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Financial Consumers Protection Assistance Management Systems (FCPAMS)

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I. Introduction

Financial consumers are vital to the development of a strong and resilient financial system. Therefore, it is essential to foster an environment where consumers can make informed financial decisions and carry out transactions with confidence that their rights and personal information are safeguarded. Equally important is ensuring that consumers have accessible channels to express concerns or provide feedback on the cooperative's products and services.

The ***Financial Consumers Protection Assistance Management Systems (FCPAMS)*** Manual sets forth the general policies and procedures of Sorosoro Ibaba Development Cooperative (SIDC) in handling of consumer concerns, in compliance with the following regulations:

a. Cooperative Development Authority (CDA) MEMORANDUM CIRCULAR NO. 2023 - 14 Series of 2023: IMPLEMENTING RULES AND REGULATIONS OF REPUBLIC ACT NO. 11765, OTHERWISE KNOWN AS THE "FINANCIAL PRODUCTS AND SERVICES CONSUMER PROTECTION ACT"

The CDA issued the circular to all cooperatives engaged in financial services to implement measures that protect the following rights of financial consumers:

- a.Right to equitable and fair treatment;
- b.Right to disclosure and transparency of Financial Products and Services;
- c.Right to protection of consumer assets against fraud and misuse;
- d.Right to data privacy and protection; and
- e.Right to timely handling and redress of complaints.

II. Purpose

This manual is in compliance with the CDA issued Implementing rules and regulations on Financial Consumer Protection Memorandum Circular 2023-14 Series of 2023. This shall serve as guide for all branches of Koopinoy SIDC Savings and Loans when dealing with clients, processing their transactions, and safeguarding their personal information. This includes overall governing policies adapted by the cooperative to protect the interest of financial consumers and promote a high standard of accountability. This also provides the tools for proper risk management and compliance programs.

III. Scope

This manual enumerates the basic principles and ethical business practices that govern the conduct of the cooperative in dealing with consumers. This ensures that appropriate mechanisms are in place to protect the interest of consumers of financial products and services under the conditions of transparency, fair and sound market conduct, and fair, reasonable, and effective handling of financial consumer disputes, which are aligned with global best practices.

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IV. Definition of Terms

Authority	refers to the Cooperative Development Authority, a government agency created by virtue of RA No. 6939, as amended by Republic Act No. 11364, in compliance with the provisions of Section 1, Article XIII of the 1987 Constitution which mandates Congress to create an agency to promote the viability and growth of cooperatives as instruments of equity, social justice and economic development.
Business Unit	refers to the units responsible for fulfilling requests and resolving product and/or service-related concerns.
Financial Consumer/clients	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 a CDARE regulated by the Authority.
Member	refers to a person, either natural or juridical, who adheres to the universally-recognized principles of cooperation and in the Articles of Cooperation and By-Laws, and has been admitted by the cooperative as member.
Complaint	refers to an expression of dissatisfaction submitted by a financial consumer relative to a financial product or service regulated by the Authority in which a response and/or resolution is expected.
Consumer Assistance Officer (CAO)	a personnel of the cooperative who interfaces with clients, is accountable for proper handling and/or resolution of customer concerns, and/or is responsible for ensuring their Business Unit's adherence to the Consumer Protection standards of conduct.
Consumer Assistance Team (CAT)	manages the cooperative's published customer service hotline and email address where clients may direct their queries, requests, and/or complaints.
Cooling off Period	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 of the cooperative and to cancel the agreement without penalty of any kind upon his or her written, electronic or other form of valid notice to the cooperative during the given period.
Complex complaint case	a complaint / request which will require more than five (5) business days to resolve due to the need to conduct thorough investigation involving various units of the cooperative or for third party intervention, assessment, or verification. Resolution thereof may ideally be achieved within a 45-day calendar period.

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V. Duties and responsibilities of SIDC

V.1 Fair and Equitable Treatment of Consumers

SIDC shall have the right to select their clients from the members of the cooperative: Provided, that it shall not discriminate against clients on the basis of race, age, financial capacity, ethnicity, origin, gender, disability, health condition, sexual orientation, religious or political affiliation: Provided, further, That SIDC may provide distinction, as necessary, when making a risk assessment on a specific financial product or service.

However, it is also the right of every financial consumer to be treated fairly, honestly, and professionally at all stages of the transaction.

SIDC demonstrates the principle of fair and equitable treatment toward financial consumers if its policies and practices observe the following:

- a. Terms and conditions are not unfair in that there is significant imbalance in the parties' rights and obligations arising under the contract, to the detriment of the financial consumer. In any agreement with the financial consumer, a term should be deemed to be unfair if it exempts or absolves a cooperative from acting with skill, care, diligence or professionalism towards a financial consumer in connection with the provision of any product or service and/or liability for failing to do so. Ambiguities in contractual terms and conditions should be construed in favor of the financial consumer.
- b. The cooperative does not employ abusive collection or debt recovery practices against its financial consumers. It shall resort to all reasonable and legally permissible means to collect amounts due them. However, in doing so, they must observe good faith and reasonable conduct and refrain from engaging in unscrupulous or untoward acts.

Both the Authority and SIDC shall ensure that mechanisms are in place to safeguard the interests of consumers.

V.2 Code of Conduct

SIDC shall incorporated in its Code of Conduct the values that protect and uphold Consumer Protection and have a process in place to detect, respond to, and establish sanction on violations thereof. Cooperative personnel and authorized agents/representatives shall not:

- a. Use deceptive or aggressive sales techniques or force clients to sign contracts or rush into a financial deal without the benefit of shopping around.
- b. Employ harassment, public shaming, or any related abusive collection practices, etc.

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- c. Discriminate or take advantage of difficulties faced by vulnerable groups such as low-income earners and persons with disability.
- d. Employees and third-party agents are prohibited from employing abusive collection or debt recovery practices against consumers.

(Refer to HR Employee Code of Ethics and Return Discipline Management for Koopinoy Employees and Third Party Agents Contracting Policy)

V.3 Training and recruitment of Staff

Through SIDC Human Resources recruitment and learning and development sections, the cooperative shall align its recruitment and training policies around responsible, fair, and professional treatment of clients.

- a. The cooperative shall adopt a risk-focused screening process for its pre-employment or background checks based on factors like the position to be filled, responsibilities associated with such position, reputational, and Consumer Protection risk implications.
- b. SIDC officers and staff must receive adequate training suitable for the complexity of the financial products or services they sell to ensure understanding of their key features, risks, terms and costs, relevant FCP standards and requirements, including statutory and regulatory requirements and related internal policies and procedures that might impact their financial consumers, including those pertaining to consumer risks arising from cybersecurity and/or digital financial products and services. Any changes or updates on policies, systems and procedures as well as product enhancement are regularly discussed and explained during the Monthly Information Dissemination Meeting. Aside from trainings for frontline service personnel, training shall also be made available to compliance and internal audit officers and staff.
- c. Officers and staff, as well as authorized third-party agents or representatives contracted for sales and marketing purposes, do not use deceptive or high pressure/aggressive sales techniques and should not force clients to sign contracts or rush into a financial deal without shopping around.

