OMBANK

OM Bank Language Policy

Date of Board Approval: 12 May 2025

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1. Purpose of the OM Bank Language Policy

The OM Bank Limited (OM Bank) Language Policy aims to promote multilingualism and ensure that all citizens have equal access to information and services related to the National Credit Act No 34 of 2005 as amended (NCA). The policy recognises the importance of language in promoting inclusivity, social cohesion, and effective communication with our customers.

2. Minimum mandatory requirements of this policy

2.1 Legislative requirements

2.1.1 The NCA regulates the credit industry and protects consumers from predatory lending practices. Given the diverse linguistic landscape of the country, it is important to establish a language policy that ensures access to information and services related to the NCA for all citizens, regardless of their language background.

2.1.2 This document outlines the Bank's language policy which was drafted with the objectives of Section 63(1) of the NCA in mind "*a consumer has a right to receive any document that is required in terms of the Act in an official language that the consumer reads or understands, to the extent that is reasonable having regard to usage, practicality, expense, regional circumstances and the balance of the needs and preferences of the population ordinarily served by the person required to deliver that document.*"

2.1.3 Accordingly, OM Bank, is required to offer Credit Documentation in at least two official languages.

2.1.4 The National Credit Regulator (NCR) will consider the proposed OM Bank Language Policy in terms of Section 63(2) of the NCA and the Policy will be effective on approval received from the NCR.

2.1.5 OM Bank Compliance will be responsible for the maintenance of the OM Bank Language Policy, to ensure it remains relevant and fit-for-purpose, unless specific events trigger an out-of-cycle review.

2.2 Language Use by OM Bank

2.2.1 All official communication related to credit agreements issued by OM Bank will be available in at least two official languages, namely English and one other language selected after analysis of customer language preferences obtained from customers through information gathering mechanisms such as surveys. Depending on the outcome of the results from the data gathering exercise, the Bank will select appropriate additional language(s). The additional language in which OM Bank will provide the documentation has been determined to be isiZulu. Additional languages may be included as resources permit, and as demand dictates.

2.2.2 OM Bank's primary operating language is English, with all documentation provided in English. OM Bank will monitor the language needs and demands of its customers on an ongoing basis and will, with the approval of the NCR, adjust its language policy where appropriate.

2.2.3 OM Bank will provide the required documents and support in terms of the NCA in plain language as far as reasonably possible. For the purposes of the NCA and this policy, a document is in plain language if it is reasonable to conclude that an ordinary consumer of the class of persons, for whom the document is intended, with average literacy skills and minimal credit experience, could be expected to understand the content, significance, and import of the document without undue effort. OM Bank will have regard to –

- the context, comprehensiveness and consistency of the document;
- the organisation, form and style of the document;
- the vocabulary, usage and sentence structure of the text; and
- the use of any illustrations, examples, headings, or other aids to reading and

2.2.4 In cases where a customers cannot read or understand the official languages, the Bank will through reasonably practical alternative communication methods attempt to made the necessary disclosure to the customer in the customer's preferred language or a language that the consumer understands. This may involve the use of interpreters, translated documents or audio recordings, as required. Where discrepancies arise due to the translation of the relevant documents, the English version of the document will take precedents.

3. Language Application by OM Bank

3.1 Language offering at Call Centers:

OM Bank will always be able to provide customer service in English at the call centre. Furthermore, the following languages are available to customers, isiZulu, however if a customer exercises the option to receive service in a language other than English, this will be done based on availability and may require the customer waits for a call to be returned when an Intentioneer becomes available.

3.2 Written Agreements:

- Quotation and Pre-Agreement Statement including the Standard Terms
    - The legally binding contract between the customer and OM Bank will be provided in English to the customer.
    - At the request of the customer, OM Bank will make the quotation (which includes the costs of credit) and pre-agreement statement including the Standard Terms available in isiZulu.

- Enforcement Notices
    - OM Bank will produce enforcement notices and other letters that are required under the NCA in English. Section 129 notices are produced with the compulsory section 129(1)(a) wording on the same document in isiZulu.

- Loan statements
    - All loan statements will be provided in English.
    - At the request of the customer, OM Bank will make the Loan statements available in isiZulu.

- Insurance Policy Documents
    - All insurance related documentation will be provided in English.

- Marketing and Advertising Material
    - Marketing and advertising material will be published in English. Where it is practically viable to do so, marketing and advertising material may also be published in any of the other official languages depending on the customer segment and geography.

4. Training and Development

OM Bank staff members involved in the implementation and day to day operations of the NCA will receive training in multilingualism and cultural sensitivity. This training will include an overview of the language policy, strategies for effective communication with customers and stakeholders from diverse linguistic backgrounds, and the use of interpreters and translation services, where necessary.

4.1 Resource Allocation

4.1.1 Sufficient resources will be allocated to ensure that the language policy is effectively implemented and provides adequate coverage of the two official languages across customer servicing areas.

4.1.2 Where translation services are requested, suitable qualified staff or service providers will be appointed to ensure quality and correctness of translations, OM Bank will make use of adequate qualified translation and interpretation services for the development of materials in additional languages, where specifically requested.

4.2 Monitoring and Review

The language policy will be regularly monitored and reviewed to ensure that it remains relevant and effective in promoting multilingualism and ensuring access to information and services for all citizens. Feedback from stakeholders and customers will be sought and used to inform improvements to the policy.

5. Conclusion

The language policy recognizes the importance of language in promoting inclusivity, social cohesion, and effective communication. By ensuring that all citizens have equal access to information and services related to the Act, the policy promotes fair and equitable treatment of consumers and supports the development of a more inclusive and just society

6. Definitions

OM Bank Limited	OM Bank
NCR	National Credit Regulator – regulates credit providers in RSA
NCA	National Credit Act 35 of 2005, regulates credit activities in RSA