

DFS Standards

Management Standards for
the Responsible Provision of
Digital Financial Services

Version 1.0, October 2024

Dear Reader,

We are pleased to share with you the Management Standards for the Responsible Provision of Digital Financial Services (the “DFS Standards”).

This resource combines into one comprehensive manual the best practices identified by financial service providers and other associated stakeholders around the world for offering digital financial services inclusively and responsibly.¹ The majority of the content addresses important customer protection practices, which the manual labels with the logo ‘CP’.

The DFS Standards cover five key dimensions of responsible management:

1. Customer-Centric Strategy
2. Committed Leadership
3. Customer-Centric Products and Services
4. Customer Protection
5. Responsible Human Resource Development

Research is underway to build a model for evaluating responsible pricing in digital finance. Cerise+SPTF and other stakeholders are actively engaged in this effort, with plans to add a pricing dimension to the DFS Standards once the model is ready.

The [DFS Standards evaluation tool](#) is a free assessment tool that combines the DFS Standards, which are also presented in this manual, along with fields to score to what extent a financial service provider is implementing each practice, and graphical functions to display summary results. Financial service providers can use this tool to evaluate and report on their current level of implementation of the DFS Standards.

While the scope of the DFS Standards is comprehensive, and therefore may seem daunting initially, users of this resource consistently express appreciation for the clarity and concrete guidance that it provides. The DFS Standards act as a “cheat sheet,” as the CEO of one digital provider described them, enabling FSPs to learn from their peers about proven management practices that mitigate risks and promote customer benefit. The DFS Standards make it efficient and simple for each FSP engaged in digital services to understand what good practice is, to assess its current level of performance, and to identify areas for improvement. It is also important to note that there is no one correct place to start, and no expectation to do everything all at once. Furthermore, the cycle of assessment and improvement is ongoing, as context and customer needs evolve. FSPs will take action step by step, in order of their own priorities, and on a realistic timeframe given their available resources.

Ultimately, the DFS Standards help both FSPs and their customers, because making digital financial services safer and more beneficial also reinforces the overall sustainability of the financial service provider serving them.

As a complement to the DFS Standards manual, please visit our [resource center](#) for tools, case studies, and other types of resources to help you strengthen practices for digital services.

We look forward to hearing from you. Please don’t hesitate to reach out with questions or to share your experiences:

info@sptfnetwork.org

Sincerely,
The Cerise+SPTF Team

¹ For readers who are familiar with the Universal Standards for Social and Environmental Performance Management (“the Universal Standards”), please note that the DFS Standards integrate many of the indicators and details from the Universal Standards, but adapted to a digital context, while also adding new management practices that mitigate customer protection risks and harms from the use of digital products and channels.



Dimension

I Customer-Centric Strategy

I.A The provider has a strategy to achieve its customer-centric goals.

I.B The provider collects, analyzes, and reports data that are specific to its customer-centric goals.

Dimension

II Committed Leadership

II.A Members of the board of directors hold management accountable for achieving the provider's customer-centric goals.

II.B Senior management is responsible for implementing the provider's strategy for achieving its customer-centric goals.

Dimension

III Customer-Centric Products and Services

III.A The provider collects and analyzes data to understand customers' needs.

III.B The provider's products, services, and channels benefit customers.

Dimension

IV Customer Protection

IV.A The provider does not overindebt customers.

IV.B The provider gives customers clear and timely information to support customer decision making.

IV.C The provider enforces fair and respectful treatment of customers.

IV.D The provider secures customer data and informs customers about their data rights.

IV.E The provider receives and resolves customer complaints.

Dimension

V Responsible Human Resource Development

V.A The provider creates a safe and equitable work environment.

V.B The provider's Human Resource Development system is designed to attract and maintain a qualified and motivated workforce.

V.C The provider's Human Resource Development system supports its customer-centric strategy.



Dimension I

Customer-Centric Strategy

I.A The provider has a strategy to achieve its customer-centric goals. [F1]

I.B The provider collects, analyzes, and reports data that are specific to its customer-centric goals.

[F1] "Customer-centric goals," also called "social goals," refer to the specific benefits that the financial service provider expects customers to gain from using financial services. For example, customers may be able to use financial services to save their money in a safe place, or to make payments securely, or to invest in their businesses, or to use insurance to mitigate their exposure to shocks.

Standard

I.A THE PROVIDER HAS A STRATEGY TO ACHIEVE ITS CUSTOMER-CENTRIC GOALS. [F1]

| Essential Practice | Indicators / Details |
|--|--|
| <p>I.A.1 THE STRATEGY SPECIFIES THE PROVIDER’S TARGET CUSTOMERS, CUSTOMER-CENTRIC GOALS, AND HOW THE PROVIDER WILL ACHIEVE THOSE GOALS.</p> | <p>I.A.1.1 The strategy defines the demographic and socioeconomic characteristics of target customers.</p> |
| | <p>I.A.1.2 The provider defines a “do no harm” strategy that articulates how it will mitigate the risks to customers connected to the use of its products and services:</p> <p><i>I.A.1.2.1 Negative effects on customers and their households</i></p> <p><i>I.A.1.2.2 Human rights violations</i></p> <p><i>I.A.1.2.3 Corruption and bribery</i></p> |
| | <p>I.A.1.3 The strategy identifies cybersecurity risks connected to its digital financial services, identifies practices to mitigate and respond to such risks, and specifies the roles and responsibilities of the board of directors and management. [F2] [F3]</p> |
| | <p>I.A.1.4 The strategy identifies external fraud risks connected to its digital financial services, identifies practices to mitigate and respond to such risks, and specifies the roles and responsibilities of the board of directors and management. [F4]</p> |
| | <p>I.A.1.5 The strategy for partners specifies the following: customer protection risks connected to its digital services, practices to mitigate such risks, indicators to measure success, and board and management roles and responsibilities. [F5]</p> |

CP

[F1] “Customer-centric goals,” also called “social goals,” refer to the specific benefits that the financial service provider expects customers to gain from using financial services. For example, customers may be able to use financial services to save their money in a safe place, or to make payments securely, or to invest in their businesses, or to use insurance to mitigate their exposure to shocks.
 [F2] “Cybersecurity” is the protection from threat of all elements of information systems, including internet-connected networks, devices, applications, and data.
 [F3] This manual uses the phrase “financial services” to mean products, services, and channels.
 [F4] “External fraud” is fraud perpetrated by actors who are neither employed nor contracted by the financial service provider. Fraud is a wrongful or criminal deception intended to result in financial or personal gain.
 [F5] Partner is any person or legal entity, other than employees, that are contracted by the provider to develop financial services or facilitate transactions and other services for customers according to the terms of the provider

*Essential Practice**Indicators / Details*

I.A.2 THE STRATEGY DEFINES INDICATORS AND TARGETS TO MEASURE THE PROVIDER'S PROGRESS TOWARD CUSTOMER-CENTRIC GOALS.

