PECCI

MULTIPURPOSE COOPERATIVE

Financial Consumer Protection Assistance Management System (FCPAMS)

Manual of Consumer Assistance Policies and Procedures

(Based on CDA Memorandum Circulars No. 2025-08 and 2026-01)

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I. CDARE'S PROFILE

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II. INTRODUCTION

This Manual establishes the Financial Consumer Protection Framework of **PECCI Multipurpose Cooperative (PECCI).** It provides a comprehensive, structured, and institutionalized approach to ensuring the protection of financial consumers across all stages of the delivery of financial products and services.

This Manual is anchored on the provisions of Republic Act No. 11765, otherwise known as the Financial Products and Services Consumer Protection Act (FCPA), and its Implementing Rules and Regulations under CDA Memorandum Circular (MC) No. 2023-14, as well as the Guidelines on the Establishment of the Financial Consumer Protection Assistance Management System (FCPAMS) by the CDA Regulated Entities (CDARES) under CDA MC No. 2025-08. It likewise aligns with other applicable consumer protection laws, rules, and regulations.

Consistent with these issuances, this Manual ensures that financial consumers are afforded their fundamental rights, including the right to fair and equitable treatment, disclosure and transparency, protection against fraud and misuse, privacy and protection of personal data, and timely handling and redress of complaints.

Furthermore, this Manual reinforces the accountability of the Board of Directors and Senior Management in embedding a culture of consumer protection within the CDARE, supported by appropriate governance structures, internal controls, and risk management systems.

It also institutionalizes the FCPAMS as the first-level recourse mechanism for financial consumers, providing accessible, affordable, independent, fair, accountable, timely, and efficient channels for resolving consumer concerns.

Ultimately, this Manual aims to promote responsible market conduct, enhance consumer trust and confidence, and contribute to the stability, integrity, and inclusive growth of the CDARE financial system.

III. LEGAL BASES

This Manual is adopted and implemented pursuant to the following laws, rules, and regulations governing financial consumer protection and the operations of CDARE offering financial products and services:

1. Republic Act No. 9520, otherwise known as the Philippine Cooperative Code of 2008, which provides the legal framework for the organization, regulation, and supervision of CDAREs in the Philippines;
2. Republic Act No. 11364, otherwise known as the Cooperative Development Authority Charter of 2019, which strengthens the regulatory and developmental powers of the Cooperative Development Authority over CDAREs;
3. Republic Act No. 11765, otherwise known as the Financial Products and Services Consumer Protection Act (FCPA), which establishes the rights of financial consumers and mandates financial service providers to uphold fair, transparent, and responsible market conduct;
4. CDA Memorandum Circular No. 2023-14, or the Implementing Rules and Regulations of Republic Act No. 11765 for CDA-Regulated Entities;
5. CDA Memorandum Circular No. 2025-08, or the Guidelines on the Establishment of the Financial Consumer Protection Assistance Management System (FCPAMS) by the CDA-Regulated Entities (CDAREs); and
6. Other relevant laws, rules, regulations, and issuances of the Cooperative Development Authority (CDA) and other competent regulatory bodies that may be applicable to financial consumer protection and CDARE operations.

IV. OBJECTIVES

PECCI’s FCPAMS aims to:

1. Ensure that financial products, services, policies, and operational processes of PECCI comply with applicable financial consumer protection laws, regulations, and standards, particularly those prescribed under Republic Act No. 11765 and relevant issuances of the Cooperative Development Authority;
2. Institutionalize consumer protection principles within the governance, management, and operational culture of PECCI, ensuring that the rights and welfare of financial consumers are consistently upheld in all dealings and transactions;
3. Establish a clear and effective framework for the implementation of the FCPAMS to facilitate the proper receiving, recording, evaluation, resolution, monitoring, and reporting of financial consumer complaints, inquiries, and requests; and
4. Promote fair, transparent, and responsible market conduct in the design, marketing, and delivery of financial products and services offered by PECCI.

V. SCOPE AND COVERAGE

This Manual shall apply to all financial products, services, operations, and activities of PECCI that involve financial consumers. Specifically, it shall cover the following:

1. All officers, employees, committees, and authorized third party agents or representatives of the CDARE who are involved in the development, approval, marketing, delivery, administration, and monitoring of financial products and services;
2. All financial products and services offered or marketed by the CDARE, including but not limited to:
   a. Loans and other credit facilities;
   b. Savings and deposit products;
3. All financial consumer transactions and interactions with PECCI, whether conducted through physical channels or digital platforms, including but not limited to branch transactions, electronic communications, online services, mobile applications, and other digital service delivery channels; and
4. All processes and activities related to consumer protection, including product design and delivery, marketing and disclosure practices, consumer assistance and complaint handling, consumer protection risk management, and monitoring and reporting mechanisms.

VI. DEFINITION OF TERMS

For purposes of clarity and consistent interpretation in the implementation of this Manual, the following terms are defined as follows:

1. **Board of Directors** refers to the body entrusted with the management of the affairs of PECCI under its Articles of Cooperation and Bylaws.

2. **Bundling of Products** refers to the act of offering two or more financial products or services together as a single package or in combination, where the consumer may obtain them jointly as part of one transaction or arrangement.

3. **CDA-Regulated Entities (CDAREs)** refer to cooperatives registered, regulated, and/or supervised by the Authority, as provided under existing laws, rules, and regulations, which offer or market financial products and/or services, excluding insurance cooperatives and cooperative banks.

4. **Complex Complaint/Request** refers to a concern that requires thorough investigation, legal review, or multi-level coordination with internal units or external institutions. Complaints may involve legal, financial, or technical concerns that take longer to resolve.

5. **Consumer Assistance Team (CAT)** refers to a group implementing the FCPAMS. The CAT serves as the primary point of contact between PECCI and financial consumer regarding financial products and services-related concerns.

6. **Cooling-off** refers to the policy or agreement that allows a financial consumer to consider the costs and risks of a financial product or service, free from the pressure to avail products or services and to cancel the agreement without penalty of any kind.

7. **Data Breach** refers to a security incident leading to unauthorized access, disclosure, or loss of personal data.

8. **Financial consumer** refers to a person or entity, or their duly appointed representative, who is a purchaser, lessee, recipient, or prospective purchaser, lessee or recipient of financial products or services. It shall also refer to any person, natural or juridical, who had or has a current or prospective financial transaction with PECCI.

9. **Financial Consumer Protection Assistance Management System (FCPAMS)** is a first-level recourse mechanism for financial consumers who are dissatisfied with a financial product and/or service. It is aimed at providing free assistance to financial consumers on their concerns with the financial products, services, and/or transactions with PECCI and/or their third-party service providers.

10. **Financial product or service** refers to financial products or services which are offered, developed, and/or marketed by PECCI which may include, but are not limited to credit, savings, investment, and other similar products and services. This also includes digital financial products or services which pertain to the broad range of financial services accessed and delivered through digital channels.

11. **Fraud** refers to any intentional act or omission designed to deceive, mislead, or gain an unauthorized benefit, including falsification, misrepresentation, identity theft, and misuse of funds.

12. **Inquiry** refers to a financial consumer's formal appeal for assistance or action regarding financial products, services, or transactions with PECCI. Inquiries may include, among others, understanding financial products and services offered by PECCI, clarifications on fees, charges, terms, and conditions, and information on consumer rights and protection measures.

13. **Marketing** refers to the act of communicating, offering, promoting, advertising, or delivering of financial products or services by financial service providers.

14. **Personal information** refers to any information whether recorded in a material form or not, from which the identity of an individual is apparent or can be reasonably and directly ascertained by the entity holding the information, or when put together with other information would directly and certainly identify an individual. (as defined under RA 10173).

15. **Request** refers to a financial consumer's formal appeal for assistance or action regarding financial products, services, or transactions with PECCI. Requests may involve, among others, guidance on procedures for transactions, complaints, or dispute resolution, documents issuance or retrieval, account-related adjustments, modifications or corrections, such as updating personal information or revising loan terms, reversal or refund requests for erroneous transactions, and reconsideration of a financial decision made by PECCI.

16. **Responsible Pricing** refers to the pricing, terms, and conditions of financial products and/or services that are set in a way that is transparent, affordable to clients, and sustainable for PECCI.

17. **Senior Management** refers to the management involved in the financial and/or credit operations of the cooperative, such as General Manager, Assistant General Manager, or its equivalent.

18. **Sensitive personal information** refers to personal information: a) About an individual's race, ethnic origin, marital status, age, color, and religious, philosophical or political affiliations; b) About an individual's health, education, genetic or sexual life of a person, or to any proceeding for any offense

committed or alleged to have been committed by such person, the disposal of such proceedings, or the sentence of any court in such proceedings; c) Issued by government agencies peculiar to an individual which includes, but not limited to, social security numbers, previous or current health records, licenses or its denials, suspension or revocation, and tax returns; and d) (4) Specifically established by an executive order or an act of Congress to be kept classified.

19. **Simple Complaint/Request** refers to a straightforward concern that can be easily resolved without requiring in-depth investigation, coordination with external parties, or extensive review of documents. Complaints typically involve minor service lapses or basic product-related inquiries that do not require escalation or technical investigation.

VII. GOVERNANCE AND OVERSIGHT

Sound governance and effective leadership are essential to ensure and uphold the rights and welfare of financial consumers in the delivery of financial products and services. In this regard, the Board of Directors and Senior Management shall ensure that consumer protection principles are integrated into the governance framework, strategic direction, risk management systems, and operational practices. They shall promote a culture of fairness, transparency, professionalism, and responsible market conduct in all dealings with financial consumers, while ensuring that appropriate policies, controls, and mechanisms are in place to safeguard consumer rights, address consumer concerns effectively, and maintain trust and confidence in the financial products and services.

A. Role of the Board of Directors

The Board of Directors shall be primarily responsible for establishing, reviewing, approving, and overseeing the implementation of the financial consumer protection framework and related policies. In this regard, the Board shall perform the following functions, among others:

1. Approve the FCPAMS under Rule IV;
2. Review and approve the Code of Conduct to ensure that it promotes fair, ethical, and responsible treatment of financial consumers;
3. Ensure that relevant information regarding the implementation of the FCPAMS and the compliance with the FCPA, other consumer protection laws, rules and regulations, and market conduct guidelines issued by the CDA are regularly reported to the Board, including actions taken to address consumer protection issues;
4. Ensure the adequate provision of resources and the effective implementation of training and competency development programs for officers and personnel involved in the delivery of financial products and services;
5. Approve remuneration and compensation structures that encourage responsible business conduct, promote fair treatment of financial consumers, and mitigate potential conflicts of interest; and
6. Periodically review the implementation and effectiveness of the FCPAMS, including how consumer-related findings are reported and whether internal audit and oversight mechanisms provide adequate supervision in relation to the business model and operating environment.

B. Role of Senior Management

Senior Management shall be responsible for ensuring that practices, operations, and business activities are aligned with the approved financial consumer protection policies and procedures. They shall perform the following functions, among others:

1. Ensure that approved FCPAMS and other FCPA-related policies and procedures are clearly documented, properly understood, and appropriately implemented across all levels and departments;
2. Establish an effective monitoring and management information system to regularly measure, aggregate, and analyze consumer-related issues to determine the level of consumer protection risks. The management information system should be able to:
   a. Provide adequate information on the performance and quality of the FCPAMS that allows for the identification of emerging consumer issues and root cause analysis;
   b. Determine the level of consumer protection risk exposure;
   c. Identify and monitor, in a timely manner, consumer protection risks that may result in financial loss to consumers, legal and reputational risks, and other related risks; and
   d. Identify and assess emerging or increasing consumer risks that affect the consumers through social media monitoring, market monitoring, and other relevant means.
3. Ascertain that weaknesses in the consumer protection practices or consumer protection emerging risks are addressed and corrective actions are taken in a timely manner;
4. Make available a wide range of accessible channels in which consumers can conveniently lodge their complaints, inquiries, and requests; and
5. Ensure observance of expectations and requirements prescribed under relevant regulations on compliance and internal audit.

VIII. FINANCIAL CONSUMER PROTECTION STANDARDS OF CONDUCT

A. FAIR AND EQUITABLE TREATMENT OF FINANCIAL CONSUMERS

1. General Policy

a. Policy Statement

All financial consumers are treated fairly, honestly, professionally, and responsibly throughout the entire consumer relationship. This commitment shall apply at all stages of the provision of financial products and services, including product design and development, marketing and promotion, client onboarding, servicing of accounts, collection practices, and termination of transactions or contractual relationships. All consumer-related activities shall be conducted with transparency, integrity, and due regard for the rights, needs, and best interests of financial consumers, in accordance with applicable consumer protection laws, regulations.

b. Client Selection and Non-Discrimination

The CDARE shall adopt fair, objective, transparent, inclusive, and consistent standards in the evaluation, approval, servicing, suspension, or termination of loans, savings, time deposits, and other financial products and services.

The CDARE shall observe the following policies:

i. Loans, savings, time deposits, and other financial products and services shall be made reasonably accessible to qualified members and financial consumers consistent with applicable laws, regulations, and prudent risk management standards.
ii. Financial inclusion shall be promoted by considering the needs of underserved, vulnerable, marginalized, low-income, rural, elderly, and differently-abled financial consumers in the delivery of financial products and services.
iii. All applications for loans, savings, time deposits, and other financial products and services shall be evaluated using objective documentary, operational, and established risk-based criteria and applicable laws, rules, and regulations.
iv. No officer, employee, committee member, authorized representative, or third-party agent shall deny, restrict, delay, or provide preferential treatment in the provision of financial products and services on the basis of race, ethnicity, origin, age, sex, gender, disability, health condition, religion, political affiliation, civil status, social status, or other protected characteristics unrelated to the legitimate evaluation of the application or transaction.
v. Financial products and services shall be designed, offered, and implemented in a manner that is responsive, understandable, affordable, and appropriate to the needs, financial capacity, and circumstances of financial consumers.
vi. All decisions involving approval, denial, suspension, limitation, restructuring, or termination of loans, savings, time deposits, and other financial products and services shall be supported by legitimate, documented, and verifiable business or risk considerations.
vii. Policies, procedures, application forms, documentary requirements, and evaluation processes shall be uniformly applied to similarly situated financial consumers to promote consistency, fairness, accountability, and inclusivity in decision-making.
viii. All personnel involved in evaluation, approval, servicing, and account management shall observe professionalism, impartiality, courtesy, respect, and sensitivity to the needs of financial consumers.
ix. Any denial, suspension, limitation, restructuring, or termination of loans, savings, time deposits, and other financial products and services shall be properly documented and supported by valid and lawful grounds consistent with the internal policies and applicable regulations.

2. Code of Conduct

This Code of Conduct establishes the ethical principles, standards of professional behavior, and expected responsibilities of all officers, employees, committees, and authorized representatives in the performance of their duties and in the delivery of financial products and services.

This Code seeks to institutionalize integrity, accountability, professionalism, transparency, confidentiality, and ethical conduct in all dealings involving financial consumers and to ensure that all covered persons perform their duties in accordance with applicable laws, regulations, and consumer protection principles.

It is recognized that maintaining public trust and confidence in the delivery of financial products and services requires the highest standards of ethical conduct, professionalism, accountability, and integrity.

a. Coverage

This Code shall apply to:

i. Members of the Board of Directors;
ii. Officers and employees;
iii. Members of committees and working groups;
iv. Members of the Consumer Assistance Team (CAT);
v. Authorized representatives and agents;
vi. Third-party service providers engaged by the CDARE; and
vii. Any person acting on behalf of PECCI in relation to financial products and services.

All covered persons shall comply with this Code as a condition of their continued employment, engagement, appointment, or authority to act on behalf of PECCI.

b. Core Values and Ethical Principles

i. Consumer Protection

All covered persons shall uphold and safeguard the rights, welfare, and best interests of financial consumers in all transactions, communications, and official dealings.

All actions and decisions affecting financial consumers shall be guided by fairness, responsibility, transparency, and due regard for consumer welfare.

ii. Integrity and Honesty

All covered persons shall act truthfully, honestly, ethically, and professionally at all times.

They shall:

- Provide accurate, complete, and truthful information;
- Avoid deception, concealment, falsification, or misrepresentation;
- Refrain from engaging in dishonest or fraudulent conduct; and
- Ensure that official statements, reports, and representations are accurate and reliable.

iii. Accountability

All covered persons shall be accountable for their actions, decisions, and conduct in the performance of their duties.

They shall:

- Observe diligence and responsibility in the discharge of their functions;
- Comply with internal controls, policies, and operational procedures;
- Cooperate in investigations, audits, and compliance reviews; and
- Promptly report violations, irregularities, or unethical conduct.

iv. Transparency

All covered persons shall ensure that official communications, disclosures, and representations are clear, accurate, understandable, and timely.

They shall:

- Communicate with professionalism and clarity;
- Avoid withholding material information;
- Ensure proper disclosure of relevant information consistent with applicable regulations; and
- Promote informed decision-making by financial consumers.

v. Professionalism

All covered persons shall maintain professionalism, competence, courtesy, and respect in all interactions and official functions.

