



FINANCIAL CONSUMER ACCESSIBILITY POLICY

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1. Introduction

This Accessibility Policy (The policy) outlines Asia Asset Finance PLC's (AAFP) commitment to ensuring equal access and opportunity for all individuals, those who require financial services from AAFP. The company is dedicated to creating an inclusive environment that accommodates the needs of all customers, employees, and stakeholders, ensuring they can fully engage with the services and facilities.

2. Scope

This policy applies to all customers, employees, contractors, and third-party service providers of AAFP, ensuring accessibility across all areas of operation. This includes web and mobile application accessibility, physical infrastructure, and accessibility of products and services. To enhance inclusivity, all AAFP branches shall be accessible to people with disabilities, including wheelchair access, and shall ensure that any emergency procedures are available in an accessible format upon request.

In the event of discrepancies between this policy and the Financial Consumer Protection Regulations (FCPR) issued by the Central Bank of Sri Lanka (CBSL), the provisions set forth by CBSL shall take precedence.

3. Legal Framework

This policy is established in accordance with relevant laws and regulations pertaining to accessibility, including,

- I. Financial Consumer Protection Regulations No.01 of 2023
- II. Any other relevant directions issued by the Central Bank of Sri Lanka under the Finance Business Act No. 42 of 2011

4. Roles and Responsibilities

4.1 Senior Management

The head of administration or the head of each department/functions shall be accessibility coordinator for their respective area. Accessibility coordinator is responsible for overseeing and implementing all accessibility measures within their branch, department, or function. This role includes coordinating efforts to ensure compliance with the accessibility policy and addressing any accessibility-related issues that arise.

Facilities Management shall oversee the physical accessibility of AAFP infrastructure, ensuring that building design, signage, and other aspects meet the required accessibility standards. The respective branch manager, regional manager and the department heads shall responsible for address any maintenance or modification needs related to accessibility.

4.2 Compliance Officer/ Key Management Person (KMP)

The Compliance Officer/KMP shall ensure overall adherence to accessibility standards, conduct regular reviews, and handle any accessibility complaints or concerns. The KMP shall share regular updates on relevant laws and regulations to ensure ongoing compliance with accessibility standards.

4.3 IT Department

The IT Department shall ensure that AAFP web and mobile applications comply with accessibility standards, conducting regular audits, and implementing necessary adjustments to maintain compliance.

4.4. Customer Service Officers/ Branch Staff

The Customer Service Officers and/or branch staff shall assist customers with accessibility needs, provide information about available accommodations, and ensure that customer interactions are handled in an accessible and inclusive manner.

5. Customer Accessibility

AAFP is dedicated to ensuring fair and equal access to our financial products and services for all consumers. The policy is designed to address the diverse needs of individuals, regardless of their social status, physical ability, marital status, race, caste, gender, age, religion, or financial literacy subject to the conditions approved by the Board of Directors for the each product.

5.1. Documents, Communication, and Information Accessibility:

AAFP shall ensure that all public documents in communication materials and informational content are available in the financial consumer friendly formats.

5.2. Websites and Mobile Applications Accessibility:

5.2.1. AAFP web and mobile application accessibility shall based on following key guidelines

- a. Inclusion: Ensure that all users, regardless of their abilities, have access to the digital content and services.
- b. Compliance: Adhere to accessibility standards, such as the Web Content Accessibility Guidelines (WCAG) and applicable local accessibility regulations.
- c. Usability: Create an experience that is not only accessible but also user-friendly for individuals with disabilities.
- d. Continuous Improvement: Regularly review and update digital properties to enhance accessibility features.

5.2.2. AAFP digital properties are designed and developed in compliance with the following guidelines:

I. Web Content Accessibility Guidelines (WCAG)

AAFP shall follow WCAG 2.1 Level AA standards as a minimum, ensuring that websites and mobile applications are:

- a. Information and user interface components must be presented in ways that all users can perceive. For example, using text alternatives for non-text content.
- b. Interface elements are designed for easy navigation and interaction, with multiple input methods supported.
- c. Content is clear, concise, and easy to comprehend.
- d. Content is compatible with various assistive technologies, including screen readers, screen magnifiers, and voice recognition software.
- e. Multi language support for website and Apps

II. Accessible Rich Internet Applications (ARIA)

AAFP shall implement ARIA attributes to enhance the accessibility of dynamic content and user interface controls on the websites and mobile applications, ensuring better compatibility with assistive technologies.

III. Mobile Accessibility Guidelines

AAFP shall ensure compliance with the Mobile Accessibility Guidelines from WCAG 2.1 Level AA. This includes:

- a. Responsive design to accommodate various screen sizes.
- b. Support for screen readers and voice control.
- c. Touch target size and spacing designed for users with limited mobility.
- d. Visual and text contrast designed to aid individuals with low vision.

IV. Accessible Content Creation

The Content creators and editors shall train in accessibility practices to ensure that text, images, video, and multimedia content meet accessibility standards. This includes:

- a. Adding alternative text to images.
- b. Captioning videos.
- c. Avoiding jargon or complex language.
- d. Structuring content with proper headings and formatting for easier navigation.

5.3. Infrastructure Accessibility:

AAFP shall ensure that physical facilities, including offices and branches, are accessible to all individuals. For the new branches AAFP shall focused to developed the entrances, ramps, elevators, and other features necessary for individuals with physical disabilities.

6. Implementation and Training

6.1. Staff Training:

AAFP shall provide comprehensive training for staff on how to effectively communicate with and assist customers, particularly those with differing abilities and older individuals. The training can be conduct in the mode of online or physical.

Training shall cover practical strategies for ensuring accessibility and promoting respect and dignity in all interactions.

6.2. Employee Awareness:

Employees shall be informed about the importance of inclusivity and equipped to handle any accessibility-related situations that may arise with customers. The compliance status shall be monitor time-to-time by the KRP and the Internal Audit.

7. Accessible Products /Services and Financial Inclusion

The company shall ensure that all financial products and services designed with accessibility in mind, ensuring that they are usable by individuals with various disabilities. Further a feedback mechanisms shall be in place to gather input from users with disabilities to continually improve accessibility. AAFP shall committed to promoting financial inclusion by offering products and services that meet the needs of diverse populations, including individuals with disabilities.

8. Financial Literacy and Education

AAFP shall provide financial literacy resources and education programs in accessible formats. The hand bill, leaflets, posters, banners and also the web side shall act as the educational instruments.

9. General Requirements

All employees and contractors shall required to comply with this Accessibility Policy and participate in relevant training. Regular reviews and updates to this policy shall be conducted to ensure continued compliance and relevance.

10. Exception Handling and Limitations

AAFP acknowledges that full compliance with accessibility standards may not always be immediately possible due to factors like branch location limitations, outdated infrastructure, or technical constraints. In such cases, the organization has established exception handling protocols, including providing alternative accommodations, such as remote services or nearby accessible locations, until updates can be made. For web and mobile applications, priority shall be given to the most critical accessibility features, with alternatives like phone support or in-branch assistance offered. Physical infrastructure upgrades shall be planned with interim solutions, such as temporary ramps, until full compliance can be achieved. Regular audits shall monitor exceptions, and corrective actions shall be taken as needed. AAFP shall also ensure transparent communication with affected customers, offering timely alternative solutions.