



## AMIR Code of Conduct Compliance Survey 2018

### Introduction

The Association of Microfinance Institutions in Rwanda (AMIR), is an umbrella of microfinance institutions in the country. Its mandate includes capacity building for its members, and the promotion of responsible finance.

AMIR brings together 343 out of 459 licensed institutions in the country. AMIR has the purpose to facilitate a vibrant microfinance industry that contributes to poverty reduction and financial inclusion.

From this perspective, AMIR is leading a market process to develop a healthy sector, driven by ethical and consumer-oriented practices. An industry Code of Conduct was developed and endorsed by AMIR members in 2013; and revised in 2017. The new version of the Code of Conduct was endorsed by AMIR members in the general assembly that took place in November 2017.

AMIR has committed to carrying out annual checks on the extent to which members comply with the letter and spirit of the industry Code of Conduct. In this respect, AMIR carried out a quick survey on a sample of members to monitor compliance with the Code of Conduct. This report summarizes key findings from the survey conducted in December 2018.

### Methodology

AMIR has developed a compliance tool that can be used by members to monitor their compliance with the Code of Conduct and report back to the association. However, AMIR experience in 2017 was that self-reported results were too optimistic, and therefore, not credible.

AMIR opted to use a group of graduates from University of Rwanda-College of Economics and Business studies (UR-CBE) to conduct a quick assessment, using a simplified assessment tool. Data collectors were trained on the Code of Conduct for a half day, and were previously trained on consumer protection principles, as well as mystery shopping technique.

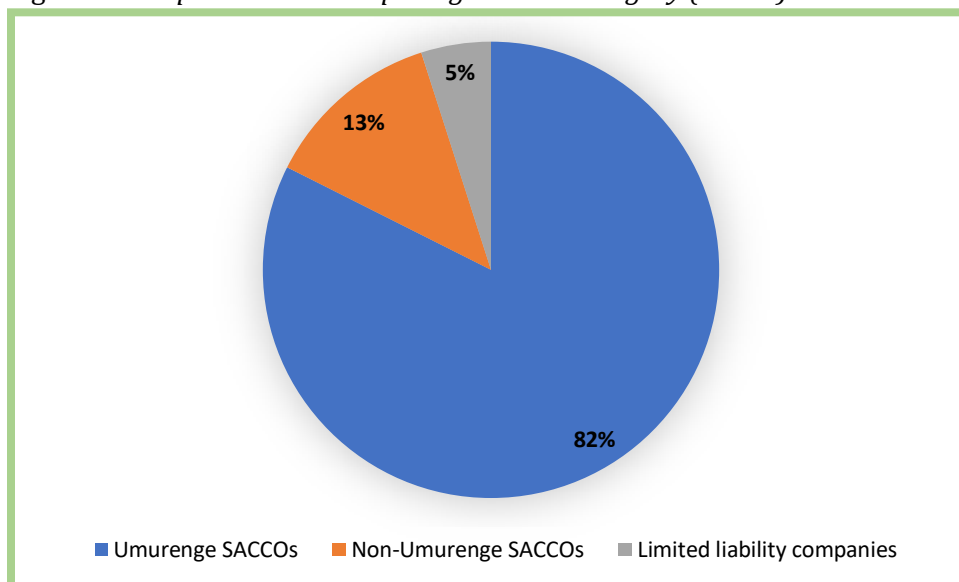
Data entry and analysis was conducted by two of the data collectors, using a simple Excel spreadsheet.

### The sample

The team sampled 186 institutions (53% of AMIR membership and 40% of the microfinance sector) around the country, using purposeful sampling method: Umurenge SACCOs were selected per district (5 SACCOs per district); while all other institutions were directly targeted by data collectors. As a result, 24 non-Umurenge SACCOs were sampled (100%), and only 9 limited companies accepted to be surveyed (45% of the total market segment).

All types of institutions were included in the sample (fig.1):

Figure 1: *Sampled institutions per legal status category (n=186)*



The tool used identified different levels of compliance:

- Awareness about the provisions in the code of conduct
- Implementation of those provisions (the assessment included a scale of 1 to 5; for all the 37 indicators included in the tool-see annex 1)

<b>Level of implementation</b>	<b>Score</b>
The institution is not aware of this requirement in the code of conduct	0
The institution is aware of the requirement but will not implement this clause of the CoC.	1
The institution sees the value to implement this clause of the CoC, but has no clear plan to do so (the institution has not yet considered how to implement this clause of the CoC)	2
The institution has already begun planning for or piloting the implementation of this clause of the CoC (e.g., a strategy exists) but it is still far from full compliance.	3
The institution partially implements this clause of the CoC (some components are not yet in place, or there is no documentation/evidence about how it is implemented).	4
The institution currently implements all the components of this clause in the CoC, and this implementation is well documented and verifiable.	5

## Findings

### 1. Overall Performance

The overall average score was 4.56 over 5. The lowest overall average score was 3.8; regarding privacy of client data. The biggest challenge identified was putting in place policies and mechanisms to protect client's data (3.2).

