



## Customer Grievance Redressal Policy

Approver	Board of Directors
Approved on	03 <sup>rd</sup> March 2017
Policy Owner	Head: Customer Service Quality
Review frequency	Annual

### Revision History and Approvals

Revision No.	Issue Date	Amendment Description
V2	30/07/2018	Annexed with V2
V3	05/11/2019	Nil Amendment
V4	04/02/2021	Nil Amendments
V5	20/01/2022	Annexed
V6	08/02/2023	Nil Amendments

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## **1. Introduction**

The Bank will strive to provide the highest quality of customer service to ensure continued customer satisfaction, retention and sustained growth of products and services.

To facilitate the customers to raise their grievances, the Bank has put appropriate mechanism in place for redressal of customer grievances.

## **2. Objective**

The Bank, through a comprehensive Customer Grievance Redressal Policy, intends to put in place systems, procedures and review mechanism for minimizing instances of customer complaints and grievances and to ensure prompt redressal of customer complaints and grievances.

Additionally, the key objectives of this policy are given below:

- Ensure unbiased, fair and just treatment to customers, including both depositors and borrowers, on an ongoing basis
- Protect customers against fraud, deception or unethical practices
- Consistently assess the impact of services in order to serve clients better
- Provide clients formal and informal channels for feedback and suggestions
- Put in place a formal grievance redressal mechanism for clients and educate customers on such mechanism
- Ensure speedy and efficient resolution of customer issues with adherence to basic principles of transparency and integrity
- Educate the customers about alternate escalation mechanisms within and outside the Bank, for resolution of the complaints / issues if they are not satisfied with the Bank's response
- Ensure that there is a mechanism for compensating customers expeditiously for any financial loss incurred by them on account of service gaps.

## **3. Applicability**

The policy document shall cover the details of grievance redressal mechanisms for customers and the procedure the employees at the Bank need to follow when such a complaint arises.

The policy will apply to employees of the Bank as well as Business Correspondents (BCs)/ Agents and shall be applicable in respect of all customers catered to by branches or by BCs/ Agents of the Bank.

The policy will cover all the products and services offered by the Bank including third party products distributed by the Bank.

#### **4. Governance Structure**

In line with RBI guidelines, the Bank will have grievance redressal mechanism at three levels i.e. the Board, Senior Management and Branches.

The Customer Service Committee at the Board level shall assess and review the overall implementation of customer service policies and initiatives.

The Standing Committee on Customer Service at Senior Management level shall serve as a micro level executive committee for driving the implementation of customer service policies and initiatives and shall act as a bridge between the various units of the Bank and Customer Service Committee of the Board.

The Branch Level Customer Service Committee shall act as a formal channel of communication between the customers and the Bank at the branch level. The detailed responsibilities of each of the aforesaid Committees are elaborated as under:

##### **4.1. Standing Committee on Customer Service**

The Standing Committee on Customer Service may be chaired by the MD & CEO or Executive Vice President in the absence of MD and CEO and will include two to three executives from the Senior Management and invited customers, if any as its members.

The Standing Committee on Customer Service shall meet at least on a bi-monthly basis to review the implementation of customer service initiatives across the Bank.

The terms of reference of the Committee shall be as under:

- Ensure timely and effective compliance of the RBI instructions on customer service
- Obtain independent feedback on the quality of customer service to ascertain if the action taken by the other departments are in tune with the spirit and intent of such instructions
- Review existing practices and procedures which may lead to frequent customer complaints, and initiate necessary corrective action on an ongoing basis to improve these procedures
- Submit a report on the areas reviewed, procedures/ practices identified and simplified to the Customer Service Committee of the Board on a periodic basis
- Examine the quarterly reports submitted by the Branch Level Customer Service Committees and provide relevant feedback to the Customer Service Committee of the Board.

##### **4.2. Branch Level Customer Service Committees**

The Branch Level Customer Service Committee will be responsible for strengthening of customer service at branch level through interaction with diverse set of customers.

