access Banks' grievance mechanisms

where applicable. In the event of such third-party involvement, Access Bank will cooperate with these entities via the Corporate Counsel which will represent Access Bank. In addition to the GMP, Access Bank is committed to managing its impacts according to global best practices.

### **3. Grievance Management Policy**

#### **3.1 Objectives**

The objective of this GMP as a guidance document is to ensure that Access Bank, at both corporate and operational levels, is aware of and responds to stakeholder concerns in Access Banks' operating countries. This Policy is designed to empower its employees and other third-parties to successfully and effectively manage grievances and complaints. To achieve this Access Bank will ensure that it:

- Handles grievances in accordance with this grievance management Policy and country specific grievance procedures, giving due consideration to confidentiality and legal requirements
- Undertakes to assess each complaint and grievance objectively and to fully investigate all issues
- Remedies impacts, address causes and takes all required actions
- Monitors grievance resolution and keeps stakeholders informed of the progress and outcomes of the grievance remediation process
- Develops training and implements procedures which will ensure that all Access Bank employees and other third party comply with this GMP
- Follows established reporting requirements related to grievance management and ensures that all high severity, Code of Conduct, Security and Safety complaints and grievances are given due priority
- Ensures that Company Secretariat and Corporate Counsel (Legal Department) are properly informed and consulted on any grievances which have legal ramifications and
- Publishes the Third-party Grievance Mechanism in Access Bank's operating countries using appropriate and easily accessible avenues.

In addition, the GMP provides important management information. It enables Access Bank to identify emerging stakeholder and community concerns and to address these proactively through its project planning and operations.

#### **3.2 Culture and Commitment**

To enable successful implementation of the Grievance Management Policy Access Bank engages with its stakeholders and uses the process of addressing grievances as an opportunity to add value to Access Banks' way of doing business. Equally, Access Bank's Management fosters a culture of transparency and responsibility amongst its employees and third-party towards all external stakeholders.

#### **3.3 Process**

It is important for Access Bank to implement the process of managing and resolving grievances. To this end, Access Bank will manage grievances and complaints related to their specific activities. This means that Access Bank will manage grievances related to Access Bank and all other activities associated with the Access Group and maintaining Social License to Operate.

### **3.4 Organization**

The grievance management team may include but is not limited to:

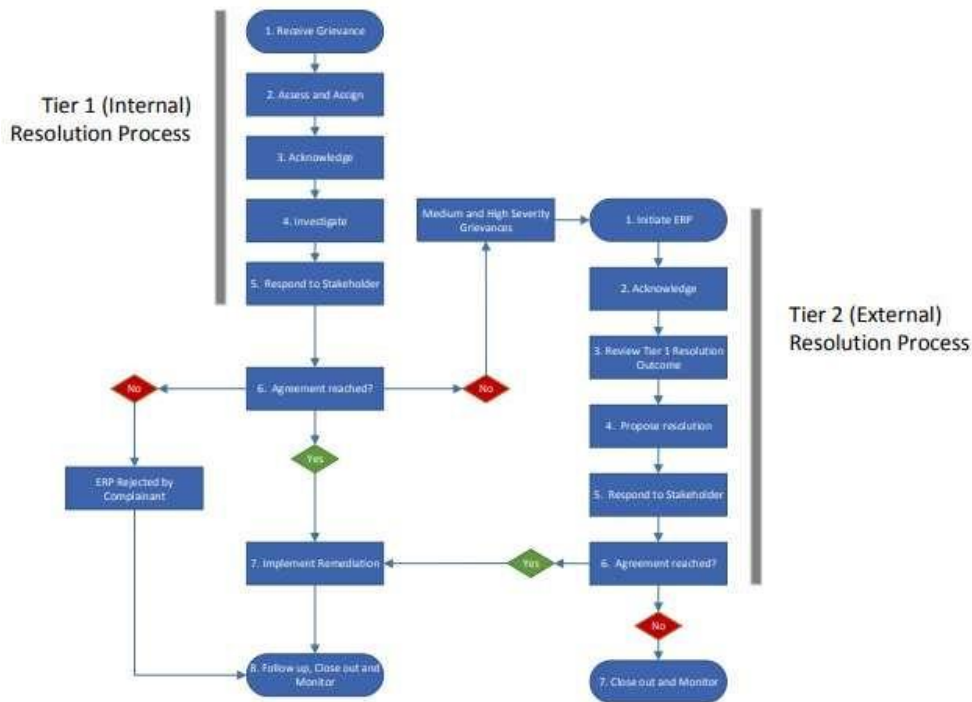
- Company Secretary
- Group Head, Legal
- Group Head, Corporate Communications
- Group Head, Environmental & Social Risk
- Chief Compliance Officer
- Group Head, Human Resources
- SBU Heads
- Group Head, Customer Experience
- Head, Group Sustainability
- Chief Operating Officer
- Chief Risk Officer
- Chief Financial Officer
- Grievance Coordinator