Performance	Overall	Umurenge SACCOs	Non-Umurenge SACCOs	Ltd CO
Average score	<b>4.56</b>	<b>4.54</b>	<b>4.63</b>	<b>4.62</b>
Minimum	3.8	3.7	4.35	4.17
(Area)	Privacy	Privacy	Privacy	Complaints handling
Maximum	<b>4.8</b>	<b>4.8</b>	<b>4.9</b>	<b>4.89</b>
(Area)	Whistle-blowing policy	Prevention of OI	Whistle-blowing policy	Prevention of OI
				Responsible pricing
				Whistle-blowing policy

96.7% of surveyed MFIs have reached more than 75% of total scores<sup>1</sup>. 90% of surveyed institutions have total points larger than 148 (the range between partial and full compliance with all the indicators). Only 13 institutions (all of which are Umurenge SACCOs) have an average score lower than 4 points (SACCO Jyejuru Cyabakamyi, Ntyazo SACCO, Duhoranjabo SACCO, Akabando SACCO, Umurange SACCO, Cyabingo SACCO, SACCO Gase, Rebakure SACCO, Imbonera SACCO, Rugezi SACCO, Kabogo Vision SACCO, SACCO Gitesi, and Bwishyura SACCO).

Figure 2: Average score per CoC component and per MFI category (n=186)

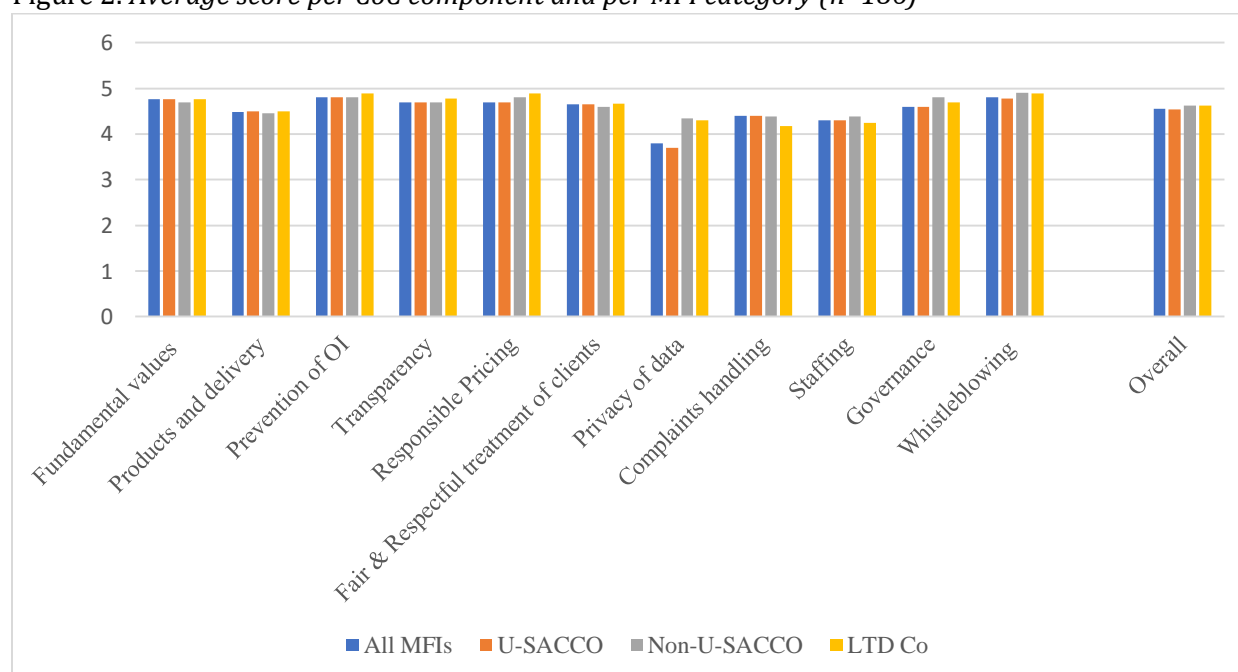


Figure 3: Frequency of total points per range (n=186)

<sup>1</sup> The maximum score is 37 (number of indicators) \* 5= 186.

