

Financial Customer Accessibility Policy

Compliance Department

SOFTLOGIC FINANCE PLC

2024

Version 1

FINANCIAL CUSTOMER ACCESSIBILITY POLICY/2024/1.0

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1. Introduction

Softlogic Finance PLC (SF PLC) is committed to providing an accessible financing environment to its stakeholders and maintains zero tolerance for discrimination. This policy communicates the steps that our company engages to ensure that our organization is accessible to everyone, as well as our commitment to guaranteeing accessibility.

The Finance Company recognizes the necessity of improving accessibility to financing services for financial customer (FC) with special needs. Such measures will ensure that the digital and physical facilities offered by the financial service providers are designed to accommodate customers with disabilities. This commitment extends to individuals, regardless of their social status, physical ability, marital status, race, caste, gender, age, religion, or financial literacy.

Financial Customer Accessibility Policy helps finance companies meet legal requirements and builds a positive reputation by demonstrating a commitment to customer-centric service and inclusivity. This approach enhances customer satisfaction, loyalty, and overall engagement with the financial services offered.

2. Definitions

- "Accessibility" means providing equal and fair access to all financial services provided by the SF PLC
- "Central Bank/CBSL" means the Central Bank of Sri Lanka established under Monetary Law Act, No. 58 of 1949 (Chapter 422).
- "Financial Customer/Consumer" means a person or entity or legal body or where the context so permits a legal representative of such customer that uses, has used or potential user of any financial product or service provided by the financial Service Providers.
- "Financial Service Providers" means Licensed Commercial Banks, Licensed Specialised Banks, Licensed Finance Companies, Specialized Leasing Companies, Authorized Primary Dealers, Authorized Money Brokers, Licensed Microfinance Institutions, Participants of Payments and Settlement Systems or any other type of Financial Service Providers approved by the Monetary Board.

3. Scope

This policy applies to all employees of Softlogic Finance PLC as well as customers, suppliers, shareholders, consultants, or any other parties that have business relationships with the company, keeping in line with the aforementioned Financial Customer Protection Regulation No 01 of 2023 (FCPR) under the extraordinary gazette No 2344/17 dated 09th August 2023 and Section 10(c) of the Monetary Law Act, No. 58 of 1949.

4. Related Policies

This Policy should be read with the other policies, key documents and guidelines of the Finance Company listed below.

- i. Sexual Harassment Policy
- ii. Complaint Handling Policy
- iii. Information Security Policies and Procedures

5. Roles and Responsibilities

- The Management is responsible for formulating the Customer accessibility policy of the company which should be approved by the Board.
- Key Management Personnel who are overseeing the financial customer protection functions, The Branch Managers, Customer Service In charge officers, or the Head of the department/units will be designated as the Accessibility coordinator of the region/department/functions.
- The coordinator will be responsible for coordinating on all accessibility measures at the branch / department/units under his / her purview.

6. Documents, Communication and Information Accessibility

- It is imperative that SFPLC shall allow equal and fair accessibility to its financial products, services, information, and facilities that are inclusive of people with a range of requirements, regardless of their social standing, physical capabilities, marital status, gender, age, race, caste, religion, or level of financial literacy.
- The SFPLC shall provide special attention to financial customers such as elderly, physically disabled, low income and low financial literate to ensure fair access to all SF PLC financial products and services.
- SF PLC shall ensure that financial customer is provided with necessary documents, Terms and Conditions, adequate information for them to take decisions on the products and services offered.
- The SF PLC grants permission to the financial customer to have assistance from a person who has been authorised by the financial customer by way of a letter of authority, a power of attorney or a board resolution.
- The SFPLC ensure that the signature of the financial customer including electronic means of signature is unambiguous and acceptable for verification purposes. Thumbprint shall be treated equally to the conventional signature.
- Customers have the right to privacy regarding their disabilities and special needs, and information pertaining to their disabilities and requirements may not be used for any reason other than serving their needs or defending their rights.
- The information provided by SF PLC shall be in plain and comprehensible language in Sinhala, Tamil or English, as preferred by the FC.

