**POLICY ON GRIEVANCE REDRESSAL**

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**Version 1.1**  
**Customer Relations Department**  
**ABC Bank Limited**  
**Head Office**

**Contents**

1. Introduction
2. Objective
3. Applicability
4. Representation from customers
5. Salient features of Policy
6. Dealing with Complaints and Improving Customer Relations
7. Resolution of Grievances
8. Internal Ombudsman
9. Banking Ombudsman
10. Other internal machinery to handle customer grievance
11. Mandatory display requirements
12. Sensitising operating staff on handling complaints
13. Record keeping & data base
14. Disclosure norms
15. Review of Policy

**1. Introduction**

In the present scenario of competitive banking, excellence in customer service is the most important tool for sustained business growth. Customer complaints are part of the business life of any corporate entity. This is more so for banks because banks are service organizations. As a service organization, customer service and customer satisfaction should be the prime concern. The bank believes that providing prompt and efficient service is essential not only, to attract new customers, but also for customer retention.

A complaint is an expression of dissatisfaction with a product or service, either orally or in writing, from a customer of the bank / non customer. Complainants may have genuine cause, although some may be made as a result of a misunderstanding or an unreasonable expectation of a product or service.

How a complaint is handled will affect the overall level of customer satisfaction. Complaints can also be used as feedback mechanism for bringing about improvement in services.

Grievance Redressal Policy has been formulated in line with guidelines of the regulators on customer service. It is also used as feedback mechanism for bringing about improvement in services.

A complaint may arise due to: • The attitudinal aspects in dealing with customers or • Inadequacy of the functions/arrangements made available to the customers or • Gaps in standards of services expected and actual services rendered.

This policy document aims at minimizing instances of customer grievances through proper service, delivery and review mechanism and to ensure prompt redressal of grievances registered.

The Bank's Grievance Redressal Policy has been formulated in line with guidelines of the regulators on Customer Service. The policy broadly strives to ensure that:

• The customer is having full right to register his/ her complaint if he/ she is not satisfied with the services provided by the bank. • Customer may give complaint in writing or orally - in person / over telephone etc. • Customers will be fully informed of avenues to escalate their grievances within the organization and their rights to alternative remedies like Banking Ombudsman, in case of dissatisfaction with response of the Bank to their complaints. • Bank will treat all complaints efficiently and fairly as handling otherwise will damage the bank's reputation and business. • The bank employees will work in good faith and without prejudice to the interests of the customer. • In order to make bank's redressal mechanism more meaningful and effective, a structured system will be built up. Such system would ensure that the redressal sought is just and fair and is permissible within the given frame-work of rules and regulation. • The policy document will be made available at all branches and bank's website. The employees concerned will be made aware about the Complaint handling process.

**2. Objective**

The Bank seeks to be the preferred financial solution provider excelling in customer delivery through insight, empowered employees and smart use of technology. The policy on Customer Grievance Redressal aims to reiterate the Bank's core values viz. Sensitivity, Integrity, Quality, Speed, Passion, Resilience, Boundary less, Ownership and Digital by laying down a structured system which would ensure availability of multiple channels within the Bank for customer grievance redressal. The policy would also ensure that redressal would be fair, consistent and in accordance with the extant rules & regulations.

**3. Applicability**

This policy is applicable to all branches, offices, Head Office Departments and the personnel involved in functioning of operations of the Bank including Banking Correspondents and other outsourced individuals / firms employed for and on behalf of the bank. The Policy aims to achieve compliance with the procedure on Grievance Redressal as outlined in the Code of Commitment to Individual Customers set out by the Banking Codes and Standards Board of India (BCSBI) as well as Master Circular on Customer Service dated 1st July 2015.

**4. Representation from Customers**

Representation from customers may be bifurcated to: • Feedback / Suggestion • Enquiry • Service Request • Complaint

Complaints alone fall under the purview of this policy. The Bank shall accept all complaint and acknowledge them within a working day unless it is: • Abusive, frivolous or vexatious in nature. • With incomplete information or no contact details. • Escalation of a complaint rejected with the concurrence of Bank's Internal Ombudsman. • Issue already rejected or resolved by Office of Banking Ombudsman through conciliation / mediation or issuance of advisories / awards.

