



Consumer Financial Protection & Product Stewardship Policy Statement

Table of Contents

- I. Consumer Financial Protection
- II. Product Stewardship & Oversight of Financial Product Reviews
- III. Fair Debt Collection & Remedial Management

I. Consumer Financial Protection

Financial Product Complaint Handling & Resolution Framework

At AlRayan, we are committed to delivering exceptional customer care as a core element of our Service Quality Policy and Business Policy. Our approach is founded on the following key pillars:

- **Complaints Management:** We maintain a robust process to address and resolve customer complaints efficiently and fairly. Our dedicated Customer Care Unit centrally manages all complaints through a customer management system. This unit allocates each complaint to the relevant business owner and monitors progress to ensure resolution within specific timelines.
- **Accessible and Transparent Channels:** Customers can raise concerns through a range of channels, including our Call Center, branches and online services, ensuring transparency and ease of access.
- **Continuous Improvement:** We regularly analyze complaints to identify root causes and implement changes, driving ongoing enhancements in our services.
- **Compliance and Oversight:** We ensure all complaints are managed in accordance with regulatory requirements, with proper oversight across every jurisdiction in which we operate.

We are dedicated to upholding these standards, ensuring every customer receives the highest level of care and support.

Oversight of Complaint Resolution Process

Complaints management is embedded within Al Rayan Bank's broader service quality policy, with regular reporting to both the Management Group Risk Committee monthly and the Board Compliance and Risk Committee quarterly. The Bank has established a customer-centric complaints framework supported by a dedicated 24/7 Call Center and Customer Care Unit to manage complaints and compliments efficiently across all channels.

The policy covers the timely intake, acknowledgment, investigation, resolution, and follow-up of complaints, ensuring customer concerns are addressed fairly and transparently. Complaints are subject to root cause analysis to identify underlying issues relating to processes, staff conduct, or products and services, with corrective actions implemented to prevent recurrence. The Bank also monitors complaint trends and patterns to identify systemic issues and drive continuous improvement in policies, procedures, training, and service delivery.

Complaints management also forms part of the Bank's wider commitment to stakeholder rights, fairness, equity, and non-discrimination. Through its Service Quality Policy, the Bank ensures that

client concerns are handled efficiently and in a timely manner, while customer feedback is incorporated into decision-making as part of its service quality and customer advocacy approach. Where complaint analysis reveals recurring or systemic issues, findings are escalated to the appropriate governance body, and the Learning and Development team develops targeted training programs to address identified gaps.

This oversight framework ensures that the Bank's complaints process is not only responsive to individual customer concerns but also serves as a strategic input to continuous improvement in products, services, and customer experience.

Corporate & SME Customer Complaint Handling Framework

We maintain a robust process to address and resolve customer complaints efficiently and fairly. For corporate and SME clients, we ensure all customers are always treated fairly and that complaints are dealt with patience, care, and in a timely manner. To minimize any customer grievance, clients are fully informed of the procedures to escalate their complaints within the organization and their rights to seek alternative remedies if they are not satisfied with the bank's response.

Retail & Private Banking Complaints Resolution & Service Quality Monitoring

The bank tracks key risk metrics of complaints to ensure the utmost customer satisfaction. Our Service Quality Department monitors and analyses these metrics using key risk indicators (KPIs), generating regular dashboards and management information for senior management review.

The Bank operates a structured escalation process whereby immediate remedial actions are triggered when monitoring reveals trends or irregularities in service delivery. To ensure objectivity, ARB commissions independent third-party entities — such as Net Promoter Score (NPS) research firms — to conduct periodic service quality assessments. The Bank determines the assessment scope, including locations, evaluation criteria, and frequency. Reports generated by these independent assessors are systematically reviewed by the respective branch managers, with material findings escalated to senior management for oversight and resolution.

Our framework is underpinned by the principles that customers are treated fairly, complaints raised by clients are handled with courtesy and promptly, customers are fully informed of procedures to escalate their complaints and their rights to alternative remedy, and all business employees must act in good faith and without prejudice to the client's interests. Where defects or recurring issues are identified, the Learning and Development team develops targeted training to upskill client-facing employees, ensuring high standards of service are maintained.