(Refer to HR Recruitment, Training and On-boarding Policy)

VI. Product Design and Delivery

VI.1 Suitability and Affordability Assessments

In ensuring that financial products and services are offered with skill, due care and diligence, while at the same time considering the consumer's financial situation, needs, capabilities and

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overall risk profiles, SIDC shall conduct assessments to determine the affordability and suitability of a financial product and/or service for consumers.

SIDC must have a written procedures for determining whether a particular financial product or service is suitable and affordable to their consumers. This shall include the determination of whether or not the amount and terms of the offered financial product or service allow the financial consumers to meet their respective obligations with a low probability of a serious hardship, and that there is a reasonable prospect that the financial product or service will provide value to its consumers. For the purpose of extending credit, this assessment shall include measures to prevent over-indebtedness. For instance, during the credit investigation assessment, loanable amount and terms are determined based on the capacity and nature of collateral being presented.

If, as a pre-condition for availing a financial product or service, a financial consumer is obliged by the SIDC to purchase another product, the consumer shall have the option to choose the provider of said product subject to reasonable standards that may be set by the cooperative. SIDC is required to inform the consumer of said right prior to availing a financial product or service.

VI.2 Evaluation of Products and Services

In ensuring that the financial products or services offered are appropriately targeted to the needs, understanding, capacity and risk appetite of financial consumers, SIDC shall continuously evaluate their financial products and services, and implement internal policies and procedures for setting prices considering, among others, the principle of responsible pricing and other relevant guidelines promulgated by the Authority.

- a. SIDC shall design products and services that meet the needs of its target markets.
- b. A client suitability assessment shall be conducted, when necessary, to evaluate whether the product aligns with the client's risk profile. If the requested product does not match the client's assessed risk tolerance, a written or digital disclosure outlining the potential consequences must be provided and acknowledged by the client prior to proceeding.
- c. Product bundling should take into consideration product suitability and should not unduly limit consumer choice.

VI.3 Cooling-off Period

As part of commitment to consumer protection and in compliance with the Consumer Financial Protection Act (FCPA) Republic Act No. 11765, borrowers are given a Cooling-Off Period that allows them to cancel their loan within a specific time, frame if they change their mind. What is Cooling-Off period? It refers to the period of time during which you can change your mind or cancel the account without interest earned.

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In line to this the following terms and conditions applies with respect to Cooling-Off period:

1. Right to Cancel. The customer/client is given the right to cancel the loan within three (3) business days from the date of acceptance of the loan terms or from the date of loan release, whichever comes first.
2. To exercise this right, the Financial Consumer/Member must notify in writing through any of the available channels listed under Customer Service Contact Details. The cancellation request must be received within the Cooling-Off Period.
 - a. If the loan has not yet been released, the loan agreement will be canceled, and the member will have no further obligations.
 - b. If the loan has already been released, the Member must return the loan net proceeds within one (1) banking day from the cancellation request including cancellation fee.
3. Deductions & Fees

Upon cancellation, the expenses before and after the disbursement, the following deductions and fees may apply:

 - a. If the loan has not yet been released, the deductions and fees are processing fees or administrative costs and any directly related costs to the loan processing.
 - b. If the loan has already been released, all expenses incurred by SIDC on top of the loan net proceeds shall be collected.
 - c. A cancellation fee equivalent to Php 500.00 for loans up to Php 500,000.00 and Php 1,000.00 for loans of Php 500,001.00 and above.
4. Once the full loan amount has been returned, a confirmation of cancellation will be provided.
5. Limitations
 - a. The right to the Cooling-Off Period can only be exercised once per loan in a year.
 - b. If the Member fails to return the full loan amount within the given time frame, the loan agreement will remain in effect, and regular repayment terms will apply.

VI.4 Pre-payment of Loans and Other Credit Accommodations

A financial consumer of SIDC may, at any time prior to the agreed maturity date, pre-pay a loan or other credit transactions in whole or in part: Provided, That costs or fees charged to the financial consumer for such pre-payment, if any, shall be reasonable and, shall be disclosed to ensure transparency, accountability, and reasonable pricing.

VI.5 Interest Rate and Other Charges on Loans

The rate of interest including commissions, premiums, fees, and other charges on loans, and forbearance of money, regardless of maturity and whether secured or unsecured, shall be at the

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discretion of the cooperative within the range as reasonably determined by the Authority after consulting the cooperative through the National Alliance of Cooperatives.

VII. Consumer Protection Risk Management System (CPRMS)

To establish CPRMS in accordance with the guidelines to be issued by the Authority, which shall serve as the foundation for ensuring cooperative's adherence to the Financial Products and Services Consumer Protection Act (FCPA), other consumer protection laws, and relevant rules and regulations promulgated by the Authority.

VII.1 Board of Directors and Senior Management Oversight

VI.1.1 Responsibilities of the Board of Directors

The cooperative's Board of Directors shall be primarily responsible for establishing, reviewing, approving, and overseeing the implementation of the CPRMS, and shall perform the following, among others:

- a. Approving the CPRMS and Financial Consumers Protection Assistance Management System (FCPAMS) under Rule IV, taking into consideration the business model, market, product lines, and relationships with third parties that may give rise to consumer protection risks;
- b. Reviewing and approving the Code of Conduct;
- c. Ensuring that relevant information pertaining to the FCPAMS and cooperative's compliance with the FCPA, other consumer protection laws, rules and regulations, and market conduct guidelines promulgated by the Authority as well as actions taken relative thereto, are reported to the Board on a regular basis;
- d. Ensuring adequate provision of resources and effective implementation of training and competency requirements for officers and personnel;
- e. Approving remuneration and compensation packages structured to encourage responsible business conduct, fair treatment and mitigate conflicts of interest based on the recommendation of the senior management; and
- f. Periodically reviewing the implementation of the CPRMS and FCPAMS, including how findings are reported and whether the audit mechanisms in place provide adequate oversight in relation to the business model and/or operating environment.

VII.1.2 Responsibilities of the Senior Management

The Senior Management shall be responsible for ensuring that the practices of the cooperative are aligned with the approved consumer protection policies and risk management system. In this regard, the Senior Management shall perform the following, among others:

- a. Ensure that approved CPRMS and FCPAM policies and procedures are clearly documented, properly understood, and appropriately implemented across all levels and business units.

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b. 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:

- i. Provide adequate information on the performance and quality of the cooperative's FCPAMS that allows for the identification of emerging consumer issues and root cause analysis;
- ii. Determine the level of consumer protection risk exposure;
- iii. 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
- iv. Identify and assess emerging or increasing consumer risks that affect the cooperative's consumers through social media monitoring, market monitoring, and other relevant means.

c. Ascertain that weaknesses in the consumer protection practices or consumer protection emerging risks are addressed and corrective actions are taken in a timely manner.

d. Make available a wide range of accessible channels in which consumers can conveniently lodge their complaints, inquiries, and requests with the cooperative. Channels may include social media platforms, e-mail, chatbot, and text/SMS to promote consumer trust. A consumer must also be able to submit a complaint by using any other channel which they ordinarily communicate with the financial service provider; and

e. Ensure observance of expectations and requirements prescribed under relevant regulations on compliance and internal audit.

