

Board Paper No : 2025/80/A
Board Meeting No : 84

Date : 21.04.2025



Customer Accessibility Policy

Policy Owner : Compliance Department / Risk Department

Version : Version 1.0

Board Approved Date : 21.04.2025

Table of Contents

- 1 Abbreviations4
- 2 Policy Objective5
- 3 Scope5
- 4 Legal Framework5
- 5 Roles and Responsibilities.....5
 - 5.1 Board of Directors5
 - 5.2 Chief Executive Officer (CEO).....6
 - 5.3 Senior Management (Heads of Departments and Regional Managers)6
 - 5.4 Financial Consumer Protection Officer (Should be a KMP)6
 - 5.5 Branch Managers.....6
 - 5.6 Customer Service and Frontline Staff6
 - 5.7 Compliance and Internal Audit Teams.....7
- 6 Customer Accessibility.....7
 - 6.1 Accessibility of Complaint Channels.....7
 - 6.2 Assistance for Vulnerable Customers.....7
 - 6.3 Complaint Acknowledgment and Tracking.....7
 - 6.4 Resolution Timeline and Escalation8
 - 6.5 Documentation and Confidentiality8
 - 6.6 Analysis and Reporting8
 - 6.7 Awareness and Education.....8
- 7 Complaint Handling and Redress.....8
 - 7.1 Assistance for Vulnerable Customers.....9
 - 7.2 Complaint Acknowledgment and Tracking.....9
 - 7.3 Resolution Timeline and Escalation9
 - 7.4 Documentation and Confidentiality9
 - 7.5 Analysis and Reporting10
 - 7.6 Awareness and Education.....10
- 8 Monitoring, Reporting and Review.....10
 - 8.1 Annual Policy Review.....10

8.2	Quarterly Accessibility Audits	10
8.3	Monthly KPI Tracking and Reporting.....	11
8.4	Customer Feedback and Engagement	11
8.5	Staff Awareness and Training Evaluations	11
8.6	Compliance Reporting to CBSL	11
9	Communication and Awareness	11
9.1	Policy Publication and Visibility.....	11
9.2	Branch-Level Awareness Displays	12
9.3	Customer Orientation and Onboarding	12
9.4	Outreach and Campaigns	12
9.5	Internal Staff Communication	12
9.6	Feedback Integration	12

1 Abbreviations

- CBSL: Central Bank of Sri Lanka
- LCB: LCB Finance PLC
- ERM: Enterprise Risk Management
- KPI: Key Performance Indicator
- WCAG: Web Content Accessibility Guidelines
- CEO: Chief Executive Officer
- SLA: Service Level Agreement
- CRM: Customer Relationship Management
- EOD: End of Day
- TAT: Turnaround Time
- SLFRS: Sri Lanka Financial Reporting Standards
- ECL: Expected Credit Loss
- PD: Probability of Default
- LGD: Loss Given Default
- SPPI: Solely Payments of Principal and Interest
- FVOCI: Fair Value Through Other Comprehensive Income
- FVTPL: Fair Value Through Profit or Loss
- HTC: Hold to Collect
- HTC&S: Hold to Collect and Sell

2 Policy Objective

The primary goal is to provide comprehensive and actionable guidelines for designing and delivering financial products, services, and environments that are accessible and inclusive to every individual. This includes people with physical, sensory, intellectual, or psychosocial disabilities, the elderly, individuals with temporary impairments, and those living in remote or underserved areas. LCB Finance PLC recognizes the right of every customer to fair treatment and aims to eliminate discrimination, ensuring all persons can conduct financial transactions independently, safely, and with dignity.

3 Scope

This policy applies to all internal and external stakeholders of LCB Finance PLC, including but not limited to employees, customers, service providers, and third-party agents. It is applicable across all services provided by the company, including loan disbursement, deposits, digital services, customer support, and outreach programs. Where there is any inconsistency between this policy and CBSL guidelines, the latter shall prevail, and the policy shall be updated accordingly to ensure compliance.

4 Legal Framework

The policy is governed by the following statutory and regulatory guidelines:

- **The Financial Consumer Protection Regulation No. 01 of 2023** issued by the CBSL, which outlines consumer rights, responsibilities, and institutional obligations.
- **The Finance Business Act No. 42 of 2011**, which provides regulatory oversight over non-bank financial institutions in Sri Lanka.
- **The United Nations Convention on the Rights of Persons with Disabilities (CRPD)**, ratified by Sri Lanka, which affirms accessibility as a fundamental human right.
- Any future guidelines or circulars issued by the CBSL concerning financial inclusion and consumer protection.

