

# Do's and Don'ts for Consumer facing staff Retail Banking Group

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**Introduction**

Abu Dhabi Islamic Bank (“ADIB”, “The Group” or “The Bank”) has developed Do’s and Don’ts guidelines to enable Consumer facing personnel within the Retail Banking Group (RBG) adhere to Consumer Protection Regulations (CPR) and the accompanying Standards, specifically concerning Business and Market Conduct.

This document should be read in conjunction with the Business and Market Conduct Policy of the Bank.

The document encapsulates best practice guidelines for Personnel in Consumer facing roles.

## Do's

1. Sales staff must, with due skill, care and diligence, act at all times with integrity and in a fair, honest and professional manner in their relationship with Consumers. <sup>5.1.1.15</sup>
2. Always identify self to the consumer and inform the consumer you are representing Abu Dhabi Islamic Bank (ADIB); Always correspond in clear and plain language. Authorized Agents must ensure that their representatives disclose and explain to Consumers the relationship between ADIB and the Authorized Agents.
3. When meeting Consumers in person on any location/ premise for carrying out any business, sales staff must ensure that the location/ premise ensures confidentiality of the exchange of personal information and security in carrying out transactions. Always meet consumers in their offices or ADIB premises for application fulfillment or document collection. Be vigilant of the office infrastructure or setup to identify fraudulent companies; <sup>4.1.1.2</sup>
4. Always explain the key terms, product benefits, warnings and risks to the consumer and ensure the product information, product benefits, key features, applicable fees and charges and warnings in the Key Facts Statement are explained to the consumer/s to enable them to choose the financial product or service best suited to their requirements; <sup>5.1.1.68</sup>
5. Always ask the consumers to fill in the forms. Sales staff can fill it (based on request) in their presence. Cross the fields that are blank and not applicable and obtain consumer signatures on completed application forms;
6. Obtain original documents from consumers. Take photocopies (as applicable) of the same, affix 'Original Seen' stamp on the copies and acknowledge with name, staff ID and date;
7. Obtain self-attestation from consumers on all documents submitted as copies;
8. Where photocopies were provided by consumers for processing the application, ensure the copies are meticulously validated against the originals at the time of signing the contracts;
9. Always obtain consumer's documents from the consumer him/herself. Do not collect from third party (other bank's sales officers, dealers, agents etc.);
10. Keep all consumer documents and applications in safe custody; Shred or send documents with consumer data to CCU for archival
11. Adhere to a clean desk policy and shred/dispose any unwanted consumer documents to avoid any potential misuse;
12. Always follow the escalation matrix or hierarchy and use the official channel for any issues or complaints; Provide easy and convenient channels for Consumers to file a Complaint (email address, phone number, fax,etc).
13. Use ADIB emails, resources, or office equipment only for business requirements;



## Don'ts

1. Obtain signatures on blank/partially filled application forms and or/ blank security cheques;
2. Provide inappropriate or misleading information relating to products, services, profit rates, other fees etc.; <sup>5.2.2.1</sup>
3. Send/receive ADIB documents, promotions or solicitation directly to consumers or potential consumer using any of the personal emails or mobile numbers; or social media (such as WhatsApp, Facebook, etc.);
4. Accept documents sighted and affixed as 'Original Seen' by other colleagues;
5. Access consumer data or accounts without genuine business reasons;
6. Share ADIB data or consumer details with third parties (sales officer of other banks);
7. Retain consumer data from previous employers or third parties, other than those that are publicly available information;
8. Leave workstation unlocked whenever away from your desk;
9. Share system or application passwords under any circumstances with anyone;
10. Retain consumer documents in personal custody;
11. Initiate the application data entry on Finnone until such time the application is complete with the full set of documents;
12. Engage in financial transactions (commissions, gifts, borrowing, etc.) with consumers or third parties. Also, do not engage in any form of relationship/partnership which may be construed as a conflict of interest;
13. Misrepresent Conventional Products as Shariah products; <sup>5.1.1.68</sup>
14. Be unreasonably persistent, coerce or place undue pressure on consumers to purchase a Financial Product and/ or Service; <sup>5.1.1.78 and 5.1.1.11</sup>
15. Make repeated solicitation calls to consumers who have previously communicated their disinterest in the Financial Product or Service; <sup>5.1.1.68</sup>
16. Visit the consumer's home or workplace without the permission of the consumer; Visit the Consumer outside the hours of 9 AM to 8 PM; <sup>5.1.1.68</sup>
17. Send direct Advertising and promotional material to Consumers under the age of 18 years. <sup>5.1.1.12</sup>