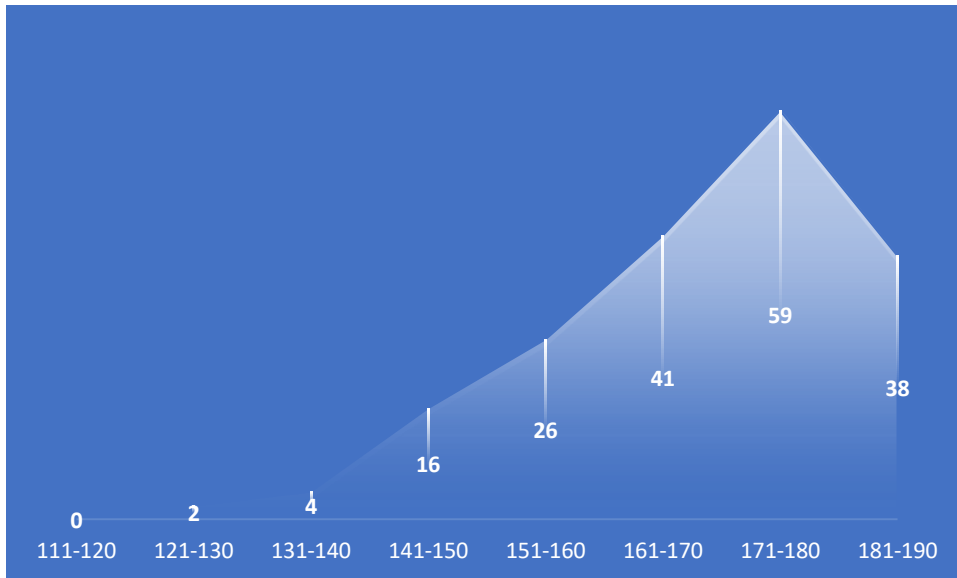
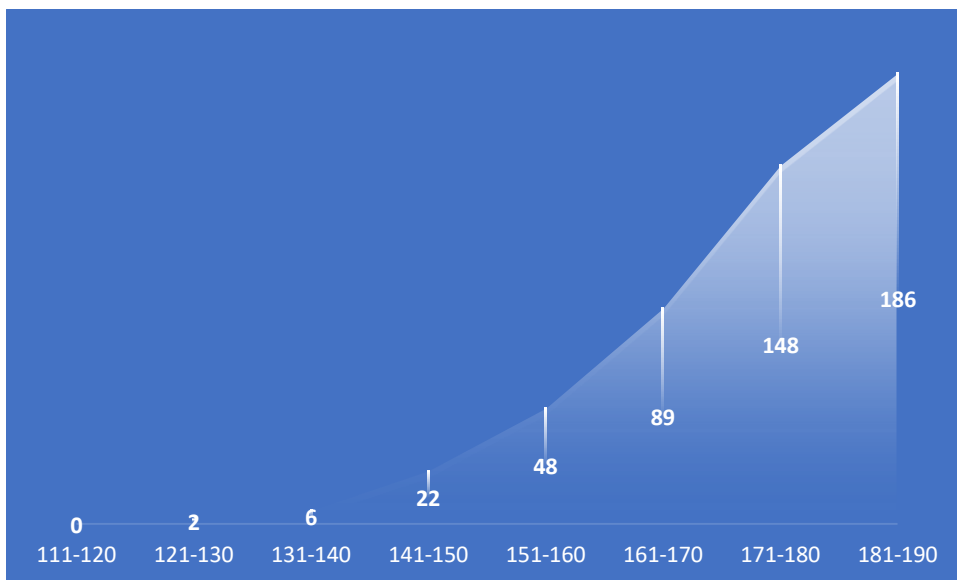


Figure 3: Cumulative frequency of total points per range (n=186)



- 0.25 percentile includes 5 MFIs
- 0.5 percentile includes 35 institutions
- 0.75 percentile includes 104 institutions

The first 2/4 percentiles (0-50%) include only 40 institutions (22%), and therefore, the majority are in the upper percentiles (78%). This demonstrates high degree of compliance with the CoC within most of AMIR members.