- The SF PLC shall ensure implementation/maintenance of multiple channels for communication for information and complaint handling.
- The company shall formulate plans with timelines to facilitate/improve financial experience for FCs with visual impairment.
- Make sure staff members understand the value of inclusion and are prepared to deal
 with any issues that may come up with clients who have accessibility-related
 questions. To achieve compliance on the accessibility policy, SFPLC must ensure that
 staff members are knowledgeable about the laws and rules pertaining to accessibility.
- Creating an environment where everyone is accepted, valued, and allowed to engage completely is what it means to be inclusive. It's critical to keep in mind to treat clients with dignity and respect, regardless of their physical limitations.
- SFPLC shall facilitate customer communications via a general hot line number and an in-house call centre.
- All the locations including head office should have a general contact number fixed.
- SFPLC shall ensure a customer service officer is assigned at each customer contact
 point to minimize the customer waiting time, to direct the customer requirements to
 relevant officers.
- All customer contacting points should adequately be cover by CCTV to be compliance with the related central bank directives.

7. Web Accessibility

We prioritize financial customer experience, ensuring our website is navigable and usable by individuals with varying abilities.

- Font size, colour and colour contrast adjustability.
- Full navigability and ability to function with the keyboard.
- Full readability with screen readers.
- All web elements shall be appropriately label or alternative text shall be used.
- All security, protection or safety features shall be provided in text.
- Adequate time shall be provided to perform all functions.

8. Mobile Applications Accessibility

Our digital platforms are designed with inclusivity in mind on accessibility shall include but not limited to:

- Font size, colour and colour contrast adjustability.
- Full navigability and ability to function with the keyboard.
- Full readability with screen readers.
- All web elements shall be appropriately label or alternative text shall be used.
- All security, protection or safety features shall be provided in text.
- Adequate time shall be provided to perform all functions.

9. Infrastructure Accessibility

The company shall comply with general laws regarding accessibility, such as facilitating differently abled and elderly financial customers, when constructing new buildings or renting.

- The company shall ensure that entrances to buildings have an adequate accessible pathways, stairs and ramps/slopes to accommodate individuals with different needs.
- The company shall ensure that pathways leading to branch entrances are free of obstacles, ensuring a clear and safe route for everyone.
- The company need to encourage choose door hardware that is easy to grasp and operate, accommodating individuals with various motor abilities.
- Install clear and visible signage (Name Board) indicating and supporting the customers to easily accessible to the branch/location premises and required service.
- All the locations including head office where SFPLC operations occur which might require customers to visit for any reason need to display the name board of the company and a clear direction on the access (e.g., Guide to the floor if a common building).
- Adequate lighting is essential for safety and navigation. Ensure that entrances are well-lit to assist individuals with visual impairments.
- Accessible entrances should be located in close proximity to accessible parking spaces, allowing for convenient and barrier-free access.

10. Financial Literacy and Education

SFPLC promotes financial literacy in many ways and one of the main methods is designing and promoting financial products that enable the customers to gain financial literacy and education. During the product promotions, SFPLC conducts awareness raising sessions on financial literacy.

11. Public Availability

Our accessibility policy, in its entirety, will be made readily available to the general public. We understand the importance of disseminating this information in accessible formats, ensuring that stakeholders can be well-informed about our dedication to accessibility.

12. General Requirements

SFPLC shall regularly review and update company policies and practices to ensure that they are in compliance with applicable accessibility laws and standards.

SFPLC shall encourage feedback from individuals from different diverse groups and take their suggestions and concerns into account when making decisions about accessibility.

SFPLC shall not issue any policies or circulars which may encourage discrimination or inaccessibility.

13. Reviewing and Reporting

This Policy will be reviewed when there is a significant change to the policy or when there is a change in the regulatory environment by the Compliance Department.

The report shall be presented by the Compliance Department to the Board Integrated Risk Management Committee for review in accordance with the requirements of the Softlogic Finance PLC.

Internal Audit will report any deviations to the above approved policy to BAC, as monitoring mechanism, as part of their periodic compliance audit at minimum.