VII.2 Operational Risk Management

The Cooperative's Operational Risk Management Policy Manual defines the minimum requirements to identify, monitor, and manage risks that are inherent in the conduct of the cooperative's business activities and/or delivery of its products and services. The Risk Oversight Committee is responsible for assisting management in the embedding of the operational risk culture, awareness, framework, and implementation throughout the cooperative.

Identification, measurement, monitoring, and control of risks that may be related to consumer protection are incorporated in the Risk Control Self-Assessment prepared periodically by operations and facilitated accordingly by the Risk Management Committee.

(Refer to Risk Management Plan and SIDC Consolidated Risk Registry)

VII.3 Internal Compliance and Audit Committee

The Internal Compliance Department and Audit Committee shall ensure the cooperative's adherence to the Consumer Protection policies as well as in ensuring the effectiveness of its application/implementation across all financial product and service offerings.

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Their responsibilities as of follows:

- a. **Regulatory Compliance** - Formulates and maintains the Consumer Protection Compliance Program aimed at preventing or reducing regulatory violations and protecting customers from harm or loss associated with non- compliance.
- b. **Internal Audit** - Updates Audit Program guidelines to include reviews of Consumer Protection practices, adherence to internal policies/procedures, and compliance with existing laws/regulations. Assesses the effectiveness and adequacy of established policies in meeting Consumer Protection objectives. Evaluates the effectiveness of the Financial Consumers Protection Assistance Management Systems (FCPAMS).

VII.4 Learning and Development

Human Resources – Learning and Development (L&D) shall own and establish the SIDC's Consumer Protection Training Program to provide continuing education about Consumer Protection laws, rules, and regulations as well as related policies and procedures to all relevant personnel, specifically to those whose roles and responsibilities involve customer servicing.

The Training Supervisor under Return Business Group, in collaboration with HR L&D, shall train all Koopinoy SIDC Savings and Loans frontliners on the products and services offered.

Marketing CSR or Consumer Assistance Team shall also include financial consumer protection module in their Customer Service Training Programs.

VII.5 Marketing Department

The SIDC Marketing Department for services projects shall be responsible for overseeing the publication of the cooperative's Financial Consumers Protection Assistance Management Systems (FCPAMS) channels and corresponding timelines in coordination with Return Support Services group. This information shall be disseminated through various platforms, including but not limited to, postings in conspicuous areas within branches and offices, the cooperative's website, leaflets, and product Terms and Conditions documents (*refer to Annex B for the full list of FCPAMS channels and timeline disclosures*).

Additionally, Marketing Department shall be tasked with initiating and managing market research studies, as needed, to assess and report on customer feedback and overall satisfaction with the cooperative's products, services, and processes. These studies are typically conducted through third-party research agencies or in-house.

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The Marketing Department shall:

- a. Ensure that advertising and marketing materials do not make false, misleading, or deceptive statements or omit key information that may materially and/or adversely affect the decision of the customer to avail of a service or acquire a product.
- b. Ensure that advertising and promotional materials are easily readable and understandable by the general public. It should disclose clear, accurate, updated, and relevant information about the product or service. It should be balanced/proportional, visible/audible; key information is prominent and not obscured; print is of sufficient size and clearly legible.
- c. Ensure that promotional materials are targeted according to the specific groups of consumers to whom products are marketed and the communication channels employed for marketing financial services.
- d. Ensure that all advertising and promotional materials disclose the fact that it is a regulated entity and that the name and contact details of the regulator are indicated.

VIII. Consumer Protection Standards of Conduct

The following Consumer Protection Standards reflect the core principles that the cooperative is expected to uphold at all times in its dealings with financial consumers. These standards should be integrated into SIDC's Aspire to Culture, further strengthening its established governance framework and addressing any conflicts that may be detrimental to the interests of financial consumers.

VIII.1 Disclosure and Transparency

VIII.1.1 General Provisions

It is the right of every financial consumer to receive clear, concise, and full disclosure of all information relative to a financial product or service that is being offered to them. This includes the right to receive information from financial services providers in a manner that will allow the financial consumer to adequately compare similar financial products or services offered in the market. This information is included in the Pre-Membership Education Seminar (PMES).

The financial consumer's right to disclosure and transparency shall be upheld before, during, and after a sale of a financial product or service and during key stages of the relationship with the consumer.

VIII.1.2 Disclosure of Terms and Conditions

SIDC shall exercise full disclosure, in writing or by electronic means, all significant terms and conditions of a financial product or service, which include the following, among others:

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- a. Information on risks, return and possible warnings;
- b. Any waiver of rights and limitations of liabilities;
- c. Consumer's rights and responsibilities;
- d. Consequences of failure to meet obligations;
- e. Rights and responsibilities of cooperative;
- f. Involvement of authorized agents;
- g. Any conflict of interest by the cooperative's staff;
- h. Cancellation of financial product or service;
- i. Full price or cost and detailed breakdown of the financial product or service including all interest, fees, charges, and penalties, and whether they can change over time; and
- J. Procedures and documentation providing the rationale for why and how prices have been set, as proof of its adherence to responsible pricing principles.

VIII.1.3 Changes in key features, terms and conditions

SIDC shall notify financial consumers, in writing, whether in printed or electronic form, of any changes in the key features and terms of the financial products and services at least thirty (30) days prior to the implementation of such changes. The notifications shall include an explanation on the nature and extent of the change, the potential impact of said change on the financial consumer, and the attached Board Resolution of the cooperative Board of Directors approving the changes.

VIII.1.4 Business and Contact Information

SIDC shall disclose in their respective financial product or service contract, policy, agreement, plan, receipt, website, promotional materials, and social media platforms the following information, among others:

- a. Address and contact details of the SIDC's head offices and branches or satellite offices, if any;
- b. Contact information of the SIDC'S consumer assistance team, as well as information on its financial consumer protection assistance management system as provided in Rule IV; and
- c. Statement that the SIDC is regulated by the Authority, as well as the address and contact details of the Authority's Head Office or the Extension Office under which it falls under its jurisdiction.

(Refer to Annex B for the businesses contact details)

VIII.1.5 Advertising Materials

SIDC shall ensure that their respective advertising materials are not false, misleading, or contain deceptive statements or omit key information that may materially and/or adversely affect the decision of the consumer to avail of a service or acquire a product.

SIDC officers and staff, as well as authorized third-party agents or representatives contracted for sales and marketing purposes, do not use deceptive or high

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pressure/aggressive sales techniques and should not force clients to sign contracts or rush into a financial deal without shopping around.

SIDC shall conduct independent review of promotional material intended for consumers, particularly with respect to materials prepared or designed by third (3rd) party or in-house marketing creatives, for purposes of verifying the accuracy of such promotional material. SIDC shall be bound by all statements made in the marketing and sales materials relative to their offered financial products or services.

VIII.1.6 Documents to be Provided to the Financial Consumer

SIDC shall provide the financial consumer a copy of each of the documents signed by them, together with all the terms and conditions. In addition, SIDC shall provide provide the consumer other documents as proof of transaction, whether in printed or electronic form, at the option of the consumer, immediately after the transaction has been completed. For products or services offered through digital means, SIDC shall provide printed copies of records upon request of the consumer.