They shall:

- Perform duties competently and efficiently;
- Treat consumers, co-workers, and stakeholders respectfully;
- Maintain proper decorum and conduct; and
- Continuously improve their knowledge, skills, and professional competence.

vi. Confidentiality and Data Privacy

All covered persons shall maintain the confidentiality, integrity, and security of financial consumer information and comply with applicable data privacy and information security laws, regulations, and policies.

They shall:

- Protect personal and sensitive personal information from unauthorized access, disclosure, misuse, alteration, or loss;
- Use information only for authorized and legitimate purposes;
- Observe confidentiality in handling records, reports, and transactions; and
- Report suspected data breaches or unauthorized disclosures immediately.
- Confidentiality obligations shall continue even after separation from service or termination of engagement.

c. Acts or Omissions Constituting Violations

The following acts or omissions, whether committed intentionally, negligently, recklessly, or through willful disregard of established policies, procedures, laws, rules, and regulations, shall constitute violations of this Code of Conduct:

i. Violations Relating to Integrity and Ethical Conduct

- Falsification, tampering, alteration, concealment, or destruction of records, reports, documents, or official information;

- Making false, misleading, deceptive, or fraudulent statements, representations, or certifications;
- Dishonesty, bad faith, or misrepresentation in the performance of official duties;
- Abuse of authority, position, or discretion for personal gain or advantage;
- Engaging in fraudulent, unethical, or unlawful activities involving financial products, services, transactions, or consumer accounts;
- Acceptance of unauthorized gifts, commissions, incentives, kickbacks, favors, or benefits in connection with official duties or transactions;
- Conflict of interest, including participation in transactions where personal interest may improperly influence official decisions or actions; and
- Failure to disclose actual or potential conflicts of interest.

ii. Violations Relating to Consumer Protection and Responsible Conduct

- Failure to uphold the rights and welfare of financial consumers;
- Unfair, abusive, unethical, or discriminatory treatment of financial consumers;
- Failure to provide accurate, complete, understandable, and timely information to financial consumers;
- Concealment or omission of material information affecting consumer decisions;
- Misrepresentation of financial products, services, costs, risks, terms, or conditions;
- Use of coercive, intimidating, abusive, deceptive, or high-pressure conduct in dealing with financial consumers;
- Failure to properly address, document, or act on consumer complaints, inquiries, requests, or reports;
- Delay, obstruction, or improper handling of consumer concerns or redress mechanisms; and
- Violation of consumer protection laws, regulations, policies, standards, or procedures.

iii. Violations Relating to Confidentiality and Data Privacy

- Unauthorized access, use, disclosure, sharing, copying, or release of confidential, personal, or sensitive personal information;
- Failure to safeguard records, systems, files, passwords, or consumer information from unauthorized access or misuse;
- Use of confidential information for personal benefit or unauthorized purposes;
- Disclosure of confidential information through unofficial channels, including social media or unauthorized electronic communications;
- Failure to report data breaches, unauthorized disclosures, or information security incidents; and
- Violation of data privacy, confidentiality, or information security policies and regulations.

iv. Violations Relating to Compliance with Policies and Procedures

- Failure or refusal to comply with this Code, internal policies, lawful directives, operational procedures, or regulatory requirements;

- Willful disregard of internal controls, compliance measures, audit findings, or corrective actions;
- Failure to cooperate during investigations, audits, inspections, or compliance reviews;
- Submission of false, inaccurate, incomplete, or misleading reports or information;
- Unauthorized approval, processing, or release of transactions, documents, or funds;
- Gross negligence or serious misconduct in the performance of duties;
- Repeated violations of policies, procedures, or directives despite prior warning or corrective action; and
- Any act or omission that exposes PECCI, its financial consumers, officers, employees, or stakeholders to financial loss, legal liability, reputational damage, operational risk, or regulatory sanctions.

d. Reporting of Violations

All officers, employees, committees, authorized representatives, third-party agents, financial consumers, and other stakeholders are encouraged to promptly report any known, suspected, or observed violation of this Code, internal policies, consumer protection standards, or applicable laws, rules, and regulations.

The following procedures shall govern the reporting of violations:

i. Reports or complaints may be submitted verbally or in writing through officially designated reporting channels, including the (designated compliance officer, human resource office, administrative officer, Consumer Assistance Team (CAT), or other authorized office or committee).
ii. All reports and complaints received shall be properly recorded, documented, and assigned a reference number for monitoring and tracking purposes.
iii. The (receiving office or officer) shall conduct an initial assessment of the report or complaint to determine the nature of the alleged violation and the appropriate course of action.
iv. Reports and complaints shall be treated with strict confidentiality and shall only be disclosed to authorized persons directly involved in the evaluation, investigation, or resolution of the matter.
v. Retaliation, intimidation, harassment, discrimination, or any form of reprisal against persons who report violations in good faith or cooperate in investigations shall be strictly prohibited and shall constitute a separate violation of this Code.
vi. Any person found to have knowingly submitted false, malicious, or fabricated reports or complaints shall be subject to appropriate disciplinary action.
vii. All reports, complaints, investigations, and actions taken shall be properly documented and maintained in accordance with records management, confidentiality, and data privacy policies.

e. Disciplinary Actions and Sanctions

Any officer, employee, committee member, authorized representative, or third-party agent found to have violated this Code, internal policies, consumer protection standards, or applicable laws, rules, and regulations shall be subject to appropriate disciplinary action, without prejudice to civil, criminal, or administrative liabilities under existing laws.

The imposition of disciplinary action shall observe due process and shall consider the nature, gravity, frequency, intent, effect, and surrounding circumstances of the violation.

Depending on the seriousness of the offense, any of the following disciplinary actions or sanctions may be imposed:

i. Verbal Warning
   For minor or first-time violations which do not result in material damage, prejudice, or harm.

ii. Written Reprimand
   For violations involving negligence, non-compliance with procedures, or repeated minor offenses.

iii. Mandatory Counseling or Retraining
   For violations arising from lack of awareness, misunderstanding of procedures, poor judgment, or failure to observe required standards.

iv. Suspension
   For serious violations involving misconduct, insubordination, breach of confidentiality, gross negligence, abuse of authority, or repeated violations despite prior warning.

v. Removal from Assigned Duties or Responsibilities
   For violations affecting the integrity, impartiality, trustworthiness, or fitness of the concerned person to continue performing specific duties or functions.

vi. Termination of Employment, Appointment, Engagement, or Authority
   For grave misconduct, fraud, dishonesty, falsification, serious breach of confidentiality, unauthorized disclosure of sensitive information, misuse of funds, conflict of interest, or other serious violations prejudicial to the CDARE or financial consumers.

vii. Restitution or Reimbursement
   Where applicable, the responsible person may be required to restore, reimburse, or compensate losses, damages, or unauthorized benefits arising from the violation.

viii. Filing of Civil, Criminal, or Administrative Actions
   Violations involving unlawful acts, fraud, financial misconduct, data privacy breaches, or other acts punishable under existing laws may be referred to the proper authorities for appropriate legal action.

ix. Other Corrective or Remedial Measures

Additional corrective measures may be imposed if deemed necessary to protect financial consumers, prevent recurrence of violations, strengthen internal controls, or promote compliance with this Code.

All disciplinary proceedings, findings, and actions taken shall be properly documented and maintained confidentially in accordance with applicable records management and data privacy policies.

f. Compliance and Enforcement

Consistent implementation, observance, and enforcement of this Code across all levels of the organization shall be ensured.

All officers, employees, committees, authorized representatives, and third-party agents shall be responsible for complying with the provisions of this Code and for conducting themselves in a manner consistent with the ethical principles, consumer protection standards, and professional responsibilities prescribed herein.

The (Assistant General Manager / Oversight Head of CAT) responsible for compliance, human resources, administrative discipline, or oversight shall monitor observance of this Code and recommend appropriate corrective, preventive, or policy enhancement measures whenever necessary.

Compliance with this Code shall form part of:

i. Personnel supervision and monitoring;
ii. Performance evaluation systems;
iii. Internal control and risk management processes;
iv. Orientation and continuing training programs;
v. Operational and administrative procedures; and
vi. Internal audit, compliance review, and oversight activities.

Where necessary, supplemental guidelines, procedures, or internal issuances may be issued to strengthen the implementation and enforcement of this Code and ensure alignment with applicable laws, regulations, and consumer protection standards.

The implementation and effectiveness of this Code shall be periodically reviewed to ensure continuing relevance, responsiveness, and consistency with the operational requirements of the CDARE and evolving consumer protection standards.

g. Training and Capacity Building

Regular orientation, training, and continuing education programs shall be conducted to ensure awareness, understanding, and compliance with this Code and applicable consumer protection laws, rules, regulations, and internal policies.

Training records, attendance sheets, and evaluation results shall be properly maintained for monitoring, audit, and compliance purposes.

h. Amendments

This Code may be amended, revised, or supplemented by the Board of Directors whenever necessary to ensure consistency with applicable laws, regulations, operational requirements, and consumer protection standards.

All amendments shall take effect upon approval through an appropriate Board Resolution.

i. Effectivity

This Code shall take effect immediately upon approval by the Board of Directors through Board Resolution No. 2026-06-143, Series of 2026.

All covered persons shall be furnished copies of this Code and shall acknowledge receipt, understanding, and compliance with its provisions.

3. Policy on Recruitment and Training

a. Recruitment

All personnel involved in the development, marketing, delivery, and administration of financial products and services, shall possess the necessary competence, integrity, and professional qualifications. Recruitment processes shall consider the applicant's knowledge, skills, experience, and ethical standards to ensure that personnel are capable of performing their responsibilities in accordance with financial consumer protection principles and applicable regulatory requirements.

b. Training

All personnel involved in financial operations, including frontline service staff, compliance officers, and internal audit personnel, shall receive adequate training to effectively perform their duties and uphold financial consumer protection standards.

i. Mandatory training programs shall be implemented, to be conducted at least (annually), covering the following areas:
   - Key features, risks, terms, and costs of financial products and services;
   - Financial consumer protection standards and applicable legal and regulatory obligations;
   - Relevant internal policies, procedures, and operational guidelines affecting financial consumers; and
   - Consumer protection risks associated with digital financial services, information security, and cybersecurity.

ii. To ensure sustainability and continuous capability development, such training programs shall likewise be incorporated into the Annual Training Plans with corresponding budgetary allocations.

iii. Proper documentation of training programs, including attendance records, training materials, and evaluation results shall be maintained and shall be subject to review during internal and external audits.

4. Policy on Third-Party Agents and Outsourcing (if applicable)

All third-party agents and outsourced service providers, including those engaged in the marketing of financial products and services and the collection of payments, shall comply with applicable consumer protection standards, observe ethical and fair business practices, and adhere to all relevant regulatory requirements.

a. Due Diligence

Appropriate background checks, due diligence, and compliance assessments prior to engaging any third-party agents, service providers, or representatives shall be conducted to ensure that they possess the necessary competence, integrity, and capacity to comply with applicable consumer protection standards and regulatory requirements.

b. Liability

PECCI shall remain solely liable for the acts or omissions of its third-party agents, service providers, or representatives in connection with the marketing of financial products and services and the collection of payments, subject to the limitations prescribed in the Memorandum of Agreement (MOA) with such third-party agents.

c. Monitoring

The performance and compliance of third-party agents with consumer protection standards, contractual obligations, and applicable regulations shall be regularly monitored and evaluated. Any identified non-compliance shall be promptly addressed through appropriate corrective actions and may result in the suspension or termination of the engagement, as necessary.

5. Policy on Fair Terms and Conditions

All contracts governing financial products and services shall be fair, transparent, and written in clear and understandable language. Contractual terms shall comply with applicable consumer protection laws and shall reflect reasonable pricing and balanced obligations.

a. Responsible Pricing

Responsible pricing in the design and delivery of financial products and services shall be observed to ensure that charges are fair, reasonable, and consistent with the financial capacity of consumers. The following shall be considered along with

ii. Interest rates, fees, charges, and penalties shall be set based on documented cost and risk considerations, including operational expenses, credit risk, and sustainability.
iii. Pricing structures for financial products and services shall be approved by the Board of Directors or its duly authorized committee.

b. Contract Review and Approval

i. All standard contracts, loan agreements, promissory notes, disclosure statements, and other documents governing financial products and services shall be reviewed by the (Credit Committee and Legal and Compliance Committee) prior to initial use to ensure compliance with applicable laws, regulations, and consumer protection standards.
ii. A periodic review shall be conducted at least once every (year) to ensure continued compliance and incorporate legal or regulatory updates.
iii. No contract shall be issued, implemented, or enforced unless it has been approved by the Board of Directors.

c. Prohibited Contract Provisions

Contracts shall not contain provisions that:

i. Waive or limit PECCI duty to act with due care, diligence, honesty, fairness, and professionalism in dealing with financial consumers;
ii. Allow unilateral changes in interest rates, fees, charges, penalties, or other key contractual terms without prior written notice and valid justification;
iii. Allow termination or cancellation of a contract without valid cause and prior notice to the financial consumer;
iv. Impose excessive, punitive, or unreasonable fees, charges, or penalties; or
v. Bind financial consumers to terms that are hidden, undisclosed, or not reasonably made available prior to contract execution.

d. Interpretation and Enforcement of Contracts

i. Any ambiguity or lack of clarity in contractual terms shall be interpreted in favor of the financial consumer.
ii. Staff shall not enforce unclear or ambiguous provisions without first elevating the matter to Senior Management for clarification.
iii. Where clarification or amendment of contractual provisions is necessary, such changes shall be properly documented, approved by the (Board of Directors, as presented by the Credit Committee) and communicated to affected financial consumers.

e. Disclosure and Explanation of Contract Terms

i. Prior to contract execution, personnel-in-charge shall ensure that all material terms and conditions are explained to the financial consumer, including payment obligations, penalties, and termination conditions.
ii. Financial consumers shall be given a reasonable time and opportunity to review and understand the contract before signing.

iii. Contracts shall not be executed through deception, concealment of material information, undue pressure, or misrepresentation.

f. Monitoring and Review

i. The (Credit Committee with the Legal and Compliance Committee) shall periodically review standard contracts and executed agreements to identify unfair, unclear, or non-compliant provisions.
ii. Findings from such reviews shall be reported to Senior Management and/or the Board of Directors, together with recommended corrective actions such as contract revision, staff retraining, or policy updates.

6. Policy on Ethical Collection and Debt Recovery

All collection and debt recovery activities shall be conducted in a lawful, ethical, and professional manner that respects the dignity, privacy, and rights of financial consumers.

a. Acceptable Collection Practices

Collection activities shall be conducted respectfully and transparently.

i. Communication
Collection personnel shall:
- Introduce themselves, their role, and the purpose of the call or visit;
- Verify the identity of the borrower before discussing account details;
- Communicate in a calm and professional manner;
- Provide accurate information on the outstanding balance, due date, and available payment options; and
- Inform borrowers of possible restructuring or remedial options, where applicable.

ii. Allowed Time and Frequency
- Collection contact shall only be made between (8:00 AM and 5:00 PM)
- Follow-up contacts shall be made only at reasonable intervals which shall be (twice a month)

iii. Field Visit Guidelines
During field visits, personnel shall:
- Wear proper identification;
- Clearly state the purpose of the visit;
- Avoid confrontation or public disturbance;
- Refrain from entering the borrower's residence without permission;
- Leave immediately if the borrower requests to end the conversation; and
- Document the visit and its outcome

iv. Professional Conduct
Collection personnel shall:

- Use respectful and non-coercive language.
- Protect the borrower's privacy and avoid public embarrassment.
- Explain consequences of non-payment truthfully.
- Escalate sensitive cases or disputes to the appropriate officer.

v. Documentation
All collection attempts and borrower commitments shall be properly recorded.

b. Prohibited Collection Practices

The collection officer and other officers and employees shall not:

i. Harass, threaten, or intimidate borrowers or their family members;
ii. Use abusive language or coercive behavior;
iii. Publicly disclose borrower debts or shame borrowers;
iv. Provide false or misleading information regarding legal consequences;
v. Misrepresent authority or impersonate government officials;
vi. Disclose borrower information to unauthorized persons;
vii. Contact borrowers outside collection window period or engage in excessive calls; and
viii. Pressure family members or third parties to pay the borrower's debt.

c. Oversight

The (Assistant General Manager / Oversight Head of CAT) shall periodically review collection practices.

7. Policy on Ethical Collection and Debt Recovery

Officers, employees, and authorized third-party agents involved in the marketing, promotion, offering, and sale of financial products and services shall at all times act honestly, fairly, and in good faith, and shall prioritize the interests and informed decision-making of financial consumers.