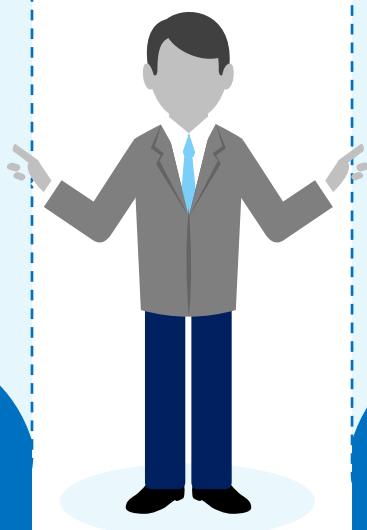
## Do's

- 14. Ensure always deliver/service in the best interest of the consumer at all stages of the relationship. <sup>5.1.1.16</sup>
- 15. Ensure adherence to ADIB policies and procedures and in case of any doubt, ask immediate supervisor.
- 16. Ensure compliance to HR policies, mandatory trainings, code of conduct and all applicable employee guidelines at all times; <sup>5.2.2.1</sup>
- 17. For consumer leads referred through the Leads Management System, always update the consumer feedback and lead status;
- 18. For Campaigns and Promotions, always communicate to the consumers the campaign features, eligibility criteria and timelines; <sup>5.1.1.68</sup>
- 19. Sales staff may communicate with a Consumer using the approved communication methods such as official email, telephone & mobile. <sup>5.2.5.6</sup>
- 20. For consumers who have verbally consented to avail the financial product and or service, always ensure the consumer is sent an official communication from the Bank to confirm acceptance of offer.
- 21. When sales staff engages in bundling of products and/or services with a Credit Product of any kind, ensure the Consumer are provided with the option to refuse the other bundled product(s) and retain the right to obtain the amount of credit based on the original offer from the Licensed Financial Institution. Offering Shari'ah compliant products and/or services must comply with the relevant Shari'ah requirements. Sales staff must disclose, in Writing, and explain the benefits of accepting a bundled product. As an exception, where credit insurance/takaful is a requirement of a proposed Credit Product, the Consumer must be informed in writing that the Consumer may obtain the insurance/takaful from regulated companies proposed by the Licensed Financial Institution. <sup>7.1.3.7</sup>
- 22. Ensure disclosure of the costs of the insurance/takaful product in Writing to the Consumer and inform the Consumer that the Consumer has the right to choose another insurance/takaful provider from minimum choice of three insurance/takaful providers approved by the Bank. <sup>2.1.3.15</sup>
- 23. Sales staff must provide Complaint process and procedures to new Consumers with contact information including an email address and phone number for Consumers to file a Complaint. The email address and phone number must also be printed on all receipts handed over to Consumer. <sup>8.1.1.4</sup>
- 24. Discuss or share information only with customer or authorized representatives ensuring proper verification.
- 25. Always assist vulnerable consumers, people of determination and any other disadvantaged groups.
- 26. Report suspected or reported fraud to the Central Incident Reporting mail group ([CIR@adib.com](mailto:CIR@adib.com)) and refer to the Fraud Risk Management for further guidance;
- 27. Always keep consumer signed documents in bank assigned custody, in a safe and secured manner. Shred unwanted documents or send documents with consumer data to CCU for archival.