I.A.2.1 The provider has at least one measurable indicator for each customer-centric goal.

Standard

I.B THE PROVIDER COLLECTS, ANALYZES, AND REPORTS DATA THAT ARE SPECIFIC TO ITS CUSTOMER-CENTRIC GOALS.

| Essential Practice | Indicators / Details |
|--|---|
| <p>I.B.1 THE PROVIDER COLLECTS DATA ON OUTCOMES FOR CUSTOMERS AND THEIR HOUSEHOLDS.</p> | <p>I.B.1.1 The provider collects data on an ongoing basis to measure whether it is achieving its customer-centric goals.</p> <p><i>I.B.1.2.1</i> The provider collects quantitative data that measures both positive and negative changes for customers and their households. Minimum frequency: annually</p> <p><i>I.B.1.2.2</i> The provider collects qualitative data that measures both positive and negative changes for customers and their households. Minimum frequency: annually</p> <p>I.B.1.2 The provider keeps an inventory of the customer data it collects and, for each type of data, identifies both the purpose for collecting it and the level of protection it requires. (Note: this can be called having a “Data Registry.”) [F6] [F7]</p> |

[F6] Customer data refers to Personal Identifiable Information (PII), meaning any information related to an identified or identifiable individual. Examples include name, address, telephone, credit score, and income estimate.

[F7] For more information on a Data Registry, see article 30 of GDPR, “Records of processing activities” (<https://gdpr-info.eu/art-30-gdpr/>).



Dimension II

Committed Leadership

II.A Members of the board of directors hold management accountable for achieving the provider's customer-centric goals.

II.B Senior management is responsible for implementing the provider's strategy for achieving its customer-centric goals.

Standard

II.A MEMBERS OF THE BOARD OF DIRECTORS HOLD MANAGEMENT ACCOUNTABLE FOR ACHIEVING THE PROVIDER’S CUSTOMER-CENTRIC GOALS.

CP

Essential Practice

Indicators / Details

II.A.1 THE PROVIDER TRAINS BOARD MEMBERS ON THEIR SOCIAL PERFORMANCE MANAGEMENT RESPONSIBILITIES.

II.A.1.1 During new member orientation or subsequent training, the provider trains each board member on customer protection.

Essential Practice

Indicators / Details

CP II.A.2 THE BOARD MAKES STRATEGIC DECISIONS BASED ON SOCIAL AND FINANCIAL DATA.

II.A.2.1 The board uses the following data, provided by management, to monitor customer protection.

CP

II.A.2.1.1 Analysis of the risk of customer over-indebtedness. Minimum frequency: annually

CP

II.A.2.1.2 Analysis of customer dissatisfaction: rates of customer dormancy and drop-out, results of exit surveys, and customer complaints. Minimum frequency: annually

CP

II.A.2.1.3 Interest rates and whether they are responsible. Minimum frequency: annually

II.A.2.1.4 Reports on the provider’s systems for data privacy and security, particularly any attacks, failures or breaches. Minimum frequency quarterly.

CP

II.A.2.1.5 Reports on any fraud or corruption, including extortion and bribery. Minimum frequency: quarterly.

CP

II.A.2.1.6 Malfunctioning of digital channels that led to customers experiencing loss of access, loss of funds, or data breaches. Minimum frequency: quarterly.

CP

II.A.2.2 The board uses the following data, provided by management, to monitor the provider’s customer-centric strategy:

II.A.2.2.1 The provider’s most recent customer protection assessment or social audit. Minimum frequency: every three years.

II.A.2.2.2 How profits are allocated, and whether profit allocation is aligned with the provider’s strategy to create benefits for customers. Minimum frequency: annually

II.A.2.3 The board uses the following data, provided by management, to monitor decent work conditions for employees:

II.A.2.3.1 Employee turnover rate, by gender. Minimum frequency: annually

II.A.2.3.2 Analysis of employee satisfaction surveys. Minimum frequency: every two years

II.A.2.4 The board takes corrective action when it identifies risks to customers, risks to employees, or when the provider is not achieving its customer-centric goals. (CP)

Essential Practice

II.A.3 BOARD OVERSIGHT OF SENIOR MANAGEMENT IS ALIGNED WITH THE PROVIDER'S CUSTOMER-CENTRIC GOALS.

Indicators / Details

II.A.3.1 The board calculates the difference between the average annual compensation of executives and entry-level employees and is able to justify any ratio higher than 25:1. Minimum frequency: annually

Standard

II.B SENIOR MANAGEMENT IS RESPONSIBLE FOR IMPLEMENTING THE PROVIDER’S STRATEGY FOR ACHIEVING ITS CUSTOMER-CENTRIC GOALS.