Statements of account or billing statements shall be provided regularly in a convenient manner to the consumer, or through the channel in which the product was sold, commensurate to the type of product and terms thereof.

VIII.1.7 Duty of the SIDC's Staff in Communicating with Consumers

Communications made by the cooperative's staff shall be conducted in such a manner that the financial consumers can understand the terms of the contract and their rights and obligations, taking into consideration client segments who may have financial literacy limitations.

IX. Protection of Consumers Against Fraud and Misuse and Information Security Standards

Financial consumers shall have the right to expect the protection from SIDC against fraud and misuse of their assets. SIDC must provide clear information on the action taken or to be taken in relation to a complaint, inquiry, or request from a financial consumer involving fraud and unauthorized transactions. This right shall be exercised in accordance with the law and CDA IRR under MC2023-14.

SIDC shall keep financial transactions, as well as relevant personal information disclosed in the course of a transaction, of its customers confidential and secure. Timely transaction notifications to curtail and/or detect unauthorized transactions shall be sent to clients.

To the extent allowed by existing laws, rules, and regulations, SIDC shall provide assistance and clear information on the actions taken or to be taken on a complaint from a client involving fraudulent or unauthorized transactions by:

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- a. Providing customers with reliable reporting channel/s available during cooperative's business hours;
- b. Communicating the claim resolution process in a timely and transparent manner;
- c. Evaluating any claim made by any account holder in relation to any disputed transaction for purposes of resolving the claim or assessing the parties' liability.

SIDC is required to uphold the privacy and protect the data of their financial consumers. To ensure the security and privacy of the financial consumer's data as well as the confidentiality, integrity, availability, authenticity, and non-repudiation of their financial transactions, SIDC shall adopt and implement information security standards consistent with the provisions of the Data Privacy Act of 2012, its Implementing Rules and Regulations, and other issuance of the National Privacy Commission, and subject to additional guidelines as may thereafter be promulgated by the Authority.

(Refer to SIDC Data Privacy Manual)

X. Financial Consumer Protection Assistance Mechanism

For an efficient financial consumer protection framework, it is important to establish a mechanism that allows consumers to know and assert their rights to have their complaints addressed and resolved within a reasonable time-frame.

The Marketing Department shall lead the implementation and monitoring of Customer Assistance Program as the Consumer Assistance Team (CAT). The Customer Service Representative (CSR) of CAT shall monitor adherence of business units to established standard operating procedures and service level agreements in handling customer concerns.

Each branch dealing with financial consumers shall designate the Branch Coordinator as the Branch Consumer Assistance Officer (CAO) who shall be responsible for the receipt and resolution of consumers' concerns pertaining to their products and services.

SIDC shall provide periodic trainings to equip designated Central and Branch Consumer Assistance Officers (CAOs) as well as customer-facing personnel with the necessary skills for the effective discharge of their functions. These trainings shall consist of modules which will enhance the CAOs' and customer-facing personnel's interpersonal communication and relationship skills, and knowledge of SIDC's corporate structure, products and services.

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XI. Consumer Assistance Channels

SIDC shall have Consumer Assistance or feedback facility in its various channels where financial consumers may raise their inquiries, requests, or complaints.

The cooperative shall ensure that financial consumers are aware on how to lodge their concerns (e.g. walk- in, letter, e-mail, telephone, etc.), and where to lodge them (e.g. Koopinoy SIDC Savings and Loans branches, hotline, social media messaging platforms and website).

(Refer to Annex B for the full list of FCPAMS channels)

XII. Consumer Assistance Procedure

Financial consumer complaints shall be received, acknowledged, investigated, and resolved in accordance with the cooperative's process on handling customer concerns.

XII.1 Receipt and Acknowledgment

Upon receipt of the complaint, the attending Consumer Assistance Officer shall acknowledge the same, obtain and record all necessary data, and explain to the customer in clear and plain language SIDC's consumer assistance process and timelines. (See Annex B)

In receiving and acknowledging consumer complaints or requests by the Consumer Assistance Team, SIDC shall obtain and record the following data from the consumers:

- a. Full name and contact details;
- b. Nature of complaint / request and relevant details;
- c. Resolution or action requested; and
- d. Name of SIDC's claims handling personnel that originally handled the subject concern, if applicable.

The acknowledgement shall include an assurance that the cooperative is dealing with the complaint or request, and that the consumer shall be kept informed of the progress of the cooperative's assessment and investigation. The consumer assistance officer must be able to explain, whenever applicable, the consumer assistance process and the relevant timelines to the consumer.

XII.2 Review and Investigation

I. Initial Handling:

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- a. Complaints received via the website or official social media messaging platforms are addressed by the Customer Service Representative under CAT.
- b. Complaints received directly at branches are forwarded by the Branch Coordinator (designated CAO) to the Customer Service Representative under CAT in the Marketing Department for response, validation, and investigation.
- c. If resolution is beyond their scope of authority, the complaint is endorsed to the concerned group/unit or third party for further investigation.

II. Resolution and Documentation:

- a. Upon resolution, the complaint, along with the FINANCIAL CONSUMERS PROTECTION ASSISTANCE MANAGEMENT SYSTEMS (FCMAPS) CUSTOMER FEEDBACK/COMPLAINT FORM is submitted to CAT for consolidation, monitoring, and reporting.
- b. If the investigation requires additional time, the Marketing Department notifies the customer, providing: (1) The reason for the extension (2) The new estimated date for feedback.

III. Escalation Process

- a. If a complaint remains unresolved within standard handling procedures, it is escalated to Management Officers.
- b. Management Officers then refer the case to the appropriate Operations Heads or business units, who must ensure the issue is addressed promptly and with urgency.
- c. The designated Operations Heads provide timely feedback on resolution progress to ensure compliance with service standards.
- d. If the Management Officers are unable to resolve the complaint, they shall escalate the case to the Board of Directors.

IV. Cases Referred by Authorities or Regulators

- a. If authorities or regulators forward complaints, the Marketing-CSR (CAT) is responsible for receiving complaints, and then, the case is endorsed to the respective business unit for investigation and resolution.
- b. The responsible business unit must ensure that concerns are addressed: (1) Accurately (2) Completely (3) Within the prescribed response period
- c. Marketing will submit a final report to the regulator to confirm resolution or ongoing actions, ensuring compliance with external requirements.
- d. After submission of compliance, the Marketing must continue monitoring the case to verify if it has been officially closed.
- e. If any additional actions or clarifications are required, the responsible unit must coordinate with Marketing and authorities/regulators to ensure full resolution.
- f. Documentation on the final closure of the case must be updated in the system for tracking, reporting, and future reference.