In particular, officers, staff, and authorized third-party agents shall not:

a. Use Deceptive, Misleading, Aggressive, or High-Pressure Sales Techniques

i. Make false, exaggerated, or unsubstantiated claims regarding the benefits, returns, safety, approval certainty, or risks of a financial product or service;
ii. Omit, conceal, or downplay material information, including fees, penalties, risks, conditions, or limitations, that could affect a consumer's decision;
iii. Employ aggressive or high-pressure tactics such as repeated unsolicited solicitations, intimidation, threats of loss of opportunity, or statements implying that approval is guaranteed or time-limited without factual basis.

b. Force or Unduly Pressure Clients to Sign Contracts

i. Require consumers to sign contracts, agreements, or acknowledgments as a condition for receiving information, preliminary evaluation, or assistance;

ii. Apply undue influence by exploiting a consumer's lack of financial literacy, urgent financial need, emotional distress, or dependence; and
iii. Condition approval, continued service, or favorable treatment on immediate contract execution without allowing the consumer to fully understand the transaction.

c. Duty to Allow Informed Decision-Making

CDARE officers, staff, and authorized agents shall ensure that financial consumers are given sufficient time, clear explanations, and reasonable opportunity to:

i. Review all relevant disclosures and contract documents;
ii. Ask questions and receive accurate, complete responses; and
iii. Make voluntary and informed decisions free from coercion or undue pressure.

d. Accountability and Enforcement

i. Violations of ethical sales practices shall be treated as breaches of the CDARE's Code of Conduct and shall be subject to disciplinary action, which may include retraining, suspension, termination of employment or agency agreement, and other sanctions as may be appropriate; and
ii. The (Assistant General Manager / Oversight Head of CAT) shall monitor sales practices through periodic reviews, mystery shopping where applicable, complaint analysis, and audit findings, and shall recommend corrective actions to Management and the Board.

8. Policy on Product Design, Suitability, and Affordability

Financial products and services offered to consumers shall be responsibly designed, suitable to their needs, and affordable based on their financial capacity in order to prevent consumer harm, mis-selling, and over-indebtedness.

The following procedures shall be observed to determine whether a financial product or service is appropriate and affordable for the financial consumer:

i. Loan or product officers shall collect relevant financial information and supporting documents from the consumer prior to offering or approving a financial product.
ii. A suitability and affordability assessment shall be conducted based on the consumer's financial situation, needs, and repayment capacity.
iii. Based on the results of the assessment, the financial product may be approved, modified, or declined.
iv. Results of the assessment shall be documented and retained in the consumer's file and recorded in the CDARE's internal systems, including FCPAMS where applicable.
v. Applications that present heightened risk of repayment difficulty or over-indebtedness shall be elevated to the designated approving authority for further evaluation.

a. Conduct of Suitability and Affordability Assessments

i. Suitability Assessment

This stage involves evaluation whether the financial product is appropriate for the consumer by considering:

- Consumer's financial needs and objectives
- Intended use of the product
- Risk tolerance and financial literacy
- Appropriateness of bundled products or related services

Financial products shall not be offered if they are unnecessary, excessive, or inappropriate for the consumer's financial profile.

ii. Affordability Assessment

This involves assessment of the consumer's capacity to meet financial obligations by evaluating:

Verified income and income stability
Existing loans and financial obligations
Repayment capacity relative to disposable income
Risk of over-indebtedness

See Annex A for the Suitability and Affordability Assessment Tool.

b. Product Approval

i. All new financial products and services and existing products and services with significant changes shall be subject to prior approval by the Board of Directors before marketing, offering, or implementation.
ii. The proposed loan product shall be denied or reduced if it may reasonably lead to financial distress.
iii. All approved financial products shall be recorded in the Product Registry.

c. Bundled Products and Consumer Choice

Any bundled financial products or services shall be disclosed and offered in a manner that preserves the consumer's freedom of choice.

i. Where the availing of a financial product or service requires the purchase of another product or service (e.g., insurance), the financial consumer shall be informed prior to contract execution, clearly explaining the purpose, benefits, and costs of the additional product or service.
ii. Financial consumers shall not be required to obtain the bundled product or service from a specific provider as a condition for approval, and at least (number of options) qualified providers shall be offered from which the consumer may choose.
iii. Relevant personnel shall be trained to clearly explain bundled product requirements and available provider options to financial consumers.

9. Policy on Evaluation and Ongoing Review of Financial Products and Services

Financial products and services shall be evaluated at least (semi-annual) to ensure that they remain appropriate, fair, transparent, sustainable, and responsive to the needs, financial capacity, and risk profile of financial consumers.

a. Evaluation Criteria

Financial products and services shall be assessed using the following criteria:

i. Consumer Appropriateness. Suitability of the product to the financial capacity and needs of the target market; clarity and understandability of product terms and conditions; and accessibility and inclusiveness of the product for intended consumers.
ii. ii. Fairness and Transparency. Reasonableness of interest rates, fees, and charges; accuracy and completeness of product disclosures; and absence of misleading, deceptive, or unfair practices.
iii. Product Performance and Sustainability. Portfolio performance, including delinquency and default rates; financial viability and sustainability of the product; and effectiveness of risk mitigation measures.
iv. Consumer Protection and Risk Indicators. Volume and nature of consumer complaints and dispute trends; compliance with consumer protection standards and regulatory requirements; and data privacy, security, and information protection safeguards.
v. Operational Efficiency. Efficiency of processing and service delivery; system reliability and internal control effectiveness; and staff competence and adherence to operational procedures.

b. Evaluation Process

The process for the evaluation of financial products and services shall be as follows:

i. Relevant data shall be collected, including product performance data, consumer complaints and feedback, risk management and compliance reports, and operational or system performance information.
ii. The collected data shall be analyzed against the established evaluation criteria to identify risks, gaps, and areas for improvement.
iii. An evaluation report shall be prepared by the Credit Committee summarizing the key findings, identified risks, and recommended actions.

c. Outcomes of Product Evaluation

Based on the results of the evaluation, the following actions may be undertaken:

i. Maintain the product or service without modification;
ii. Modify product features, pricing, or operational processes;
iii. Enhance disclosures or consumer communication;
iv. Provide additional staff training or operational improvements; or

v. Restrict, suspend, or discontinue the product where necessary.
vi. Monitor the implementation of approved actions and reassess affected products when necessary to ensure that identified issues have been properly addressed.

10. Policy on Cooling-Off Period

A cooling-off period for applicable financial products and services shall be provided to allow financial consumers sufficient time to review the terms and conditions of the contract and cancel the transaction without penalty, in accordance with consumer protection standards.

i. An official and updated list of financial products and services subject to cooling-off periods shall be maintained.
ii. Such list shall be disclosed to financial consumers through product disclosures, contracts, marketing materials, and other appropriate communication channels.
iii. Financial products involving long-term commitments, higher risk exposure, or complex contractual terms shall have a cooling-off period of (three days).
iv. A cooling-off period shall not apply to loans with a term of less than one (1) year;
v. A cooling-off period shall not apply to time deposits which exceed (Php100,000 and above).

For Loan Products:

a. Duration of Cooling-off Period

The applicable cooling-off period for each financial product or service covered shall be:

- All loan products (see Annex K): cooling-off period of (three days) working days

The cooling-off period shall commence on the (date of submission of request and return of the loan proceeds).

b. Consumer Rights During the Cooling-Off Period

During the cooling-off period, financial consumers shall have the right to:

i. Cancel the loan, whether new or renewal (at the option of the CDARE);
ii. Incur no interest but may be charged with cancellation fees or charges that are not greater than the actual or reasonable approximation of costs incurred, and that the cancellation fee is equivalent to the service fee and the average bank rate.
iii. Receive clear instructions on the procedures for cancellation.

c. Procedure for Cancellation During the Cooling-Off Period

Financial consumers who wish to cancel a financial product or service within the cooling-off period shall follow the procedures below:

i. The financial consumer shall submit a signed written or electronic request for cancellation and the return of loan proceeds within the prescribed cooling-off period.
ii. Upon receipt of the request, the (Customer Care) shall process the cancellation and shall be approved by the (Credit Committee)
iii. Within (one day upon receipt of request), the consumer shall be provided with written confirmation of the cancellation and the amount of cancellation fees to be paid by the financial consumer within;
iv. The financial consumer shall return the loan proceeds, if applicable, and/or pay cancellation fees within (three days).

If the financial consumer does not cancel the transaction within the cooling-off period, the contract shall remain valid and enforceable in accordance with its terms and conditions.

For Time Deposits:

a. Duration of Cooling-Off Period

A depositor shall be granted a Cooling-Off Period of (three days) immediately following the signing of the time deposit agreement.

b. Consumer Rights During the Cooling-Off Period

During the cooling-off period, financial consumers shall have the right to:
i. Cancel the time deposit placement without penalty or pre-termination charges. However, may be charged with fees or charges that are not greater than the actual or reasonable approximation of costs incurred.
ii. Receive clear instructions on the procedures for cancellation.

c. Procedure for Cancellation During the Cooling-Off Period

Financial consumers who wish to cancel the time deposit placement within the cooling-off period shall follow the procedures below:

i. The financial consumer shall submit a signed written or electronic request for cancellation within the prescribed cooling-off period.
ii. Upon receipt of the request, the (Customer Care) shall process the cancellation and shall be approved by the (Treasurer).
iii. Upon cancellation within the cooling-off period, the principal amount shall be returned to the depositor and withhold from the said refund the fees or charges. No interest shall be paid to the depositor during the cooling-off period, if withdrawn.

11. Policy on Pre-Payment of Loans

Refer to the Credit Committee's Policy on Advance payment of loans.

12. Policy on Interest Rates and Other Charges

Interest rates, fees, penalties, and other charges imposed on financial products and services shall be fair and reasonable.

B. DISCLOSURE AND TRANSPARENCY

1. Policy Statement

PECCI recognizes that full, clear, timely, and accurate disclosure is fundamental to protecting the rights of financial consumers and enabling informed decision-making.

It shall ensure that all financial consumers are provided with clear, concise, truthful, and complete information relating to any financial product or service before, during, and after the transaction, and at all material stages of the consumer relationship.

Disclosures shall be made in a manner that allows financial consumers to understand, compare, and assess financial products or services offered in the market, taking into account varying levels of financial literacy, vulnerability, and access to information.

The consumer disclosure principles shall be integrated in the following:

a. Product development and approval;
b. Marketing and sales processes;
c. Contract execution;
d. Post-sale servicing; and
e. Consumer education activities, including the Pre-Membership Education Seminar (PMES), where applicable.

2. Policy on Disclosure of Terms and Conditions

All material terms and conditions of a financial product or service shall be disclosed and explained to the financial consumer prior to contract execution:

Such disclosure shall include, at a minimum:

a. Product Features and Risks
Clear explanation of the nature of the product or service, expected benefits, material risks, limitations, and relevant warnings;

b. Returns and Cost Implications
Information on expected returns, where applicable, and circumstances under which such returns may vary or not materialize;

c. Waivers and Limitations
Any waiver of consumer rights or limitation of the liabilities of PECCI, subject to applicable laws and consumer protection standards;

d. Consumer Rights and Responsibilities
The rights, duties, and obligations of the financial consumer, including remedies and available assistance mechanisms;

e. Consequences of Default or Non-Compliance
Clear description of penalties, fees, enforcement actions, and other consequences arising from failure to meet contractual obligations;

f. CDARE Rights and Responsibilities
The rights, duties, and obligations of PECCI under the contract;

g. Use of Agents or Third Parties
Disclosure of the involvement of authorized agents, service providers, or third-party partners in product delivery or servicing;

h. Conflict of Interest
Any actual or potential conflict of interest involving officers, staff, or agents that may affect the consumer;

i. Cancellation and Cooling-Off Rights
Conditions, procedures, timelines, and effects of cancellation, cooling-off, or termination of the product or service;

j. Full Pricing Disclosure
The total cost of the product or service, including interest, fees, charges, premiums, commissions, penalties, and whether such costs may change over time; and

k. Responsible Pricing Rationale
Procedures and documentation explaining how prices were determined, demonstrating adherence to responsible pricing principles.

All disclosures shall be accurate, current, understandable, and not misleading, and shall be provided sufficiently in advance to allow the consumer to make an informed decision.

3. Policy on Changes in Key Features, Terms, and Conditions

Any changes to key features, terms, or conditions of a financial product or service shall not be implemented without prior written notice to affected financial consumers.

a. Consumers shall be notified at least thirty (30) days prior to the effectivity of any such change, unless a shorter period is allowed by law or regulation.
b. Notices shall clearly state:
   i. The nature and scope of the change;
   ii. The justification for the change;
   i. The potential impact on the financial consumer; and
   iv. The options available to the consumer, including cancellation or modification, where applicable.

c. Any change shall be supported by a Board Resolution approving the amendment and certifying compliance with consumer protection standards.
d. Changes shall not be applied retroactively in a manner prejudicial to the consumer, except where required by law.

4. Policy on Business and Contact Information Disclosure

Accurate and updated business and contact information shall be readily accessible to financial consumers through contracts, policies, receipts, websites, digital platforms, and promotional materials.

Disclosures shall include:
a. Official name, address, and contact details of PECCI's head office and branches or satellite offices;
b. Contact information of the Consumer Assistance Team (CAT);
c. A statement that PECCI is regulated by the CDA, including the address and contact details of the relevant CDA office.

5. Policy on Advertising, Marketing, and Promotional Materials

All advertising, marketing, and promotional materials for financial products and services shall be accurate, clear, fair, and not misleading, and that they provide financial consumers with sufficient information to make informed decisions.

a. All advertising, marketing, and promotional materials shall present truthful, balanced, and clear information about the financial products and services offered and shall accurately reflect their actual terms and conditions. Such materials shall not contain misleading, deceptive, exaggerated, or unsubstantiated claims, nor omit key information, including applicable interest rates, fees, charges, penalties, risks, eligibility requirements, or other material terms necessary for financial consumers to understand the product and its associated costs. The use of misleading graphics, fine print, or sample computations without clear qualifications shall likewise be prohibited.

b. Officers, staff, and agents involved in marketing or sales shall use only approved product explanations, fully disclose the total cost of credit or financial obligations prior to any commitment, refrain from pressure or urgency tactics, and allow financial consumers reasonable time to review and compare available options.

c. No advertising or promotional material, whether produced internally or by third parties, shall be used or distributed without prior written approval from the (Credit Committee with guidance by the Board of Directors), and all approved materials shall be reviewed periodically, at least annually or whenever there are changes in product features, pricing, or regulatory requirements, to ensure that the information remains accurate and up to date. All approved versions shall be properly recorded, logged, and archived for monitoring and audit purposes.

d. All statements, offers, rates, benefits, and representations contained in marketing and promotional materials shall be considered binding on PECCI, unless corrected in writing and communicated to the consumer prior to the execution of the contract.

6. Policy on Documents to be Provided to Financial Consumers

Financial consumers shall be provided with copies of all documents signed, including contracts, disclosures, and terms and conditions.

a. Proof of transaction, such as official receipts, transaction slip, shall be provided immediately after completion, in printed or electronic form, at the option of the consumer.

b. For digital transactions, printed copies shall be provided upon request.

c. Statements of account or billing statements shall be issued (semi-monthly / monthly), through preferred channels by the financial consumer.

7. Policy on Communication Standards and Staff Responsibility

All concerned officers and staff shall communicate with financial consumers in a manner that is clear, respectful, and understandable, taking into account:

a. The consumer's level of financial literacy;

b. Language and accessibility needs; and

c. Vulnerability or special circumstances.

Staff shall ensure that consumers understand their rights, obligations, and key contract provisions before proceeding with any transaction.

C. PROTECTION OF FINANCIAL CONSUMERS AGAINST FRAUD AND MISUSE

1. Policy Statement

PECCI is committed to protecting financial consumers against fraud, misuse, and unauthorized transactions involving its financial products and services. In support of this commitment, it shall promote a culture of vigilance, integrity, and accountability in all its operations to safeguard the interests of financial consumers.

This policy shall apply to all financial products, services, systems, and delivery channels, including transactions conducted through physical offices, digital platforms, or third-party service providers. It shall likewise apply to all officers, employees, committees, agents, and third parties engaged in the marketing, processing, administration, or management of financial products and services.

It shall adopt measures to minimize the risk of fraud and misuse by ensuring that appropriate safeguards, monitoring mechanisms, and response procedures are in place to detect suspicious activities, protect consumer accounts and information, and address incidents that may result in financial loss or harm to financial consumers. These measures shall also aim to strengthen consumer trust and preserve the integrity, reliability, and security of the financial services.

2. Fraud Prevention and Response Measures

Preventive, detective, and responsive measures to protect financial consumers shall be implemented, particularly with respect to savings and deposits, against fraud, misuse, loss, or unauthorized transactions.