| Essential Practice | Indicators / Details |
|--|---|
| <p>II.B.1 THE PROVIDER INCLUDES CUSTOMER-CENTRIC GOALS IN ITS OPERATIONAL PLAN AND THE CEO/MANAGING DIRECTOR HOLDS SENIOR MANAGERS ACCOUNTABLE FOR ACHIEVING TARGETS.</p> | <p>II.B.1.1 The provider includes its customer-centric goals and targets in the business plan or operational plan.</p> |

| Essential Practice | Indicators / Details |
|--|---|
| <p>CP II.B.2 MANAGEMENT MAKES STRATEGIC AND OPERATIONAL DECISIONS BASED ON SOCIAL AND FINANCIAL DATA.</p> | <p>II.B.2.1 Senior management analyzes the following data and assesses risks: CP</p> <p><i>II.B.2.1.1</i> Customer protection risks. At minimum, this includes analysis of over-indebtedness, unfair treatment, lack of transparency, insufficient security of customer data, complaints, fraud, and corruption and bribery. Minimum frequency: monthly. CP</p> <p><i>II.B.2.1.2</i> Analysis of decent work conditions. At minimum, this includes health and safety, compensation and benefits, and working conditions. Minimum frequency: annually</p> <p><i>II.B.2.1.3</i> Malfunctioning of digital channels that led to customers experiencing loss of access, loss of funds, or data breaches. Minimum frequency: monthly</p> <p><i>II.B.2.1.4</i> Partner performance as stipulated in the partner contracts and service level agreements. Minimum frequency: monthly</p> |

II.B.2.2 Internal audit and/or risk management integrates the following criteria into ongoing monitoring activities: (CP)

II.B.2.2.1 Customer repayment capacity, loan approval analysis, prevention of aggressive sales (CP)

II.B.2.2.2 Transparency to customers (CP)

II.B.2.2.3 Compliance with code of conduct; prevention of fraud and corruption (CP)

II.B.2.2.4 Collateral seizing and appropriate debt collection practices (CP)

II.B.2.2.5 Customer data misuse and fraud (CP)

II.B.2.2.6 Complaints handling, including review of a sample of cases (CP)

II.B.2.3 Management takes corrective action when it identifies risks to customers, risks to employees, or when the provider is not achieving its customer-centric goals (CP)



Dimension III

Customer-Centric Products and Services

III.A The provider collects and analyzes data to understand customers' needs.

III.B The provider's products, services, and channels benefit customers.

Standard

III.A THE PROVIDER COLLECTS AND ANALYZES DATA TO UNDERSTAND CUSTOMERS' NEEDS.

| Essential Practice | Indicators / Details |
|--|---|
| <p>III.A.1 THE PROVIDER CONDUCTS MARKET RESEARCH AND PILOT TESTING.</p> | <p>III.A.1.1 Before introducing new products, services, or delivery channels, the provider conducts market research that includes gathering the following data about its target customers:</p> |
| | <p><i>II.A.1.1.1</i> Analysis of market share, market saturation, and potential market</p> |
| | <p><i>II.A.1.1.2</i> Customer profile data, including gender, age, location (urban/rural), and poverty/income level</p> |
| | <p><i>II.A.1.1.3</i> Data on customers' needs, goals, and any obstacles to using financial services</p> |
| | <p>III.A.1.2 The provider collects feedback on pilot products from partners that interact directly with the provider's customers. (CP)</p> |

| Essential Practice | Indicators / Details |
|--|---|
| <p>III.A.2 THE PROVIDER USES DATA TO IDENTIFY PATTERNS OF FINANCIAL BEHAVIOR BY CUSTOMER SEGMENT.</p> | <p>III.A.2.1 The provider analyzes product use (types and frequency) by demographic and socioeconomic segments of its customers. (CP)</p> |

Essential Practice

Indicators / Details

III.A.3 THE PROVIDER COLLECTS FEEDBACK ON CUSTOMERS' EXPERIENCES USING THE PROVIDER'S FINANCIAL SERVICES.

III.A.3.1 The provider conducts customer satisfaction surveys. Minimum frequency: every other year

III.A.3.2 The provider conducts interviews with dormant and/or exiting customers to look for evidence of product design failures.

III.A.3.3 The provider gathers feedback on customers' experiences from the following sources:

III.A.3.3.1 - Employees

III.A.3.3.2 - Partners

Standard

III.B THE PROVIDER’S PRODUCTS, SERVICES, AND CHANNELS BENEFIT CUSTOMERS. (CP)

Essential Practice

Indicators / Details

III.B.1 THE PROVIDER USES INSIGHTS FROM CUSTOMER DATA TO DESIGN PRODUCTS, SERVICES, AND DELIVERY CHANNELS.

III.B.1.1 The provider designs new products, services (financial and non-financial), and delivery channels using insights from market and pilot studies, customer feedback, and customer outcomes data. (CP)

III.B.1.2 The provider modifies its existing products and services in response to customers’ needs, feedback, and outcomes. (CP)

Essential Practice

Indicators / Details

III.B.2 THE PROVIDER REMOVES BARRIERS THAT PREVENT ACCESS TO FINANCIAL PRODUCTS AND SERVICES.

III.B.2.1 The provider offers loan sizes and loan terms that are suited to the customer’s repayment capacity, considering financial transactions, cash flow, and/or business type.

III.B.2.2 If the provider offers savings, it sets minimum requirements and withdrawal conditions that are compatible with the cash flows of the target customers.

Essential Practice

Indicators / Details


III.B.3 THE PROVIDER’S PRODUCTS, SERVICES, AND CHANNELS PROTECT CUSTOMERS FROM HARM.


III.B.3.1 For loans of at least three months’ duration, the provider tailors repayment schedules to the customer’s cash flows and type of business. (CP)


III.B.3.2 If the provider has collateral or guarantor requirements, these requirements do not create severe hardship for customers. (CP)


III.B.3.2.1 The provider has a list of assets that cannot be pledged as collateral, which includes items that would create severe hardship or significant loss of income earning ability for the customer. (CP)


- III.B.3.2.2** *The provider bases collateral valuation on a verifiable market price/resale value. A second-level approver confirms the collateral valuation.*



- III.B.3.2.3** *The minimum requirement for the value of collateral does not exceed two times the loan amount, and cash collateral does not exceed 20% of the loan amount.*



- III.B.3.2.4** *If the provider collects title documents or puts a lien on property, it returns the title to the customer or releases the lien once the loan is repaid.*



- III.B.3.3** If the provider lends in hard currency, it informs customers of the foreign exchange risk using cost scenarios. The provider can also justify the decision not to lend in local currency.



- III.B.3.4** If the customer business is related to sectors known to have high social risks, the provider conducts additional due diligence to mitigate risk.
- III.B.3.5** If the provider offers voluntary insurance, it assesses the value of insurance products to customers.



