

## **POLICY ON COMPLAINT/GRIEVANCES REDRESSAL**

### • **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 are the prime concerns of our bank.

Our Bank believes that providing prompt and efficient service is essential not only to attract new customers, but also to retain existing ones. This policy aims at minimizing instances of customer complaints and grievances through proper service delivery and review mechanism and to ensure prompt redressal of customer complaints and grievances.

The Bank's policy on grievance redressal follows the under noted principles:

- Customers be treated fairly at all times.
- Complaints raised by customers are dealt with courtesy and on time.
- Customers are fully informed of avenues to escalate their complaints/grievances within the organization and their rights to alternative remedy, if they are not fully satisfied with the response of the bank to their complaints.
- Branches/ROs shall pay special attention to complaints emanating from rural areas and those relating to lending to priority sector including loans under Government's Poverty Alleviation Programmes.
- Bank will treat all complaints efficiently and fairly as they can damage the bank's reputation and business if handled otherwise.
- The bank employees must 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 needs to be built up towards such end. 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 is made available at all branches. The concerned employees have been made aware about the complaint handling process.

- The customer complaint arises due to –

- The attitudinal aspects in dealing with customers.
- Inadequacy of the functions/arrangements made available to the customers or gaps in standards of services expected and actual services rendered.

The customer is having full right to register his complaint if he is not satisfied with the services provided by the bank. He can give his complaint in writing, orally, over telephone, through Toll Free Voice Mail or through the Complaints Box in Bank's website.

If the customer's complaint is not resolved within given time or if he is not satisfied with the solution provided by the bank, he can approach Banking Ombudsman with his complaint or other legal avenues available for grievance redressal.

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- **INTERNAL MACHINERY TO HANDLE CUSTOMER COMPLAINTS / GRIEVANCES**

- **Customer Service Committee of the Board:**

This sub-committee of the Board will be responsible for formulation of a Comprehensive Deposit Policy incorporating the issues such as the treatment of operations in the account on death of the holder of that account, the product approval process and the annual survey of depositor satisfaction and the triennial audit of such services. The Committee will also examine any other issues having a bearing on the quality of customer service rendered. This Committee will also review the functioning of Standing Committee on Customer Service.

## **2.2. Standing Committee on Customer Service:**

The Standing Committee on Customer Service will be chaired by the Managing Director / Executive Director of the Bank. Besides, the Committee will have three senior Executives and two External Members drawn from the public as Members. The Committee will have the following functions:

- Evaluate feedback on quality of customer service received from various quarters. The committee will also review comments/feedback on customer service and implementation of commitments in the Code of Bank's Commitments to Customers received from BCSBI.
- The Committee will be responsible to ensure that all regulatory instructions regarding customer service are followed by the bank. Towards this, the committee would obtain necessary feed-back from Regional managers/ functional heads.

- This committee also will consider unresolved complaints/grievances referred to it by other functionaries and also complaints related to non-compliance with the Code of Bank's Commitments to Customers.
- The Committee will submit report on its performance to the customer service committee of the board at quarterly intervals.
- **Nodal Officer and other designated officials to handle complaints and grievances:**

The General Manager – Planning & Development, Corporate Office, Bangalore will be the Nodal Officer at Corporate Office to receive complaints from customers / VIPs / Reserve Bank of India / Ministry of Finance, etc. A Complaint Cell at Corporate Office will monitor the receipt and speedy redressal of complaints.

The Regional Heads will be Nodal Officers for their respective Regions to receive the complaints from various customers and will have to redress the complaints / grievances addressing appropriate letter to the complainant. The Regional Offices shall designate an Executive in Scale IV as Complaint Redressal Officer to assist the Nodal Officer (Regional Head).

At branch level, the Branch Head will have to receive the complaints irrespective of the mode – whether in person or otherwise including those found in the Complaint Box and will have to acknowledge the same to the complainant and redress the complaint and inform the same to Regional Office, by following the procedure laid down in this regard.

### **3. MANDATORY DISPLAY REQUIREMENTS**

The Bank will be providing at the branches –

- A Complaint/Suggestion Box for lodging complaints
- The name, address and contact number of the Nodal Officers of the Regions for receiving complaints and suggestions.
- Name and address of the Banking Ombudsman of that area.
- Name, address and contact number of the Code Compliance Officers of the Regions.
- Code of Bank's Commitments to Customers / Fair Practice code.
- Toll Free Voice Mail No.1800 425 6655
- Information regarding observance of Customers' Day on 15<sup>th</sup> of every month.
- Comprehensive Notice Board containing information on Customer Service, Service Charges, Grievance Redressal, Other Services and Information available in booklet form.