II. Product Stewardship & Oversight of Financial Product Reviews

At AlRayan, we are committed to delivering innovative, high-quality products that meet the needs of our customers while upholding the highest standards of safety, compliance, and transparency. Our approach to product management is guided by a structured program designed to ensure every new product is carefully developed, thoroughly evaluated, and introduced responsibly to the market. Customers have access to clear and transparent information on our products and services via all engagement channels, ensuring informed decisions at every stage.

New Product Approval Governance & Program Development

All new products are developed under a formal program, following a clear sequence of planning, design, and assessment. The approval process is governed by our New Products Policy and Group Delegation of Authority Policy and matrix, ensuring that each product receives the appropriate level of scrutiny and authorization before launch.

In line with the Bank's Delegation of Authority Policy:

- The Credit and Investment Committee of the Management (CIC) reviews and approves all financing products.
- The Group's Assets, Liabilities and Capital Management Committee (GALCCO) reviews and approves all liabilities products.
- The Wealth Management's Investment and Product Committee (IPC) reviews and approves all products related to Wealth Management
- The Executive Committee of the Board oversees the entire process and endorses the final products.

This structured policy guarantees transparency, accountability, and alignment with both internal standards and external regulatory requirements. All marketing collaterals are balanced, clear, simple, and easy to understand, containing essential information for customers.

Regulatory Compliance & Fair Advertising

Following Qatar Central Bank (QCB) regulations is a crucial part of how we manage our products. Every new product goes through a thorough risk assessment and, when needed, is submitted to QCB for review and approval. We also obtain the necessary regulatory approvals from the Ministry of Commerce and Industry before advertising any products, ensuring full compliance with national laws and standards. If an application is declined, we clearly explain the reasons and provide extra support to customers facing financial challenges, highlighting our dedication to fair and responsible banking practices.

Product Risk Assessment Annual Review & Data Privacy

Before any product is approved, a rigorous risk assessment is carried out to identify and mitigate potential risks to customers and the bank. This process includes evaluating operational, financial, and reputational risks. Once launched, all products and channels are subject to an annual compliance review and risk assessment, ensuring ongoing safety, quality, and adherence to regulatory standards. Customer data is protected through strict privacy measures and opt-in and opt-out processes, in accordance with regulatory requirements, ensuring consent and data security at all times.

Consumer Financial Protection & Ethical Selling Training

AlRayan Bank maintains a comprehensive training program on consumer financial protection for all customer-facing employees, ensuring that staff at every level are equipped to deliver services that are fair, transparent, and in the best interest of customers.

The scope of consumer financial protection training includes:

Ethical selling practices: Training on needs-based selling, suitability assessment, avoidance of mis-selling, and ensuring that products and services recommended to customers are appropriate to their financial circumstances and objectives.

Financial literacy for employees: Ensuring that all customer-facing staff have a thorough understanding of the Bank's product suite, profit rate structures, fee disclosures, financing terms, and the risks and benefits of each product, enabling them to explain these clearly and accurately to customers.

Consumer protection regulatory framework: Training on applicable Qatar Central Bank consumer protection directives, the Bank's complaint handling procedures, customer rights, data privacy obligations, and the regulatory expectations for fair treatment of banking customers.

Vulnerable customer awareness: Guidance on identifying and supporting customers who may be vulnerable due to age, financial difficulty, disability, or other circumstances, ensuring these customers receive appropriate care and are not placed at a disadvantage.

Anti-mis-selling controls: Training on the Bank's internal controls, sales quality monitoring, and the consequences of mis-selling, including the role of mystery shopper assessments and service quality reviews in identifying and addressing any shortcomings.

Islamic finance principles: Ensuring employees understand how Sharia-compliant products operate and can communicate the ethical foundations of Islamic banking to customers with clarity and accuracy.

Training is delivered through a combination of mandatory onboarding modules, annual refresher courses, and ad hoc sessions triggered by regulatory updates, new product launches, or findings from complaint analysis or service quality reviews. The Learning and Development team is responsible for curriculum development, delivery, and tracking, in coordination with the Compliance function.

Training completion and competency assessment records are maintained centrally. Results are factored into employee performance evaluations and are reported to the relevant management oversight committees.

This program ensures that AlRayan Bank's employees serve as the first line of consumer financial protection, supporting the Bank's commitment to ethical conduct, customer advocacy, and regulatory compliance.