- III.B.3.5.1** *The provider analyzes data on product use: product uptake, claims ratio, renewal rate, and coverage ratio.*



- III.B.3.5.2** *The provider analyzes data on how it processes claims: claims rejection ratio, average time for claim's resolution, reasons for rejection of claims, reasons for lapses in coverage.*


- III.B.3.5.3** *The provider analyzes data on customer experience with insurance: demographics of those covered, complaints, customer satisfaction.*


- III.B.3.5.4** *If the claims ratio for life insurance is below 60%, the provider asks the insurance provider to justify the reason.*


- III.B.3.6** The provider asks customers if they have encountered any challenges with partners. Minimum frequency: annually.


- III.B.3.7** The provider monitors malfunctions of digital channels, such as extended outage or processing delays, on an ongoing basis, and has mechanisms to address problems as needed:



Essential Practice

III.B.4 THE PROVIDER’S PRODUCTS AND SERVICES HELP CUSTOMERS REDUCE THEIR VULNERABILITY TO SHOCK AND SMOOTH CONSUMPTION.

Indicators / Details

III.B.4.1 The provider offers products and services that help customers maintain stable levels of expenditure despite income fluctuation or emergencies. Select all that apply:

- III.B.4.1.1* Emergency loans
- III.B.4.1.2* Savings with an easy withdrawal process
- III.B.4.1.3* Voluntary insurance

Essential Practice

III.B.5 THE PROVIDER MONITORS THE PERFORMANCE OF ITS ALGORITHMS TO ENSURE INCLUSION AND EQUITY FOR CUSTOMERS.

Indicators / Details

III.B.5.1 The provider analyzes loan algorithm results by customer segment to compare approved customers with the applicant pool and reviews against the provider’s strategy.

III.B.5.2 The provider analyzes loan amounts approved by customers with similar financial profiles.

Essential Practice

III.B.6 THE PROVIDER MITIGATES EXTERNAL FRAUD RISK AND ASSISTS CUSTOMERS WHO ARE VICTIMS OF FRAUD.

Indicators / Details

III.B.6.1 The providers assesses fraud risk by researching external fraud trends and analyzing customer feedback, to identify the fraud risk in the market.

III.B.6.2 The provider mitigates external fraud risk on an ongoing basis, through at minimum the following activities:

- III.B.6.2.1* Investing in technologies and building internal capacity necessary to mitigate fraud.
- III.B.6.2.2* Analyzing data, including customer complaints data, to identify suspicious activity.
- III.B.6.2.3* Informing customers using at minimum two different channels, on how to protect themselves from fraud and how to report suspected fraud to the provider.

III.B.6.3 The provider informs and assists customers in case of external fraud.

III.B.6.3.1 The provider communicates to customers when it identifies suspected fraudulent activity. Timeframe: For digital communication channels: within 24 hours of when the provider becomes aware of the problem; for physical communication channels: within 7 days.

III.B.6.3.2 The provider begins to investigate a fraud within 24 hours of it being reported by a customer.

III.B.6.3.3 The provider restores lost funds to customers who were victims of fraud within one month, unless the provider can prove customer negligence.



Dimension IV

Customer Protection

- IV.A** The provider does not overindebt customers.
- IV.B** The provider gives customers clear and timely information to support customer decision making.
- IV.C** The provider enforces fair and respectful treatment of customers.
- IV.D** The provider secures customer data and informs customers about their data rights.
- IV.E** The provider receives and resolves customer complaints.

Standard

CP **IV.A THE PROVIDER DOES NOT OVERINDEBT CUSTOMERS.**

Essential Practice

Indicators / Details

CP **IV.A.1 THE PROVIDER MAKES LOAN DECISIONS BASED ON A CUSTOMER'S REPAYMENT CAPACITY.**

IV.A.1.1 The provider's loan approval includes the following elements, unless the provider is using alternative data to understand repayment capacity and the loan size is less than 20% of GNI per capita. [F8]

CP

IV.A.1.1.1 The percentage of a borrower's surplus income [F9] that can be applied to debt service, including existing debt both from the provider and from other lenders, may not be higher than 70%.

CP

IV.A.1.1.2 Loan approval decisions that are supported by automated analysis are made by at least one person. Otherwise, loan approval decisions are made by at least two people, one of whom does not interact directly with the customer.

CP

IV.A.1.1.3 If a credit bureau exists, the provider reports customer data to credit bureaus and uses credit reports in the approval process for loans. If the provider offers group loans, either the provider or fellow group members conduct due diligence for each group member.

CP

IV.A.1.2 The provider conducts a cash flow analysis to evaluate repayment capacity that includes the following elements, unless the provider is using alternative data to understand repayment capacity and the loan size is less than 20% of GNI per capita:

CP

IV.A.1.2.1 Income, expenses, and debt services related to business and family, and any other sources of revenue, including informal sources.

CP

IV.A.1.2.2 No use of guarantees, guarantor income, collateral and/or insurance coverage as proxies for repayment capacity or as the main basis for loan approval.

CP

IV.A.1.3 In cases where the provider uses alternative data to assess the size of loan for which a customer is eligible, the provider analyzes some type of financial transactions data. [F8] [F10]

[F8] Alternative data: When assessing creditworthiness this includes any data, financial or otherwise, other than the income, expense and debt service data used in traditional repayment capacity analysis.

[F9] "Surplus income" refers to the funds that remain available for the borrower to spend after she has paid all necessary business expenses and basic household expenses (e.g., home, food, health, education), as well as taxes, if applicable.