Such measures shall include, but shall not be limited to, the following:

a. Internal Controls and Segregation of Duties

i. Establishment of effective internal control systems that ensure no single officer or employee has sole control over critical financial processes involving the receipt, recording, custody, and disbursement of share capital, savings, and other funds;

ii. Clear segregation of duties among personnel responsible for authorization, processing, recording, reconciliation, and custody of financial consumer assets;

iii. Regular review and strengthening of controls over cash handling, collections, withdrawals, transfers, refunds, and adjustments involving consumer funds:
- Conduct monthly reconciliations and quarterly audits of all cash receipts, withdrawals, transfers, refunds, and adjustments against accounting records and bank statements;
- Document discrepancies and corrective actions in a Control Review Log;
- Require approval for unusual or large transactions; and
- Update procedures and staff responsibilities annually or as needed.

b. Record-Keeping and Data Protection Systems

i. Maintenance of accurate, complete, and up-to-date records of loans and savings balances, deposits, and other financial consumer accounts;

ii. Implementation of secure physical and electronic record-keeping systems that protect financial consumer information from unauthorized access, alteration, loss, or destruction;

iii. Adoption of data protection measures consistent with applicable data privacy laws, including access controls, authentication procedures, encryption (where applicable), and audit trails.

c. Monitoring and Detection of Suspicious Activities

i. Implementation of monitoring mechanisms to detect unusual, irregular, or unauthorized transactions affecting savings, loans, or other consumer assets, such as withdrawals exceeding set limits, multiple large deposits, or frequent adjustments. It shall use (manual, i,e. random account audit, daily transaction review reports) monitoring tools to identify unusual or unauthorized transactions;

ii. Periodic reconciliation of member account records against bank balances, and general ledger accounts;

iii. Prompt escalation of red flags, discrepancies, or anomalies to (Senior Management) for further review.

d. Reporting, Investigation, and Resolution of Fraud-Related Complaints

i. All suspected fraud, misuse, or unauthorized transactions involving financial consumer assets, whether reported by a financial consumer or detected internally through monitoring, internal controls, or audit activities, shall be promptly acted upon by the Senior Management.
ii. When a financial consumer reports a suspicious or unauthorized transaction, the (CAT) shall immediately log the complaint in the complaints database, acknowledge receipt to the consumer, and initiate an investigation within (twenty-four (24) hours) from receipt of the report.
iii. When unusual, suspicious, or unauthorized activity is detected through monitoring systems, internal controls, or audit reviews, the (CAT) responsible shall immediately report in writing the incident to the Senior Management/BOD within (twenty-four (24) hours).
iv. All fraud-related complaints and incidents shall be investigated in (twenty-four (24) hours) by the (CAT).
v. For consumer-reported cases, appropriate updates shall be provided (as needed) to the financial consumer during the investigation and advise on interim measures that may help mitigate potential loss or further misuse.
vi. For cases detected internally, the affected financial consumer shall be promptly informed of the issue (as needed), the actions being undertaken to investigate the matter, and the available remedies, refund or restitution mechanisms, and options for complaint escalation.
vii. Proper documentation of all investigations, including the details of the complaint or incident, investigation procedures undertaken, findings, corrective actions implemented, and measures adopted shall be undertaken to prevent the recurrence of similar incidents.

e. Restitution and Corrective Measures

Where fraud, misuse, or unauthorized transactions are established, appropriate corrective action shall be taken, which may include:

i. Restoration or reimbursement of affected savings, or deposits, subject to applicable laws, rules, and contractual arrangements;
ii. Disciplinary action and/or filing of cases against responsible officers, employees, or agents; and
iii. Strengthening of internal controls, systems, and procedures to prevent similar incidents.

3. Financial and Digital Literacy Initiatives

As part of the consumer protection mandate, financial and digital literacy shall be promoted, with particular emphasis on helping financial consumers understand and safeguard their savings, deposits, and other financial interests, especially for products and services offered through electronic or digital channels.

Financial and digital literacy activities shall be conducted for financial consumers every (other month) and shall also be integrated into Pre-Membership Education Seminars (PMES), onboarding activities for new members, and other continuing member education programs.

Such initiatives shall include, but shall not be limited to, the following:

a. Education on Product Features, Risks, and Costs
b. Information on Consumer Rights and Responsibilities
c. Guidance on Fraud Prevention and Safe Financial Practices
d. Digital Literacy for Electronic and Online Services
e. Access to Consumer Assistance and Complaint Mechanisms

D. PRIVACY AND PROTECTION OF FINANCIAL CONSUMERS' DATA

1. Policy Statement

It is the right of every financial consumer to expect that their financial transactions, as well as all personal and sensitive personal information disclosed in the course of their dealings, are kept confidential, secure, and protected against unauthorized access, use, disclosure, alteration, or loss.

It shall recognize its obligation to process personal data lawfully, fairly, transparently, and proportionately, consistent with the provisions of Republic Act No. 10173, otherwise known as the Data Privacy Act of 2012, its Implementing Rules and Regulations, and all relevant issuances of the National Privacy Commission (NPC).

This policy applies to all personal data of financial consumers, including but not limited to information relating to:

a. Savings, deposits, loans, and other financial transactions;
b. Personal identification, contact details, and demographic information;
c. Employment, income, and financial capacity information; and
d. Digital identifiers and transaction data collected through electronic or online channels.

Data privacy and protection principles shall be observed before, during, and after the provision of financial products and services, and throughout the entire lifecycle of personal data processing.

2. Information Security Standards

The privacy and protection of data of their financial consumers shall be upheld. To ensure the confidentiality, integrity, availability, authenticity, and non-repudiation of financial consumer data and transactions, appropriate organizational, physical, and technical security measures shall be adopted and implemented consistent with the Data Privacy Act of 2012, its Implementing Rules and Regulations, NPC issuances, and any additional guidelines that may be promulgated by the Authority.

Such standards shall include, but shall not be limited to, the following:

a. Organizational Security Measures

i. Designation of (Data Privacy Officer) to oversee data privacy compliance and information security practices;
ii. Limitation of access to personal and financial consumer data strictly to (Authorized Officers/Personnel) on a need-to-know basis;
iii. Training and awareness programs for officers, employees, and authorized agents on data privacy obligations, confidentiality, and secure handling of consumer information, within (one (1) year) after appointment

b. Physical Security Measures

i. Secure storage of physical records, files, passbooks, contracts, and documents containing financial consumer data in locked cabinets or restricted-access areas;
ii. Controlled access to offices, record rooms, and data storage facilities to prevent unauthorized entry or tampering. Only the (Authorized Officers/Personnel) shall be granted access; and
iii. Proper disposal or destruction of physical records containing personal data through shredding or other secure methods when retention is no longer necessary (as needed). In line with the BIR requirement of preserving documents for a minimum of ten years. Hardcopies must be retained for the first five years of the retention period.

c. Technical Security Measures

i. Use of appropriate information technology safeguards, such as user authentication, access controls, passwords, encryption, and audit trails, to protect electronic consumer data;
ii. Regular system monitoring, vulnerability assessments, and updates to protect against cyber threats, malware, and unauthorized intrusions;
iii. Secure backup and recovery mechanisms to ensure the availability and integrity of financial consumer data in case of system failure or incidents.

3. Lawful Collection, Use, and Disclosure of Data

a. Only personal and financial data needed to process a loan, savings, deposit, or other financial transaction, such as name, contact details, income, employment, and (other personal data deemed by the CDARE as necessary) shall be collected;
b. Financial consumers shall be informed of the purpose, scope, and extent of data collection and processing, and consent shall be obtained where required by law. A Data Privacy Consent Clause, reflected in the Loan Application Form shall be obtained from the financial consumer authorizing the collection, use, processing, and sharing of their personal data for legitimate and lawful purposes related to the evaluation, approval, and administration of the

loan. The Data Privacy Consent Clause is attached as Annex B;

c. Personal and financial consumer data shall not be used for purposes inconsistent with those disclosed, unless otherwise allowed by law;
d. Disclosure or sharing of consumer data with third parties shall be limited to lawful purposes, subject to confidentiality safeguards, and in accordance with applicable data privacy regulations.

4. Data Sharing with Third Parties and Authorized Agents

a. Where financial consumer data are shared with authorized agents, service providers, insurers, credit investigators, or other third parties, it shall ensure that such entities are bound by confidentiality and data protection obligations;
b. Data-sharing arrangements shall be supported by written agreements that clearly define permitted uses, security measures, and accountability;
c. PECCI shall remain responsible for ensuring that financial consumer data are adequately protected, even when processed by third parties.

5. Retention and Disposal of Financial Consumer Data

a. Personal and financial consumer data shall be retained for the duration necessary to process loans, savings, deposits, or other financial transactions, and for at least (ten years) after the relevant transaction or account closure, or longer if required by audit, investigation, other legal requirements (BIR, CDA, etc.); and
b. After the retention period, all physical records shall be (shredded before actual disposal) and electronic records shall be permanently deleted with secure wiping or encryption destruction, ensuring that data cannot be recovered or reconstructed and upon the clearance from the Data Privacy Officer.

6. Data Breach Management and Incident Response

a. Upon detection of a suspected or confirmed breach, the (responsible unit) shall within (twenty-four (24) hours) initiate containment measures, including restricting system access or isolating affected systems, and shall investigate the affected accounts, records, and information systems to determine the nature, scope, and cause of the incident.
b. All data breaches or security incidents shall be subject to thorough investigation within (twenty-four (24) hours) to determine the extent of the breach, the personal data involved, and the potential impact on affected financial consumers. It shall ensure proper documentation of the incident, including the circumstances of the breach, investigation findings, actions taken to contain the breach, and measures adopted to mitigate its effects.
c. Financial consumers whose personal data may have been compromised shall be notified promptly within (twenty-four (24) hours). Notification shall include information on the nature of the breach, the types of data involved, potential risks to the consumer, and recommended measures that the consumer may take to protect themselves.

d. Where required by applicable laws and regulations, data breaches shall be reported to the National Privacy Commission, within the prescribed period, including instances where the breach poses a risk to the rights or interests of affected financial consumers.
e. Appropriate corrective and preventive actions shall be implemented to address the causes of the breach and prevent recurrence. Such measures may include system security updates or patches, enhancement of access controls, strengthening of internal procedures, and additional training or awareness programs for officers, employees, and authorized personnel.
f. All data breach incidents, investigation results, and corrective actions taken shall be reported to Senior Management/Board of Directors for appropriate oversight and monitoring.

E. TIMELY HANDLING AND REDRESS OF COMPLAINTS

1. Policy Statement

Financial consumers shall be provided with accessible, affordable, independent, fair, accountable, timely, and efficient means for resolving complaints, inquiries, and requests arising from their financial transactions and dealings with PECCI.

It is recognized that effective complaint handling and redress are essential components of fair and equitable treatment of financial consumers and are critical to maintaining trust, transparency, and accountability.

Accordingly, clear, well-documented, and functional mechanisms for complaint handling and redress shall be established, implemented, and maintained, covering complaints related to, but not limited to:

a. Financial products and services, including loans, savings, share capital, deposits, insurance-linked products, and digital services;
b. Fees, charges, interest rates, penalties, and pricing practices;
c. Disclosure, sales, and marketing practices;
d. Unauthorized transactions, fraud, errors, or misuse of consumer funds; and
e. Conduct of officers, employees, and authorized third-party agents.

FCPAMS shall be adopted as the official mechanism for receiving, handling, resolving, and monitoring financial consumer complaints and concerns.

2. Scope and Applicability

The FCPAMS shall apply to:

a. All financial consumers, whether members or non-members, who avail of or inquire about financial products and services;
b. All financial products and services, including but not limited to:
   i. Loans and credit facilities;
   ii. Savings and deposits;

iii. Insurance-related or bundled products;
iv. Digital or electronic financial services; and

c. All consumer-related transactions undertaken directly or through third party agents

3. Nature and Characteristics of the FCPAMS

The FCPAMS shall be characterized by the following minimum attributes:

Attribute	Policy Requirement
Free of Charge	No fees shall be imposed for filing or pursuing a complaint
Accessible	Multiple channels are available
Independent	Free from undue influence or conflicts of interest
Timely	Governed by defined timelines
Accountable	Clear assignment of roles
Transparent	Consumers are informed at every stage

The FCPAMS shall not be used to:

a. Waive consumer rights;
b. Delay redress;
c. Discourage complaints; or
d. Shield from accountability.

4. Creation of the Consumer Assistance Team (CAT)

A Consumer Assistance Team (CAT) shall be designated as the implementing body of the FCPAMS. The establishment of the CAT institutionalizes commitment to fair treatment, protection, and effective redress for financial consumers in accordance with applicable consumer protection laws, rules, and regulations.

The CAT shall function as the first-level, internal dispute resolution mechanism and shall be responsible for ensuring that consumer complaints, inquiries, and requests are handled efficiently, objectively, consistently, and within prescribed timelines, prior to any escalation to the Board of Directors or the CDA.

a. Organizational Form and Structure

The CAT is constituted as a working group composed of the Oversight Head, who is the Assistant General Manager, and one (1) representative each from the Accounting, Internal Audit, and Administration units, to be designated by Management, as well as from the Mediation and Conciliation Committee.

b. Designation of the CAT

The CAT shall be formally recognized through a (Board Resolution).

c. Independence and Separation from Claims Handling Functions

To preserve impartiality and prevent undue influence, the CAT shall be independent from the claims handling, credit approval, collection, or frontline service units.

Specifically:

i. CAT members shall not resolve complaints involving transactions they personally processed, approved, or supervised;
ii. The CAT shall operate separately from units whose performance or incentives may be affected by complaint outcomes; and
iii. Management shall ensure that CAT decisions are free from retaliation, pressure, or interference.

d. Roles and Responsibilities of the Consumer Assistance Team

The CAT shall perform the following functions, each of which is integral to the effective operation of the FCPAMS:

Function	Detailed Explanation
1. Receipt and Logging	Receives all consumer complaints, inquiries, and requests through approved channels and records them in the complaints database with a unique reference number.
2. Classification	Determines whether complaints or requests are Simple or Complex based on their nature, factual issues, financial exposure, and regulatory implications.
3. Investigation and Resolution	Conducts fact-finding, document review, coordination with concerned units, and resolution within prescribed timelines, ensuring due process and consistency.
4. Escalation	Elevates unresolved, sensitive, or complex complaints to Board of Directors when authority or policy limits are reached.
5. Confidentiality Assurance	Ensures that all consumer information obtained during the complaint process is protected in accordance with data privacy and confidentiality rules.
6. Consumer Guidance	Informsconsumers of procedures, timelines, documentation requirements, and available remedies in a clear and understandable manner.

7. Documentation and Reporting	Maintains complete records of complaints and prepares reports required for internal oversight and regulatory submission.
8. Feedback Processing	Collects, records, and analyzes consumer feedback to assess satisfaction and identify service gaps.
9. Systemic Issue Identification	Identifies recurring complaints or patterns and recommends corrective actions or policy improvements to Management.
10. Inquiry Assistance	Provides accurate information and assistance to consumers on the CDARE's financial products and services.
11. Compliance Assurance	Ensuresthat complaint handling and consumer interactions comply with applicable consumer protection laws, regulations, and internal policies.

e. Accountability and Oversight

The CAT shall be accountable to Senior Management and the Board of Directors through periodic reporting.

5. Capacity Building for the CAT

The members of the CAT shall be ensured that they are competent, qualified, and continuously equipped with the necessary knowledge, skills, and ethical standards to effectively perform their functions.

Capacity building is a core control measure to ensure that consumer complaints, inquiries, and requests are handled professionally, consistently, fairly, and in compliance with consumer protection laws and regulations.

a. Training Areas, Frequency and Modes of Delivery

At a minimum, the CAT shall undergo training at least (once a year) or as necessary in response to regulatory changes, new products, or emerging consumer risks, covering the following areas:

i. PECCI's Financial Products and Services
ii. Interpersonal Skills and Customer Service
iii. Basic and Advanced Listening Skills
iv. Listening skills training shall enable CAT members to:
v. Written and Verbal Communication Skills
vi. Handling Financial Consumer Feedback
vii. Dealing with Difficult People
viii. Problem Solving and Conflict Resolution

Delivery modes may include:

i. In-house training;
ii. External seminars or workshops;
iii. Online learning modules; and
iv. Case simulations and role-playing exercises.

b. Competency Assessment and Documentation

PECCI shall:

i. Assess CAT members' competency through evaluations, tests, or performance reviews;
ii. Address identified gaps through targeted training or coaching; and
iii. Maintain training records, attendance sheets, and evaluation results for audit and inspection purposes.

6. Publication of the FCPAMS

The key features of the FCPAMS shall be ensured that they are clearly, visibly, and continuously disclosed to financial consumers to promote awareness, accessibility, transparency, and trust.

Publication of the FCPAMS is intended to:

- Inform financial consumers of their right to lodge complaints, inquiries, and requests;
- Ensure that consumers understand the process, timelines, and available remedies;
- Prevent information asymmetry between PECCI and its financial consumers; and
- Support fair, timely, and effective resolution of consumer concerns.

a. Scope and Coverage of Publication

The key features of the FCPAMS shall be published in conspicuous places within its premises and through (other appropriate communication platforms) to ensure that information is easily accessible, understandable, and available at all times.

Publication shall cover the entire consumer assistance process, including the handling of complaints, requests and inquiries.