This committee will conduct monthly meetings with customers including depositors, borrowers and a senior citizen may preferably be included therein at the branch level to study customer grievances, cases of delay and other difficulties faced by the customers. It will also provide a forum for the customers to provide their feedback/ suggestions and help the Bank in evolving ways to improve customer service.

The Branch Level Customer Service Committees may also submit quarterly reports giving inputs/ suggestions to the Standing Committee on Customer Service thus enabling the Standing Committee to examine them and provide relevant feedback to the Customer Service Committee of the Board for necessary policy/ procedural action.

#### **4.3. Customer Service Department and Principal Nodal Officer**

The Bank shall have a Customer Service Department at its Head Office to oversee the customer service and improving the quality of service at the entire Bank which shall be headed by Head, Customer Services.

With a view to making the Grievance Redressal Mechanism more effective, the Principal Nodal Officer is appointed under the Banking Ombudsman Scheme to monitor the implementation of customer service and complaint handling for the entire Bank.

The Bank shall also appoint a Regional Nodal Officers (RNO) for each of the Regions to ensure smooth resolution of customer grievances. The PNO and RNO at Head Office and Regional Office levels respectively, shall be the point of contact with whom the BO, Indian Banks' Association (IBA) and RBI can liaise for resolution of customer complaints.

The Customer Services Department shall ensure that following details are displayed in the branch and on the website of the Bank.

- Names of officials who can be contacted for redressal of complaints along with direct telephone number, fax number, complete address and email address.
- Details of RNO, Regional Heads and PNO
- Names and other contact details of MD & CEO and other business heads to enable customers to approach them if required.
- Contact details of the BO Offices of the respective areas.
- Code of Bank's Commitment to Customers framed by Banking Code and Standards Board of India (BCSBI).
- Detailed Grievance Redressal Mechanism

#### **4.4 Internal Ombudsman**

Reserve Bank of India has directed all Banks scheduled banks to appoint Internal Ombudsman as an independent authority to review complaints that were partly or wholly rejected by the bank. The main aim of IO Scheme is to strengthen the internal grievance redressal system of bank, to ensure that the complaints of the customers are redressed at the level of the bank and to minimize the need for the customers to approach external forums for redressal. The Bank shall appoint the Internal Ombudsman as per eligibility

criteria provided in RBI's Internal Ombudsman Scheme, 2018. The IO scheme provides a settlement which may be acceptable to the bank as well as customer. The customer, if not satisfied with the settlement offer, will however be at liberty to appeal to the banking ombudsman of Reserve Bank of India.

## **5. Customer Grievance Redressal**

Each customer touch point with the Bank will drive towards creating a lasting impression in the customer's mind through a seamless experience, ease of accessibility, faster resolution and transparency in communication.

The Bank shall launch new delivery channels such as BCs, ATMs, internet banking, mobile banking, etc. to fortify existing branch network and strengthen operations. The Bank shall improve upon the technology ecosystem by incorporating the learnings from existing operations and build advanced capabilities to improve operational efficiency.

## **6. Customer Grievance Redressal Mechanism**

### **6.1 Timeframe for Grievance Redressal**

The Bank shall endeavour at all times to redress every single grievance at the same time of its receipt. However, where there are some rectifying actions to be completed to ensure total redressal, the Bank will advise the Customer of the progress of the Actions being taken and engage with the Customer in a meaningful manner so as to instil confidence in the system, till the resolution of the grievance.

### **6.2 Channels for Communication and Escalation Mechanism**

The Bank shall make the following channels available to customer to register any grievance that is seen required to be communicated to the Bank officials:

1. Branch / Physical Premises of the Bank such as the ATM, BC/BF Centres, and other contact touch-points that will be made available from time to time in future.
  - a. In these centres, there should be adequate mechanism like Complaints Register, complaint box for the recording of the grievance.
  - b. Notice Boards indicating the availability of such Complaints Register should be prominently displayed in such physical premises, with the contact details of the local representative of the Bank.
  - c. The contact details of the local representative should necessarily include the personal telephone number and the email address of the concerned representative.
  - d. The notice board should indicate the response time that can be expected for the grievance.
  - e. Such Notice Boards should compulsorily include the local vernacular version of the notice.
  - f. Anonymous / pseudonymous complaints will not be covered under the Scheme and such complaints will not be entertained. However, as good Corporate Governance, depending upon the gravity of the allegation,

the same will be examined by the Bank and further process will be done judiciously.