5 Roles and Responsibilities

To ensure effective implementation and compliance of the Customer Accessibility Policy, clearly defined roles and responsibilities are assigned across different levels of the organization as follows:

5.1 Board of Directors

- Provide overall strategic direction and approval of the Customer Accessibility Policy.
- Integrate accessibility considerations into the institution's governance framework and risk management systems.
- Review periodic reports on accessibility compliance, challenges, and customer feedback.

- Ensure budget allocation for necessary infrastructure upgrades and staff training programs related to accessibility.

5.2 Chief Executive Officer (CEO)

- Lead and promote an organizational culture that prioritizes inclusivity and customer accessibility.
- Oversee the implementation of the policy across all business units.
- Appoint a dedicated Officer to coordinate policy implementation.

5.3 Senior Management (Heads of Departments and Regional Managers)

- Develop and execute accessibility action plans specific to their operational areas.
- Ensure that all services, communications, and branch operations comply with accessibility standards.
- Provide ongoing support to branch managers and staff in fulfilling policy objectives.
- Include accessibility KPIs in departmental performance evaluations.

5.4 Financial Consumer Protection Officer (Should be a KMP)

- Serve as the main point of contact for internal and external accessibility-related issues.
- Coordinate training programs and awareness campaigns across the company.
- Maintain documentation of accessibility initiatives, complaint logs, and audits.
- Liaise with external bodies such as advocacy groups, disability organizations, and the CBSL.

5.5 Branch Managers

- Implement accessibility features at the branch level, such as signage, seating, and customer support practices.
- Ensure frontline staff are trained and equipped to assist customers with special needs.
- Monitor local compliance and report on any barriers or customer concerns to senior management.

5.6 Customer Service and Frontline Staff

- Deliver inclusive, respectful, and effective service to all customers regardless of their accessibility needs.
- Assist customers in navigating facilities, using digital tools, and understanding financial products.
- Escalate any unresolved accessibility issues to the Financial Consumer Protection Officer or branch manager.

5.7 Compliance and Internal Audit Teams

- Conduct periodic reviews and internal audits to evaluate compliance with accessibility standards.
- Identify gaps or areas of improvement and ensure timely corrective actions.
- Report findings and recommendations to senior management and the Board.

6 Customer Accessibility

A key element of financial customer protection is the assurance that all customers, regardless of their abilities or background, have access to a fair, transparent, and accessible complaint resolution mechanism. LCB Finance PLC is committed to addressing all grievances promptly and effectively through a structured complaint handling process.

6.1 Accessibility of Complaint Channels

- Customers can file complaints via multiple avenues:
 - In-person at any branch office.
 - Dedicated hotline available during business hours.
 - Email support through a publicly listed contact.
 - Online complaint forms accessible on the company website.
 - Postal communication addressed to the Head Office.
 - Dedicated WhatsApp number for quick access.
- All branches will prominently display complaint channel information, including formats available for persons with disabilities (e.g., large print notices, audio explanation options).

6.2 Assistance for Vulnerable Customers

- Frontline staff are trained to assist customers who may require help in lodging a complaint, including:
 - Visually impaired or hearing-impaired customers.
 - Elderly individuals.
 - Non-literate or low-literacy customers.
 - Customers with language or cognitive limitations.
- Translation and interpretation assistance will be provided in Sinhala, Tamil, and English.

6.3 Complaint Acknowledgment and Tracking

- Every complaint will be acknowledged in writing (print or digital) within **two (2) working days** of receipt.
- Customers will be issued a **reference number** for tracking their complaint.
- Status updates will be provided upon request via any of the preferred communication channels.

6.4 Resolution Timeline and Escalation

- Complaints will be resolved within **ten (10) working days**, unless exceptional investigation is needed.
- Complex cases will receive an interim response with a revised resolution date.
- If unsatisfied with the response, customers may escalate their complaints through:
 - **Level 1:** Branch Manager
 - **Level 2:** Regional Manager or Head of Department
 - **Level 3:** Financial Consumer Protection Officer or Compliance Officer
 - **Level 4:** Independent Internal Ombudsman
- Unresolved cases may be further referred to the **Financial Ombudsman of Sri Lanka** under CBSL.

6.5 Documentation and Confidentiality

- All complaints and resolutions are documented in a centralized Complaint Management System.
- Customer information and complaint details are treated with strict confidentiality in accordance with data protection regulations.

6.6 Analysis and Reporting

- Complaint data is analyzed monthly to identify trends, root causes, and systemic issues.
- Quarterly reports are reviewed by senior management and presented to the Board.
- Metrics include complaint volumes, resolution timeframes, escalation rates, and satisfaction scores.