[F10] Financial transactions data: PAR, average loan size, loan repayments, deposits, and withdrawals, purchases, transfers)

- IV.A.1.4** The provider’s policy on loan prepayment specifies the conditions under which it is acceptable for customers to pay a loan early in order to take a new loan. CP
- IV.A.1.4.1* When the customer applies to prepay and get another loan, the provider specifies a time period and/or percentage of the active loan’s principle that the customer must repay before being eligible for a new loan. CP
- IV.A.1.4.2* When the customer is taking another loan immediately after prepayment, the provider conducts a new cash flow analysis, unless the provider is using alternative data to understand repayment capacity and the loan size is less than 20% of GNI per capita. CP

Essential Practice

Indicators / Details

- CP IV.A.2 THE PROVIDER MONITORS THE MARKET AND RESPONDS TO HEIGHTENED OVER-INDEBTEDNESS RISK.**
- IV.A.2.1** Senior management monitors the following indicators to identify over-indebtedness risk: CP
 - IV.A.2.1.1* Portfolio quality by channel, product, and customer segment, including customers whose loan renewal decisions are automated. Minimum frequency: monthly. CP
 - IV.A.2.1.2* Restructured, rescheduled, or refinanced loans. Minimum frequency: monthly CP
 - IV.A.2.1.3* Customer stress level by channel, product, and customer segment, including customers whose loan renewal decisions are automated. Minimum frequency: annually
- IV.A.2.2** The provider defines performance levels that trigger additional internal monitoring and response in the following areas: CP
 - IV.A.2.2.1* - Portfolio at risk
 - IV.A.2.2.2* - Customer stress
- IV.A.2.3** If the provider’s total credit risk has averaged more than 10% during any quarter in the past three years, the provider has taken corrective measures. CP

Standard

CP **IV.B** THE PROVIDER GIVES CUSTOMERS CLEAR AND TIMELY INFORMATION TO SUPPORT CUSTOMER DECISION MAKING.

| Essential Practice | Indicators / Details |
|--|---|
| <p>IV.B.1 THE PROVIDER COMMUNICATES INFORMATION ABOUT ITS FINANCIAL SERVICES USING SIMPLE LANGUAGE AND ACCESSIBLE CHANNELS.</p> | <p>IV.B.1.1 The provider communicates in simple and local languages. CP</p> |
| | <p>IV.B.1.2 The provider offers a free channel for customers to reach a live person to discuss any question, comment, or complaint. The channel operates at minimum 8 hours a day 5 days a week. CP</p> |
| | <p>IV.B.1.3 The provider publishes basic product information, including pricing, digitally and in physical locations. [F11] CP</p> |
| | <p>IV.B.1.4 If the provider offers payment, cash-in, or cash-out services through a partner, it verifies that the partner publishes basic product information digitally and in physical locations. [F11] CP</p> |

| Essential Practice | Indicators / Details |
|---|--|
| <p>IV.B.2 The provider communicates comprehensive information about terms, conditions, and pricing before customers sign a contract to use financial services.</p> | <p>IV.B.2.1 The provider verifies that customers who are signing a contract to use financial services have understood the terms and conditions. The provider conducts this analysis by customer segment.</p> |
| | <p>IV.B.2.2 The provider informs borrowers in writing, using simple, local language, of key facts related to taking out a loan before borrowers sign a contract. The key facts include at minimum the following information:</p> <ul style="list-style-type: none"> - Total loan amount - Pricing, including all fees (APR/EIR if the majority of loans have a duration of at least three months; MPR if the majority of loans have a duration under 3 months) - Total cost of credit: all principal, interest, and fees plus cash collateral - Disbursement date and loan term CP |

[F11] "Basic product information" encompasses the price and a description of the product.

- Repayment amount (principal and interest) and frequency
- All deductions from principal disbursement (eg: first installment, commissions, fees, cash collateral, taxes), if applicable
- How cash collateral / mandatory savings can be used in case of default, if applicable
- Moratorium interest rates, terms, and conditions, if applicable
- How to file a complaint
- How to contact a live person

- IV.B.2.3** Loan contracts are available in the major local languages and include the following information, as applicable to the product: (CP)
- Total loan amount
 - Fees
 - Repayment schedule with principal and interest amounts, number, and due dates of all repayment installments
 - Grace period
 - Mandatory savings / mobile wallet amount
 - Automatic account debiting mechanisms
 - Linked products
 - Member or guarantor obligations
 - Collateral requirements and seizing procedures
 - Consequences of late payment and default
 - Prepayment conditions: whether it is possible and how it affects the cost
 - Whether terms and conditions can change over time and how that would affect customers

- IV.B.2.4** If the provider offers savings, it informs customers in writing of the following information: (CP)
- Fees, including closure fees
 - Interest rate and how amounts will be calculated
 - Minimum and maximum balance requirements
 - Any restrictions withdrawal of funds
 - Whether deposits are governmentally insured

- IV.B.2.5** If the provider offers payments, it informs customers who are initiating or receiving money transfers, or using other payment services, in writing, of the following information: (CP)
- Amount paid by sender, in sender's currency
 - Estimated exchange rate

- Amount to be received in the destination currency
- Fees
- Instructions for collecting payment
- Cancellation conditions
- Instructions for resolving errors
- Transaction confirmation
- Taxes
- Linked products (if any)

IV.B.2.6 If the provider offers insurance, it informs customers in writing of the following information at the time of enrollment: (CP)

- A certificate of coverage which states, at minimum, the premium, amount and term of coverage, who are the beneficiaries, which events are covered, any major exclusions, and when and how to file a claim
- An explanation of the documentation required to prove damage, if applicable
- Terms related to cancelation”

IV.B.2.7 The provider gives customers a completed copy of the contract and makes the contract accessible any time digitally or in physical form. (CP)

Essential Practice

Indicators / Details

CP IV.B.3 THE PROVIDER COMMUNICATES WITH CUSTOMERS ABOUT ALL ACTIVITY ON THEIR ACCOUNTS.

IV.B.3.1 The provider gives customers accurate information about their accounts in the following ways: (CP)

IV.B.3.1.1 Providing access to their up-to-date loan, savings, or other account balance upon request. (CP)

IV.B.3.1.2 Sending messages to customers whenever it makes a scheduled deduction from the customer account. (CP)

IV.B.3.1.3 Providing receipts, on paper or electronically, for every transaction. (CP)

IV.B.3.2 The provider gives customers notice and the opportunity to opt out before automatically renewing a voluntary product. (CP)

IV.B.3.3 The provider sends customers a reminder at least one day before making any authorized scheduled debit to the customer’s account. (CP)

IV.B.3.4 If the provider offers insurance, it provides beneficiaries with timely information during the claims process. CP

IV.B.3.4.1 The provider notifies the beneficiary within 30 days of making a decision about the claim. CP

IV.B.3.4.2 When the claim decision results in a settlement, the provider notifies the beneficiary within 30 days of the settlement. If the claim is denied, the provider notifies the beneficiary of the reason and gives an opportunity for appeal. CP

Standard

CP **IV.C** THE PROVIDER GIVES CUSTOMERS CLEAR AND TIMELY INFORMATION TO SUPPORT CUSTOMER DECISION MAKING.