## 2. Strengths and weaknesses

Areas of the CoC where there are many sampled institutions that fully comply with the clauses include:

- Responsible Pricing (150 institutions or 82.4%)
- Prevention of Over-indebtedness (149 institutions or 81.9%)
- Core values (141 institutions, or 77.5%)
- Transparency (139 institutions, or 76.4%)

There was a low score (below 4) on Privacy of clients' data (particularly on “privacy policy and appropriate technology systems for gathering, processing, using and storing client information in a secure manner”; where the average score was 3.2). Indeed, only 80 MFIs reported to be fully compliant with this requirement (44%). Many MFIs reported that they don't know how to comply, including 24 Umurenge SACCOs, while many other have not yet planned to comply with this requirement (e.g. 67 Umurenge SACCOs -37% of the sample-reported that they don't have a plan to comply with the requirement).

Other areas where improvement is needed include:

- training staff on complaints handling, put in place complaints resolution systems and ensure that they are actively used and effective (average score:3.9).
- putting in place human resources and financial procedure manuals to regulate and guide staff recruitment, evaluation, salaries, retention and dismissal so that both parties (employer and employee) are at the same level of understanding on the purposes and consequences of application of those procedures (average score: 3.9).

### ***2.1.Limited companies***

The average score per institution in the Limited liability company category is 4.62 over 5. The lowest score is 4.35 (161 points over 185 possible) while the largest is 4.92 (181 points over 185 possible). All the institutions (100%) are above the 75% threshold (148 points over 185 possible) set by AMIR as a target.

Areas of strengths for Ltd companies include:

- Prevention of Over-indebtedness (8 MFIs, 89%);
- Responsible Pricing (8 MFIs, 89%);
- Whistle blowing policy (8 MFIs, 89%);
- Transparency (7 MFIs, 78%);
- Governance (7 MFIs, 78%).

Limited liability companies are on top of all the requirements in the CoC, as none reported not knowing how to implement any clause in it. In addition, no MFI in this category reported inability to implement any requirement in the CoC. Only one institution reported that they have not yet planned to put in place mechanisms that ensure that they comply with all laws and regulations, including AMIR CoC.

Limited liability companies are less compliant in staffing practices (only 4 institutions are fully compliant-44%); and complaints handling (only 3 institutions are fully compliant=33%). In a nutshell, there is a need to push for full compliance in all Ltd companies in the following areas:

- put in place human resources and financial procedure manuals to regulate and guide staff recruitment, evaluation, salaries, retention and dismissal so that both parties (employer and employee) are at the same level of understanding on the purposes and consequences of application of those procedures (only 1 MFI is fully compliant);
- ensure that clients are aware of their right to complain, give feedback and how to file complaints (only 2 MFIs are fully compliant);
- train staff on complaints handling, put in place complaints resolution systems and ensure that they are actively used and effective (only 2 MFIs are fully compliant).

### ***2.2.Non-Umurenge SACCOs***

The average score in this category is 4.63. Individual scores per MFI range from a minimum of 3.49 (129 points over 185 possible), and a maximum of 5 (185 points over 185). Only one institution (COOPEC Zamuka) is under AMIR's threshold of 75% compliance target (148 points) with 129 points (a score of 3.49).

Non-Umurenge SACCO demonstrated high levels of compliance in governance and whistle blowing policy (22 are fully compliant in each, or 96%). They are also doing well in prevention of over-indebtedness and responsible pricing, where 20 institutions out of 23 (87%) are, on average, fully compliant with the indicators in those components. However, non-Umurenge SACCOs need to improve on the following areas:

- train staff on complaints handling, put in place complaints resolution systems and ensure that they are actively used and effective (only 10 MFIs are fully compliant-43%);
- explore other unserved and underserved areas for expansion, avoiding areas that are already adequately served (only 11 MFIs are fully compliant-48%);
- put in place human resources and financial procedure manuals to regulate and guide staff recruitment, evaluation, salaries, retention and dismissal so that both parties (employer and employee) are at the same level of understanding on the purposes and consequences of application of those procedures (only 11 MFIs are fully compliant-48%).

### ***2.3.Umurenge SACCOs***

The average score in this category is 4.54; from a minimum of 3.38 (125 points out of 185 possible) and a maximum of 5 (185 points). In this category, 13 institutions (8.8%) don't meet AMIR target of 75% compliance. These are: SACCO Jyejuru Cyabakamyi, Ntyazo SACCO, Duhoranjabo SACCO, Akabando SACCO, Umurange SACCO, Cyabingo SACCO, SACCO Gase, Rebakure SACCO, Imbonera SACCO, Rugezi SACCO, Kabogo Vision SACCO, SACCO Gitesi, and Bwishyura SACCO.