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V. Referrals from the Board of Directors, Senior and Executive Management Officers and Authorities

Customer complaints received by Board of Directors, Senior and Executive Management Officers & Employees, Marketing Customer Service and the Authorities shall be handled as follows:

<i>Recipient of Customer Feedback or Complaints</i>	<i>Prescribed Handling</i>
a. Board of Directors, Senior Management Officers and employees	To be referred to the designated Branch CAO
a.1 Complaints received via email	Note: The designated CAOs shall acknowledge receipt of complaint then forward it to the Customer Service Representative under CAT in the Marketing Department for response, validation, and investigation.
a.2 Complaints received via phone call / sms	
a.3 Complaints from walk-in customers	
a.4 Complaints from social media accounts/ hotlines	
b. Authorities	To be sent via SIDC corporate email: customerservice@sidc.coop The Marketing-CSR (CAT) is responsible for receiving complaints from authorities, monitoring, coordinating responses, and ensuring proper validation and closure.

XIII. Complaints Management and Reporting

XIII.1 Recording and Data Management

1. A centralized up-to-date log and record of all customer complaints shall be kept and maintained by the Customer Assistance Team (CAT) and Consumer Assistance Officers of the different branches for the consolidation, monitoring and reporting.
2. SIDC shall maintain copies of complaints and requests received, including supporting and other relevant documents, for a maximum period of three (3) calendar years. Digital copies may be created as recommended by Management or the Board of Directors for future reference.
3. Complaints / Requests / Inquiries received from the consumers shall not be disclosed to a third party, except as may be required by the conduct of the cooperative's investigations.

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XIII.2 Complaints Reporting

1. A consolidated complaints monthly report shall be prepared by the Marketing Customer Assistance Team (CAT) and presented in the monthly Information Dissemination Meeting. A copy of the said report as well as the minutes of the meeting shall be shared with the Management Committee via e-mail.
2. The cooperative-wide Quarterly Report shall be presented by the Marketing Department Manager to the Board of Directors through the Risk Management Committee.
3. Identification and analysis of emerging Consumer Protection risks that pose potential impact to the cooperative shall be conducted regularly. Material developments, if any, shall be escalated to Internal Compliance and Senior Management for proper action.

XIV. Customer Feedback Mechanism

SIDC shall establish consumer feedback mechanisms which will allow the recording and analysis of consumer feedback to improve their respective FCPAMS. Feedback shall be obtained on the following matters:

- a. Overall consumer satisfaction;
- b. Processes needing improvement;
- c. Personnel needing improvement; and
- d. Any suggestions for improvement

Consumer feedback may be obtained through a feedback form or customer satisfaction survey which shall be made available to walk-in clients and in the cooperative's other consumer assistance channels.

XV. Complaints Database

SIDC shall create their respective database of complaints received, including supporting and relevant documents. The complaints database shall include the following information, among others:

- a. Name of the complainant;
- b. Date of receipt of the complaint;
- c. Subject or nature of the complaint;
- d. Name of the personnel directly handling or in charge of the complaint and the officer supervising its resolution;
- e. Actions taken on the complaint;
- f. Resolution of the complaint;
- g. Date of resolution; and
- h. Other relevant information

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The database shall be maintained by the Consumer Assistance Team in SIDC's management information system, enabling consolidation, comparison, and analysis of complaints data to identify trends in consumer complaints, determine whether complaints indicate an isolated issue or a more widespread concern for consumers, and identify potential problems and risks.

To ensure data privacy and confidentiality, anyone granted access to the database must sign a Data Sharing Agreement, outlining the responsibilities for secure handling, non-disclosure, and protection of sensitive consumer information in accordance with relevant data protection policies and regulations.

XVI. Submission of Complaints Reports to the Board of Directors

The Consumer Assistance Team shall submit and present Complaints Reports to the Division Meeting, that later will be presented to Management Committee. The Chief Executive Office will present the same report to the Board of Directors on a monthly basis. The Complaints Report shall include, at the minimum, the following information:

- a. General category of complaints received;
- b. Number of complaints received per category;
- c. Number of complaints resolved;
- d. Aging of complaints;
- e. Explanations for deviations, if any, from the required resolution period;
- f. General description of resolutions and actions taken relative to complaints received;
and
- g. Recommendations on how to avoid recurring complaints and suggestions for process.
and personnel competency improvement.

SIDC shall submit a Consolidated Complaints Report to the Authority on a quarterly basis. The Quarterly Consolidated Complaints Report shall be submitted until the fifteenth (15th) day of the month following the end of the quarter.

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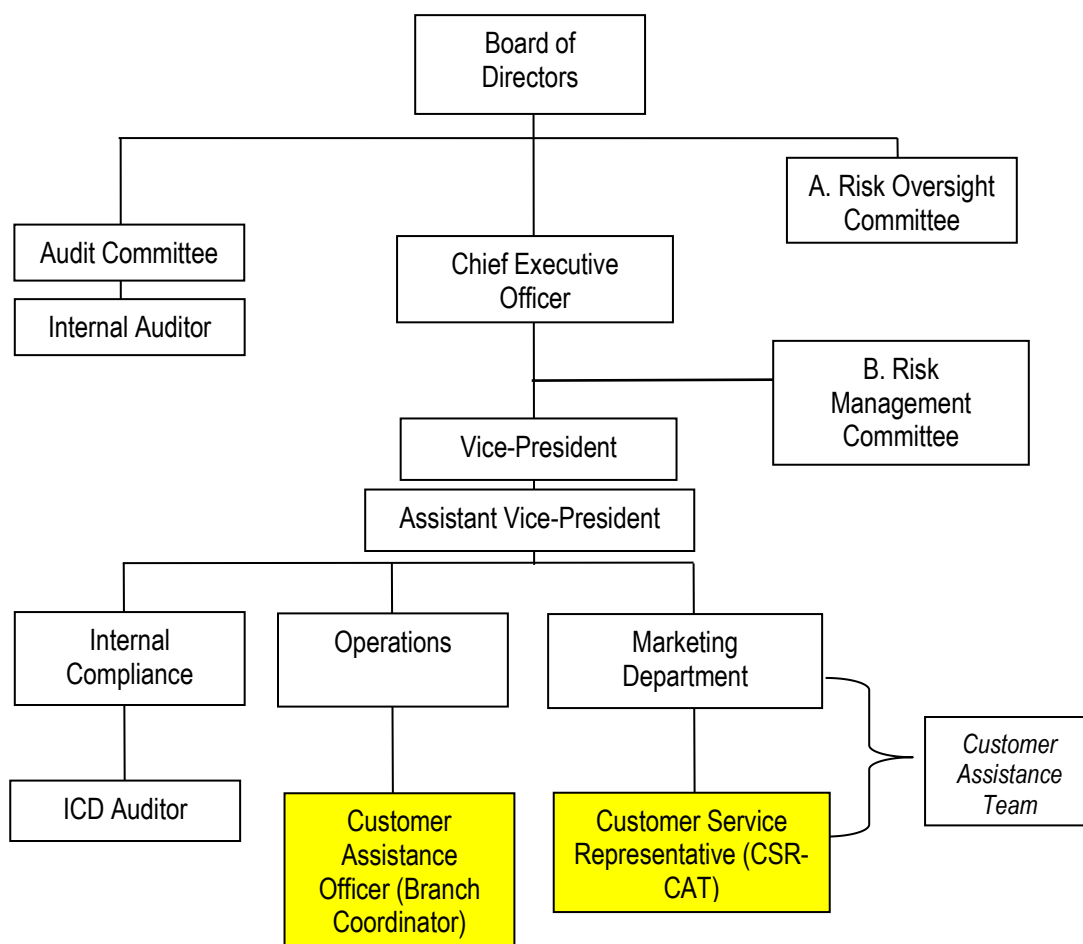
Initial Issuance Date: April 28, 2025

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XVII. ANNEXES

Annex A. Organizational Structure



A. Board of Directors

Risk Oversight Committee Composition:
(1) Chairperson; (2) Committee Members

B. Management

Risk Management Committee Composition:
1. Chief Executive Officer
2. Vice-President
3. Assistant Vice-Presidents (Reach, Return, Revenue)
4. Senior Managers (Finance, Shared Services)
5. Risk Management Officer

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Annex B. Consumer Assistance Channels and Processing Time

SIDC shall be responsible for notifying consumers on the available means / channels where complaints, requests or inquiries may be communicated for resolution. Such notification shall be disseminated via the cooperative's official website, welcome kits, statements of accounts, marketing collateral, or other appropriate means as determined by the business units.