## 4 RESOLUTION OF GRIEVANCES

Branch Manager will be responsible for the redressal of complaints/grievances in respect of customer service by the branch. He would be responsible for ensuring closure of all complaints received at the branches. It is his foremost duty to see that the complaint be resolved completely to the customer's satisfaction. If the branch manager feels that it is not possible at his level to solve the problem, he will have to refer the case to Regional Office for guidance. Similarly, if Regional Office finds that they are not able to solve the problem such cases will have to be referred to the Nodal Officer at Corporate Office.

### 4.1 Resolution of grievances in respect of Pensioners covered under National Pension System.

As per the Pension Fund Regulatory and Development Authority (PFRDA) Redressal of Subscriber Grievance Regulations, 2015, following policies have been incorporated in the Grievance Redressal Policy of the Bank .

S.No.	Policy	Guidelines in respect of Pensioners covered under National Pension System
1	<b>Grievance redressal policy</b>	<ul style="list-style-type: none"><li>• Every intermediary under the National Pension System and any other pension scheme regulated by the Authority shall follow the grievance redressal policy as laid down under these regulations. In case of National Pension System, the National Pension System Trust shall lay down detailed guidelines and procedures for a two level grievance redressal policy for intermediaries and other entities with minimum conditions as referred to in regulation 4 and shall be responsible for the overall grievance management system. The two levels for the grievance redressal shall comprise a senior management level officer to be designated as Grievance Redressal Officer for compliance of the requirements laid down in such policy. In addition, every branch or authorized office or centre other than the central office, head office, corporate office or principal office of the intermediary dealing with National Pension System shall also have an officer nominated as the Grievance Redressal Officer for that office or centre.</li><li>• Any other pension scheme regulated by the Authority shall also provide for a two level grievance redressal policy approved by its board or decision making body.</li><li>• All such grievance redressal policies for National Pension System and for other pension schemes regulated by the Authority shall be filed with the Authority or National Pension System Trust as the case may be, by the intermediary or entity or person governed by the provisions of the Act and placed prominently in public domain.</li><li>• The National Pension System Trust shall be required to monitor and periodically conduct review and perform</li></ul>

		oversight on the grievance management system in respect of schemes under the National Pension System. The National Pension System Trust shall, forward to the Authority, reports on its review and oversight, within such period as may be specified by the Authority.
2	<b>Filing of grievance redressal policy</b>	<p>The grievance redressal policy to be filed in all cases with the Authority or the National Pension System Trust needs to adhere to the following minimum conditions, namely:-</p> <ul style="list-style-type: none"> <li>• Every intermediary under the National Pension System and any other pension scheme regulated by the Authority shall designate a senior management level officer as Grievance Redressal Officer for compliance of the requirements laid down in such policy. In addition, every branch or authorized office or centre other than the central or head or corporate or principal office dealing with National Pension System or any other pension scheme regulated by the Authority shall also have an officer nominated as the Grievance Redressal Officer for that office or centre;</li> <li>• Every intermediary under the National Pension System and any other pension scheme regulated by the Authority shall have a clearly defined system and procedure for receiving, registering, acknowledging and effectively disposing off of grievances received in a prompt and fair manner;</li> <li>• Every intermediary under the National Pension System and any other pension scheme regulated by the Authority must inform a subscriber at the commencement of relationship with the subscriber and at such other time when the information is likely to be required by the subscriber, of – <ul style="list-style-type: none"> <li>• the subscribers’ right to seek redressal of any complaints, through the redressal mechanism as specified under these regulations; and</li> <li>• the processes followed by the intermediaries under the National Pension System and other pension scheme regulated by the Authority, to receive and redress complaints from subscribers;</li> </ul> </li> <li>• The grievance redressal policies would need to conform to the benchmarks and standards as laid down or amended by the Authority from time to time. These benchmarks may include <i>inter alia</i> resolution time for grievance, service quality, manner of receiving grievances, number of outstanding grievances against</li> </ul>