Other functions and departments (work streams) responsible for resolution of specific types of grievances

- Relationship Manager (As required)
- CSI Program Manager (As required)
- Investor Relations Officer (As required)

The GMT is an ad-hoc multidisciplinary team established to manage the resolution process for high severity or high-risk grievances or grievances filed by complainants via alternative grievance mechanisms where Access Bank needs to be represented in the resolution or review process. This team will be led by the respective manager and supported by the Access Bank Legal & Compliance Department, depending on the nature of the grievance. The task force will ensure that the resolution of these types of grievances is given maximum priority, and that further risk is avoided.

## **4. Grievance Management Process: Overview**



The figure above outlines the Two-Tier grievance management approach adopted by Access Bank. Internal grievance resolution process and external review are further detailed in this document. Each Tier is comprised of specific administrative steps and associated timeframes required for grievance resolution.

**5. Third Party Grievance Process**

Tier 1 Practical implementation of the Access Bank GMP will be achieved through the third-party and employee’s grievance procedures. The grievance resolution procedure might differ in each of Access Bank’s operating countries according to the prevalent culture, rules and regulations.

**5.1 Receiving Grievance**

Stakeholders will be able to submit grievances in English and local languages as applicable. Stakeholders will have the ability to submit grievances anonymously and Access Bank will keep the grievance resolution process confidential. Grievance will still be considered and addressed. Stakeholders will be able to submit a grievance in the following ways:

Grievance Management Route	Channel
Email	<a href="mailto:GrievanceManagement@accessbankplc.com">GrievanceManagement@accessbankplc.com</a>
Website (see Appendix A)	<a href="http://www.accessbankplc.com">www.accessbankplc.com</a>
Branches	Any of our branch/service outlets nationwide



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The grievant can lodge their written grievance to the Branch Manager or Head of Operations at any branch/service outlets.

The grievant should make sure that the following information is provided to ensure a prompt handling of her/his complaint:

- ✓ The name (optional), address and mobile number of the grievant
- ✓ The description of the complaint and the project being carried out.
- ✓ The damage suffered or likely to be suffered because of the project.
- ✓ How the complainant is or will be directly affected by the project.
- ✓ Where relevant, copies of any documentation supporting the complaint.

However, if a stakeholder leaves a grievance (in a voice-message) outside the operating hours or at weekends, the Grievance Coordinator will attempt to contact the stakeholder within 3 working days of receiving the original message to record the details of the grievance. Any information request which comes through the grievance hotline will be recorded by the Grievance Coordinator and passed on to the relevant work-stream to respond and communicate.

The Grievance Coordinator is the focal point of grievance resolution and is responsible for ensuring the resolution process from receipt, through investigation, remediation and till closure with the support of different work streams. The Grievance Coordinator will be responsible for coordinating grievance support required from each work stream who collects, reports and communicates grievances as they occur. The in-country Grievance Coordinator will be responsible for assessing the severity of a grievance and assigning the grievance accordingly based on consultation with responsible work stream managers.

## 5.2 Assessing and assigning severity

Grievances are defined according to three severity levels: low, medium and high.