Areas where efforts should be concentrated in terms of improvement include:

- a privacy policy and appropriate technology systems for gathering, processing, using and storing client information in a secure manner (score:3);
- train staff on complaints handling, put in place complaints resolution systems and ensure that they are actively used and effective (score: 3.9);
- put in place human resources and financial procedure manuals to regulate and guide staff recruitment, evaluation, salaries, retention and dismissal so that both parties (employer and employee) are at the same level of understanding on the purposes and consequences of application of those procedures (3.85).

## Way Forward

This survey pinpointed areas where AMIR needs to strengthen communication with members to increase awareness, and possibly provide technical assistance in implementing some provisions in the code of conduct. In general, there is a need to strengthen:

- Privacy of client's data, particularly in SACCOs;
- Mechanisms for complaints handling in limited companies and SACCOs.
- Building the capacity of staff to be able to understand the content of the CoC and comply with it. This includes putting in place human resource development policies and training staff.

Any intervention to improve compliance with the code of conduct should be tailored to the needs of the target institutions, as the analysis demonstrated that SACCOs, no-Umurenge SACCOs and limited companies have each their own challenges, different from other categories.

The next survey will take place towards the end of 2019; to compare with results in this report. This report is considered as a baseline, as the previous one used a different tool, and therefore, had different conclusions.

## Annexes

### 1. Overall Performance



#	Institution	Respondent	Position	Contacts	Date	Frequency per score					
Component	#Q	Average Score	0	1	2	3	4	5			
0: Core Values	1	4.5690608	1	0	1	5	60	114			
	2	4.8232044	0	0	2	0	26	153			
	3	4.7569061	0	0	1	5	31	144			
	4	4.8287293	0	0	0	0	31	150			
	5	4.8388889	0	0	0	2	25	153			
	6	4.7277778	0	0	0	2	45	133			
		4.7574279									
CPP #1	7	4.6629834	0	0	0	5	51	125			
	8	4.2833333	1	0	5	26	57	91			
	9	4.679558	0	0	3	6	37	135			
	10	4.3149171	8	7	2	6	38	120			
		4.485198									
CPP#2	11	4.7912088	0	0	0	2	34	146			
	12	4.9065934	0	0	0	1	15	166			
	13	4.7222222	0	0	1	2	43	134			
		4.8066748									
CPP #3	14	4.7679558	0	0	1	2	35	143			
	15	4.6923077	0	0	1	7	39	135			
	16	4.7142857	0	0	2	7	32	141			
		4.7248497									
CPP #4	17	4.489011	3	3	6	12	24	134			
	18	4.8791209	0	0	2	1	14	165			
	19	4.8021978	0	1	0	2	28	151			
		4.7234432									
CPP#5	20	4.5549451	2	0	2	13	39	126			
	21	4.7967033	0	0	0	3	31	148			
	22	4.7197802	0	0	2	6	33	141			
	23	4.2944444	3	0	5	25	47	100			
	24	4.8932584	0	0	0	2	15	161			
		4.6518263									
CPP #6	25	3.2044199	12	1	28	73	31	36			
	26	4.4751381	3	1	5	8	45	119			
		3.839779									
CPP #7	27	4.6850829	0	0	1	7	40	133			
	28	3.9175824	7	0	13	41	41	80			
	29	4.4640884	1	0	3	19	45	113			
	30	4.4628571	1	0	4	18	41	111			
		4.3824027									
HR policies	31	4.8066298	1	0	1	1	25	153			
	32	3.8674033	15	0	10	26	48	82			
	33	4.281768	4	0	5	22	51	99			
		4.3186004									
Governance	34	4.3646409	6	0	6	10	47	112			
	35	4.8666667	0	0	1	1	19	159			
	36	4.6740331	1	0	2	13	22	143			
		4.6351136									
WB	37	4.8076923	0	0	0	3	29	150			
		4.8076923									