Product Competency Training

The product team plays a pivotal role throughout the development and launch process. Responsibilities include briefing Corporate Affairs, creating customer forms and advertising materials, and coordinating with relevant departments to obtain necessary approvals. Prior to launch, comprehensive education and training sessions are provided to stakeholders and staff, equipping them with the knowledge required to support the new product and deliver consistent, high-quality service. Our employees are thoroughly trained on our products and services to address any customer queries.

Fair Marketing Practices & Advertising Approval Procedures

All advertising materials and product collateral are developed in consultation with Corporate Affairs and are subject to rigorous review to ensure accuracy, compliance, and clarity. Regulatory approvals are obtained from the Ministry of Commerce and Industry before any public communication or promotional activity is undertaken, further reinforcing our commitment to responsible marketing and transparency.

Continuous Product Quality Improvement & Customer Feedback Integration

Our dedication to product quality extends beyond the initial launch. Through regular reviews, stakeholder feedback, and continuous improvement initiatives, we strive to maintain excellence in every product and service offered. This ensures that our customers benefit from safe, reliable, and innovative solutions, and our stakeholders are kept informed and engaged at every stage.

III. Fair Debt Collection & Remedial Management

The Bank maintains a disciplined collection and recovery framework to manage overdue obligations, preserve asset quality, and support the long-term resilience of its balance sheet. The framework is supported by approved policies, clearly defined responsibilities, escalation protocols, and oversight arrangements to ensure that recovery activities are conducted fairly, consistently, transparently, and in a professionally controlled manner.

The Bank recognizes its responsibility to protect the interests of shareholders, depositors, customers, and other stakeholders. Accordingly, it maintains policies and procedures designed to recover amounts due in accordance with applicable laws, contractual rights, regulatory requirements, and sound banking practices. These measures support prudent credit risk management, sustainable profitability, capital preservation, and long-term shareholder value.

In line with Qatar's evolving ESG and sustainability disclosure requirements, the Bank seeks to conduct collection and recovery activities responsibly, with appropriate consideration of environmental, social, and governance factors. This includes fair customer treatment, protection of customer confidentiality, responsible engagement with customers experiencing financial difficulty, strong governance over recovery decisions, and transparent disclosure of relevant risk management practices through the Bank's approved public reporting channels.

The Bank's collection and recovery practices are guided by the following principles

- **Governance and oversight:** Collection and recovery activities are governed by approved policies, internal controls, management oversight, and periodic review processes.
- **Regulatory alignment:** Recovery practices are conducted in accordance with applicable QCB requirements, relevant laws, contractual obligations, and approved internal governance frameworks.
- **Shareholder protection:** The Bank maintains recovery policies designed to safeguard financial assets, preserve capital, reduce credit losses, and support sustainable shareholder value.
- **Fair customer treatment:** The Bank engages with customers professionally and fairly, including consideration of appropriate repayment arrangements where feasible.
- **Social responsibility:** Recovery actions are undertaken with due care, respect, and appropriate sensitivity to customer circumstances, while maintaining financial discipline.
- **Data protection and confidentiality:** Customer information used in collection and recovery activities is handled in accordance with applicable data privacy, confidentiality, and information security requirements.
- **Climate and ESG risk awareness:** Where relevant, ESG and climate-related considerations may be reflected in credit monitoring, portfolio reviews, and recovery strategy decisions.
- **Transparency and disclosure:** The Bank supports clear and reliable public disclosure of relevant ESG, risk management, and governance practices through appropriate channels, including the annual report, public website, and investor-related disclosures, as applicable.

•**Sustainable banking:** The Bank's recovery framework supports responsible banking by balancing effective recovery of amounts due with ethical conduct, stakeholder confidence, and long-term financial resilience.

Debt Collection Governance & Oversight

The Executive Committee of the Board oversees and guides the Bank's collection efforts. These efforts are directed toward safeguarding the Bank's rights and ensuring the recovery of all outstanding dues. The Committee attaches the highest importance to the collection process as a cornerstone of financial stability and the protection of the interests of shareholders and clients alike. In close coordination with the relevant departments, the Committee continues to supervise all measures undertaken to secure timely and efficient recovery, while maintaining strict adherence to applicable regulations and directives issued by supervisory authorities.

Debt Collection Employee Training & Competency

AlRayan Bank ensures that all employees involved in collection and recovery activities are appropriately trained to carry out their responsibilities in a manner that is fair, professional, ethical, and fully compliant with applicable laws, regulatory requirements, and the principles of Islamic finance.