Essential Practice

Indicators / Details

CP **IV.C.1 THE PROVIDER’S CODE OF CONDUCT REQUIRES FAIR AND RESPECTFUL TREATMENT OF CUSTOMERS.**

IV.C.1.1 The provider’s code of conduct states the organizational values, standards of professional conduct, and treatment of customers that it expects of all employees, and defines the sanctions to apply in case of a breach. CP

IV.C.1.2 The provider’s policies prohibit the following: CP

IV.C.1.2.1 Corruption, theft, kickbacks, fraud CP

IV.C.1.2.2 Customer intimidation, including but not limited to using abusive language, publicly humiliating the customer, and using threats. In cases of in-person interaction, the provider prohibits the use of physical force, limiting physical freedom, sexual harassment, shouting, and entering the customer’s home uninvited.” CP

IV.C.1.2.3 Discrimination against all internationally recognized Protected Categories. [Note: Protected Categories are as follows: People over 40 years old; Sex; Race/ethnicity/national extraction/social origin /caste; Religion; Health status, including HIV status; Disability; Sexual orientation; Political affiliation/opinion; Civil/marital status; Participation in a trade union.] CP

IV.C.1.3 The provider informs customers, verbally or in writing, about the prohibited behaviors found in the code of conduct. CP

IV.C.1.4 The provider records or documents the conversations between customers and staff for the purposes of quality control.

IV.C.1.5 The provider’s contract or service level agreement with partners includes standards of customer protection and defines the sanctions to apply in case of a violation.

Essential Practice

Indicators / Details

- IV.C.2 THE PROVIDER DOES NOT USE AGGRESSIVE SALES TECHNIQUES.**

 - IV.C.2.1** The provider has internal controls to monitor whether employees or partners are engaging in aggressive practices.
 - IV.C.2.2** The provider’s incentive structure does not promote aggressive sales.

 - IV.C.2.2.1 If employees’ salaries are comprised of a fixed and a variable portion, the fixed portion must represent at least 50% of total salary.*
 - IV.C.2.2.2 The provider monitors employees’ productivity ratios and investigates those that are above a predetermined threshold.*
 - IV.C.2.3** The provider requires at minimum three confirmations of interest before it approves a loan without assessing capacity to repay.
 - IV.C.2.4** Except in cases where loan duration is less than a month, the provider gives customers the right to cancel without cost for at minimum two business days after a loan approval.

Essential Practice

Indicators / Details

- IV.C.3 THE PROVIDER PROTECTS CUSTOMERS’ RIGHTS TO RESPECTFUL TREATMENT DURING THE LOAN COLLECTION PROCESS.**

 - IV.C.3.1** The provider’s collections policy includes the following:

 - IV.C.3.1.1 A list of appropriate and inappropriate debt collections practices, including collateral seizing practices.*
 - IV.C.3.1.2 A schedule for the collections process that allows time for the debt collector to determine the reasons for a customer’s default and for the customer to find solutions.*
 - IV.C.3.1.3 The provider informs the customer prior to seizure of collateral, allowing the customer to attempt to remedy the default.*
 - IV.C.3.1.4 A prohibition on sales of the customers’ collateral to the provider, the staff of the provider, to their relatives, or to partners involved in the seizing process.*
 - IV.C.3.2** The provider restructures or writes off loans on an exceptional basis, based on a list of cases of specific distress.

Standard

CP **IV.D THE PROVIDER SECURES CUSTOMER DATA AND INFORMS CUSTOMERS ABOUT THEIR DATA RIGHTS.**

Essential Practice

CP **IV.D.1 THE PROVIDER MAINTAINS THE SECURITY AND CONFIDENTIALITY OF CUSTOMER DATA.**

Indicators / Details

- IV.D.1.1** The provider reduces its exposure to cybersecurity risk.

 - IV.D.1.1.1* The provider assesses cybersecurity risks and implements security measures adapted to each of its financial services.
 - IV.D.1.1.2* The provider conducts penetration testing. Minimum frequency: quarterly CP
- IV.D.1.2** The provider monitors the integrity of its electronic files on an ongoing basis.
- IV.D.1.3** The provider restricts access to customer data.

 - IV.D.1.3.1* The provider restricts system access to only the data and functions that correspond to an employee’s role (“least privilege” principle). CP
 - IV.D.1.3.2* The provider controls employee use of files outside the office and the provider keeps records of the employees who request/are granted access to customer files outside their normal permission. CP
 - IV.D.1.3.3* The provider safeguards customer data when employees leave the organization. CP
- IV.D.1.4** The provider communicates to customers about system failures and cybersecurity breaches and compensates customers for loss of funds.

 - IV.D.1.4.1* The provider communicates to customers when a channel is down and they no longer have access to services. Timeframe: Within 24 hours of when the provider becomes aware of the problem, for digital customers; within 7 days for analog customers.
 - IV.D.1.4.1* If the customer has lost data or funds, the provider alerts the customer within 7 days to specify the loss mitigation it will offer.
 - IV.D.1.4.1* The provider compensates customers for lost funds within one month of when the loss occurred.
- IV.D.1.5** The provider informs customers of their responsibility to safeguard access to their accounts. CP