## 2. Limited Liability Company Performance

Component		MF11	MF12	MF13	MF14	MF15	MF16	MF17	MF18	MF19		Frequencies					
												0	1	2	3	4	5
0: Core values	1	5	5	4	5	5	5	4	5	4	4.666667	0	0	0	0	3	6
	2	5	5	5	5	5	5	4	5	5	4.888889	0	0	0	0	1	8
	3	5	5	5	5	5	5	4	5	4	4.777778	0	0	0	0	2	7
	4	5	5	5	4	5	5	5	5	5	4.888889	0	0	0	0	1	8
	5	5	5	4	5	5	5	5	5	5	4.888889	0	0	0	0	1	8
	6	5	4	4	4	5	5	5	5	4	4	4.444444	0	0	0	0	5
											4.759259	0	0	0	0	2	6.8
CPP #1	7	5	5	4	4	5	5	5	4	4	4.555556	0	0	0	0	4	5
	8	5	4	4	4	5	4	5	3	3	4.111111	0	0	0	2	4	3
	9	5	5	5	5	5	4	4	4	4	4.555556	0	0	0	0	4	5
	10	5	4	5	5	5	5	5	5	5	4.888889	0	0	0	0	1	8
											4.527778	0	0	0	1	3	5.3
CPP #2	11	5	5	5	5	5	5	5	5	5	5	0	0	0	0	0	9
	12	5	5	5	5	4	5	5	5	5	4.888889	0	0	0	0	1	8
	13	5	5	4	4	5	5	5	5	5	4.777778	0	0	0	0	2	7
											4.888889	0	0	0	0	1	8
CPP #3	14	5	5	5	5	5	5	4	5	4	4.777778	0	0	0	0	2	7
	15	5	5	5	5	5	5	4	4	4	4.666667	0	0	0	0	3	6
	16	5	5	5	5	5	5	5	5	4	4.888889	0	0	0	0	1	8
											4.777778	0	0	0	0	2	7
CPP #4	17	5	5	5	5	5	5	4	4	4	4.666667	0	0	0	0	3	6
	18	5	5	5	5	5	5	5	5	5	5	0	0	0	0	0	9
	19	5	5	5	5	5	5	5	5	5	5	0	0	0	0	0	9
											4.888889	0	0	0	0	1	8
CPP #5	20	5	3	5	5	5	5	4	3	4	4.333333	0	0	0	2	2	5
	21	5	5	5	5	5	5	5	4	5	4.888889	0	0	0	0	1	8
	22	5	4	5	5	5	5	5	5	5	4.888889	0	0	0	0	1	8
	23	5	4	5	4	5	5	4	5	4	4.555556	0	0	0	0	4	5
	24	3	5	5	5	5	5	5	4	5	4.666667	0	0	0	1	1	7
											4.666667						
CPP #6	25	3	4	5	5	5	5	4	4	4	4.333333	0	0	0	1	4	4
	26	5	4	4	4	5	5	4	4	4	4.333333	0	0	0	0	6	3
											4.333333	0	0	0	1	3	5.7
CPP #7	27	4	4	4	4	5	5	3	4	4	4.111111	0	0	0	1	6	2
	28	4	4	4	4	5	5	3	3	4	4	0	0	0	2	5	2
	29	5	5	4	5	5	4	3	4	4	4.333333	0	0	0	1	4	4
	30	5	4	4	5	4	5	3	4	4	4.222222	0	0	0	1	5	3
											4.166667	0	0	0	1	5	2.8
HR Policies	31	5	4	5	5	5	5	5	5	4	4.777778	0	0	0	0	2	7
	32	3	4	4	4		5	3	3	4	3.75	0	0	0	3	4	1
	33	3	5	4	5	4	5	4	4	4	4.222222	0	0	0	1	5	3
											4.25	0	0	0	1	4	3.7
Governance	34	2	4	4	5	5	5	4	4	4	4.111111	0	0	1	0	5	3
	35	5	5	5	5	5	5	5	5	5	5	0	0	0	0	0	9
	36	5	5	5	5	5	5	5	5	5	5	0	0	0	0	0	9
											4.703704	0	0	0	0	2	7
WB	37	5	5	5	5	5	5	5	5	4	4.888889	0	0	0	0	1	8
											4.888889						8
		177	170	171	175	177	182	162	163	161							
		4.8	4.6	4.6	4.7	4.8	4.9	4.4	4.4	4.4	4.622896						