6.7 Awareness and Education

- Ongoing campaigns will be conducted to educate customers on their rights and the available complaint resolution processes.
- Educational materials (flyers, posters, digital content) will be made accessible across all branches and online platforms.

7 Complaint Handling and Redress

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8 Monitoring, Reporting and Review

To ensure the effective implementation and continual improvement of the Customer Accessibility Policy, LCB Finance PLC adopts a robust and transparent monitoring and review mechanism in line with the directives issued under the Financial Consumer Protection Framework by the Central Bank of Sri Lanka (CBSL).

8.1 Annual Policy Review

- The Customer Accessibility Policy shall be reviewed **annually** by the Compliance Department in consultation with the Financial Consumer Protection Officer.
- The review will assess:
 - Alignment with the latest CBSL guidelines.
 - Implementation challenges and gaps.
 - Recommendations from audits, staff, and customer feedback.
- Revised policies shall be approved by the Board of Directors and disseminated internally and publicly.

8.2 Quarterly Accessibility Audits

- Internal audit teams will conduct **quarterly audits** of branches, digital platforms, and customer service operations to evaluate accessibility standards.
- Audit scope includes:
 - Physical infrastructure (e.g., ramps, counters, signage).
 - Digital platforms (e.g., website/mobile app accessibility compliance).
 - Staff adherence to inclusive service protocols.
 - Accessibility of complaint handling mechanisms.
- Findings will be reported to the Senior Management Committee and actioned within one month.

8.3 Monthly KPI Tracking and Reporting

- Each branch will submit **monthly accessibility performance indicators (KPIs)** including:
 - Number of accessibility-related complaints.
 - Number of accommodations requested and fulfilled.
 - Staff training completion rates.
 - Percentage of accessible documents issued to customers.
- Consolidated branch reports will be reviewed by the Accessibility Officer and summarized for quarterly Board-level updates.

8.4 Customer Feedback and Engagement

- **Bi-annual customer feedback surveys** (online and in-branch) will capture customer satisfaction related to service accessibility.
- Focus group discussions with customers from vulnerable and differently-abled groups will be held annually to assess inclusivity and service gaps.
- Suggestions from feedback will be prioritized for operational improvements.

8.5 Staff Awareness and Training Evaluations

- Annual evaluations of staff training programs will assess effectiveness, coverage, and knowledge retention.
- Training will be updated as necessary to reflect new CBSL mandates and identified knowledge gaps.

8.6 Compliance Reporting to CBSL

- A **bi-annual compliance report** summarizing policy implementation, audit findings, complaints, and redress outcomes shall be submitted to CBSL.
- Any material breaches or unresolved risks must be reported immediately with an action plan.

9 Communication and Awareness

An effective Customer Accessibility Policy must be supported by a strong communication and awareness strategy to ensure that all stakeholders—especially customers—are informed, engaged, and empowered to use accessible services. LCB Finance PLC is committed to implementing a proactive and inclusive communication framework.

9.1 Policy Publication and Visibility

- The Customer Accessibility Policy shall be:
 - Published on the official website in Sinhala, Tamil, and English.

- Available at all branch premises in printed format, including large print and Braille versions upon request.
- Included in the employee handbook and policy portal for internal staff reference.

9.2 Branch-Level Awareness Displays

- All branches will display:
 - Posters highlighting customer rights and available accessibility services.
 - Clear instructions on how to request support (e.g., sign language interpretation, large print materials).
 - Emergency evacuation plans inclusive of customers with mobility challenges.

9.3 Customer Orientation and Onboarding

- New customers will receive a brief overview of available accessibility features during the onboarding process.
- Account opening forms and key product brochures will include information on how to request accommodations.
- Audio versions of critical documents will be made available for customers with visual impairments.

9.4 Outreach and Campaigns

- Periodic awareness campaigns will be conducted:
 - Through social media, radio, and local newspapers to reach rural and differently-abled communities.
 - During International Day of Persons with Disabilities and other relevant observances.
 - In partnership with disability advocacy groups and NGOs to widen outreach.

9.5 Internal Staff Communication

- Regular internal bulletins and team meetings will reinforce accessibility commitments.
- Special communication toolkits will be circulated before audits, campaigns, or major policy revisions.
- Suggestion boxes and anonymous staff feedback forms will help improve communication processes.

9.6 Feedback Integration

- Customer suggestions and complaints related to communication effectiveness will be monitored monthly.
- Feedback will be used to revise materials, simplify language, and introduce more inclusive visual aids.

RECOMMENDATION

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Head of Compliance

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Chief Risk officer

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CEO / Chief Executive officer