The severity rating of a grievance is based on the potential consequence (actual or potential) of the grievance in relation to:

- Social and Environmental impact, including:

- o Health
- o Safety
- o Security
- o Livelihoods
- o Income
- o Amenity / Lifestyle
- o Access to services
- o Social Relations / Community Cohesion
- o Environmental quality
- o Natural resources

- Impact on Access Banks’ corporate reputation

Categorization of severity may partially be determined by Complainant vulnerability: similar effects may impact differently on vulnerable and non-vulnerable households. Severity level is determined by the highest level of impact associated with the grievance. Each severity level is described in the Table 1 below:

Grievance Severity Matrix

Impact	Consequence/Severity		
	Low	Medium	High
Social and Environmental	Minimal impact, likely to have little real effect. Mitigation is easily achieved; compensation unlikely to be necessary.	Impact is real but not substantial or long-lasting. Mitigation is both feasible and easily achieved; compensation likely to be moderate	Significant impact and potentially long-lasting. Mitigation is likely to be difficult: expensive, time consuming and requiring difficult negotiation; compensation may be significant.
Corporate reputation	No Impact	Local or Moderate Reputation Damage	Significant Loss of Shareholder/ Public Trust
Input required for resolution	Local: frequently discussion with complainant	Local/ National: may require technical input from relevant work stream and key decision-maker.	Global: may require Corporate level input and decision-making

### 5.3 Categorizing grievances

To assist the Grievance Coordinator in correctly assessing and escalating grievances to the correct work-streams the following grievance categories have been identified:

#### 5.3.1 Grievance Management in the Workplace

##### 5.3.1.1 Causes of Grievance in the Workplace

- Discrimination or harassment
- Unfair treatment by supervisors or colleagues
- Unjust termination or disciplinary actions
- Poor working conditions
- Breach of employment contract

### 5.3.1.2 Cases of Grievance in the Workplace

- An employee filing a complaint about sexual harassment.
- An employee alleging racial discrimination in promotion practices.
- Workers reporting unsafe working conditions.

### 5.3.1.3 Steps to Address Grievances in the Workplace

#### Step 1: Reporting

Employees can report grievances through:

- Email to HR or designated grievance officer.
- Online grievance portal on the company intranet.
- Direct submission to supervisors or HR representatives.

#### Step 2: Acknowledgment

Within 2 business days, HR will acknowledge receipt of the grievance and inform the complainant of the next steps.

#### Step 3: Initial Assessment

HR will assess the grievance within 5 business days to determine if it requires further investigation. If it is a minor issue, immediate action will be taken.

#### Step 4: Investigation

A formal investigation will be conducted for severe grievances, including interviews with relevant parties and reviewing documentation. This process will be completed within 15 business days.

#### Step 5: Resolution and Communication

HR will develop a resolution plan based on the investigation findings and communicate the resolution to the complainant within 20 business days.

#### Step 6: Follow-Up

HR will follow up with the complainant within 2 weeks to ensure the resolution was effective and gather feedback.

### 6.3.1.4 Points of Contact

- HR Department
- Designated Grievance Officers
- Supervisors/Managers

## **5.3.2 Grievance Management in the Marketplace**

### **5.3.2.1 Segment: Customers**

#### **5.3.2.1.1 Causes of Grievance**

- False advertising
- Defective products or services
- Poor customer service

#### **5.3.2.1.2 Cases of Grievance**

- A customer lodging a complaint about a defective product.
- Allegations of misleading advertising practices.

#### **5.3.2.1.3 Steps to Address Grievances**

##### **Step 1: Reporting**

Customers can report grievances through:

- Customer service email or phone line.
- Online complaint form on the company website.
- Direct submission at any bank branch.

##### **Step 2: Acknowledgment**

Customer Service will acknowledge receipt of the grievance within 2 business days and inform the complainant of the next steps.

##### **Step 3: Initial Assessment**

The Customer Service team will assess the grievance within 5 business days to determine if it requires further investigation or immediate resolution.

##### **Step 4: Investigation**

For grievances requiring further investigation, the relevant department (e.g., Quality Control, Legal) will be involved to investigate within 15 business days.