Essential Practice

Indicators / Details

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|---|---|
| <p>CP IV.D.2 THE PROVIDER INFORMS CUSTOMERS ABOUT DATA PRIVACY AND DATA RIGHTS.</p> | <p>IV.D.2.1 The provider explains to customers how it will use customer data, with whom it will share the data, and how partners will use the data. The provider requests that customers opt in before using or sharing their data. CP</p> <p>IV.D.2.2 Information about data use and consent is easy for customers to understand. CP</p> <p><i>IV.D.2.2.1</i> When requesting consent from customers to use their data, the provider informs customers how it will use the data, including what are the minimum data to share to gain access to the product. The provider communicates through accessible channels. CP</p> <p><i>IV.D.2.2.2</i> The provider gives customers the right to withdraw their permission to use data and explains any consequences of withdrawal. CP</p> <p>IV.D.2.3 The provider notifies customers of their right to review and correct their personal and financial data. The provider reminds customers of this right at times when it informs customers that it denied their application for a financial services. CP</p> <p>IV.D.2.4 The provider deactivates or deletes customer data once the person ceases to be a customer and notifies customers of their right to require the provider to cease using or sharing their data. (Note: this may be called the right to “Be Forgotten.” [F12])</p> |
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[F12] See article 17 of GDPR, called “Right to erasure (‘right to be forgotten’). This article names the circumstances under which a customer has the right to require the provider to erase his or her personal data, and the provider must do so “without undue delay.” (<https://gdpr.eu/article-17-right-to-be-forgotten/>)

Standard

CP **IV.E THE PROVIDER RECEIVES AND RESOLVES CUSTOMER COMPLAINTS.**

Essential Practice

CP **IV.E.1 THE PROVIDER HAS A COMPLAINTS MECHANISM THAT IS EASILY ACCESSIBLE TO CUSTOMERS AND ADAPTED TO THEIR NEEDS.**

Indicators / Details

IV.E.1.1 Customers have a way to submit complaints to persons other than their primary point of contact. CP

IV.E.1.2 The provider has at least two complaints channels that are free of charge and accessible to customers. CP

IV.E.1.3 The provider informs customers about how to submit a complaint. CP

IV.E.1.3.1 The provider displays information on how to submit a complaint in product documentation, in the digital channels it uses to offer financial services, and in any physical service locations. CP

IV.E.1.3.2 At the time when customers are applying to use financial services, the provider informs customers of how to submit a complaint. CP

IV.E.1.4 The provider has a complaints escalation process and informs customers of how to use it.

Essential Practice

CP **IV.E.2 THE PROVIDER RESOLVES COMPLAINTS EFFICIENTLY.**

Indicators / Details

IV.E.2.1 The provider identifies the level of severity each complaint. Senior management is aware immediately of severe complaints and is responsible for addressing them. CP

IV.E.2.2 The provider registers customer complaints in a secure system that reaches the complaints handling staff and/or management. CP

- IVE.2.3** The provider resolves customer complaints quickly. (CP)
- IVE.2.3.1* The provider sends to customers a confirmation of receipt of their complaints and a notification when the complaint has been resolved. (CP)
- IVE.2.3.2* If a provider receives complaints via call centers or chat, it monitors the average wait time. (CP)
- IVE.2.3.2* The provider resolves the majority of complaints within 48 hours. For complaints that take longer to resolve, the provider notifies the customer of the reason for the delay. (CP)
- IVE.2.4** Complaints handling staff have access to relevant customer data, including transaction details and notes from previous complaint conversations. (CP)
- IVE.2.5** The provider helps its customers to resolve complaints they have with partners. (CP)

Essential Practice

Indicators / Details

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| <p>CP IVE.3 THE PROVIDER USES INFORMATION FROM COMPLAINTS TO MANAGE OPERATIONS AND IMPROVE PRODUCT AND SERVICE QUALITY.</p> | <ul style="list-style-type: none"> IVE.3.1 The complaints system creates a report for management and customer care staff. Minimum frequency: monthly (CP) IVE.3.2 Management reviews complaints reports by customer segment, by product, and by delivery channel. Minimum frequency: quarterly (CP) IVE.3.3 The provider investigates whether customers had complaints but did not file them, by conducting at minimum the following activities: Minimum frequency: annually (CP) <i>IVE.3.3.1</i> Analyzing complaints by socioeconomic characteristics to see if certain segments of customers are under- or over-represented among the customers who complain. <i>IVE.3.3.2</i> Surveying a representative sample of all customers to ask if they have complaints that they have not filed. |
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Dimension V

Responsible Human Resource Development

V.A The provider creates a safe and equitable work environment.

V.B The provider's Human Resource Development system is designed to attract and maintain a qualified and motivated workforce.

V.C The provider's Human Resource Development system supports its customer-centric strategy.

Standard

V.A THE PROVIDER CREATES A SAFE AND EQUITABLE WORK ENVIRONMENT.

Essential Practice

V.A.1 A WRITTEN HUMAN RESOURCES POLICY IS AVAILABLE TO ALL EMPLOYEES THAT EXPLAINS AND PROTECTS THEIR RIGHTS.

Indicators / Details

V.A.1.1 The provider’s Human Resource policy explains employees’ rights and responsibilities related to the following:

V.A.1.1.1 Work rules and disciplinary procedures

V.A.1.1.2 Grievance resolution

V.A.1.1.3 Collective bargaining agreements and freedom of association

V.A.1.1.4 Whistle blower safeguards

V.A.1.1.5 Anti-harassment safeguards

V.A.1.1.6 Conditions for dismissal and exit formalities

V.A.1.2 The provider meets or exceeds local regulations in the following areas:

V.A.1.2.1 Competitive wages

V.A.1.2.2 Benefits/social protection

V.A.1.2.3 Limits on working hours and overtime hours

V.A.1.2.4 Overtime pay and paid leave

V.A.1.3 The provider’s non-discrimination policy towards employees covers all internationally recognized Protected Categories. [Note: Protected Categories are as follows: People over 40 years old; Sex; Race/ ethnicity/national extraction/social origin /caste; Religion; Health status, including HIV status; Disability; Sexual orientation; Political affiliation/opinion; Civil/marital status; Participation in a trade union.]