### 3. Non-Umurenge SACCO Performance

Component	#Q	Average Score	Frequencies					
			0	1	2	3	4	5
0: Core values	1	4.25	1	0	1	2	6	14
	2	4.833333	0	0	1	0	1	22
	3	4.625	0	0	1	1	4	18
	4	4.791667	0	0	0	0	5	19
	5	4.875	0	0	0	0	3	21
	6	4.75	0	0	0	1	4	19
		4.6875	0.166667	0	0.5	0.666667	3.833333	18.83333
CPP #1	7	4.75	0	0	0	1	4	19
	8	4.043478	1	0	1	4	6	11
	9	4.695652	0	0	1	1	2	19
	10	4.333333	0	2	1	0	5	16
		4.455616	0.25	0.5	0.75	1.5	4.25	16.25
CPP #2	11	4.708333	0	0	0	1	5	18
	12	5	0	0	0	0	0	24
	13	4.73913	0	0	0	0	6	17
		4.815821	0	0	0	0.333333	3.666667	19.66667
CPP #3	14	4.73913	0	0	1	0	3	19
	15	4.708333	0	0	1	0	4	19
	16	4.666667	0	0	0	0	8	16
		4.70471	0	0	0.666667	0	5	18
CPP #4	17	4.666667	0	0	0	2	4	18
	18	4.958333	0	0	0	0	1	23
	19	4.791667	0	0	0	0	5	19
		4.805556	0	0	0	0.666667	3.333333	20
CPP #5	20	4.541667	0	0	1	2	4	17
	21	4.833333	0	0	0	0	4	20
	22	4.708333	0	0	1	0	4	19
	23	4.166667	0	0	3	3	5	13
	24	4.916667	0	0	0	0	2	22
		4.633333	0	0	1	1	3.8	18.2
CPP #6	25	4.041667	0	0	4	3	5	12
	26	4.666667	0	0	2	0	2	20
		4.354167	0	0	1.5	1.125	3.725	17.65
CPP #7	27	4.583333	0	0	0	1	8	15
	28	3.875	1	0	2	5	6	10
	29	4.5	0	0	0	2	8	14
	30	4.583333	0	0	1	1	5	17
		4.385417	0.25	0	0.75	2.25	6.75	14
HR Policies	31	4.708333	0	0	1	1	2	20
	32	3.958333	1	0	2	4	6	11
	33	4.458333	0	0	1	2	6	15
		4.375	0.333333	0	1.333333	2.333333	4.666667	15.33333
Governanc	34	4.666667	0	0	1	1	3	19
	35	4.958333	0	0	0	0	1	23
	36	4.916667	0	0	0	1	0	23
			4.847222	0	0	0.333333	0.666667	1.333333
WB	37	4.916667	0	0	0	0	2	22
		4.916667	0	0	0	0	2	22
		4.634637						

#### 4. Umurenge SACCOs Performance

Component	#Q	Average Score	Frequencies					
			0	1	2	3	4	5
0: Core values	1	4.616438	0	0	0	3	50	93
	2	4.815068	0	0	1	0	24	121
	3	4.787671	0	0	0	4	23	119
	4	4.828767	0	0	0	0	25	121
	5	4.834483	0	0	0	2	20	123
	6	4.744828	0	0	0	1	35	109
		4.771209	0	0	0.166667	1.666667	29.5	114.3333
CPP #1	7	4.664384	0	0	0	4	41	101
	8	4.335616	0	0	4	20	45	77
	9	4.680272	0	0	2	5	31	109
	10	4.287671	8	5	1	5	31	96
		4.491986	2	1.25	1.75	8.5	37	95.75
CPP #2	11	4.795918	0	0	0	1	28	118
	12	4.897959	0	0	0	1	13	133
	13	4.712329	0	0	1	2	35	108
		4.802069	0	0	0.333333	1.333333	25.33333	119.6667
CPP #3	14	4.77551	0	0	0	2	29	116
	15	4.693878	0	0	0	7	31	109
	16	4.714286	0	0	2	7	22	116
		4.727891	0	0	0.666667	5.333333	27.33333	113.6667
CPP #4	17	4.442177	3	3	6	10	17	108
	18	4.863946	0	0	2	1	12	132
	19	4.795918	0	1	0	2	22	122
		4.70068	1	1.333333	2.666667	4.333333	17	120.6667
CPP #5	20	4.578231	2	0	1	9	31	104
	21	4.782313	0	0	0	3	26	118
	22	4.707483	0	0	1	6	28	112
	23	4.303448	3	0	2	21	38	81
	24	4.902098	0	0	0	1	12	130
		4.654715	1	0	0.8	8	27	109
CPP #6	25	3	12	1	24	67	22	20
	26	4.452055	3	1	3	8	36	95
		3.726027	2.5	0.25	3.875	14.375	24.125	82.5
CPP #7	27	4.739726	0	0	1	5	25	115
	28	3.92517	6	0	11	33	29	68
	29	4.472603	1	0	3	15	33	94
	30	4.464286	1	0	3	15	31	90
		4.400446	2	0	4.5	17	29.5	91.75
HR Policies	31	4.821918	1	0	0	0	21	124
	32	3.85034	14	0	8	19	37	69
	33	4.260274	4	0	4	18	40	80
		4.310844	6.333333	0	4	12.33333	32.66667	91
Governanc	34	4.328767	6	0	4	9	38	89
	35	4.848276	0	0	1	1	17	126
	36	4.623288	1	0	2	11	22	110
		4.60011	2.333333	0	2.333333	7	25.66667	108.3333
WB	37	4.782313	0	0	0	3	26	118
		4.782313	0	0	0	3	26	118
		4.634637						