##### **Step 5: Resolution and Communication**

The Customer Service team will communicate the resolution to the complainant within 20 business days, providing details of the actions taken.

##### **Step 6: Follow-Up**

Customer Service will follow up with the complainant within 2 weeks to ensure satisfaction with the resolution and gather feedback.

#### **5.3.2.1.4 Points of Contact**

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- Customer Service Department
- Quality Control Team
- Legal Department

### **5.3.2.2 Segment: Investors**

#### **5.3.2.2.1 Causes of Grievance**

- Mismanagement of funds
- Lack of transparency
- Unethical business practices

#### **5.3.2.2.2 Cases of Grievance**

- An investor filing a complaint about mismanagement of their investment funds.
- Allegations of unethical practices by the bank's management.

#### **5.3.2.2.3 Steps to Address Grievances**

##### **Step 1: Reporting**

Investors can report grievances through:

- Email: Investor Relations email or phone line.
- Online Portal: Online complaint form on the company website.
- Direct Submission: At any bank branch or head office.

##### **Step 2: Acknowledgment**

Investor Relations will acknowledge receipt of the grievance within 3 business days and inform the complainant of the next steps.

##### **Step 3: Initial Assessment**

The Investor Relations team will assess the grievance within 7 business days to determine if it requires further investigation or immediate resolution.

##### **Step 4: Investigation**

For serious grievances, an investigation involving relevant departments (e.g., Finance, Legal) will be conducted within 20 business days.

##### **Step 5: Resolution and Communication**

Investor Relations will communicate the resolution to the complainant within 30 business days, detailing the actions taken and any changes implemented.

##### **Step 6: Follow-Up**

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Investor Relations will follow up with the complainant within 1 month to ensure satisfaction with the resolution and gather feedback.

#### 5.3.2.2.4 **Points of Contact**

- Investor Relations Department
- Finance Department
- Legal Department

#### 5.3.2.3 **Segment: Project-Finance**

##### 5.3.2.3.1 **Causes of Grievance**

- Non-compliance with project agreements
- Delays in project implementation
- Negative environmental or social impacts

##### 5.3.2.3.2 **Cases of Grievance**

- A partner company reporting non-compliance with the agreed project terms.
- Affected stakeholders complaining about negative impacts from the project.

##### 5.3.2.3.3 **Steps to Address Grievances**

###### **Step 1: Reporting**

Project-finance grievances can be reported through:

- Email: To the Project Finance team.
- Online Portal: Online grievance portal on the company website.
- Direct Communication: With the project manager or finance representative.

###### **Step 2: Acknowledgment**

The Project Finance team will acknowledge receipt of the grievance within 3 business days and inform the complainant of the next steps.

###### **Step 3: Initial Assessment**

The Project Finance team will assess the grievance within 7 business days to determine if it requires further investigation or immediate resolution.

###### **Step 4: Investigation**

For significant grievances, a detailed investigation involving relevant project teams and stakeholders will be completed within 20 business days.

### **Step 5: Resolution and Communication**

The Project Finance team will communicate the resolution to the complainant within 30 business days, detailing actions taken and preventive measures.

### **Step 6: Follow-Up**

The Project Finance team will follow up with the complainant within 1 month to ensure satisfaction with the resolution and gather feedback.

#### **5.3.2.3.4 Points of Contact**

- Project Finance Team
- Project Manager
- Environmental and Social Risk Department

### **5.3.3 Grievance Management in the Community**

#### **5.3.3.1 Segment: Affected Parties from CSI Initiatives**

##### **5.3.3.1.1 Causes of Grievance**

- Inequitable distribution of resources or aid
- Lack of transparency in CSI project execution
- Negative impacts from CSI initiatives

##### **5.3.3.1.2 Cases of Grievance**

- Community members reporting unfair distribution of aid during a CSI initiative.
- Allegations of lack of transparency in project execution.