The following channels are available for the consumers:

1. SIDC Website
2. Marketing Customer Service Hotline - Consumer Assistance Team
3. SIDC Social Media Accounts
4. SIDC Customer Feedback (QR Code)
5. Random Phone Survey

SIDC Customer Careline (Customer Assistance Team)

1. 0947-895-2785

2. 0998-965-8129

CS Email address: customerservice@sidc.coop

SIDC Official Website

Corporate: <https://www.sidc.coop>

SIDC Corporate Facebook Account: <https://www.facebook.com/SIDCOfficial>

Corporate Email address: info@sidc.coop

Koopinoy: <https://koopinoy.sidc.coop>

Koopinoy SIDC Savings and Loans Facebook Account:

<https://www.facebook.com/koopinoyidcofficial>

Processing Time

Consumer concerns shall be acknowledged, recorded, investigated, resolved fairly & consistently, and closed within the prescribed processing time or reasonable time-frame, as follows:

CONCERN	TIMELINE	
FOR COMPLAINTS OR REQUESTS		
Acknowledgment	Simple	Within twenty-four (24) hours from receipt of complaint / request
	Complex	Within twenty-four (24) hours from receipt of complaint / request
Processing and resolution (assessment, investigation and resolution)	Simple	Within seven (7) working days from receipt of complaint / request
	Complex	Within forty-five (45) working days from receipt of complaint / request

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Communication of resolution to requesting consumer	Simple	Within nine (9) working days from receipt of complaint / request
	Complex	Within forty-seven (47) working days from receipt of complaint / request
FOR INQUIRIES	By next business day	

NOTES:

1. The processing time shall be commenced from the date of receipt of complaint.
2. In case additional information is required to facilitate investigation and the customer failed to respond after two (2) follow-ups, the CSR-CAT shall send the Unit's final response to the customer (copy-furnished Internal Compliance) documenting such.
3. In cases where complaints cannot be resolved within the prescribed processing time, the CSR-CAT shall notify the customer, copy-furnished the concerned authority (as applicable), on the extension needed to provide the resolution, indicating the reason for extension, and the expected date of resolution.

Annex C. Regulations

Sorosoro Ibaba Development Cooperative is a duly registered cooperative under the supervision and regulation by the Cooperative Development Authority (CDA).

CDA CONTACT DETAILS

Address

CDA CALABARZON EO - 2/F HECTAN PENTHOUSE BLDG., CHIPECO AVENUE, BRGY. HALANG, CALAMBA CITY, LAGUNA 4027

Email: r4a@cda.gov.ph

Website: www.cda.gov.ph

Contact Number: (049) 545-1486

Social Media: <https://www.facebook.com/cdaroiva>

For inquiries, requests, suggestions, feedback and concerns, contact the following:

Tel Nos. (043)300-4058 to 59 loc. 291

Email: customerservice@sidc.coop

Mobile Nos: 0947-895-2785; 0998-965-8129

Koopinoy SIDC Savings and Loans Customer Feedback Survey

<https://bit.ly/KoopinoySIDC-FeedbackSurveyForm>

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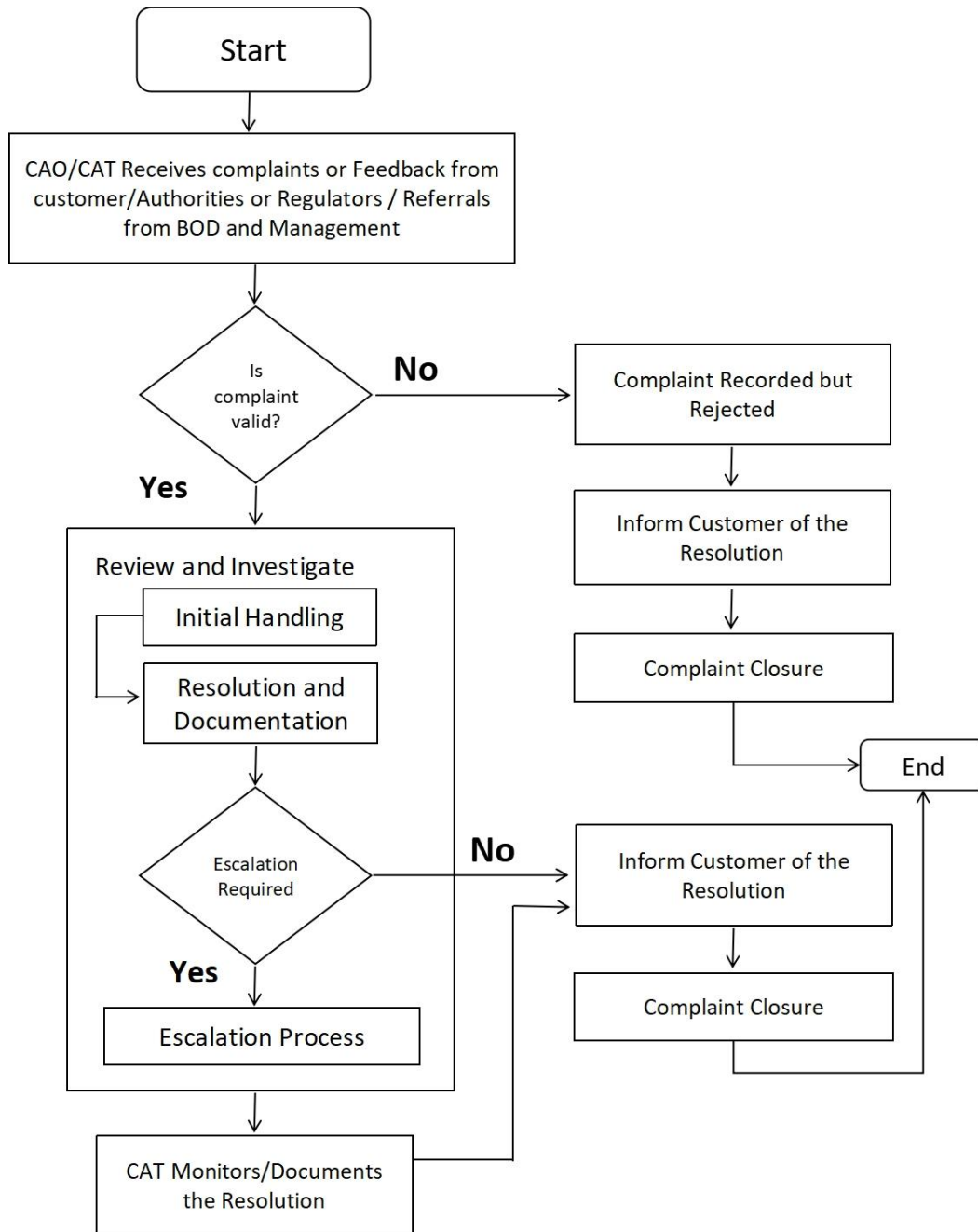
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Annex D. Customer Complaints Handling Workflow