**5. Salient Features of the Policy**

• Bank's Customer care / Customer Experience Group shall be the designated point for receipt of complaints. • Complaints received at other branches / offices shall also be acknowledged and accepted. • All complaints shall be registered in central Complaint Redressal Management system (CRM) of the Bank and assign a unique reference number. • Complaints shall be monitored and marked as closed only after resolving / replying to the customer grievance. • The complaints received from regulators will be resolved centrally by CRD at the Head Office. The timelines as mandated by respective regulator will be adhered to, as far as possible. • The Grievance Redressal Policy will be accessible to all so as to ensure that information of lodging and resolving complaints is readily available to all. This policy will be available on the Bank's website as well as at Branches / Offices and shall be made available to customers free of charge upon request. • There will be no charge for lodging a complaint. • Details of complainant and/ or complaint will be shared with other organizations/ regulatory authorities only if in accordance with the laws of the country and the customer will be kept apprised about the same. Sharing of information otherwise will only be done with a written consent of the customer except in the case of regulatory/ statutory provisions to disclose the same in terms of the law in force. The same will be done only in circumstances where the input of an external agency /organization is necessary for resolving the complaint. • The policy aims to improve processes and systems towards better customer experience by taking cognizance of customer feedback and Complaints. • Resolution of complaints would be, wherever applicable, in accordance with Bank's Policy on Customer Compensation / Policy on Customer Protection.

**6. Dealing with Complaints and Improving Customer Relations**

**Registration of Complaints by Customers**

The following channels are available for registration of complaints:

**In Person:** a. **Complaints / Suggestions box:** Complaint/ suggestion box will be provided at all Branches of the bank for use of customers. Further, a notice requesting the customers to meet the Branch Manager in case of any grievance will be prominently displayed.

b. **Complaint Book / Register:** Bank shall ensure that complaint registers are kept at prominent locations in branches so as to enable customers to enter their complaints, if any. All complaints received at branches shall be entered in Bank's internal software system depending on the category of complaint.

c. **Complaint Form:** A complaint form, along with details of the Nodal Officers for complaint redressal will be made available in the homepage of Bank's Website (www.bankwebsite.com – Helpdesk – Complaint registration) to facilitate submission of General complaints by customers.

**By Letter / e-mail:** Customers may register their Complaints / Feedback / Suggestions in writing addressed to Branch, Controlling Offices, Head Office or any executive of the Bank or their designated email ids.

**Over Telephone:** Customers may register their complaints over phone in any of bank's registered landline numbers/ mobile numbers of executives.

**Customer Care:** Customers may also lodge the complaints through the Bank's toll free numbers [1800-XXX-XXXX (Service Provider 1) / 1800-XXX-XXXX (Service Provider 2) / 91 XXX XXXXXXX (NRI)] or dedicated email id for receipt of complaints, customercare@bank.com.

**Through Website / Social Media Handles:** Customers may submit their complaints online through the Web based Grievance Redressal Management portal – WebGRM available under 'Complaint Registration' on home page of Bank's website www.bankwebsite.com or through other social media networking sites.

**Through Mobile Banking App:** Customers may submit their complaints - both financial & non-financial (internet & mobile banking related) using Bank's mobile application – Services & Requests – Complaints. The status of complaints may be tracked using the View Status option.

**Complaints through Net Banking:** Customers may also raise their complaints, suggestions/ queries through Bank's Net Banking Portal – Message Centre.

All general complaints will be entered and processed in CRM. Transaction related complaints [ATM, POS, Online and Unauthorized transactions] shall be entered in Information bank for further processing.

To facilitate faster and complete resolution of complaints, a complaint letter /email should contain: • Complainant's name, address and contact details (e-mail id, phone / mobile numbers etc.) • Relationship information such as Customer ID/ Account number / Debit / Credit Card number/ Application number. • Reference number of previous complaint / request lodged, if any. • Details and nature of the complaint. • Name of branch / ATM or any other customer touch point accessed by the customer, if any, prior to lodgement of the complaint. • Copies of supporting documents, wherever applicable.

**Complaints against Business Facilitators / Business Correspondents / Outsourced Agents**

Customer complaints arising out of the acts of omission and commission of its duly appointed Business Facilitators / Business Correspondents will also get redressed as per this grievance Redressal Policy.