Training for collections staff covers the following areas:

Regulatory and legal framework: Applicable Qatar Central Bank directives, relevant civil and commercial laws, data protection requirements, and banking secrecy obligations governing collections activities.

Fair treatment and ethical conduct: Principles of fair customer treatment, respectful communication, non-coercive engagement, and sensitivity to customers experiencing financial hardship or vulnerability.

Islamic finance principles: The application of Sharia-compliant practices throughout the collections process, ensuring all recovery actions are consistent with the Bank's Islamic banking obligations.

Escalation and remedial procedures: The graduated collections approach from early-stage reminders through soft collections, restructuring discussions, and, where necessary, referral for legal recovery — including the role of the Remedial Management team and defined escalation triggers.

Customer rights and complaint handling: Customer entitlements to receive clear information about outstanding obligations, available restructuring options, their right to raise complaints during the collections process, and access to independent dispute resolution.

Data privacy and confidentiality: Proper handling of customer information throughout the recovery process, in accordance with the Bank's data protection policies and applicable privacy regulations.

Anti-fraud and financial crime awareness: Identification and reporting of suspicious circumstances encountered during collections activities.

The Bank recognizes that the quality and conduct of its collections activities directly impacts customer relationships, reputational integrity, and regulatory standing, and invests in ensuring its collections workforce meets the highest professional standards.

Loan Modification & Financial Hardship Support

AlRayan Bank is committed to providing fair and responsible support to retail and corporate customers who experience financial difficulty, consistent with its obligations under Qatar Central Bank regulations and the principles of Islamic banking.

The Bank maintains a structured approach to identify and assist customers in financial hardship at the earliest practicable stage.

All loan modification and hardship arrangements are assessed on a case-by-case basis, documented in accordance with the Bank's credit policies, and approved by the appropriate credit authority in line with the Group Delegation of Authority Policy.

The Bank ensures that customers are clearly informed of available options through direct communication from their relationship managers, the Customer Care Unit, and the Bank's published terms and conditions. The Bank does not penalise customers for engaging in hardship discussions in good faith.

Performance monitoring of loan modification activities is conducted by the Credit Risk Management function and reported to the Group Risk Committee and the Board Compliance and Risk Committee. Trends in restructuring volumes, re-default rates, and customer outcomes are tracked as key indicators of the framework's effectiveness.

This approach reflects AlRayan Bank's commitment to responsible lending and consumer financial protection, recognising that supporting customers through periods of difficulty contributes to long-term financial stability for both the customer and the Bank.

Financial Education Initiatives & Stakeholder Outreach

AlRayan Bank recognises that financial literacy is fundamental to sound financial decision-making and plays a vital role in consumer financial protection. The Bank is committed to promoting financial awareness and education among its customers, the wider community, and targeted stakeholder groups.

The Bank's financial education activities include:

Customer financial awareness: The Bank provides accessible educational content through its digital channels, website, mobile application, and branch network to help customers understand financial

products, profit rate structures, financing obligations, and responsible borrowing. This includes guidance on budgeting, savings, and managing financial commitments.

Youth and student engagement: In collaboration with educational institutions, the Bank supports initiatives to introduce financial literacy concepts to young people and university students, including internship and graduate placement programs that include exposure to responsible banking practices.

SME and entrepreneurship support: The Bank provides educational resources and advisory support to small and medium-sized enterprise (SME) clients, helping them understand financing options, credit management, cash flow planning, and sustainable business practices.

Community outreach and partnerships: The Bank participates in community events, forums, and industry conferences that promote awareness of sustainable finance, Islamic finance principles, and responsible banking. This includes the Bank's annual Sustainability Forum, which brings together industry leaders, regulators, and clients to discuss sustainability topics including financial literacy and climate-related finance.

Islamic finance education: As a leading Islamic bank, AlRayan Bank actively promotes understanding of Sharia-compliant financial products and services, helping customers and stakeholders appreciate how Islamic finance principles align with ethical and responsible banking.

Digital and social media outreach: The Bank leverages its digital platforms, including AI-enabled tools and social media channels, to deliver financial education content to a broad audience, ensuring accessibility and engagement across different demographics.

The Bank periodically reviews and enhances its financial education initiatives in response to stakeholder feedback, evolving customer needs, and regulatory guidance.

Through these initiatives, AlRayan Bank aims to empower customers and communities with the knowledge needed to make informed financial decisions, thereby contributing to broader financial inclusion and stability.