The information shall be presented in clear, plain language, and where appropriate, in formats suitable for consumers with limited financial literacy.

b. Minimum Information to Be Published

The published materials shall include, at a minimum, the following:

i. The purpose and scope of the FCPAMS;
ii. The types of concerns that may be submitted by financial consumers, including complaints, requests for assistance, inquiries, or reports of suspected fraud or unauthorized transactions;

iii. The available channels through which financial consumers may submit complaints or requests for assistance, such as through PECCI office, telephone, email, online platforms, or other communication channels;
iv. The procedures for filing complaints or requests for assistance, including the information and supporting documents that may be required from the financial consumer;
v. The expected timelines for acknowledgment, investigation, and resolution of complaints or requests for assistance;
vi. The process for providing updates to financial consumers regarding the status of their complaints or requests for assistance;
vii. The procedures for escalation or referral of unresolved complaints to the appropriate authority, when applicable; and
ix. The contact details of the CAT.

7. Consumer Assistance Mechanisms or Channels

A wide, accessible, reliable, and responsive range of consumer assistance mechanisms or channels shall be established and maintained through which financial consumers may submit complaints, inquiries, and requests relating to the financial products, services, transactions, or the conduct of its officers, staff, or authorized third-party agents.

a. Minimum Consumer Assistance Channels

Multiple channels for submitting complaints, inquiries, and requests shall be provided, including but not limited to the following:

i. Walk-in or personal visit;
ii. Consumer assistance help desk;
iii. Dedicated hotline or telephone number;
iv. Electronic mail (email) (official email address – feedback@pecci.com.ph);
v. Centralized web portal;
vi. Mobile application (if applicable);
vii. Social media platforms officially maintained;
viii. Written correspondence (letter or mail);
ix. Fax (where applicable); and
x. Such other channels as may be deemed necessary

No single channel shall be treated as exclusive, and that financial consumers may use any channel ordinarily used to communicate with PECCI.

b. Channel-Specific Standards and Controls

To ensure consistency, reliability, and accountability, minimum operational standards shall be adopted for each consumer assistance channel, as outlined below:

Channel	Minimum Standards and Controls
Walk-in / Personal Visit	Presence of a designated desk or personnel; issuance of acknowledgment; assistance in completing CIR forms
Help Desk / Hotline	Trained CAT personnel; call logs; clear escalation protocols
Email	Official email address - feedback@pecci.com.ph; automated or manual acknowledgment within 24 hours
Web Portal	Secure submission facility; reference number generation; data privacy controls
Mobile Application	Secure access; confirmation message; linkage to CAT
Social Media	Official accounts only; monitoring protocols; redirection to formal complaint channels where necessary
Letter / Mail	Date stamping upon receipt; logging in complaints database
Fax	Secure handling; immediate recording and acknowledgment

c. Use of the CIR form

The CIR Form shall:

i. Serve as the standard template for lodging complaints, inquiries, and requests;
ii. Be made available in printed and electronic formats;
iii. Be accessible at branches, help desks, websites, and other consumer assistance channels; and
iv. Capture sufficient information to allow proper assessment and resolution of the concern.

CAT personnel shall assist financial consumers in completing the CIR Form where necessary, without influencing the substance of the complaint or request.

The CIR Form is attached as Annex C.

8. Consumer Assistance Process and Timelines

A structured and timely process shall be adopted for the receipt, assessment, investigation, and resolution of financial consumer complaints and requests for assistance through the FCPAMS.

A. Inquiries

The CAT shall require the financial consumer to submit a CIR Form for all inquiries or requests for clarification. Such submissions shall be recorded, and the inquiry shall be acknowledged and addressed not later than the next business day from receipt to ensure prompt assistance and responsiveness.

The CAT shall provide the necessary information, guidance, or clarification regarding the financial products and services, procedures, or policies, ensuring that the response is clear, accurate, and helpful to the financial consumer. Where the inquiry requires verification or coordination with other units, the financial consumer shall be informed accordingly and provided with appropriate updates until the matter is properly addressed.

Step No.	Process Description	Responsible Unit	Key Activities	Documents / Output	Timeline
1	Receipt of Complaint or Request	CAT	Receive complaint/request through walk-in, email, phone, or written submission.	Complaint/Request received	Upon receipt
2	Assess and Verify Inquiry	CAT	Review the inquiry, verify information, and coordinate with the concerned unit if necessary.	Verified Information / Endorsement	Within the prescribed response period
3	Provide Response	CAT	Provide clear, accurate, and appropriate information or guidance to the consumer based on existing policies, procedures, and records.	Response to Inquiry	Immediately upon verification
4	Record and Close Inquiry	CAT	Document the action taken and formally close the inquiry in the records and monitoring system.	Closed Inquiry Record	After response has been provided

Inquiries → By next business day

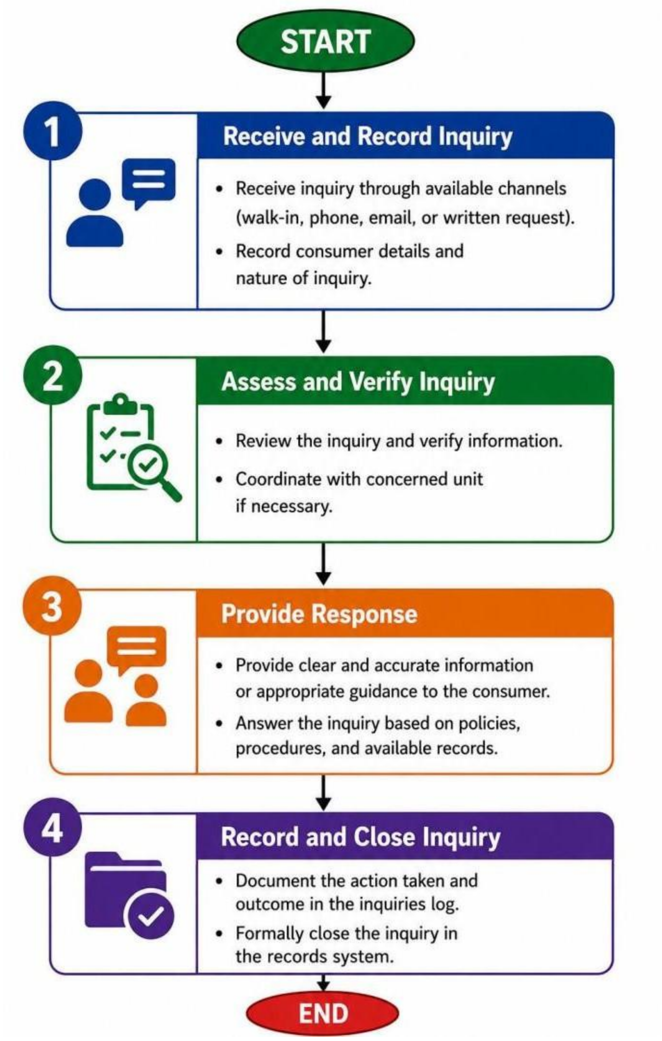

Figure 1: Standard Procedure for Handling Financial Consumer Inquiry

B. Complaint and Request

The following process workflow outlines the standard procedure for handling financial consumer complaints or requests. It provides a clear and systematic sequence of activities from the receipt and acknowledgment of the complaint or request up to its investigation, resolution, and final communication to the consumer.

The workflow is designed to ensure that all complaints and requests are managed in a timely, fair, and transparent manner, consistent with the principles of financial consumer protection. It also establishes the roles and responsibilities of the CAT, Senior Management, and other concerned units in assessing, investigating, resolving, and documenting consumer concerns:

Step No.	Process Description	Responsible Unit	Key Activities	Documents / Output	Timeline
1	Receipt of Complaint or Request	CAT	Receive complaint/request through walk-in, email, phone, or written submission.	Complaint/Request received	Upon receipt
2	Recording of Complaint Details	CAT	Record consumer information: name, contact details, nature of complaint/request, requested resolution, and personnel previously involved (if applicable).	Complaint recorded in registry	(Within 24 hours from receipt)
3	Issuance of Acknowledgement Receipt	CAT	Issue acknowledgement receipt including summary of concern, complaint classification, response timeline, contact person for follow-up, and next steps.	Acknowledgement Receipt	Within 24 hours from receipt
4	Initial Assessment	CAT	Review complaint/request to determine completeness of information, validity of concern, and classification as simple or complex.	Assessment record	(Within three days)
5	Request for Additional Information (if necessary)	CAT	Request additional documents or clarification from consumer when submitted information is insufficient.	Additional documents from consumer	(Within three days)
6	Investigation / Analysis	CAT with concerned departments	**For Simple:** verify documents, review transaction records, clarify discrepancies. **For Complex:** review documents,	Investigation findings	Simple: Within 3 days, Complex: 7-14 days)

			coordinate with departments, identify root cause, evaluate compliance.		
7	Notification of Delay (if necessary)	CAT	Inform the complainant if investigation cannot be completed within the prescribed timeframe and provide reason and expected completion date.	Notice of delay to complainant	(Within three days)
8	Determination of Resolution	CAT	**For Simple:** dismissal, rectification of errors, issuance of documents, adjustments to accounts. **For Complex:** dismissal, corrective measures, redress/compensation (mediation & conciliation), procedural improvements.	Proposed resolution	(Within three days)
9	Approval of Resolution	Senior Management	Review and approve recommended resolution actions.	Approved resolution	(Within three days)
10	Implementation of Resolution	CAT and concerned units	Implement approved corrective actions, remedies, or adjustments necessary to address the complaint.	Implemented resolution	(Within three days)
11	Communication of Results	CAT	Provide written response including summary of findings, actions taken, resolution outcome, right to appeal, and contact details.	Final written response to consumer	Within 2 days after resolution

12	Closure and Documentation	CAT	Record the resolution and formally close the complaint in the complaints registry.	Closed complaint record	(within 2 days)

Simple Complaint / Request → within 7 days from receipt
Complex Complaint / Request → within 45 days from receipt

Figure 2: Standard Procedure for Handling Financial Consumer Complaints or Requests

a. Acknowledgement of Financial Consumer Complaint or Request

i. Acknowledgment shall be issued within twenty-four (24) hours from receipt of the complaint or request.
ii. The Acknowledgment Receipt shall include:
   - Complaint Reference Number;
   - Summary of the issue;
   - Classification (inquiry, simple complaint, or complex complaint);
   - Applicable timelines;
   - Name and contact details of the assigned CAT personnel; and
   - Description of the next steps in the process.
iii. Acknowledgment shall be provided in writing or electronically, using clear and understandable language.

b. Processing and Resolution of Financial Consumer Complaint or Request

Processing and resolution shall be conducted using a systematic, three-phase approach, namely:

- Assessment Phase
- Investigation Phase
- Resolution Phase

Overview of the Three-Phase Process

Phase	Primary Objective	Key Output
Assessment	Determine completeness, validity, classification, and ADR suitability	Classification and ADR determination
Investigation	Establish facts, root cause, and assess dispute resolution options	Findings and ADR recommendation
Resolution	Decide and implement appropriate action or ADR outcome	Final resolution and communication

b.1. Assessment Phase

i. Purpose of the Assessment Phase

The Assessment Phase is the initial screening stage of the consumer assistance process. Its purpose is to:

- Confirm that the complaint or request is within PECCI scope;
- Determine whether sufficient information has been provided;
- Assess the nature, seriousness, and complexity of the concern;
- Classify the complaint or request as Simple or Complex; and

- Preliminarily determine whether the nature of the dispute may be appropriate for mediation or conciliation as an alternative means of resolution, particularly for complex cases involving ongoing relationships or negotiable remedies.

ii. Scope of the Assessment

During the Assessment Phase, the Consumer Assistance Team (CAT) shall:

- Review the complaint or request for completeness and clarity;
- Verify whether the issue involves the PECCI's financial products, services, personnel, or service providers;
- Identify the product or transaction involved;
- Determine whether the concern has been previously raised or resolved;
- Identify the remedy sought by the financial consumer; and
- Assess whether the complaint presents elements suitable for mediation or conciliation, such as willingness of the parties to negotiate, absence of fraud or criminal conduct, and the possibility of mutually acceptable remedies.

Where information is insufficient, the CAT may request additional details or documents from the consumer, provided that such request is reasonable and does not unduly delay processing.

iii. Documentation Requirements

All assessment actions shall be documented, including:

- Date of assessment;
- Name of CAT member conducting the assessment;
- Initial findings;
- Classification decision;
- Initial ADR suitability assessment; and
- Justification for classification and ADR consideration.

This documentation shall form part of the official complaint record.

iv. Assessment of Simple Complaints or Requests

Definition and Characteristics

A complaint or request may be classified as Simple when it:

- Involves straightforward factual issues;
- Requires minimal verification;
- Does not involve disputed facts or interpretation of law or policy; and
- Can be resolved using existing records, policies, or standard procedures.

Simple complaints or requests are generally not appropriate for mediation or conciliation, as they can be resolved directly by the CAT.

The CAT shall:

- Review the complaint/request based on the information already submitted;
- Validate the concern using available records and systems;
- Determine whether immediate resolution is possible; and
- Proceed directly to resolution without further investigation.

v. Assessment of Complex Complaints or Requests

Definition and Characteristics

A complaint or request shall be classified as Complex when it:

- Involves disputed facts or conflicting claims;
- Requires interpretation of contracts, policies, or regulations;
- Involves potential financial loss, redress, or compensation;
- Raises allegations of unfair treatment, misconduct, or non-compliance; or
- Requires coordination with multiple units or third parties.

ADR Suitability Determination for Complex Complaints

For complex complaints or requests, the CAT shall explicitly determine whether mediation or conciliation may serve as an appropriate and effective alternative dispute resolution mechanism, considering the following factors:

- The willingness of both parties to engage in good faith discussions;
- The nature of the dispute and whether it allows negotiated settlement;
- The absence of allegations involving fraud, criminal liability, or matters requiring formal adjudication;
- The potential to preserve the cooperative-member or consumer relationship; and
- The likelihood of achieving a timely, fair, and mutually acceptable resolution.

This determination shall be documented and communicated to the financial consumer as part of the processing of the complaint.

Assessment Procedure for Complex Complaints

For complex complaints or requests, the CAT shall:

- Conduct a more detailed review of the complaint/request;
- Identify gaps in information or documentation;
- Request additional supporting documents or clarifications from the consumer, where necessary;
- Determine whether interviews with the consumer or internal personnel are required;
- Assess and document the appropriateness of mediation or conciliation as an ADR option; and
- Formally record the basis for classifying the complaint as complex and for recommending or deferring ADR.

b.2. Analysis / Investigation Phase

Following the completion of the Assessment Phase, the CAT shall undertake a thorough, impartial, and evidence-based analysis or investigation of the financial consumer's complaint or request. This phase is critical in establishing the factual basis of the concern, determining compliance with applicable laws and internal policies, identifying root causes, and evaluating appropriate remedies or resolution options.

The analysis/investigation phase shall be conducted in a manner that is objective, timely, confidential, and proportionate to the nature and complexity of the complaint or request, while ensuring due process for both the financial consumer and PECCI.

i. Objectives of the Analysis / Investigation Phase

The Analysis/Investigation Phase aims to:

- Verify the accuracy and completeness of facts surrounding the complaint or request;
- Determine whether PECCI, its officers, staff, or service providers complied with applicable laws, regulations, and internal policies;
- Identify systemic, procedural, or behavioral issues that contributed to the concern;
- Assess the validity of the financial consumer's claims and the appropriateness of the remedy sought;
- Determine whether mediation or conciliation may be pursued as an effective and fair alternative dispute resolution mechanism for complex complaints; and
- Establish a sound basis for the final resolution or escalation, if necessary.

ii. Analysis / Investigation of Simple Complaints or Requests

Scope and Nature

For simple complaints or requests, the analysis/investigation shall be limited in scope and completed within a short timeframe, as these concerns typically involve straightforward issues that can be resolved through verification of existing records.

This phase shall involve:

- Verifying submitted documents;
- Reviewing transaction records, account statements, or system entries; and
- Clarifying minor discrepancies or misunderstandings with the financial consumer or relevant internal units.

Procedures for Simple Complaints

The CAT shall:

- Cross-check the complaint/request against available records and systems;
- Validate facts using standard operating procedures, contracts, or approved product terms;

- Coordinate with concerned internal units, where necessary, for factual clarification only;
- Determine whether the concern resulted from clerical error, miscommunication, or standard operational processes; and
- Document the findings and immediately proceed to resolution if no further investigation is required.
- Simple complaints or requests shall not be unnecessarily escalated and shall be resolved within the prescribed resolution period.

iii. Analysis / Investigation of Complex Complaints or Requests

Scope and Nature

For complex complaints or requests, the analysis/investigation phase shall involve a deeper and more comprehensive inquiry, recognizing that such cases may involve disputed facts, multiple parties, contractual interpretation, regulatory compliance issues, or potential financial redress.

The CAT shall ensure that the investigation is independent, unbiased, and sufficiently documented to support the final decision.