##### **5.3.3.1.3 Steps to Address Grievances**

#### **Step 1: Reporting**

CSI grievances can be reported through:

- Email: Sustainability email or phone line.
- Public Meetings: Community forums or town hall meetings.
- Online Portal: Online grievance portal on the company website.

#### **Step 2: Acknowledgment**

The Sustainability team will acknowledge receipt of the grievance within 5 business days and inform the complainant of the next steps.

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### **Step 3: Initial Assessment**

The Sustainability team will assess the grievance within 10 business days to determine if it requires further investigation or immediate resolution.

### **Step 4: Investigation**

A thorough investigation will be conducted for significant grievances, involving relevant teams within 30 business days.

### **Step 5: Resolution and Communication**

The Sustainability team will communicate the resolution to the complainant within 40 business days, detailing the actions taken and any corrective measures implemented.

### **Step 6: Follow-Up**

The Sustainability team will follow up with the complainant within 1 month to ensure the resolution was effective and gather feedback on the grievance process.

#### **5.3.3.1.4 Points of Contact**

- Sustainability Team
- CSI Program Manager

#### **5.3.3.2 Segment: Affected Parties from Project-Financed Initiatives**

##### **5.3.3.2.1 Causes of Grievance**

- Negative environmental or social impacts in communities from project-financed initiatives
- Disruptions in communities caused by project activities
- Non-compliance with project agreements

##### **5.3.3.2.2 Cases of Grievance**

- Residents affected by environmental damage caused by a project-financed initiative.
- Local businesses disrupted by project activities.

##### **5.3.3.2.3 Steps to Address Grievances**

#### **Step 1: Reporting**

Project-financed grievances can be reported through:

- Email: To the ESRM/ Sustainability Unit.
- Online Portal: Online grievance portal on the company website.



**Step 2: Acknowledgment**

The ESRM/Sustainability Unit will acknowledge receipt of the grievance within 5 business days and inform the complainant of the next steps.

**Step 3: Initial Assessment**

The ESRM/Sustainability Unit will assess the grievance within 10 business days to determine if it requires further investigation or immediate resolution.

**Step 4: Investigation**

For significant grievances, an investigation involving relevant departments and stakeholders will be completed within 30 business days.

**Step 5: Resolution and Communication**

The ESRM/Sustainability Unit will communicate the resolution to the complainant within 40 business days, detailing the actions taken and preventive measures implemented.

**Step 6: Follow-Up**

The ESRM Unit will follow up with the complainant within 1 month to ensure satisfaction with the resolution and gather feedback on the grievance process.

**5.3.3.2.4 Points of Contact**

- ESRM Unit
- Sustainability Team
- Project Manager
- Environmental and Social Risk Department

**6. Information Management**

The Grievance Coordinator is responsible for recording the individual grievance files (evidence trail) in the Grievance Management Tool. This online management system will include both stakeholder engagement and grievance management modules. By having a single tool to manage both stakeholders and grievances, Access Bank can better manage its impact and engagement process across its work areas as well as easily identify problem areas. Grievance Coordinator(s) will provide continuous input into the design and implementation of the grievance management tool. The Grievance Coordinator will be responsible for ensuring the quality of all information recorded in the Grievance Management Tool, including Tier 1 and Tier 2 grievance resolution outcomes. In situations where the grievance files are not complete it is the responsibility of the Grievance Coordinator to follow up with the relevant stakeholders and to capture all required information.