**Complaints against agents covered under Bank's Corporate Agency Agreements**

Though customer complaints regarding products/ services offered by the bank through tie up with corporate agents will be dealt in accordance with Bank's Policy on Grievance Redressal; complaints against specific agents / intermediaries, if any, will be dealt in accordance with agreement with the corporate agency.

**7. Resolution of Grievances**

If a complaint is in respect of a particular branch, customers may contact the Branch Manager directly or by phone, e-mail or any other means, to get their grievance redressed. (For mail-id, phone number, name of the Branch Manager/ Regional Office, customers can visit the link: http://bankwebsite.com/branch/branchlist.aspx) BM shall strive to resolve the complaint within the next working day at the branch level itself.

If the complaint is not redressed on the same day at the branch level itself, a complaint may be lodged. In order to ensure an effective complaint redressal mechanism, the bank has put in place a three tier complaint redressal system for all channel complaints.

**Tier 1: Complaint Registration with Customer Care:**

Customers desirous of lodging complaint may take up the same with Bank's Customer Experience Group who will then take up the same with business unit concerned for resolution. The complainant will receive an auto acknowledgement instantaneously with a reference number on receipt of the complaint at Bank's end. Based on the nature of complaint and business unit handling the same, it will undergo three levels of internal escalation.

**Level 1:** Complaint will be handled by the Official designated for the same in the business unit concerned. On exceeding the stipulated TAT it will get auto-escalated to immediate supervisor of the official at Level 1.

**Level 2:** On breach of TAT, the supervisor of official at Level 1 will be intimated. A specified number of days will be allotted at this level for resolution post which the complaint will be internally escalated to the next level.

**Level 3:** On breach of TAT, the supervisor of official at Level 2 / the head of business unit concerned will be intimated. A specified number of days will be allotted at this level for resolution post which the complaint will be escalated to nodal department, i.e. Facility Management Group.

**Tier 2: Escalation to Nodal Officer – Customer Relations Department**

In case of dissatisfaction with resolution provided at Stage 1 or the complaint remaining unresolved within stipulated period of 15 days, it shall be escalated to Facility Management Group for redressal. The complaint will be redressed within 10 days, from the date of escalation.

**Tier 3: Escalation to Principal Nodal Officer:**

In case of dissatisfaction with resolution provided at Stage 2, a complaint may be escalated to Bank's Principal Nodal Officer who shall be an official of the cadre of General Manager / above.

**8. Internal Ombudsman**

The Internal Ombudsman mechanism was set up by RBI with a view to strengthen the internal grievance redressal system of banks and to ensure that the complaints of customers are redressed at the level of the bank itself by an authority placed at the highest level of bank's grievance redressal mechanism so as to minimize the need for the customers to approach other forum for redressal. Bank shall appoint Internal Ombudsman (IO) as an independent authority to review complaints that are partially/ wholly rejected.

The Internal Ombudsman shall not handle complaints received directly from complainants or members of the general public. All general complaints non-attended/ not resolved beyond 20 days of receipt, will be internally escalated to Internal Ombudsman before conveying the final decision to the complainant within a period of 30 days, from the receipt of complaint. In addition, digital transaction complaints will also be escalated on breach of stipulated TAT.

Where the Internal Ombudsman upholds the decision of the bank to reject or partly reject the complaint, the reply to the complainant should explicitly state the fact that the complaint has been examined by the Internal Ombudsman and for the reasons stated in the reply, the decision of the bank has been upheld.

In case of disagreement with the Internal Ombudsman's decision, the Bank may obtain approval from the Competent Authority, Executive Director In-charge of customer service for banks/Managing Director. All such cases shall be subsequently reviewed by the Customer Service Committee of the Bank's Board. The reply forwarded to the complainant shall mention that the complaint was examined by the Internal Ombudsman and the decision of the regulated entity was overruled by the Internal Ombudsman in favour of the complainant; however, the regulated entity, with the approval of the Competent Authority, has disagreed with the decision of the Internal Ombudsman. Such decision must be communicated to the complainant within 7 days of communication of the decision of the Internal Ombudsman on the case to the regulated entity. All such cases shall be subsequently reviewed by the Customer Service Committee of the Bank's Board.

**9. Banking Ombudsman**

In the unlikely event of a customer not receiving a response within 30 days from the date of lodgement of the initial complaint, or in case of dissatisfaction with the response given by the Bank, he/ she may approach the Banking Ombudsman. The details of the Banking Ombudsman will be made available on the Bank's website (http://www.bankwebsite.com) under disclosures, on website of RBI and also at our branches on the Comprehensive Notice Board.