Components of the investigation

The investigation of complex complaints or requests may include, but is not limited to, the following activities:

Review of Documents and Transaction Records

Examination of contracts, loan agreements, disclosures, receipts, and acknowledgments:

- Review of transaction histories, payment records, system logs, and internal reports;
- Validation of disclosures, notices, and communications provided to the financial consumer; and
- Verification of approvals, authorizations, and internal controls relevant to the transaction.

Gathering of Additional Information

The CAT may gather additional information through:

- Written clarifications or sworn statements from the financial consumer;
- Internal reports or explanations from concerned officers, staff, or units;
- Coordination with third-party service providers or agents, if applicable; and
- Interviews or consultations, where necessary, to clarify facts or timelines.

All requests for additional information shall be reasonable, relevant, and documented, and shall not be used to unduly delay the resolution of the complaint.

Identification of the Root Cause
The CAT shall analyze the underlying cause(s) of the complaint or request, which may include:

- Procedural weaknesses or gaps in internal controls;
- Inadequate disclosures or communication failures;
- System or technology-related issues;
- Staff error, misconduct, or lack of training; or
- Product design or policy deficiencies.

Root cause analysis shall be used not only for resolving the individual complaint but also for identifying recurring or systemic issues requiring corrective or preventive action.

Evaluation of Compliance
The CAT shall evaluate whether the actions or omissions involved in the complaint or request comply with:

- Financial consumer protection laws and regulations;
- CDA issuances, circulars, and guidelines;
- PECCI policies, manuals, and approved procedures; and
- Applicable service agreements or third-party arrangements.

Any identified non-compliance shall be clearly documented and considered in determining the appropriate resolution, corrective action, or referral to management.

Mediation and Conciliation for Complex Complaints
During the analysis/investigation of complex complaints or requests, the CAT shall formally evaluate whether mediation or conciliation may be pursued as an alternative dispute resolution (ADR) mechanism, taking into account:

- The results of the factual and compliance analysis;
- The nature of the dispute and whether negotiated settlement is feasible;
- The willingness of both parties to participate in good faith;
- The potential to preserve or restore the cooperative-consumer relationship; and
- The likelihood of achieving a timely and mutually acceptable outcome.
- Where mediation or conciliation is deemed appropriate:
- The CAT shall inform the financial consumer of the option and explain the process;
- The recommendation to pursue ADR shall be documented in the case file; and
- The complaint shall proceed in accordance with the Omnibus Rules of Procedures, without prejudice to the consumer's right to pursue other remedies if ADR is unsuccessful.

Timeliness and Consumer Communication
If the analysis/investigation of complex complaints or requests cannot be completed within the prescribed timeframe, the following shall be done:

- Inform the financial consumer in writing of the reason for the delay;
- Clearly explain the need for an extended timeframe;
- Provide the expected date for the completion of the analysis/investigation; and
- Continue to provide status updates, as appropriate.

Delays shall be exceptional and justified, and shall not result from internal inefficiencies or lack of coordination.

Documentation and Reporting
All actions taken during the analysis/investigation phase shall be properly recorded, including:

- Documents reviewed;
- Information gathered;
- Findings and conclusions;
- Compliance assessment results;
- ADR evaluation and recommendations; and
- Justifications for delays, if any.

These records shall form part of the official complaint file and shall be used for internal monitoring, management reporting, and regulatory submission, as required.

b.3. Resolution Phase

The Resolution Phase is the critical stage where PECCI acts on the findings from the assessment and investigation of consumer complaints or requests. The goal is to ensure fairness, transparency, accountability, and timely resolution while protecting the rights and interests of financial consumers.
The phase emphasizes:

- Fair resolution – addressing the consumer's concern appropriately.
- Corrective action – rectifying errors or non-compliance.
- Remediation – providing financial or non-financial redress where applicable.
- Alternative dispute resolution (ADR) – exploring mediation or conciliation for complex cases.
- Continuous improvement – preventing recurrence and improving internal systems.

Resolution Options for Simple Complaints / Requests
Simple complaints are generally administrative, transactional, or minor service-related concerns that do not involve complex legal, operational, or financial issues.

Possible Actions and Examples:

Action	Discussion	Example
Dismissal of Complaint	Used when a complaint has no merit, insufficient evidence, or is withdrawn by the consumer. The CAT must clearly document reasoning and evidence for dismissal and communicate to the consumer in understandable language.	A consumer submits a duplicate complaint for a previously resolved inquiry.
Rectification of Errors	Correct minor transactional or procedural mistakes, ensuring accuracy of records, accounts, and communications. It demonstrates proactive consumer protection and responsiveness.	Correcting a misposted savings deposit
Issuance or Reissuance of Documents	Provide consumers with requested or corrected official documents promptly. Ensures transparency and trust, especially in financial matters.	Re-issuance of receipts, or loan amortization schedules.
Account Adjustments	Correct account balances, interest, or contributions in line with transaction records and contractual agreements. Ensuring that consumer assets are accurately maintained.	Adjusting savings account balance after miscalculated interest

Timeline: Within 7 calendar days from receipt of complaint/request.

Resolution Options for Complex Complaints/Requests
Complex complaints involve financial, operational, legal, or reputational implications, often requiring coordination among multiple departments. Examples include disputes on share capital, unauthorized deductions, or breaches of service agreements.

Possible Actions and Examples:

Action	Discussion	Example
Dismissal of Compliant	Applied when investigation	A consumer alleges an

	shows lack of merit, insufficient evidence, or withdrawal by the consumer. Must be documented, justified, and communicated transparently.	error in payment posting, but records confirm correct processing.
Corrective Measures	Rectify errors, non-compliance, or unfair practices. This may involve updating account balances, correcting misapplied fees, or adjusting savings contributions. Corrective measures demonstrate responsiveness and accountability.	Reversing an unauthorized deduction in a member's savings account.
Redress or Compensation	Financial or non-financial remedies to compensate for actual or potential losses or inconvenience. Requires clear documentation and consumer acknowledgment.	Refund of overcharged fees, interest correction. Non-financial remedies may include apology letters, priority service, or complimentary advisory support.
Alternative Dispute Resolution (ADR)	Mediation or conciliation may be facilitated to amicably resolve disputes with the consumer. ADR helps reduce legal risks, maintain trust, and prevent escalation. CDA's Mediation-Conciliation Rules must be followed.	Complex dispute over misapplied savings withdrawal resolved through facilitated discussion and mutually agreed corrective actions.
Continuous Improvement / Procedural Changes	Identify root causes and implement systemic improvements. This could include policy updates, staff training, system upgrades, or process redesigns. Ensures long-term consumer protection and reduces future complaints.	Implementing additional controls to prevent misposting of payment; revising procedures for verifying savings account transactions.

Timeline: Within 45 calendar days from receipt of complaint/request.

c. **Communication of Results of Action Taken on Financial Consumer Complaints or Requests**

Communication of the resolution is a critical component of the FCPAMS, ensuring that financial consumers are informed of the status and outcome of their complaints or requests. It demonstrates accountability, transparency, and responsiveness, while reinforcing trust in PECCI and its commitment to fair treatment of consumers.

The communication process applies to both simple and complex complaints/requests and must be completed within two (2) business days from the final resolution by the Consumer Assistance Team (CAT) and/or Senior Management.

i. **Communication Channels**

Although the final printed communication is required, interim updates may also be provided through:

Channel	Use Case / Notes
In-person / Walk-in	Shall be used when the financial consumer personally visits the office. This channel allows the provision of a printed copy of the resolution, explain the findings of the complaint investigation, clarify issues raised by the financial consumer, and answer questions. This shall be used for complex, high-value, or sensitive complaints where direct discussion may facilitate better understanding and resolution.
Registered Mail / Courier	Shall be used for the formal delivery of the printed final communication to the financial consumer's recorded address. This channel provides proof of delivery or receipt, ensuring that the resolution was officially transmitted to the financial consumer.
Phone Call / Hotline	Shall be used to provide immediate updates, clarification of the complaint status, or requests for additional information or documents from the financial consumer. However, any information communicated through phone or hotline must be documented in the complaint handling records, and the final resolution must still be issued in printed form.
Email / Electronic Communication	Shall be used to provide

	acknowledgment of receipt of the complaint, status updates, requests for supporting documents, or advance notice of the resolution. However, official printed communication of the final decision must also be provided to ensure proper documentation and compliance with recordkeeping requirements.

ii. Content of Communication

All communications must include the following:

Section	Description
Actions Taken	Corrective measures, remedies, or compensatory actions (financial or non-financial). Examples: account adjustments, refunds, re-issuance of documents.
Resolution Outcome	Status of complaint: fully resolved, partially resolved, or requires further follow-up.
Consumer's Right to Appeal	Instructions to escalate the matter to the BOD, including forms, submission deadlines, and contact points.
Contact Information for Follow-Up	Name, position, email, phone, and office hours of the responsible CAT officer/unit.

9. Confidentiality Clause

In handling complaints, inquiries, or requests from financial consumers, it must be ensured that all information obtained is managed with the highest degree of confidentiality and in compliance with applicable laws, rules, and regulations on consumer protection and data privacy. Accordingly, the policies shall guide the proper protection, access, use, and disclosure of consumer information throughout the complaint handling process.

a. It must also be ensured that all personal, financial, complaint-related, and communication information obtained from financial consumers during the complaint handling process is treated with strict confidentiality in accordance with applicable laws, including RA 11765 and the Data Privacy Act of 2012 (RA 10173).

b. Access to consumer information shall be limited only to authorized personnel who require such information in the performance of their official duties, and such information shall not be shared with unauthorized individuals or used for purposes unrelated to complaint resolution.

c. Disclosure of consumer information shall only be allowed when necessary for internal investigation, mediation or conciliation proceedings, or when required by law or by competent regulatory or judicial authorities.

d. All personnel involved in complaint handling shall observe strict confidentiality, sign the Confidentiality Clause (attached as Annex D), immediately report any breach of data privacy, and be subject to appropriate administrative or legal sanctions for any violation of confidentiality obligations.

10. Statement of No Conflict of Interest

To safeguard fairness, transparency, and trust, all complaints shall be investigated by personnel who are free from any actual or perceived conflict of interest. This requirement applies to all stages of complaint handling, from receipt and assessment to resolution and reporting.

a. Scope of Conflict of Interest

Conflicts of interest may arise in the following circumstances:

Type of Conflict	Description / Example
Direct Involvement	CAT member is directly involved in the transaction, product/service, or decision that is the subject of the complaint. Example: A loan officer investigating a complaint about a loan they themselves approved.
Indirect Involvement	CAT member has a personal or financial relationship with a party involved in the complaint. Example: Supervising a complaint filed against a close relative or business associate.
Financial Interest	CAT member may gain or lose financially based on the outcome of the complaint.
Professional/Operational Interest	CAT member's work performance, promotion, or appraisal may be affected by the complaint's outcome.

b. All CAT members shall declare any potential conflicts of interest (COI) before handling complaints, and any identified conflict shall require the concerned personnel to immediately recuse themselves, with the case reassigned to an independent CAT member or a designated conflict-free body.

c. All actions related to conflict of interest, including self-declarations, recusals, and reassignment of cases, shall be properly documented in the complaints database and subject to review by Senior Management and periodic internal audit.

d. It must be ensured that complaints are handled fairly, impartially, and free from personal or professional bias, and shall require assigned CAT members to sign a Statement of No Conflict of Interest (attached as Annex E) for every complaint handled.

11. Consumer Feedback Mechanism

Effective consumer protection requires not only the resolution of complaints but also a proactive understanding of consumer perceptions, satisfaction, and suggestions. The Consumer Feedback Mechanism is an essential component of the FCPAMS, designed to capture, record, analyze, and act on consumer insights to continuously improve products, services, and complaint-handling processes.

a. Purpose and Objectives

The Consumer Feedback Mechanism aims to:

i. Gauge Overall Consumer Satisfaction – Identify how consumers perceive the quality, responsiveness, and fairness of the services.
ii. Identify Processes Needing Improvement – Detect operational bottlenecks, inefficiencies, or gaps in consumer assistance and service delivery.
iii. Evaluate Personnel Performance – Assess the competency, professionalism, and responsiveness of personnel involved in handling consumer concerns.
iv. Capture Consumer Suggestions – Gather practical ideas from consumers that may help enhance products, services, and procedures.
v. Support Continuous Improvement – Use feedback to enhance the FCPAMS, refine internal policies, and strengthen consumer protection standards.

b. Feedback Collection Channels

Multiple accessible channels shall be established to collect consumer feedback, ensuring inclusivity and convenience:

Channel	Description	Remarks
Walk-in / Personal Visit	Consumers provide feedback directly at PECCI office	Feedback forms should be available at help desks or CAT stations
Centralized Web Portal	Online submission of feedback through secure web portal	Includes structured forms and open-text options
Mobile Application	Feedback submission via official mobile app	Supports attachments (screenshots, documents) for detailed issues
Social Media	Dedicated consumer service pages or chatbots	Monitored and logged by CAT for response and trend analysis

Email / Letter	Formal written submissions	Ensurestraceability and printed records
Telephone / Hotline	CAT-assisted voice feedback	Documented via feedback Log and recorded where applicable
Surveys	Periodic satisfaction surveys via SMS, email, or in-app notification	Targeted to consumers who used services recently

The CDARE shall ensure that all feedback channels are accessible, secure, and convenient, including options for differently-abled consumers or those with limited digital access.

c. Feedback Form Design

Feedback forms should capture both quantitative and qualitative data, enabling structured analysis. A sample table for a feedback form may include:

Section	Details to Capture
Consumer Information	Full Name, Contact Details (optional for anonymous feedback)
Service Experience	Type of product / service, date of interaction, channel used
Satisfaction Ratings	Overall satisfaction (scale 1–5), timeliness, professionalism clarity of information
Process Evaluation	Ease of lodging complaints/requests, clarity of resolution process
Personnel Evaluation	Helpfulness, knowledge, responsiveness of staff handling the concern
Suggestions	Open-text area for improvement ideas, recommendations, or compliments
Follow-up Request	Option for the consumer to request a response or action regarding feedback

The Customer Feedback Form is attached as Annex F.

d. Recording and Documentation

All consumer feedback shall be logged and recorded systematically by the CAT. Key documentation practices include:

i. Feedback Log – Maintain a centralized log (electronic or physical) including:

Field	Description
Feedback Reference Number	Unique identifier for tracking
Consumer Name / ID	Optional for anonymity
Date Received	Date the feedback was received
Channel	Walk-in, online, mobile app, email, etc.

Nature of Feedback	Complaint, compliment, suggestion, inquiry
Staff Involved	Personnel involved in the related interaction
Action Taken	Immediate response or acknowledgment
Status / Follow-up	Completed, pending, or under review

e. Analysis and Reporting

The CAT shall analyze feedback trends to identify systemic issues, recurring complaints, or operational gaps. This process involves:

i. Quarterly Consolidation – Aggregate feedback data from all channels for trend identification.

ii. Evaluation Metrics (May include the following):

Metric	Purpose
Overall Satisfaction Score	Measures general perception of CDARE services
Process Efficiency	Assesses timeliness andclarity of complaint resolution
Personnel Performance	Identifies training or coaching needs
Recurring Issues	Highlights systemic problems or procedural gaps
Improvement Suggestions	Feeds into product/service enhancement plans

f. Reporting to Senior Management

The CAT shall submit a quarterly Consolidated Feedback Report to Senior Management. The report should include:

i. Summary of quantitative ratings and qualitative feedback
ii. Identified areas for improvement and recommended actions
iii. Status of implementation of previous recommendations
iv. Trends and potential risks affecting consumer satisfaction

A sample quarterly Feedback Analysis Report is attached as Annex G.

12. Creation of Complaints Database

A systematically maintained complaints database is essential to the effective functioning of the FCPAMS. It serves as a central repository of all consumer complaints, requests, and inquiries, enabling to monitor trends, identify recurring issues, measure performance, and support regulatory compliance.