## Don'ts

- 18. Exploit the consumers' limited or lack of knowledge of the Financial Product and or Service and or proposed transaction (financial and non-financial); <sup>5.1.1.68</sup>
- 19. Falsely state that the offer regarding Financial Products and or Services includes any promotional gifts, incentives, bonuses is only available for a limited time or is in limited supply to force an immediate decision where there are no such limitations; <sup>5.1.1.68</sup>
- 20. Make false promises or offer incentives to a consumer when applying for the Financial Product and or Service which cannot be fulfilled by the Bank; <sup>5.1.1.68</sup>
- 21. Offer, give, solicit or accept any personal gifts or rewards (monetary or otherwise) from consumers at all times. <sup>5.2.3.5</sup>
- 22. Coerce consumer to switch the relationship if he/she is already in touch with another staff or channel for applying for the financial product or service. <sup>5.1.1.78 and 5.1.1.11</sup>
- 23. Misuse information obtained in the course of working and manage these information following the Group's "needs to always know" principle and respect information barriers and duties of confidentiality in line with ADIB's information security policies.
- 24. Use your association with the group to advance their personal interests, act in any way that could harm the ADIB's reputation or use their positions to provide preferential help to anyone seeking to do business or employment with ADIB.
- 25. Discuss confidential information/conduct meetings with consumers in public places, including hallways, elevators, taxis, airplanes, subways, trains and restaurants.
- 26. Fail to comply with regulations, such as policy churning, that can lead to disciplinary actions.
- 27. Indulge in any form of discrimination, abuse, harm consumers regardless of family status, gender, minority group status, race or age.
- 28. Deliberately withhold or conceal the existence of reasonable alternative Financial Products and/or Services that may be appropriate to the Consumer including those with lower costs, financing rates and Fees.



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**Appendix**

## Appendix- CPR Regulations and Standards

Regulation Name	Regulation reference	Article	Regulation Article/ para number	Article Number	Regulation text The exact text from the regulatory document as-is for the corresponding article/paragraph
Consumer Protection Regulation	CBUAE/BSD/N/2021/444	Article 3: Institutional Oversight	3.2.2. Description	3.2.2.5	Licensed Financial Institutions must have and be able to demonstrate a corporate culture of Consumer service, fairness, transparency, ethical business conduct and effective disclosure.
Consumer Protection Regulation	CBUAE/BSD/N/2021/444	Article 5: Business Conduct	5.1.2. Description	5.1.2.5	Licensed Financial Institutions must ensure that the staff who directly interact with Consumers will: a. Competently, efficiently and professionally discharge their duties and provide prospective and existing Consumers with the information and services they are entrusted to provide or sell. b. Have sufficient knowledge of products and/or services required to help and educate Consumers. c. Have the professional qualifications at all times necessary to provide advice and carry out transactions.
Consumer Protection Regulation	CBUAE/BSD/N/2021/444	Article 5: Business Conduct	5.2.2. Description	5.2.2.1	All Consumers must be treated equitably, honestly and fairly at all stages of their relationship with Licensed Financial Institutions. Treating Consumers fairly must be an integral part of the good governance, business conduct and corporate culture of all Licensed Financial Institutions.
Consumer Protection Standards	NA	Article 2: Disclosure and Transparency	2.1 Disclosure 2.1.3.. General provisions for Credit/Financing products At the Point of Entering the Contract	2.1.3.15	Where insurance/takaful coverage is a mandatory component of the Credit/Financing Product and/or Service, the Licensed Financial Institutions must disclose the purpose of the insurance/takaful. The Licensed Financial Institution must disclose the costs of the Licensed Financial Institution's insurance/takaful product in Writing to the Consumer and inform the Consumer that the Consumer has the right to choose an insurance/takaful provider from minimum choice of 3 insurance/takaful providers approved by the Licensed Financial Institution. The Consumer should inform the Licensed Financial Institution of the choice of insurance/takaful provider within a reasonable period of time. If the Consumer does not inform Licensed Financial Institutions of the choice of a provider, the Licensed Financial Institution has the right to choose an insurance/takaful provider from the approved insurance/takaful providers presented to the Consumer. The Licensed Financial Institution must also disclose to the Consumer if the insurance/takaful provider belongs to the same group of institutions as the Licensed Financial Institution.
Consumer Protection Standards	NA	Article 4: Market Conduct	4.1 Responsible Market Conduct 4.1.1 General Provisions for Responsible Market Conduct Appropriate location for carrying out Business	4.1.1.2	When meeting Consumers in person on any location/premise for carrying out any business, the Licensed Financial Institution must ensure that the location/premise provides an appropriate physical space and environment that ensures confidentiality of the exchange of personal information and security in carrying out transactions.