**10. Other Internal Machinery to handle Customer grievances**

**Branch Level Customer Service Committee (BLCSC) Meetings**

Banks were advised to establish Customer Service Committees at branch level. In order to encourage a formal channel of communication between the customers and the bank at the branch level, banks should take necessary steps for strengthening the branch level committees with greater involvement of customers. It is desirable that branch level committees include their customers too. Further, as senior citizens usually form an important constituent in banks, a senior citizen may preferably be included therein. The Branch Level Customer Service Committee may meet at least once a month to study complaints/ suggestions, cases of delay, difficulties faced / reported by customers / members of the Committee and evolve ways and means of improving customer service. The branch level 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.

**Standing Committee on Customer Service**

The Standing Committee on Customer Service will be chaired by the Managing Director/ Executive Vice President of the bank. Besides senior executives of the bank, the committee would also have non-official as member.

a. The committee will evaluate comments / feed-back on quality of customer service received from various quarters and the implementation of codes as stipulated in the Bank's Code of Commitment to Customers set by BCSBI.

b. The Committee shall be responsible to ensure that all regulatory instructions regarding customer service are followed by the bank. Towards this, the committee may obtain necessary feed-back from zonal / regional managers/ functional heads.

c. The committee also shall consider unresolved grievances referred to it by functional heads responsible for redressal and offer their advice.

d. The committee will submit report on its performance to the customer service committee of the board at quarterly intervals.

**Customer Service Committee of the Board (CSCB):**

Bank has constituted a Customer Service Committee of the Board with experts and representatives of customers as invitees. This sub-committee of the Board is responsible for overseeing the implementation of service enhancement initiatives across the Bank towards improvement of customer experience. CSCB assesses the service governance structure and effect ongoing improvements in the quality of service provided by the Bank.

Customers may also be invited to share their experience and feedback with the Committee. This committee shall be responsible for formulation of a Comprehensive Deposit Policy incorporating the issues such as the treatment of death of a depositor for operations of his account, the product approval process and the annual survey of depositor satisfaction and the triennial audit of such services. The Committee would also examine any other issues having a bearing on the quality of customer service rendered. This Committee would also review the functioning of Standing Committee on Customer Service.

The Bank will conduct periodical surveys to get feedback from customers and their expectations from the Bank to assess the overall level of customer service of our Bank across the country. On-line survey facility also will be provided.

**Board:**

As per directions of RBI, Vide Master Circular on Customer Service in Banks RBI/2015-16/59 DBR No.Leg.bc.21/09. 07. 006/2015-16 dated July 1, 2015; Banks are to review Customer Service/ Customer care aspects in bank and submit a detailed memorandum in this regard to the Board of Directors, once every six months and initiate prompt corrective actions wherever deficiency in service quality or skill gap is observed. In accordance with the same, Bank will hold Sequestered Board meetings devoted entirely to issues on customer service at least once every six months.

**Nodal Officer and other designated officials to handle complaints and grievances:**

The Bank shall appoint a Principal Nodal Officer at their head office who shall not be a rank less than a General Manager or an officer of equivalent rank and shall be responsible for representing the Bank and furnishing information on behalf of the Bank in respect of complaints filed against the Bank. The Bank may appoint such other Nodal Officers to assist the Principal Nodal Officer as it may deem fit for operational efficiency.

**11. Mandatory display requirements**

The bank shall prominently display/ make available on request the following:

**1. At Branch:** • The appropriate arrangement for receiving complaints and suggestions. • The name, address and contact details of the Nodal & Principal Nodal Officers appointed under the Integrated Ombudsman Scheme. • The Contact details of Banking Ombudsman. • Code of Bank's commitments to customers /Fair Practice codes.

**2. In Website:** • The names and other details of the officials at the Head Office / Regional Offices who can be contacted for redressal of complaints including the names of the Nodal Officers/ Principal Nodal Officer. • The names and other details of the Managing Director & CEO and also Line Functioning Heads for various operations to enable the customers to approach them in case of need, if necessary. • Code of Bank's commitments to customers / Fair Practice codes.