The CAT is responsible for the creation, maintenance, and ongoing management of the database, ensuring completeness, accuracy, confidentiality, and usability of all data.

a. Objectives of the Complaints Database

The complaints database serves multiple critical purposes:

i. Centralized Record-Keeping – All complaints, inquiries, and requests are stored in a single system, providing a clear and auditable record of all consumer interactions.
ii. Trend and Risk Analysis – Data can be analyzed to identify recurring problems, systemic risks, or product/service deficiencies.
iii. Performance Monitoring – Facilitates tracking of complaint handling timelines, resolution outcomes, and effectiveness of remedial actions.
iv. Regulatory Compliance – Ensures that all complaints are documented and available for review by the CDA or other relevant authorities.
v. Continuous Improvement – Provides insights for procedural, operational, or policy adjustments to prevent future complaints.

b. Database Structure and Fields

The complaints database may be maintained in Microsoft Word, Excel, or an electronic complaint management system. It should capture detailed information for each complaint, including, but not limited to:

Field	**Description**	**Notes / Guidance**
Complaint Reference Number	Unique identifier for each complaint	Assigned automatically or manually for traceability
Name of Complainant	Full name of the consumer	The complainant should be identified
Date of Receipt	Date the complaint was received	For aging and SLA monitoring
Subject / Nature of Complaint	Category or brief description of issue	E.g., service delay, account error, unauthorized transaction
Personnel Handling	Name of CAT officer assigned to resolve complaint	Ensures accountability and traceability
Supervising Officer	Name of supervising officer overseeing resolution	For quality control and review
Status of Complaint	Current stage (e.g., Received, Under Investigation, Resolved, Escalated)	Supports monitoring of pending or overdue complaints
Actions Taken	Detailed description of steps taken to address the complaint	Should include interim measures and final actions
Resolution of Complaint	Outcome of complaint (e.g., dismissed, rectified, compensated, escalated)	Clear and documented for transparency
Aging of Complaint	Number of days since receipt	Helps monitor compliance with resolution timelines
Date of Resolution	Date complaint was resolved	For performance metrics and SLA tracking
Date of Communication	Date results were communicated to the consumer	Must match the printed communication requirement
Supporting Documents	List of attachments, emails, letters, or proofs	Ensures completeness and evidence for audit
Remarks	Any other relevant information	Can include feedback, lessons

	or observations	learned, or trends

Attached as Annex H complaints database template which can be adapted to CDAREs' size, complexity, and digital capacity.

c. Analysis and Utilization

The complaints database is not just a storage tool, it is an active management instrument:

i. Trend Analysis – Identify the most frequent complaint types, products or services causing dissatisfaction, or patterns indicating systemic issues.
ii. Performance Metrics – Calculate average resolution times, percentage of complaints resolved within SLA, and escalation rates.
iii. Risk Assessment – Highlight potential financial, operational, reputational, or regulatory risks arising from repeated complaints.
iv. Management Reporting – Provide data to Senior Management and the Board of Directors for strategic decision-making and oversight.

The database supports quarterly reporting, feeding into the Consumer Feedback Mechanism and broader continuous improvement processes.

d. Confidentiality and Security

i. All data in the complaints database must comply with the Data Privacy Act of 2012.
ii. Access to the database shall be restricted to authorized personnel only, primarily the CAT and supervising officers.
iii. Physical and electronic safeguards should be in place to protect the integrity and confidentiality of complaint data.
iv. Sharing of complaint information outside PECCI must only occur for legitimate investigative purposes or as required by the Authority.

13. Preparation and Submission of Complaints Reports

The Complaints Report is a critical component of the FCPAMS, serving as a structured mechanism for monitoring, oversight, and accountability. It provides Senior Management and the BOD with a clear, accurate, and timely view of the nature, status, and resolution of consumer complaints, as well as insights for continuous improvement in consumer protection practices.

The CAT is responsible for preparing and submitting the report to Senior Management, who in turn endorses it to the BOD on a monthly basis. The report should also be made available to the CDA for inspection and compliance monitoring.

a. Objectives of the Complaints Report

The Complaints Report serves several purposes:

i. Operational Oversight – Ensures that complaints are handled according to established procedures and timelines.
ii. Accountability – Documents the CAT's actions and Senior Management's review to

promote responsible governance.

iii. Trend Analysis – Identifies recurring issues, systemic risks, and areas requiring process improvements.
iv. Regulatory Compliance – Provides an auditable record for CDA inspections or examinations.
v. Continuous Improvement – Informs decision-making for training, policy updates, and operational adjustments.

b. Contents of the Complaints Report

Each report shall include the following sections:

Section	Description	Purpose / Notes
General Category of Complaints	Broad classification of complaints received	Examples: product-related, service-related, digital transaction issues, account errors, fees/charges disputes
Number of Complaints per Category	Quantitative count of complaints in each Category	Enables monitoring of high-volume complaint areas
Number of Complaints Resolved	Number of complaints closed during the reporting period	Measures effectiveness and responsiveness
Aging of Complaints	Average time taken for resolution; includes pending complaints	Monitors compliance with resolution timelines: 7 days for simple, 45 days for complex complaints
Explanations for Deviations	Justifications for complaints resolved beyond prescribed Timelines	Ensures accountability for delays and documents mitigating circumstances
General Description of Resolutions & Actions Taken	Summary of corrective measures, redress, or other actions applied	Provides qualitative insight into handling practices and operational improvements
Recommendations for Continuous Improvement	Suggestions to prevent recurring complaints, enhance service, and improve personnel Competency	Feeds into training, policy adjustments, and process optimization

c. Reporting format

The Complaints Report (attached as Annex I) shall be presented in tabular form for clarity and ease of analysis.

d. Submission Process

The CAT shall prepare a monthly complaints report compiling all complaints received, resolved, and pending, ensuring the accuracy of complaint status, resolution dates, actions taken, and attaching relevant supporting documents.

i. Senior Management shall review and validate the report, assess the performance of the CAT, identify operational gaps, and endorse recommendations for improvement prior to submission.
ii. The monthly complaints report, together with Senior Management's comments, shall be submitted to the BOD for oversight and review of complaint trends and consumer protection compliance, and shall be made available to CDA inspectors or examiners during regulatory inspections or examinations.

14. System for Evaluating the Effectiveness of the FCPAMS

The FCPAMS is a critical framework to ensure that financial consumers' complaints, requests, and inquiries are handled efficiently, fairly, and transparently. To maintain high standards of consumer protection, CDAREs must implement a systematic and periodic evaluation process to assess the effectiveness of their FCPAMS.

Evaluation ensures that the system remains responsive, identifies gaps or inefficiencies, and promotes continuous improvement in complaint handling, consumer assistance, and overall service quality.

a. Objectives of the FCPAMS Evaluation System

The evaluation of FCPAMS serves to:

i. Assess Responsiveness – Determine whether consumer complaints, requests, and inquiries are resolved within prescribed timelines and according to established processes.
ii. Identify Gaps and Weaknesses – Detect systemic issues in procedures, personnel performance, or resource allocation that may impact consumer protection.
iii. Promote Continuous Improvement – Provide actionable recommendations to enhance policies, processes, and service delivery.
iv. Enhance Accountability and Governance – Ensure that the CAT, Senior Management, and Board of Directors maintain oversight of consumer protection mechanisms.
v. Support Regulatory Compliance – Provide auditable evidence to the CDA and ensure alignment with consumer protection regulations, including RA 11765 and related guidelines.

b. Key Components of the Evaluation Process

The evaluation of FCPAMS shall be multi-dimensional, incorporating both quantitative and qualitative assessments. The key components include:

Component	Description	Source of Data
Complaint Handling Efficiency	Measures whether complaints are acknowledged, assessed,	Complaints database, CIR forms

	and resolved within required timelines (7 days for simple, 45 days for complex)	
Complaint Resolution Effectiveness	Evaluates whether complaints were resolved satisfactorily, including application of corrective actions and redress	Complaints reports, follow-up surveys
Consumer Satisfaction	Assesses financial consumers' satisfaction with the complaint handling and overall services	Customer feedback forms, surveys, focus groups
Compliance with Policies & Procedures	Determines adherence to internal policies, confidentiality, conflict of interest, and escalation Procedures	Audit reports, CAT internal checklists
Recurring Issues and Root Causes	Identifies recurring complaint categories and systemic problems to inform preventive measures	Complaints database analysis, trend reports
Personnel Performance	Reviews the performance of CAT personnel in handling complaints professionally, timely, and accurately	Feedback surveys, performance evaluations
Improvement Implementation	Monitors whether recommendations from prior evaluations were implemented effectively	Follow-up reports, BOD review notes

c. Evaluation Methodology

i. Relevant complaint data shall be collected and compiled for the evaluation period, including complaints reports, CIR forms, feedback surveys, and database records covering simple and complex complaints, inquiries, requests, complaint aging, unresolved cases, and recurring issues.
ii. Quantitative and qualitative analysis of complaint handling performance shall be conducted by measuring key indicators such as acknowledgment timeliness, resolution timeliness, resolution success rate, complaint trends, adequacy of actions taken, and consumer feedback on satisfaction and accessibility.
iii. Performance gaps and systemic issues shall be identified by comparing actual results with internal service standards and regulatory requirements, including reviewing

procedural weaknesses, recurring complaints, and operational constraints that may affect effective complaint resolution.

iv. Based on the findings, an Evaluation Report on the Effectiveness of the FCPAMS shall be prepared, including recommendations and corrective actions, which shall be submitted to Senior Management for review and endorsement to the BOD, with a summary of KPIs, identified gaps, corrective measures, and implementation timelines.

d. Frequency of Evaluation

i. An Annual Evaluation shall be conducted, which involves a comprehensive review of all complaints, consumer feedback, and KPIs for the entire year to assess the effectiveness of the complaint handling system.
ii. The CDARE may also conduct a Special Evaluation when necessary, such as after significant changes in products or services, the introduction of new processes, or in response to regulatory recommendations or identified systemic issues.

Sample Evaluation Report on The Effectiveness of the FCPAMS is shown under Annex J.

IX. APPROVAL, REVIEW AND AMENDMENT OF THE MANUAL

This Manual shall be subject to approval, periodic review, amendment, revision, and updating to ensure its continuing relevance, effectiveness, operational responsiveness, and compliance with applicable laws, rules, regulations, and issuances relating to financial consumer protection and the operations of PECCI.

Any approval, review, amendment, modification, supplementation, or revision of this Manual shall be guided by the principles of transparency, accountability, regulatory compliance, operational efficiency, and protection of financial consumers.

1. Approval and Effectivity

This Manual shall be approved by the BOD through an appropriate Board Resolution.

Upon approval, this Manual shall take effect fifteen (15) days after its publication, posting, dissemination, or circulation in accordance with applicable laws, rules, regulations, and internal policies.

All officers, employees, committees, authorized representatives, and third-party service providers concerned shall be furnished copies of this Manual and shall be responsible for complying with and implementing its provisions.

Where applicable, financial consumers shall be informed of relevant provisions affecting their rights, obligations, terms and conditions, or consumer assistance mechanisms through appropriate disclosure channels.

The following procedures shall govern the approval of this Manual:

i. The draft Manual shall be prepared, consolidated, or endorsed by the (Assistant General Manager / Oversight Head of CAT).

ii. The proposed Manual shall be reviewed by the (Credit Committee, Audit Committee and Legal and Compliance Committee) to determine consistency with applicable laws, regulations, consumer protection standards, operational requirements, and institutional objectives.
iii. Comments, recommendations, or revisions from concerned offices, committees, officers, or management may be incorporated prior to endorsement for approval.
iv. The final draft of the Manual shall be submitted to the BOD for evaluation and approval through an appropriate Board Resolution.

2. Review and Amendment of the Manual

This Manual shall be subject to periodic review, amendment, revision, and updating to ensure its continuing relevance, effectiveness, operational responsiveness, and compliance with RA No. 11765 and its IRR, CDA MC No. 2025-08, and other applicable laws, rules, regulations, and regulatory issuances.

The review and amendment of this Manual shall be undertaken (annually) including but not limited to the following circumstances:

i. Changes in applicable laws, rules, regulations, or regulatory issuances issued by the CDA or other regulatory authorities;
ii. Adoption of new financial products, services, technologies, systems, or operational processes;
iii. Identification of gaps, weaknesses, risks, or deficiencies in existing consumer protection policies, procedures, controls, or complaint handling mechanisms;
iv. Findings and recommendations arising from internal audits, compliance reviews, regulatory examinations, risk assessments, or consumer complaints analysis; and
v. Other circumstances requiring enhancement or strengthening of the financial consumer protection framework and operational policies.

The following procedures shall govern the review, amendment, or revision of this Manual:

i. Any proposed amendment or revision may be initiated by the (Board of Directors, Senior Management, CAT, Internal Audit, Credit Committee, Audit Committee, Legal and Compliance Committee or any designated committee or unit responsible for consumer protection compliance).
ii. All proposed amendments shall be reviewed by the (Credit Committee, Audit Committee and Legal and Compliance Committee) to determine consistency with existing laws, regulations, consumer protection standards, and operational requirements.
iii. Proposed amendments shall include the justification, objectives, and expected impact of the changes, including any effects on financial consumers, internal operations, and compliance obligations.

iv. Material amendments affecting consumer rights, complaint handling procedures, pricing structures, disclosures, or operational controls shall be evaluated for their potential impact on financial consumers and corresponding mitigating measures shall be identified.
v. All amendments or revisions to this Manual shall require approval by the Board of Directors through an appropriate Board Resolution prior to implementation.
vi. Upon approval, the amended provisions shall be properly communicated to all concerned officers, employees, committees, authorized representatives, and third-party service providers to ensure awareness and effective implementation.
vii. Where applicable, financial consumers shall be informed of amendments affecting their rights, obligations, terms and conditions, or consumer assistance mechanisms through appropriate disclosure channels.
viii. Proper version control and documentation of all amendments shall be maintained which shall include the date of approval, effectivity date, summary of revisions, and corresponding Board Resolution number.

ANNEX A

PRODUCT SUITABILITY AND AFFORDABILITY ASSESSMENT TOOL

This template shall be completed prior to the approval of any financial product to determine whether the product is suitable for the intended consumer segment and affordable for the target market.

A. Product Identification

Item	Details
Product Name	
Product Type (Loan / Savings / Deposit / Insurance / Other)	
Target Market	
Intended Product Purpose	
Product Term	
Proposed Interest Rate	
Fees and Charges	
Responsible Officer	
Date of Assessment	

B. Target Market Suitability Assessment

Criteria	Result (Pass/Fail)	Remarks
Target market clearly defined (income level, occupation, capacity)		
Product addresses a clear financial need of the target market		
Product complexity appropriate to financial literacy level		
Eligibility criteria aligned with target market profile		
Bundled products justified and appropriate		

Suitability Result: ☐Suitable ☐Requires Modification ☐Not Suitable

C. Product Pricing and Cost Review

Pricing Component	Details
Interest Rate	
Service Charges	
Processing Fees	
Penalties	
Insurance Premium (if applicable)	
Other Charges	

Pricing Compliance Test:

Criteria	Compliance (Yes/No)	Remarks
Pricing supported by documented cost analysis		
Pricing approved by Board or authorized committee		
Interest and other charges within CDA policy limits		
Interest, other charges and penalties within CDARE's policy limits		

No hidden or undisclosed charges		

D. Affordability Analysis

Indicator	Value
Estimated average income of target market	
Estimated monthly amortization	
Estimated disposable income (Income after mandatory deductions such as taxes and social benefit contributions)	
Repayment-to-disposal income ratio (Estimated monthly amortization/Estimated disposal income)	

Repayment-to-disposal income ratio (Debt Servicing Ratio) Guide:

≤ 40% – Acceptable 41–50% – Moderate Risk

> 50% – High Risk

Affordability Result: ☐ Affordable if the result is acceptable

☐ Requires Adjustment if the result involves moderate risk ☐ Not Affordable if the result is high risk

May include other criteria such as:

E. Consumer Harm Test delete

Risk Indicator	Yes/No	Remarks
Product may encourage excessive borrowing		
Pricing structure may cause repayment stress		
Product complexity may confuse consumers		
Bundled products may restrict consumer choice		
Risk of over-indebtedness among target market		

F. Product Risk Rating delete

Risk Category	Rating (Low / Medium / High)
Consumer Protection Risk	
Financial Risk	
Operational Risk	
Reputational Risk	

Overall Product Risk Rating: ☐ Low ☐ Moderate ☐ High

G. Final Recommendation

☐ Product may be approved

☐ Product requires modification before approval

☐ Product should be approved

Recommended changes (if any): ___________________________

H. Approval

Role	Name	Signature	Date
Credit Committee			
Board of Directors			

ANNEX B

PECCI Multipurpose Cooperative
[Formerly PLDT EMPLOYEES CREDIT COOPERATIVE (PECCI)]
4TH Floor Universal-Re Bldg. Paseo de Roxas corner Perea Sts., Makati City
Tel. Nos. (02) 8892-6917 / (02) 8813-1656 / (02) 8892-8959

DATA PRIVACY CONSENT CLAUSE

By signing this Loan Application Form, I hereby authorize **PECCI Multipurpose Cooperative (PECCI)** to collect, use, process, store, and share my personal and financial information for purposes related to the evaluation, verification, approval, and administration of my loan application and any resulting credit facility.
I understand that my information may be disclosed to authorized officers, employees, partner institutions, and regulatory authorities, when necessary, subject to applicable laws and regulations, including the Data Privacy Act of 2012. I acknowledge that my personal data shall be handled with confidentiality and protected through appropriate safeguards in accordance with **PECCI** data privacy policies.