V.A.1.4 The provider operates in accordance with national law on forced labor and minimum age for employment, but in no case employs workers under 14 years old. If national law does not address forced labor, the provider complies with international law.

| Essential Practice | Indicators / Details |
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| <p>V.A.2 EMPLOYEE COMPENSATION IS EQUITABLE AND ADEQUATE.</p> | <p>V.A.2.1 The provider pays salaries based on market rates, and never below the sectoral minimum wage.</p> <p>V.A.2.2 The provider analyzes salary data to check that men and women receive equal pay for equal work and have equal opportunities for pay increase/promotion.</p> |

| Essential Practice | Indicators / Details |
|---|---|
| <p>V.A.3 The provider has a safety and health management system.</p> | <p>V.A.3.1 The provider assesses the health and safety risks faced by its employees and audits its existing safety measures. Minimum frequency: annually</p> <p>V.A.3.2 The provider takes necessary measures to mitigate hazards.</p> <p><i>V.A.3.2.1 The provider offers health and safety equipment, training, and adapted physical accommodations.</i></p> <p><i>V.A.3.2.2 The provider has an emergency/disaster response plan and trains management and employees on how to follow the plan. Minimum training frequency: annually</i></p> |

Standard

V.B THE PROVIDER’S HUMAN RESOURCE DEVELOPMENT SYSTEM IS DESIGNED TO ATTRACT AND MAINTAIN A QUALIFIED AND MOTIVATED WORKFORCE.

| <i>Essential Practice</i> | <i>Indicators / Details</i> |
|---|--|
| <p>V.B.1 THE PROVIDER GIVES EMPLOYEES COMPLETE EMPLOYMENT DOCUMENTATION AND TRAINING TO UNDERSTAND THEIR JOB REQUIREMENTS.</p> | <p>V.B.1.1 The provider communicates to employees their individual employment terms:</p> <p><i>V.B.1.1.1 Base salary and opportunities for any other type of compensation (overtime, incentive pay)</i></p> <p><i>V.B.1.1.2 Job description / scope of work</i></p> |

| <i>Essential Practice</i> | <i>Indicators / Details</i> |
|---|---|
| <p>V.B.2 THE PROVIDER GIVES EMPLOYEES FORMAL OPPORTUNITIES TO COMMUNICATE WITH MANAGEMENT.</p> | <p>V.B.2.1 The provider has a formal grievance mechanism that allows employees to raise workplace concerns in a confidential manner.</p> |

Standard

V.C THE PROVIDER’S HUMAN RESOURCE DEVELOPMENT SYSTEM SUPPORTS ITS CUSTOMER-CENTRIC STRATEGY.

Essential Practice

Indicators / Details

CP V.C.1 DURING THE RECRUITMENT AND HIRING PROCESS, THE PROVIDER ASSESSES EACH CANDIDATE’S COMMITMENT TO ACHIEVING THE PROVIDER’S CUSTOMER-CENTRIC GOALS AND SERVING ITS TARGET CUSTOMERS.

VC.1.1 All employees sign a document acknowledging that they will abide by the Code of Conduct. **CP**

Essential Practice

Indicators / Details

CP V.C.2 THE PROVIDER TRAINS ALL EMPLOYEES ON ITS CUSTOMER-CENTRIC GOALS AND ON CUSTOMER PROTECTION.

VC.2.1 The provider trains employees on customer protection, in line with their roles and responsibilities. The training covers at minimum the following topics: **CP**

VC.2.1.1 Repayment capacity analysis and the credit approval process **CP**

VC.2.1.2 How to avoid aggressive sales techniques, including how to respect customers’ right to refuse products **CP**

VC.2.1.3 How to communicate pricing, terms and conditions to customers, either in person or virtually, and how to verify customer understanding **CP**

VC.2.1.4 Debt collections practices and loan recovery procedures **CP**

VC.2.1.5 Confidentiality and data sharing policies and fraud risks, including common frauds, fraud identification, and fraud reporting **CP**

VC.2.1.6 How the full lifecycle of the complaints mechanism works, both for complaints lodged against the provider and for complaints against partners, and how to treat customers respectfully during the process. [F13] **CP**

VC.2.1.7 How to monitor overindebtedness and customer stress.

[F13] The “full lifecycle of complaints” encompasses the initial contact with the person who complained, entering the complaint into the database, analysis of the complaint, resolution, and closing the case.

Essential Practice

Indicators / Details

CP V.C.3 THE PROVIDER EVALUATES AND INCENTIVIZES EMPLOYEES BASED ON SOCIAL AND FINANCIAL CRITERIA.

V.C.3.1 Employee performance appraisals and incentives include customer protection criteria, such as portfolio quality and customer service, including treating customers respectfully and without discrimination. **CP**

V.C.3.2 The provider reviews incentive schemes to check for negative consequences such as fraud, customer mistreatment, aggressive sales, over-indebtedness, or high employee turnover. **CP**

About CERISE+SPTF

Cerise+SPTF promotes responsible and inclusive finance by setting and promoting management standards, creating assessment tools, and supporting implementation and capacity building, in order to improve outcomes for end customers. As the developers and champions of interdependent and complementary tools and products, Cerise and SPTF have worked closely together since the mid-2000s and formalized their partnership through a Memorandum of Understanding in 2021.

Our history:

- Founded in 2005, the Social Performance Task Force, or SPTF, developed, and regularly updates, the Universal Standards for Social and Environmental Performance Management (the Universal Standards) and the management standards for the responsible provision of digital financial services (“DFS Standards”). These standards guide impact-driven financial service providers in making finance safer and more beneficial for low-income customers. A membership organization, SPTF has more than 7,800 participating individuals from every region of the world.
- Cerise, a French nonprofit created in 1998, pioneered the implementation of social performance management, working with committed financial service providers to launch the Social Performance Indicators initiative in 2001. As a social innovator, Cerise works with actors in inclusive finance, social business and impact investing to co-create social standards and social assessment tools that are free to all. Cerise also offers fee-based consultancy services to all types of impact-driven organizations, equipping them with the skills and tools they need to define and achieve their impact goals.

To learn more:

- Visit the [Cerise+SPTF website](#) for an overview of Cerise+SPTF’s mission, vision, team and activities.
- Use the [SPI Online platform](#) to gain access to tools and resources and news.
- Visit the [social investor webpage](#) on the Cerise+SPTF website to learn more about how we support fund managers and private equity firms to drive measurable social impact. The suite of assessment tools developed by Cerise+SPTF helps social investors of all types to mitigate risks, enhance financial inclusion, and ensure sustainable returns by promoting customer-centric practices and responsible management of digital financial services.
- Connect to social and environmental performance management professionals (“SEPM Pros”) around the world via our [database of SEPM professionals](#).