		<p>intermediaries under the National Pension System or any other pension scheme and any other matters which in the opinion of the Authority, are relevant for redressing such grievances;</p> <ul style="list-style-type: none"> <li>• Details of turnaround times shall be clearly laid down in the two level grievance redressal policy to be filed with the Authority by the Intermediaries or respective Government or any other entity governed by the provisions of the Act;</li> <li>• Every two level grievance redressal policy to be filed with the Authority shall be placed in the public domain and preferably displayed in Hindi, English and other applicable regional languages in its office by each intermediary under the National Pension System and by any other pension scheme regulated by the Authority.</li> </ul>
3	<b>Turnaround Times</b>	<ul style="list-style-type: none"> <li>• There shall be two types of turnaround times, namely:— <ul style="list-style-type: none"> <li>• The turnaround times for provision of services as applicable to,-</li> <li>• the intermediaries other than Government nodal offices or PAOs or Pr AOs or DTOs or DTAs or DDOs, which shall be in accordance with the service level agreements or other relevant agreements, memorandum of understandings, offer documents or circulars issued by the Authority from time to time.</li> </ul> <p><i>Explanation.-</i> For the purpose of this clause, the abbreviations “PAOs”, “Pr.AOs”, “DTAs”, “DTOs” and “DDOs” shall stand for Pay and Accounts Offices, Principal Accounts Offices, Directorate of Treasury and Accounts, District Treasury Offices and Drawing and Disbursing Officers under the Central Government or analogous offices under the Central Government or central autonomous bodies which interact with the central recordkeeping agency on behalf of the subscribers for the purpose of National Pension System. Further, the abbreviations “DTAs”, “DTOs” or “DDOs” shall stand for Directorate of Treasury and Accounts, District Treasury Office and Drawing and Disbursing Officer under the State Government or analogous offices under the State Government or State autonomous bodies which interact with central recordkeeping agency on behalf of the subscribers for the purpose of National Pension System;</p> <ul style="list-style-type: none"> <li>• Government nodal offices or PAOs or PrAOs or</li> </ul> </li> </ul>

		<p>DTAs or DTOs or DDOs, which shall be in accordance with the circulars or guidelines issued by the Authority, National Pension System Trust or the Central Government or the concerned State Government from time to time on registration of subscribers, incorporating change or modification in subscriber details, timelines for remittance of National Pension System contributions including legacy contributions, compensation of loss to the subscribers due to delay of such remittance and any other related issue to protect the interest of the subscribers; and.</p> <ul style="list-style-type: none"> <li>• The turnaround time for the grievance redressal in accordance with regulation 6.</li> </ul>
4	<p><b>Turnaround times for grievance redressal</b></p>	<ul style="list-style-type: none"> <li>• An acknowledgement shall be sent to the complainant within three working days of the receipt of the grievance by the concerned entity so identified for the purpose. The acknowledgement shall contain the name and designation and contact details of the officer who shall be dealing with the grievance received.</li> <li>• The complainant shall be provided with a unique grievance number for future reference for every grievance registered. The grievance redressal proceedings of the complaint shall be deemed to have commenced on the first date of receipt of the grievance by an intermediary.</li> <li>• In case the complaint received does not pertain to the intermediary to which the same has been lodged, the complaint shall be transferred to the concerned intermediary within three working days, under intimation to the complainant.</li> <li>• Where the intermediaries under National Pension System or any other pension scheme regulated by Authority has resolved the complaint, within three working days, it may communicate the resolution along with the acknowledgement to the complainant.</li> <li>• Every grievance shall be disposed off within a period of thirty days of its receipt and a final reply shall be sent to the complainant, containing details of resolution or rejection of the complaint, with reasons thereof recorded in writing.</li> <li>• The intermediary under National Pension System or any other pension scheme regulated by Authority, while</li> </ul>

