

Reviewed February 2008

## **FIRST BANK**

### **Complaint Procedures**

It is the policy of First Bank to respond to customer complaints, disputes and issues swiftly and to take each complaint seriously. It is not the intention to burden the bank or customers with documentation or paperwork in order to resolve issues brought to the bank's attention in the normal course of business. First Bank promotes a quick, decisive and accurate response to all inquiries, questions and concerns brought to our attention. Not all of these situations are in the form of a written complaint presented to the bank by a customer.

The board of directors delegates the responsibility of monitoring and responding to complaints to the senior management of the bank. The Marketing Director is appointed as the complaint resolution officer (CRO). All written complaints will be directed to the appropriate functional area. The appropriate personnel will draft responses to consumers and/or regulators, and cross copy the CRO. Generally, the CRO will keep a central file of complaints and responses unless stated differently in this document, and the board of directors will review new complaints and responses at a board meeting at least quarterly. Senior management will determine if certain complaints must be brought to the attention of the board more often or if the response to the consumer and/or regulator should come from the board.

If there is any uncertainty as to where to direct a complaint, contact the Marketing Director.

#### **GENERAL PROCEDURES FOR COMPLAINT RESOLUTION**

##### ***Interviewing Institution Personnel***

Institution personnel may be interviewed individually by the functional department manager or designated CRO if they are involved in the consumer's complaint or comment. Explanations of the occurrence can be requested during the interview process, and copies of any written instructions furnished to employees about the allegation will be reviewed and discussed during the interview process.

##### ***Written Report***

The department manager or CRO will write a report, presenting the facts and information in a clear, objective manner. The report should:

- Summarize the facts in a chronological order.
- Detail the precise claims of the complainant.