## 7. Stakeholders & Responsibilities

Stakeholder	Roles & Responsibilities
<b>Sponsors (External Party)</b>	<p>These are the equity holders or a special purpose company set up to carry out the project. Their roles include:</p> <ul style="list-style-type: none"> <li>➤ Source for the Project site from the Community, pay the agreed property value, and hold an engagement session with the host community on the benefit(s) of the project, and how the impact will be mitigated.</li> <li>➤ Seek finance the project.</li> <li>➤ Obtain all regulatory approvals for the project before commencement.</li> <li>➤ Provide means of communicating grievance/complaints to the community and other stakeholders.</li> <li>➤ Receive Grievances/Complaints from both the Community and the Bank and calls for Stakeholder Engagement to resolve the issues.</li> </ul>
<b>Host Community (External Party)</b>	<p>These are the group of people who live around the project site and who are directly impacted by the project's development and operations.</p> <p>Their roles include:</p> <ul style="list-style-type: none"> <li>➤ Agree on the provision of the needed area for the Project at an agreed cost.</li> <li>➤ Raise issues of concern with the Sponsors regarding the desired development</li> <li>➤ Appoint representatives to take up the issue on their behalf with the sponsor, local authority and/or financial institution for a peaceful resolution.</li> </ul>
<b>Sustainability Unit (Internal Party)</b>	<p>The Sustainability unit is responsible for ensuring that our customers receive quality service(s) across every touch point in and outside of the Bank.</p> <p>The following shall be the responsibilities of the Sustainability Unit under this Policy:</p> <ul style="list-style-type: none"> <li>➤ Receive complaints/grievances from all stakeholders (suppliers, host community, sponsors, off-takers, etc.)</li> <li>➤ Register the complaint in the Bank's Complaint Register (Grievance Database)</li> <li>➤ Initiate an engagement with the complainant within the month that the complaint(s) are received to discuss all complaints and agree on appropriate resolution.</li> <li>➤ engage the Business Group Head and other internal stakeholders for prompt resolution of cases that cannot be</li> </ul>

	<p>resolved at the level of Sustainability unit.</p> <ul style="list-style-type: none"> <li>➤ The outcome of the resolution shall be communicated within 30 to 60 days to the aggrieved parties for closure, as well as published on the Bank’s website in line with Access Bank’s Disclosure policy.</li> <li>➤ If necessary, recommended compensation shall be processed for management approval, and communicated to the beneficiary complainant appropriately.</li> <li>➤ Present the following reports to the ESG Committee on a quarterly basis:             <ul style="list-style-type: none"> <li>i) Number of complaints received</li> <li>ii) Community(ies)/Person(s) affected</li> <li>iii) Outcome of Investigations</li> <li>iv) Recommendations</li> </ul> </li> </ul>
<p><b>ESG Committee (Internal Party)</b></p>	<ul style="list-style-type: none"> <li>➤ The ESG Committee shall approve the outcome/recommendation presented by Sustainability for dissemination through approved channels.</li> <li>➤ Assign unresolved issue to a panel of specialized team for resolution and reporting to the Committee at its next seating.</li> </ul>

**8. Risk Mitigated by this Policy**

This framework was developed to mitigate against major risks listed hereunder:

**Social Risk:** these are events that may impair a company’s social capital or expose it to adverse consequences stemming from population-based activities and negative public perception.

**Construction Completion Risk:** this is the risk that the project may be delayed beyond the planned duration thereby causing inconvenience to the host community.

**Political & Regulatory Risk:** this is the risk that there will be a change in laws, regulations, and concessions which may cause the project delayed further or discontinued totally.

## 9. Monitoring, Reporting and Reviews

### 9.1 Monitoring and Reporting

Access Bank is committed to preventing the reoccurrence of grievances and monitoring management of grievances and disputes as they occur. Therefore, the Access Bank Grievance Mechanism Policy will be subject to periodic reviews to eliminate systemic problems and to ensure that the resolution process is working efficiently and produces effective outcomes. The overall grievance management performance will be monitored and evaluated against the indicators below.

Commitment	Indicator (the target is 100%)
Efficiency (Timely resolution)	Total number and percentage of grievances received, logged, acknowledged, processed, resolved and closed within set time frame of 30 days (low severity) and 60-90 days (medium and high severity) <ul style="list-style-type: none"> <li>▪ Number and percentage of grievances closed versus open</li> <li>▪ Number and percentage of outstanding non-resolved grievances</li> </ul>
Trends (Qualitative data)	Number and percentage of grievances received per categories <ul style="list-style-type: none"> <li>▪ Number and percentage of grievances received per severity level</li> <li>▪ Number and percentage of grievances resolved versus rejected</li> <li>▪ Number and percentage of grievances per region/location</li> <li>▪ Number and percentage of grievances per receiving organization</li> </ul>
Effectiveness (Awareness, usage, satisfaction of complainants)	Number and percentage of stakeholders satisfied with solution <ul style="list-style-type: none"> <li>▪ Number and percentage of stakeholders satisfied with level and timing of information they received during a grievance process</li> <li>▪ Number and percentage of cases requesting external review or alternative third-party arbitration</li> </ul>
Contentious improvement (Commitment to integrate procedural lessons learned)	Qualitative indicators shall be reported monthly and include root cause analysis, specific case examples and lessons learned.