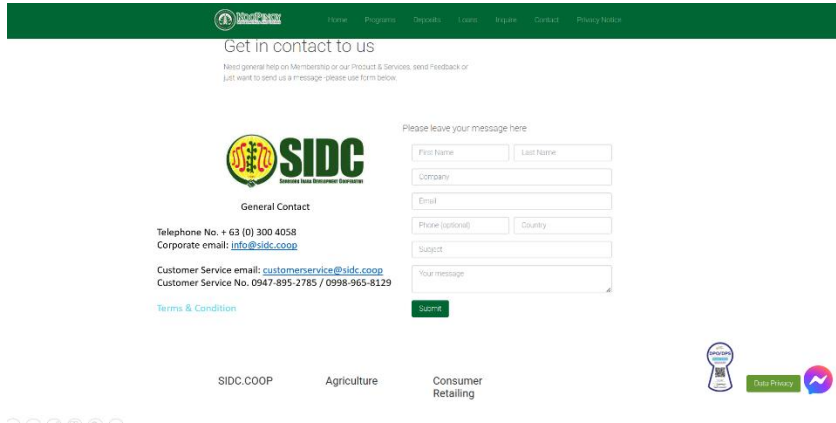


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Annex E. Customer Feedback

Koopinoy Website Contact Us Page (<https://koopinoy.sidc.coop>)

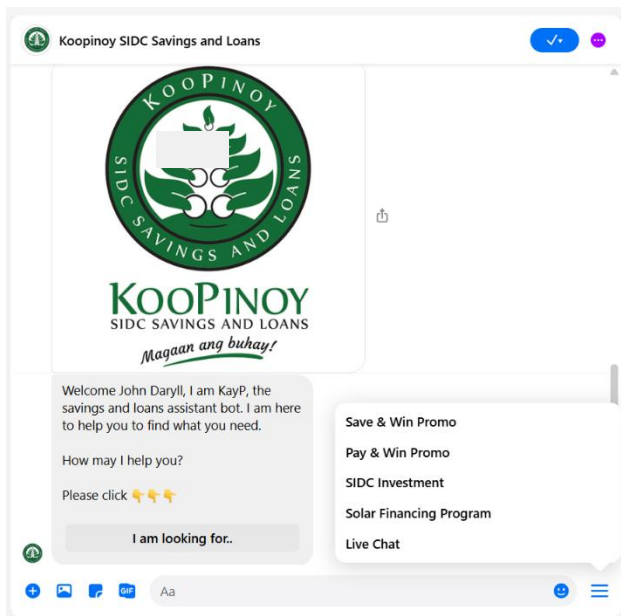


(Desktop View)



(Mobile View)

Koopinoy Facebook Chat Bot (<https://www.facebook.com/koopinoysidcofficial>)



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Annex G. Reports

Internal Report

The Marketing - CAT is responsible for collating, analyzing, and reporting consumer concerns, on a monthly basis, to Senior Management and the Board of Directors. Data sources shall be the Centralized Case Tracking Report from CAOs via google sheet.

External Report

SIDC shall submit a Consolidated Complaints Report to the Authority on a quarterly basis. The Quarterly Consolidated Complaints Report shall be submitted until the fifteenth (15th) day of the month following the end of the quarter.

To facilitate the reporting process, the following schedule shall be observed by concerned units:

ACTIVITY	PERSONNEL / UNIT RESPONSIBLE	FREQUENCY	SCHEDULE OF SUBMISSION/ PRESENTATION
Logging of received complaint from SIDC official channels (walk-in, website, facebook, email, call/text to google form data base	Consumer Assistance Officer (CAO) and Customer Service Representative (CAT)	Daily	Upon receipt of complaints/inquiries
Presentation of consolidated complaints report to designated CAOs	Marketing - CAT	Monthly	Information Dissemination Meeting / CAO Meeting
Submission of consolidated report to Senior Management and Board of Directors	Marketing - CAT	Monthly	Before the scheduled MANCOM Meeting / BOD Meeting
Submission of consolidated report to Cooperative Development Authority (CDA)	Executive Office	Quarterly	Until the fifteenth (15th) day of the month following the end of the quarter.

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Annex H. Framework in the Handling of Complaints Before the Authority (MC-2023-14)

Financial consumers may initiate the complaints mechanism through the submission of the FCPAMS Assistance Request Form (FCPAMS ARF) either physically to the CDA Extension Office having jurisdiction over the cooperative or through the electronic mail of the said CDA Extension Office.

The Cooperative Development Authority (CDA), through its extension office having jurisdiction over the cooperative, provides efficient and effective consumer redress or complaints handling mechanisms such as mediation, conciliation, or other modes of alternative dispute resolution to address conflicts between financial consumers and service providers. The financial consumer may avail of the mechanism prior to adjudication.

Adjudication

The Authority, through its Adjudication Division, shall have the power to adjudicate actions arising out of or in connection with financial consumer transactions with cooperatives or violations or implementation of the provisions of R.A. No. 11765 not resolved at the cooperative level as other cases falling within the jurisdiction of the Authority as provided in the CDA Omnibus Rules of Procedure.

In the exercise of its adjudicatory powers, the Authority shall have the power to issue subpoena duces tecum and summon witnesses to appear in their proceedings and when appropriate, order the examination, search and seizure of all documents, and books of accounts of any entity or person under investigation as may be necessary for the proper disposition of the cases before it. Further, the Authority shall have the power to punish for contempt, both directly and indirectly, in accordance with the pertinent provisions of and penalties prescribed by the Rules of Court.

The Rules of Court and the CDA Omnibus Rules of Procedure may be applied in proceedings before the CDA Adjudication Division by analogy or in a suppletory character, and whenever practicable and convenient.