Signature Over Printed Name
Date

PECCI Multipurpose Cooperative
[Formerly PLDT EMPLOYEES CREDIT COOPERATIVE (PECCI)]
4TH Floor Universal-Re Bldg. Paseo de Roxas corner Perea Sts., Makati City
Tel. Nos. (02) 8892-6917 / (02) 8813-1656 / (02) 8892-8959

Reklamo, Kahilingan, o Katanungan Form
Complaint, Inquiry and Request Form (CIR)

A. Kapahintulutan (Data Privacy Consent)			
Sumasang-ayon ka ba sa pagkolekta at pagbahagi ng iyong personal na impormasyon para sa pag-proseso ng iyong reklamo, kahilingan o katanungan ayon sa PECCI Multipurpose Cooperative Data Privacy Policy? (Do you agree in the collection and sharing of your personal information during complaint, request or inquiry processing in accordance with the PECCI Multipurpose Cooperative Data Privacy Policy?) ☐ **AKO AY SUMASANG-AYON** (I AGREE) ☐ **DI AKO SUMASANG-AYON** (I DO NOT AGREE) **PIRMA** (SIGNATURE): **PETSA** (DATE):			
B. Personal na Impormasyon (Personal Information)			
Buong Pangalan (Full Name)			
Numero ng telepono o cellphone (Telephone or mobile phone number)			
Email Address			
Tirahan (Address)			
Kasarian (Sex at birth)	☐**Babae** (Female) ☐**Lalaki** (Male)		
Uri ng hinaing (Type of Request) **Pumili ng isa** (Choose one)	☐ **Reklamo** (Complaint)	☐ **Kahilingan** (Request)	☐ **Katanungan** (Inquiry)
C. Paglalarawan ng reklamo, kahilingan o tanong (Magdagdag ng papel, kung kinakailangan) *Description of complaint, request or inquiry (Continue on a separate sheet of paper, if necessary)*			
D. Halaga ng sangkot na salapi, kung mayroon man *(Amount involved, if any)*			

PECCI Multipurpose Cooperative
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Tel. Nos. (02) 8892-6917 / (02) 8813-1656 / (02) 8892-8959

CONFIDENTIALITY CLAUSE

All information obtained, processed, and documented during the handling of financial consumer complaints and requests under the Financial Consumer Protection Assistance Management System (FCPAMS) shall be treated with strict confidentiality. **PECCI Multipurpose Cooperative (PECCI)** shall ensure that the identity, personal information, and transaction details of the financial consumer are safeguarded and used solely for the purpose of resolving the complaint or request.

Access to confidential information shall be limited to authorized personnel directly involved in the assessment, investigation, and resolution of the complaint. Any disclosure of information to third parties shall require the explicit consent of the financial consumer, except when disclosure is necessary to comply with legal or regulatory requirements.

The CDARE shall adopt appropriate data privacy and security measures in accordance with the RA 10173 or the Data Privacy Act of 2012 and its implementing rules and regulations. Unauthorized disclosure, misuse, or mishandling of confidential information shall be subject to disciplinary action and applicable penalties under existing laws and **PECCI** policies.

ANNEX E

PECCI Multipurpose Cooperative
[Formerly PLDT EMPLOYEES CREDIT COOPERATIVE (PECCI)]
4TH Floor Universal-Re Bldg. Paseo de Roxas corner Perea Sts., Makati City
Tel. Nos. (02) 8892-6917 / (02) 8813-1656 / (02) 8892-8959

STATEMENT OF NO CONFLICT OF INTEREST

PECCI Multipurpose Cooperative (PECCI) hereby affirms its commitment to uphold the principles of impartiality, fairness, and transparency in the implementation of the Financial Consumer Protection Assistance Management System (FCPAMS).

All personnel involved in the assessment, investigation, and resolution of financial consumer complaints and requests shall perform their duties objectively and without any conflict of interest. They shall disclose any personal, financial, or professional relationships that may affect impartiality or create a perception of bias in handling consumer concerns.

Any personnel found to have a conflict of interest shall be immediately excused from the complaint-handling process, and the matter shall be reassigned to an independent officer or committee to ensure fair and unbiased resolution.

The CDARE shall adopt internal policies and procedures to prevent, identify, and manage conflicts of interest, consistent with consumer protection laws and **PECCI** governance standards.

ANNEX F

PECCI MULTIPURPOSE COOPERATIVE (PECCI)
CONSUMER FEEDBACK FORM

This Consumer Feedback Form is designed to gather insights from financial consumers to assess the quality, efficiency, and transparency of the Financial Consumer Protection Assistance Management System (FCPAMS) of PECCI Multipurpose Cooperative. Your feedback will help us improve our services and ensure consumer protection.

Consumer Information:
NAME: ____(optional)
CONTACT NUMBER: ____________________________________(optional)
EMAIL ADDRESS: ______________________________________(optional)
DATE: ____

Which channels did you use to file your complaint/request/inquiry? (Check all that apply)

☐ Walk-in ☐ Phone call
☐ Email ☐ Online Portal
☐ Social media (Facebook) ☐ Others (Please specify): _________________________

Please rate each statement using the scale below:

Scale	Description
5	Strongly Agree
4	Agree
3	Neutral
2	Disagree
1	Strongly disagree

Statement	5	4	3	2	1	N/A
I found the process of filing complaint/request/inquiry easy and convenient.						
My complaint/request/inquiry was resolved within the expected timeframe.						
The complaint/request/inquiry process, timelines, and status updates were clearly explained and communicated.						
The personnel who handled my complaint/request/inquiry was/were courteous and professional.						
The personnel demonstrated knowledge of products, services, and complaint resolution procedures.						
The personnel responded to my complaint/request/inquiry promptly.						
The resolution provided to my complaint was fair and impartial.						
I was assured that my personal and financial information was handled with confidentiality and care.						
I was informed of my right to escalate my complaint if the resolution was unsatisfactory.						
I am satisfied with the overall complaint/request/inquiry-handling process.						
Please share any additional suggestions to help us improve our services:						

I hereby declare that the information provided is true and correct to the best of my knowledge.
Signature: ___________________________
Date: ___________________________

Thank you for taking the time to share your feedback. Your opinion is valuable in helping us improve our services and ensure the protection of financial consumers.

ANNEX G

PECCI MULTIPURPOSE COOPERATIVE (PECCI)
Sample Quarterly Report on Consolidated Feedback and Analysis Report
For the Quarter Ended _______

1. **Total Complaints/Requests/Inquiry Received: 25**
2. **Summary of Responses**

Statement	**Average Rating**
1. I found the process of filing complaint/request/inquiry easy and convenient.	4.2
2. My complaint/request/inquiry was resolved within the expected timeframe.	3.8
3. The complaint/request/inquiry process, timelines, and status updates were clearly explained and communicated.	4.0
4. The personnel who handled my complaint/request/inquiry was/were courteous and professional.	4.5
5. The personnel demonstrated knowledge of products, services, and complaint resolution procedures.	4.3
6. The personnel responded to my complaint/request/inquiry promptly.	4.1
7. The resolution provided to my complaint was fair and impartial.	4.0
8. I was assured that my personal and financial information were handled with confidentiality and care.	4.4
9. I was informed of my right to escalate my complaint if the resolution was unsatisfactory.	3.9
10. I am satisfied with the overall complaint/request/inquiry-handling process.	4.2
Overall Average Rating	**4.1**

3. **Key Findings**

Based on the analysis of the survey responses, the following key findings were observed:

- Consumers expressed high satisfaction with the courtesy and professionalism of personnel;
- Timeliness of resolution received the lowest rating, indicating the need for improvement; and
- Grievance escalation awareness needs enhancement to effectively exercise their rights and access to redress mechanisms.

4. **Recommendations**

To address the identified areas for improvement, the following recommendations are proposed:

- Streamline the complaint resolution process to improve timeliness;
- Improve the dissemination of information on grievance escalation procedures through various communication channels to ensure that financial consumers are well-informed of their rights and available redress mechanisms;
- Provide refresher training to personnel on customer service, product knowledge, and consumer protection policies;

ANNEX H

PECCI MULTIPURPOSE COOPERATIVE (PECCI)
SAMPLE COMPLAINTS DATABASE

SIMPLE COMPLAINTS

Complaint Reference Number	Name of the Complainant	Date of Receipt of the Complaint	Subject/Nature of the Complaint	Name of the personnel directly handling or in charge of the complaint and the officer supervising its resolution	Status of the Complaint (Resolved/ On-going)	Actions taken on the complaint	Resolution of the complaint	Date of Resolution	Aging of Complaints (from acknowledgement to resolution)			Remarks
									1-3 days	4-7 days	8 days and above	
SC-2025-001	Juan Dela Cruz	2025-02-10	Erroneous computation of interest	Maria Santos (CSO), Mr. Reyes (Compliance Officer)	Resolved	Verified loan documents and recalculated interest charges	Issued corrected loan statement and refunded overcharged amount	2025-02-16		/		Member was satisfied with the resolution
SC-2025-002	Maria Lopez	2025-02-12	Delay in the release of loan	Joel Ramirez (Loan Officer), Mr. Cruz (Manager)	Resolved	Expedited loan review and approval process	Loan was released with an apology letter	2025-02-14	/			Process improvement: Implement ed tracking system
SC-2025-003	Mark Reyes	2025-02-08	Charges not disclosed	Jenny Santiago· (Customer Service), Mr. Dela Peria (Manager)	Resolved	Provided detailed breakdown of charges	Waived undisclosed fees and updated policy	2025-02-18			/	Include a Disclosure Checklist before signing loan agreements

COMPLEX COMPLAINTS

Complaint Reference Number	Name of the Complainant	Date of Receipt of the Complaint	Subject/Nature of the Complaint	Name of the personnel directly handling or in charge of the complaint and the officer supervising its resolution	Status of the Complaint (Resolved/ On-going)	Actions taken on the complaint	Resolution of the complaint	Date of Resolution	Aging of Complaints					Remarks
									1-5 days	6-15 days	16-30 days	31-45 days	46 days and above	
CC-2025-001	Ana Castillo	2025-01-15	Unauthorized loan	John Cruz (Fraud Analyst), Atty. Del Rosario (Legal Counsel)	Resolved	Investigated transaction	Reversed unauthorized transaction	2025-02-10						Strengthened fraud detection system
CC-2025-002	Roberto Santos	2025-01-20	Non-recording of loan payment	Lisa Tan (Collecting Officer), Mr. Medina (Operations Head)	Resolved	Internal investigation conducted	Posted payment and disciplinary action to Loan Officer undertaken	2025-02-03						Conduct monthly reconciliation of member accounts to identify discrepancies and correct errors promptly
CC-2025-003	Carlos Jimenez	2025-01-10	Breach of the cooperative's data storage system, compromising financial consumer information	Martin Torres (Data Protection Officer), Ms. Ramos (Compliance Officer)	Ongoing	Internal investigation ongoing	Pending final resolution	Pending						Reviewing privacy policies

ANNEX I

PECCI Multipurpose Cooperative
[Formerly PLDT EMPLOYEES CREDIT COOPERATIVE (PECCI)]
4TH Floor Universal-Re Bldg. Paseo de Roxas corner Perea Sts., Makati City
Tel. Nos. (02) 8892-6917 / (02) 8813-1656 / (02) 8892-8959

SAMPLE COMPLAINTS REPORT TO BOARD OF DIRECTORS
For the Month Ended ________________

General category of complaints received	Number of complaints received per category	Number of complaints resolved	Aging of complaints (Number of days the complaints were resolved)			Explanations for deviations, if any, from the required resolution period	General description of resolutions and actions taken relative to complaints received	Recommendations on how to avoid recurring complaints and suggestions for process and personnel competency improvement
			1-3 days	4-7 days	8 days and above			
Simple complaints	4	4	2	1	1	One complaint pending additional document submission	Processed pending loan applications and expedited issuance of official receipts	Implement checklist for complete loan requirements and assign dedicated personnel for follow-ups; Implement queue management system and digitize loan applications; Introduce online status tracking for applications

General category of complaints received	Number of complaints received per category	Number of complaints resolved	Aging of complaints (Number of days the complaints were resolved)					Explanations for deviations, if any, from the required resolution period	General description of resolutions and actions taken relative to complaints received	Recommendations on how to avoid recurring complaints and suggestions for process and personnel competency improvement
			1-5 days	6-15 days	16-30 days	31-45 days	46 days and above			
Simple complaints	1	1					1		Processed pending loan applications and expedited issuance of official receipts	Implement checklist for complete loan requirements and assign dedicated personnel for follow-ups; Implement queue management system and digitize loan applications; Introduce online status tracking for applications

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SAMPLE EVALUATION REPORT ON THE EFFECTIVENESS OF THE FCPAMS
FOR THE YEAR ENDED ___________

Performance Metrics	Performance Indicators	Actual Rating	Excellent (5)	Very Good (4)	Satisfactory (3)	Needs Improvement (2)	Poor (1)	Score
Resolution Efficiency	Percentage of consumer complaints, requests, or inquiries resolved within the prescribed timeframe		95% and above	85% to 94%	75% to 84%	50% to 74%	Below 50%	
		92%		/				4
Resolution Effectiveness	Percentage of resolved cases with fair and satisfactory outcome based on consumer feedback	80%	95% and above	85% to 94%	75% to 84%	50% to 74%	Below 50%	
					/			3
Consumer Satisfaction	Overall satisfaction rating from consumers who have used the FCPAMS	3.8	4.5 to 5.0 (Very Satisfied)	4.0 to 4.49 (Satisfied)	3.0 to 3.99 (Neutral)	2.0 to 2.99 (Dissatisfied)	Below 2.0 (Very Dissatisfied)	
					/			3
Escalation Rate	Percentage of complaints escalated to the CDA due to unresolved or unsatisfactory outcomes	6%	2% and below	3% to 5%	6% to 10%	11% to 15%	Above 15%	
					/			3
Regulatory Compliance	Timeliness and accuracy of consumer assistance reports (i.e., Complaints Report) submitted to the Board of Directors	97%	100% of reports submitted on time with complete and accurate data	90% to 99% of reports submitted on time with minor errors	80% to 89% of reports submitted on time, some requiring corrections	60% to 79% of reports submitted late or with errors	Below 60% of reports submitted late or incomplete	
				/				4
Average Score								**3.4 Satisfactory**

Overall Performance Summary:

1. Strong Areas: Resolution Efficiency and Regulatory Compliance
2. Areas for Improvement: Consumer Satisfaction and Escalation Rate

Recommendation:

1. Conduct consumer feedback analysis to improve satisfaction levels.
2. Strengthen resolution processes to reduce escalations.

ANNEX K

List of PECCI Products and Services

Interest rate is 9% diminishing balance equivalent to 4.8% per annum

Category	Loan Description	Maximum Loanable Amount	Number of Co-makers	Repayment Terms
Short Term Loan	Newbie Loan	60,000	Three (3)	Up to 24 months
Short Term Loan	Mini Loan	90,000	Three (3)	Up to 36 months
Short Term Loan	Inflationary Loan	100,000	Six (6)	Up to 36 months
Short Term Loan	Variable Loan	120,000	Six (6)	Up to 36 months
Short Term Loan	Calamity Loan	200,000	Six (6)	Up to 36 months
Short Term Loan	Emergency Loan	150,000	Six (6)	Up to 36 months
Short Term Loan	Educational Loan	250,000	Six (6)	Up to 36 months
Short Term Loan	Regular Loan	290,000	Six (6)	Up to 36 months
Short Term Loan	Maternity / Paternity Loan	100,000	Six (6)	Up to 36 months
Short Term Loan	Special Assistance Loan	210,000	Six (6)	Up to 36 months
Short Term Loan	Credit Card Balance Transfer Loan	250,000	Six (6)	Up to 36 months
Short Term Loan	Bonus Advance Loan: Midyear	80% of basic monthly salary after deducting tax	Three (3)	Payable within three (3) working days after the release of bonus
Short Term Loan	Bonus Advance Loan: Longevity	80% of basic monthly salary after deducting 32% tax	Three (3)	Payable within three (3) working days after the release of bonus
Short Term Loan	Bonus Advance Loan: 13th month	80% of basic monthly salary	Three (3)	Payable within three (3) working days after the release of bonus
Short Term Loan	Bonus Advance Loan: Christmas	80% of basic monthly salary	Three (3)	Payable within three (3) working days after the release of bonus
Short Term Loan	Bonus Advance Loan: Unused Sick Leave Pay	50% of gross USLP	Three (3)	Payable within three (3) working days after the release of bonus

Category	Loan Description	Maximum Loanable Amount	Repayment Terms
Long Term Loan	Enhanced PECCI Loan Account Restructuring (EPLAR)	Loan Matrix or net 60,000	Up to 180 months
Long Term Loan	Loyal Member Loan (LML)	3,000,000	Up to 120 months
Long Term Loan	Pangkabuhayan Loan (PL2)	750,000	Up to 120 months
Long Term Loan	Advance Retirement Loan (ARL)	1,000,000	Up to 180 months
Long Term Loan	Regular Provident Loan (RPL)	3,000,000	Up to 120 months
Long Term Loan	Pinag-isang Loan Balances (PLB)	3,000,000	Up to 180 months
Long Term Loan	Enhanced Car Loan (ECL)	1,500,000	Up to 120 months
Long Term Loan	Buy Out Loan (BOL)	6,000,000	Up to 180 months
Long Term Loan	Express Loan (EXPL)	3,000,000	Up to 60 months