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**Appendix****A. Contact form to be hosted on the Bank's website**

Name of Aggrieved Person (Optional/Anonymous)	
Email Address	
Phone Number	
Description of Project	
Complaint Details	
Date	



## APPROVAL LOG

Generated for Case Number 70796175

STAKEHOLDER GRIEVANCE MANAGEMENT FRAMEWORK

STAKEHOLDER GRIEVANCE MANAGEMENT FRAMEWORK

APPROVER NAME	DESIGNATION	COMMENT	ROUTING STATUS	DATE APPROVED
JOSEPH OSOGBUE (OSOGBUEJ)	Global Advisory			2024-08-13 08:00:00
VIRGINIE NOWAK (NOWAKV)	Head, Customer Experience Unit (CX)	Approved		2024-08-13 10:00:00
GBENGA ADELEKE (ADELEKEG)	Group Head, Environmental and Social Risk Management	Okay		2024-08-13 11:00:00
PAUL ASIEMO (ASIEMOP)	Group Head, Market Risk, Risk Analytics	Supported		2024-08-14 21:00:00
ROBERT IMOWO (IMOWOR)	Group Head, Corporate Counsel	Recommended		2024-08-19 17:00:00
OMOBOLA FALEYE (FALEYEO)	Chief Audit Executive	okay		2024-08-19 19:00:00
FEMI JAIYEOLA (JAIYEOLAF)	Group Chief Conduct and Compliance	Approved		2024-08-20 10:00:00
GREGORY JOBOME (JOBOMEG)	Executive Director, Risk Management	For the grievance severity		2024-08-20 23:00:00

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TIN-007928790001  
Board of Directors  
Chairman: P. Usoro  
Managing Director/CEO: R Ogbonna  
Deputy Managing Directors: C Okoli  
Directors: I Akpana, A Adekoya, I Osime, O Nwuke, H Usman, O Fajobi, T Osuntoki  
Executive Directors: G Jobome, H Ambursa, O Kumapayi, I Soji-Okusanya

		calibration use the Bank's standard categorisation with worsening severity: Low, Moderate, Above Average and High.	
ROOSEVELT OGBONNA (OGBONNAR)	Group Managing Director	I approve. Gbenga, please discuss.	2024-08-26 20:00:00

### Comments

ROOSEVELT OGBONNA (ogbonnar) I approve. Gbenga, please discuss. (2024-08-26 20:57:24 )

Gregory Jobome (jobomeG) For the grievance severity calibration use the Bank's standard categorisation with worsening severity: Low, Moderate, Above Average and High. (2024-08-20 23:29:02 )

Femi Jaiyeola (jaiyeolaf) Approved (2024-08-20 10:18:26 )

OMOBOLA FALEYE (faleyeo) okay (2024-08-19 19:04:17 )

Robert Imowo (imowor) Recommended (2024-08-19 17:24:22 )

PAUL ASIEMO (asiemop) Supported (2024-08-14 21:36:43 )

GBENGA ADELEKE (adelekeg) Okay (2024-08-13 11:46:15 )

Kyawa Bunu (bunuk) Kindly approve. (2024-08-13 11:34:21 )

GBENGA ADELEKE (adelekeg) This is being returned as requested. Please amend and upload quickly so we can fast track approval to recover the lost period. (2024-08-13 10:58:35 )

Virginie Nowak (Nowakv) Approved (2024-08-13 10:04:00 )

Kyawa Bunu (bunuk) Kindly approve. (2024-08-13 07:01:03 )

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