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Annex I. Procedures for Handling Customer Complaints

A. Customer Concerns received by the branches CAO

Staff/Unit Responsible	PROCEDURES	SLA
Branch Coordinator/ Consumer Assistance Officer (CAO)	<i>For concerns within the branch transactions:</i> 1. Receive and acknowledge inquiries, requests or complaints. (See <i>Annex M. Customer Complaint Form</i>) 2. Forward complaints to CSR-CAT for review and validation 3. If the concerns were resolved right away after receipt of CAO, he/she shall perform the following: a. Provide customer the resolution and furnish copy to CSR-CAT. b. Log the case in the centralized case tracking report via google sheet with the following details: ● Branch Name ● Member's Code Number ● Full Name ● Address ● Contact Details ● Type or Nature of Concern ● Product or Service ● Date when complaint/request/inquiry was received ● Action Taken/Action Plan 4. If concerns need to be referred to personnel within the branch, perform the following: a. Provide ticket number and processing time to customer. <i>For concerns outside the branch transactions:</i> 1. CAO receive and acknowledge inquiries, requests, or complaints. 2. Forward complaints to CSR-CAT who will refer the complaints to concerned branch or business units after review and validation of the complaint. if possible, may escalate the case to proper cooperative authorities for customer complaints resolution.	Within 24 hours from receipt of complaint

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B. Resolution of Case(s) Referred to Concerned branch or business unit / staff

Staff/Unit Responsible	PROCEDURES	SLA
Concerned Branch / Business Unit / Staff	1. Investigate/Evaluate the complaint within the agreed SLA, and provide/update the concerned CAO with the resolution details and/or if extension is needed.	Within seven (7) days from receipt of complaint / Request or up to forty-five (45) days for complex cases
	<i>In cases where complaints cannot be resolved within the reasonable processing time, CSR-CAT shall notify the customer, copy- furnished the CAO and authority (as applicable), on the needed extension indicating the reason, and the expected date of resolution.</i>	

C. Handling of Complaints received by Board of Directors, Elected Officers, Senior Management and Employees

Staff/Unit Responsible	PROCEDURES	SLA
BOD / Elected Officer / Senior Management / Employees	1. Receive complaints from customers. 2. Take note the following details and forward the same to the CSR-CAT for proper handling: ● Member's Code Number ● Full Name ● Address ● Contact Details ● Type or Nature of Concern ● Product or Service ● Date when complaint/request/inquiry was received	Within 24 hours from receipt of complaint
CSR-CAT	1. Acknowledge receipt of complaint via e-mail, copy- furnished designated CAO and the personnel who referred the complaint 2. Log a case to google sheet and facilitate investigation & resolution following procedures specified in item A above.	Within 2 working days from date of receipt

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D. Handling Customer Complaints Referred by Authority

Staff/Unit Responsible	PROCEDURES	SLA
Marketing - Customer Assistance Team (CAT)	1.Receive complaints referred by the Authorities via e- mail. 2.Send an acknowledgment letter to the concerned authority, copy-furnished Internal Compliance Department. 3. Log a case to google sheet and refer the case to the concerned branch / CAO.	Within 2 working days from date of receipt
Concerned Branch / Designated CAO	1.Assist/Facilitate case investigation and resolution following existing guidelines. <i>Note: In case additional information is required to facilitate investigation and the customer failed to respond after two (2) follow-ups, the CSR-CAT shall send the cooperative's final response to the Authority.</i>	Within seven (7) working days from receipt of complaint / Request or up to forty-five (45) days for complex cases
Concerned Branch/CAO	3. Upon resolution of the case, Marketing-CAT will notify the concerned branch/unit/CAO in writing, copy furnished the Internal Compliance Department	Within 2 working days after case resolution

E. Handling of Escalated Concerns

Staff/Unit Responsible	PROCEDURES	SLA
Area Manager / Regional Manager	1. Receive the referred escalated cases. 2. Coordinate with the designated/ concerned CAO to facilitate assistance to CSR-CAT on immediate investigation and resolution.	Within 7 working days from receipt of complaint
CSR_CAT	3. Provide written response (Response Summary) to customer with action taken or action plan.	

F. Case Closure

Staff/Unit Responsible	PROCEDURES	SLA
Designated CAO/CSR-CAT	1. Close the regular case and tag approved or closed details on data base with corresponding remarks.	Within 2 working days after case resolution

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Marketing - CAT	2. Close case referred by the Authority and tag approved or closed details on data base with corresponding remarks.	
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Using Google Sheet, all cases must be logged for monitoring and consolidation of reports by the Marketing - Consumer Assistance Team. Below is the report template to be filled-up and monitored by the designated Consumer Assistance Officer (CAO) and Marketing Customer Service Representative (CSR) - CAT:

[illegible]

Marketing - Customer Assistance Team (CAT) shall prepare the quarterly consolidated complaints summary report based on the case tracking report and to be submitted by the Executive Office to the Authority.

The CAO/CSR-CAT shall use the following category, classification or nature of complaints:

- a. **Systems** - complaints caused by the system errors / hardware issues resulting to non-deliver of service
- b. **Process** - issues and concerns related to internal processes failure or delay or needs improvement in the existing business transaction process.
- c. **People** - any concerns or issues related to actions of the servicing employees
- d. **Fraud** - complaints on deception or use of dishonest method for personal gain.

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e. **Pricing/Interest Rate/Penalty** – Complaints regarding fees, charges, interest rates, penalties, or discrepancies in financial obligations.

f. **Membership Related** – Concerns about eligibility, registration, ID, withdrawal, benefits, or member services.

g. **Quality** – Feedback on product or service standards, reliability, defects, or unsatisfactory outcomes.

h. **Surroundings** – Environmental concerns, cleanliness, accessibility, or physical infrastructure affecting customer experience.

i. **Others** – Any complaint or feedback outside the specified categories, requiring further clarification.

Annex M. Customer Complaint Form

	CUSTOMER FEEDBACK / COMPLAINT FORM	SIDC-MO-F-GEN-032 REVISION 02
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Privacy Disclaimer: In accordance to the R.A. 10173 or the Data Privacy Act of 2012, all information gathered like findings and corrective action will remain confidential between the responsible branch/department and the Auditor. This will be dispose accordingly after it served its purpose.

Name: _____ **Date of filing:** _____
Code No.: _____ **Ticket No.:** _____
Contact Details: **Branch/Department:** _____
 Mobile number: _____ e-mail: _____
 Address: _____

Mode of Complaints: **Origin of Complaints:**
☐ Walk-in ☐ Call ☐ Member-Customer ☐ Employee
☐ Online ☐ Text ☐ Management ☐ Officers/BOD

Transaction:
☐ Feeds ☐ Savings ☐ Insurance
☐ Merchandise ☐ Loans ☐ Investment ☐ Other Service _____

Type of Complaint/Feedback
☐ Process ☐ System ☐ People ☐ Fraud
☐ Membership Related ☐ Quality ☐ Pricing/Interest Rate/Penalty
☐ Surroundings ☐ Others: _____

Statement of Customer Feedback/Complaint

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(To be filled up by the CAT/CSR)

() New Incident () Recurring

Immediate Action:

Plan of Action:

Follow-up:

Details of Follow-up	Date	Status	Followed-up by:	Next Follow-up
		☐ Open ☐ Closed		
		☐ Open ☐ Closed		
		☐ Open ☐ Closed		

Aging (Number of Days From Date Filed to Date Closed): _____

Summary of Response:

...

Assisted / Prepared by:

Reviewed by:

Noted by:

Note: **Customer Complaint Form** is available at any Koopinoy SIDC Savings and Loans branches. For list of branches: bit.ly/2023KoopinoySIDCSavingsandLoans-Branches