2. Website / Email channels of the Bank should be facilitated to specifically capture the grievances with distinct and dedicated web-pages / generic Mail IDs set up specifically for capture of such grievances. Such set up should be backed up robust back-end work-flows to ensure that the captured grievances are acknowledge and acted upon immediately.
3. Escalation Mechanism:
  - a. Each complaint/grievance should be immediately assigned a distinct ID so that its process/life-cycle can effectively be tracked end-to-end by the Bank.
  - b. Each Complaint should necessarily be resolved within 7 working days of its receipt.
  - c. Any delay – irrespective of the cause of such delays – should require escalation to the immediate next superior in the hierarchy of the redressal mechanism.
  - d. The Bank shall at any cost should not delay the resolution of the grievance beyond 30 working days from the date of the receipt of the grievance.
  - e. All delays will be immediately and suitably communicated to the aggrieved customer, and in certain cases, personally by the Bank Officials.
  - f. The Escalation Mechanism should be displayed in all channels – physical or electronic – with clear details of the next contact person at each stage including the time frame.
  - g. The customer should also be provided with the details of the Banking Ombudsman – with a brief note on when and how to contact the official. Such details should also contain the contact details of the Principal Nodal Officer of the Bank.

### **6.3 Review of the Redressal Mechanism**

1. The Bank shall maintain robust MIS on the Grievances/Complaints received by it at all times.
2. An Ageing Analysis of all outstanding items should be prepared periodically and reported to the Board through the Standing Committee.
3. Stringent action should be taken against repeat-offenders amongst the bank's staff or that of its partners, where behavioural issues contribute to such grievances of customers.
4. Reports on such incidents including action-taken should be periodically advised to the Customer Service Committee of the Board.

### **6.4 Review of Exiting Customers**

The Bank shall proactively manage customer grievances by assessing them even before it is registered formally as a grievance.

The Silent Customer chooses to Exit the Relationship rather than register a Grievance.

Such instances can only be found by a structured process of contacting each of the customers who have “exited” their banking relationship with the Bank.

The Bank shall put in place suitable mechanisms to use the Call-Centre Resources to personally contact each of such customers and diligently elicit and record their responses to provide an opportunity for redressing any points of dissatisfactions and win the customer back.

Such processes should be embedded with suitable training structures and data-capture capabilities so as to analyse the same meaningfully and provide reports to the senior management and eventually to the Board of the Bank.

## **7. Customer Compensation**

The Bank will compensate the customer for financial losses, if any, only after proper verification.

The compensation amount shall be

- a. Compensation of actual monetary loss and a fair equivalent of any other recognisable loss
- b. Compensation as ordered by any regulatory or statutory bodies
- c. Compensation of a fair and monetary equivalent for recognisable non-monetary loss suffered by the customer

The approval for the pay-out of compensation shall be approved as per the approval matrix outlined in the Delegation of Financial Authority approved by the Board.

## **8. Record Keeping**

The records pertaining to customer complaints shall be maintained for a minimum period of 5 years from the date of resolution. Moreover, timely backup of system data of complaints shall be taken to ensure availability of data at all times.

## **9. Policy Review & Updates**

This Board approved policy will be reviewed as and when required or at least on an annual basis for incorporating changes and regulatory updates, if any, in overall grievance redressal mechanism, to improve customer experience and satisfaction.

## **10. Regulatory References**

- RBI Master Circular on Customer Service in Banks dated July 1, 2015
- IBA Model Policy for Grievance Redressal in Banks
- IBA Fair Practice Code
- IBA Fair Practice on Lending
- IBA Model Customer Rights Policy
- BCSBI Code of Commitment to Customers