**12. Sensitizing operating staff on handling complaints**

Staff shall be properly trained for handling complaints. We are dealing with people and hence difference of opinion and areas of friction can arise. Imparting soft skills required for handling irate agitated customers, will be an integral part of the training programs. It would be the responsibility of the Nodal Officer to ensure that internal machinery for handling grievances operates smoothly and efficiently at all levels. He /She shall give feedback on training needs of staff at various levels to the Human Resources Department.

**Rewarding best branches on the basis of Customer Service:**

Branches are rewarded on annual performance on various business parameters. In addition to this, branches which excel in extending customer service will also be properly recognized. Selection can be from the marks given by Inspecting Officers depending upon the excellence in various services provided by the branches at the time of regular inspection. The list of branches rewarded shall be maintained. Further exemplary mail/letter received from customer end highlighting branch service to be rewarded.

**13. Record Keeping & Data Base**

The record of complaints would be maintained for a minimum period of ten years from the date of their resolution. Backup copies of the software will be made as per the latest Backup Policy under the Information Security Policy.

**14. Disclosure Norms**

Bank shall disclose the brief details regarding the number of complaints along with the financial results. This statement shall include all the complaints received at the Head Office / Regional Office level as also the complaints received at the branch level. If the customer complaints are redressed within next working day, bank need not include the same in the statement of complaints. All employees will be made aware about the complaint handling process and the incentive available to the Bank, if the complaints are redressed within the next working day.

Branches, Regional Offices and HO Depts. shall enter the particulars of complaints received and the details of action taken in the CRM module. Complaints related to failed ATM transactions are maintained separately to ensure prompt redressal of complaints within the specified time limit prescribed from time to time. The details of action taken on complaints lodged through the Bank's website shall be noted in the web based grievance redressal module itself. Based on the above centralized complaint redressal system, Bank can get the action taken report on complaints received at various levels at any point of time. All complaints will be replied to within a maximum period of 30 days. Any complaint that is to be wholly / partly rejected will be forwarded through competent authority to Bank's Internal Ombudsman to obtain his/her concurrence. Replies to these complaints will specifically state the same as already mentioned in Clauses above.

**Analysis and Disclosure of complaints - Disclosure of complaints / unimplemented awards of Banking Ombudsmen along with Financial Results:**

As per the recommendation of the Committee on Procedures and Performance Audit on Public Services (CPPAPS), banks shall place a statement of complaints before their Boards / Customer Service Committees along with an analysis of the complaints received. The complaints shall be analysed: • to identify customer service areas in which the complaints are frequently received; • to identify frequent sources of complaint; • to identify systemic deficiencies; • For initiating appropriate action to make the grievance redressal mechanism more effective.

Further, the following details shall be disclosed along with the financial results:

**Customer Complaints** • Number of complaints pending at the beginning of the year • Number of complaints received during the year • Number of complaints disposed during the year • Of which, number of complaints rejected by the Bank. • Number of complaints pending at the end of the year

**Maintainable complaints received by the Bank from Office of Banking Ombudsman** • Number of maintainable complaints received by the Bank from OBOs. • Number of complaints resolved in favour of the Bank by BOs • Number of complaints resolved through conciliation/ mediation/ advisories issued by BOs. • Number of complaints resolved after passing awards by BOs against the Bank. • Number of unimplemented Awards within the stipulated time (other than those appealed)

In addition, details of top 5 grounds of complaints received by the Bank from customers will also be disclosed. The detailed statement of complaints and its analysis shall be displayed on the web-site for information of the general public at the end of each financial year. All complaints pertaining to ATM cards issued by the Bank shall also be included in the disclosures.

Vide RBI/2020-21/87 CEPD.CO.PRD.Cir.No.01/13.01.013/2020-21 dated 27.01.2021, RBI, with a view to ensure that banks discharge this responsibility effectively, has mandated that the cost of redress of complaints will be recovered from those banks against whom the maintainable complaints in the OBOs exceed their peer group average.

**15. Review of Policy**

This policy will be reviewed at annual intervals. The policy would be available on Bank's website and at all branches (on request). All employees of the Banks will be made aware of this policy. The compensation to the customer for any financial loss he/she might incur due to deficiency in service on the part of the bank or any act of omission or commission directly attributable to the bank will be considered based on Bank's Policy on Customer Compensation and Policy on Customer Protection.

**Document End**