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Regulation Name	Regulation reference	Article	Regulation Article/ para number	Article Number	Regulation text The exact text from the regulatory document as-is for the corresponding article/paragraph
Consumer Protection Standards	NA	Article 5: Business Conduct	5.1 Responsible Business Conduct 5.1.1 General Provisions for Promoting Competition General Requirements -	5.1.1.11	Licensed Financial Institutions must conduct themselves in a professional manner at all times when dealing with Consumers. They must not be unreasonably persistent or place Undue Pressure on Consumers to purchase any Financial Product and/or Service.
Consumer Protection Standards	NA	Article 5: Business Conduct	5.1 Responsible Business Conduct 5.1.1 General Provisions for Promoting Competition General Requirements -	5.1.1.12 5.1.1.15	Licensed Financial Institutions must not send direct Advertising and promotional material to Consumers under the age of 18 years. Licensed Financial Institutions must, with due skill, care and diligence, act at all times with integrity and in a fair, honest and professional manner in their relationship with Consumers.
Consumer Protection Standards	NA	Article 5: Business Conduct	5.1 Responsible Business Conduct 5.1.1 General Provisions for Promoting Competition General Requirements -	5.1.1.16	Acting in the best interest of Consumers starts from the beginning of any relationship with the Consumer and continues for as long as the Consumer remains with the Licensed Financial Institution. It includes assessing the Consumers' financial needs, current and future financial situation, financial dependencies, attitude towards incurring risk and the Consumers' level of literacy and understanding of the Financial Product and/or Service being requested or offered.
Consumer Protection Standards	NA	Article 5: Business Conduct	5.1 Responsible Business Conduct 5.1.1 General Provisions for Promoting Competition Sales, Marketing, Advertising and Financial Promotional Activities	5.1.1.68	Licensed Financial Institutions must not engage in Marketing and / or sales conduct that is misleading or deceptive. The following actions fall within the prohibitive practices: a. Making repeated solicitations through any channel of communications to promote Financial Products and/or Services to Consumers who have previously opted out of these communications and/or communicated their disinterest in the Financial Product and/or Service; b. Conducting one or more personal visits to the Consumer's home or workplace without the Consumer's permission; c. Exploiting a Consumer's lack of knowledge, apathy or ability to understand the Financial Product and /or Service or the proposed transactions; d. Falsely stating that the offer regarding Financial Products and/or Services that includes any promotional gifts, incentives, bonuses is only available for a limited time or is in limited supply, to elicit an immediate decision, when in fact there is no such limitation; e. Misrepresenting conventional products as being Shari'ah-compliant funds or products; f. Omitting material facts that are relevant for the Consumer to make an informed decision, including the use of small print to obscure such facts; and g. Soliciting Consumers with incentives or attractive promises, for example Financial Promotions or gifts, when the Licensed Financial Institution is aware that it is not able to reasonably fulfil the demand for such promises.