## 5. Tool Used for Data collection

		The institution is not aware of this requirement in the code of conduct (0)	The institution is aware of the requirement but will not implement this clause of the CoC (2)	The institution sees the value to implement this clause of the CoC, but has no clear plan to do so (3)	The institution has already begun planning for the implementation of this clause of the CoC but it is still far from full compliance (4).	The institution partially implements this clause of the CoC (4)	The institution currently implements all the components of this clause in the CoC, and this implementation is well documented and verifiable (5).
We are committed to being honest and ethical in our relationships with customers and other stakeholders	1						
We provide to low income customers—women, men, boys and girls—financial and non-financial services that are demand-driven, properly addressing their needs and enhancing their wellbeing.	2						
We provide to our clients complete and accurate information.	3						
We are committed to fair practices, which balance respect for clients' dignity and an understanding of their vulnerable situation.	4						
We safeguard clients' personal information	5						
We provide to our clients formal and informal channels for their feedback and suggestions and consistently assess the impact of their services	6						
We design products that are appropriate to clients' needs and do not harm.	7						
We proactively seek client feedback on products and delivery channels, investigate drop-outs.	8						
We use that information to develop new products or to improve existing ones.	9						
We do not use aggressive sales techniques	10						
We conduct appropriate client repayment capacity analysis before disbursing a loan	11						
We systematically report to and use data from the credit bureau.	12						
We make sure that the management and Board are aware of and concerned about the risk of over-indebtedness and monitor it.	13						
We fully disclose to clients cost and non-cost information.	14						
We raise the client's awareness of the options, choices and responsibilities in financial relations with other MFIs.	15						
We use a variety of disclosure mechanisms, to communicate clear and accurate information about our products.	16						

We offer market-based, non-discriminatory pricing.	17						
We strive to have efficiency ratios aligned with our peers.	18						
We do not charge excessive fees and we strive to maintain our pre-payment penalties, account closure fees, transaction fees or other penalties at a reasonable level.	19						
We implement policies to promote ethics and prevent fraud and make efforts to inform clients of their rights.	20						
We define in specific details what we consider to be appropriate debt collection practices to avoid endorsing a policy of zero tolerance for PAR.	21						
Our human resources policies are aligned around fair and responsible treatment of clients.	22						
We implement policies to promote ethics and prevent fraud including staff, performance evaluation procedures, describing sanctions in case of violations of the code of conduct, and putting in place mechanisms to monitor practices.	23						
We make necessary efforts to inform clients of their rights.	24						
We have a privacy policy and appropriate technology systems for gathering, processing, using and storing client information in a secure manner.	25						
We inform clients about when and how their data is shared and get their consent.	26						
We ensure that our clients are aware of their right to complain, give feedback and how to file complaints.	27						
We train our staff on complaints handling	28						
We put in place complaints resolution systems and ensure that they are actively used and effective.	29						
We use client feedback to improve practices and products.	30						
We strive to ensure that we recruit skilled and qualified personnel	31						
We have a framework of procedures and management controls to ensure employee adherence to AMIR code of conduct.	32						
We continuously build the capacity of our staff to enable them to effectively implement and abide by the letter and spirit of AMIR Code of Conduct.	33						
We strive to ensure that we are never at fault with the laws and regulations related to microfinance, or other laws that are in force in Rwanda, including AMIR Code of Conduct.	34						
We observe high standards of governance, ensuring fairness, integrity and transparency by inducting persons with good and sound reputation and understanding of microfinance as members of the Board of Directors.	35						
We maintain transparency in keeping our books of accounts and reporting/presentation and disclosure of financial statements by qualified auditor(s).	36						
We ensure that any person or AMIR member is entitled to report an incident of improper conduct by us or any other AMIR member to AMIR Reconciliation Committee.	37						