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Consumer Protection Standards	NA	Article 5: Business Conduct	5.1 Responsible Business Conduct 5.1.1 General Provisions for Promoting Competition Bundling of Financial Products and/or Services	5.1.1.78	Licensed Financial Institutions must not apply Undue Pressure or coerce Consumers into obtaining a Financial Product and/or Service from them or anyone else as a condition for obtaining another Financial Product and/or Service from them.
Consumer Protection Standards	NA	Article 5: Business Conduct	5.1 Responsible Business Conduct 5.1.2 General Provisions for Deposit Products Current and Saving Accounts	5.1.2.5	Debit Cards Licensed Financial Institutions can issue debit cards in a secure manner that are linked to any type of accounts. They may charge approved Fees for issuance of new cards, replacement of lost cards or renewal of expired cards. However, they must disclose these Fees in the manner specified in Article 2: Disclosure and Transparency.
Consumer Protection Standards	NA	Article 5: Business Conduct	5.2 Fair Treatment of Consumers 5.2.2 General Provisions for Fair Treatment of Consumers General Requirements	5.2.2.1	General Provisions for Fair Treatment of Consumers The Board of Licensed Financial Institutions, must establish a control framework that articulates and demonstrates clearly its values and culture with respect to treating the Consumer fairly, such as: a. Good ethics, values and transparency in promoting and selling Financial Products and/or Services to Consumers; b. Positive Consumers relations, Complaint management and Complaint resolution; c. Assisting People of Determination; d. Equal, Fair treatment of all Consumers; e. Confidentiality and safeguarding of Consumers' information and assets; f. Addressing conflicts of interest; g. Service performance standards that provide timely delivery of Financial Products and/or Services; and h. Identifying and addressing Errors including systemic and administrative Errors expeditiously.
Consumer Protection Standards	NA	Article 5: Business Conduct	5.2 Fair Treatment of Consumers 5.2.5 Debt Collection Practice Communication with the consumers	5.2.5.6	a. A Licensed Financial Institution may communicate with a Consumer or his/her guarantor using the following approved methods: i. E-mail; ii. Registered mail; iii. Courier; iv. SMS messages; v. Phone calls; or vi. Such other method as consented to by the Consumer.

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Consumer Protection Standards	NA	Article 7 : Responsible Financing Practice	7.1 Responsible Financing 7.1.3 Consumer Assessment for Suitability	7.1.3.7	If a Licensed Financial Institution engages in bundling of products and/or services with a Credit Product of any kind, it must provide the Consumer with the option to refuse the other bundled product(s) and retain the right to obtain the amount of credit based on the original offer from the Licensed Financial Institution. Offering Shari’ah compliant products and/or services must comply with the relevant Shari’ah requirements. The Licensed Financial Institution must disclose, in Writing, and explain the benefits of accepting a bundled product. As an exception, where credit insurance/takaful is a requirement of a proposed Credit Product, the Consumer must be informed in Writing that the Consumer must obtain the insurance/takaful from regulated companies proposed by the Licensed Financial Institution.
Consumer Protection Standards	NA	Article 8 : Complaint Management and Complaint Resolution	8.1 Complaint Management and Complaint Resolution 8.1.1 Complaints Management Function	8.1.1.4	The Complaint Management function must ensure: a. The Licensed Financial Institution’s written Complaint process and procedures are publicly available in branches and given to new Consumers with contact information including an email address and phone number for Consumers to file a Complaint. The email address and phone number must also be printed on all receipts handed over to Consumer, be present on the Licensed Financial Institution’s website and be displayed at a prominent location in the Licensed Financial Institution’s premises; b. Easy and convenient access for Consumers to file a Complaint; c. Proper processes for the registration all the Complaints received from the various channels, the classification and tracking of Complaints and the monitoring of TAT; d. Acknowledgement of the Complaints with a unique service request (SR) number. The SR number shall be used for tracking and escalating the Complaints; e. A written response is provided to the Consumer on the decision of the Licensed Financial Institution regarding the Complaint and include full and complete reasons for the decision, subject to lawful obligations; f. The Consumer is informed in Writing if there is a violation of the TAT for issuing a final decision and provide the reasons; g. The timed performance standards of the Licensed Financial Institution’s Complaint process are monitored and reported quarterly on the adequacy of the actual performance to Senior Management; h. Potential breaches of the law are reported to the Licensed Financial Institution’s Compliance function without delay; and i. The tracking and analysis of Complaint trends and issues and reporting to Senior Management on a monthly basis.





# Thank you

## Disclaimer

*This document is prepared based on the current CPR obligations. As and when there are changes to the processes, controls and regulatory environment, the respective BORMs in consultation with wider stakeholders must keep this document up to date.*