		<p>disposing off the complaint, shall inform the complainant the manner in which he or she may pursue the complaint, if dissatisfied with such resolution or rejection, as the case may be.</p> <ul style="list-style-type: none"><li>• If the complainant is not satisfied with the redressal of his grievances or if it has not been resolved by the intermediary by the end of thirty days of the filing of the complaint, he may escalate the grievance to the National Pension System Trust in accordance with the provisions contained in regulation 10. If the grievance remains unresolved after its receipt at the National Pension System Trust, on the expiry of a period of thirty days from the receipt thereof, the complainant may file a representation with the Ombudsman to be appointed by the Authority under these regulations for redressal of the grievances of the complainant, within such period as has been specified for the purpose:</li></ul> <p>Provided that provisions of this sub-regulation, shall not apply where the complaint is directly in relation to a grievance against the National Pension System Trust and no other intermediary:</p> <p>Provided further that where the complaint is directly against the National Pension System Trust and no other intermediary, the National Pension Trust shall resolve the grievance of the subscriber in the manner and within the period specified under this regulation [except under sub-regulation (7) and if the grievance remains unresolved, the complainant may file an appeal with the Ombudsman to be appointed by the Authority under these regulations for redressal of the grievances of the complainant, within such period as has been specified for the purpose.</p> <ul style="list-style-type: none"><li>• Any intermediary under the National Pension System and any other pension scheme regulated by the Authority is required to maintain records of each complaint received by it and the measures taken by it for its redressal.</li><li>• The intermediary under the National Pension System and other pension scheme regulated by the Authority is also required to submit periodic reports to the National Pension System Trust or Authority as may be specified from time to time.</li><li>• Any failure on the part of intermediary under National Pension System or any other pension scheme to follow the above-mentioned procedures and time-frames shall involve such penalties or other actions as may be imposed or taken by the Authority in accordance with the provisions of the Act, in addition to any compensation that may be required to be paid to the subscriber by such intermediary.</li></ul>
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5	<b>Closure of grievance</b>	<p>A grievance shall be considered as disposed off and closed in any of the following instances, namely:—</p> <ul style="list-style-type: none"> <li>• when the intermediary or entity regulated by Authority has acceded to the request of the complainant fully;</li> <li>• where the complainant has indicated in writing, its acceptance of the response of the intermediary or entity regulated by the Authority;</li>   <li>• where the complainant has not responded within forty-five days of the receipt of the written response of the intermediary or entity regulated by the Authority;</li> <li>• where the Grievance Redressal Officer has certified under intimation to the subscriber that the intermediary or entity regulated by the Authority has discharged its contractual, statutory and regulatory obligations and therefore closes the complaint;</li> <li>• where the complainant has not preferred any appeal within forty-five days from the date of receipt of resolution or rejection of the grievance communicated by the intermediary or entity regulated by the Authority or the National Pension System Trust, as the case may be;</li> <li>• where the decision of the Ombudsman in appeal has been communicated to such complainant:</li> </ul> <p>Provided that the closure shall not be applicable where the Ombudsman or the Authority, as the case may be has allowed filing of the appeal, beyond the specified period.</p>
6	<b>Categorisation of complaints</b>	<p>Categorisation of complaints as may be specified by the Authority from time to time shall be adopted by the intermediaries or any entity under National Pension System or any other pension scheme regulated by the Authority and incorporated in their systems.</p>
7	<b>System Requirements</b>	<p>The grievance redressal policy shall provide for automated systems to enable online registration, tracking of status of grievances by the complainants and generation of periodical reports as may be specified by the Authority. The system shall also be designed to that it can integrate seamlessly with the Authority's system in the manner as maybe specified by the Authority from time to time.</p>
8	<b>Escalation of Grievance to</b>	<ul style="list-style-type: none"> <li>• Any subscriber whose grievance has not been resolved within thirty days from the date of receipt of the grievance by the intermediary, or who is not satisfied with the</li> </ul>

	<p><b>National Pension System Trust</b></p>	<p>resolution provided by any intermediary under the National Pension System (other than National Pension System Trust) shall register a grievance with the National Pension System Trust, against such intermediary. The National Pension System Trust shall follow up the grievance with the concerned intermediary for redressal of the subscriber grievance. The National Pension System Trust shall call for the resolution of the subscriber grievance and respond to the subscriber within thirty days from the date of receipt of the grievance under this sub-regulation, about the resolution of the grievances.</p> <p>The subscriber whose grievance has not been resolved by the intermediary within thirty days from the date of submission of the grievance to the National Pension System Trust , or who is not satisfied with the resolution provided by the National Pension System Trust shall prefer an appeal to the Ombudsman against the concerned intermediary or entity .</p> <ul style="list-style-type: none"> <li>• Nothing contained in sub- regulation (1) shall apply to a grievance which is directly against the National Pension System Trust, and it shall be resolved by the National Pension System Trust in accordance with the provisions of regulation 6.</li> </ul>
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• **TIME FRAME:**

The complaint received will have to be looked into/examined and grievance redressed to the satisfaction of the complainant. The complaint received at the branch should be analyzed and redressed within shortest possible time, and in any case not later than 7 days.

The complaint received at Regional Office is to be forwarded to Branch and after getting the clarification and confirmation of redressal, a letter to be sent to the complainant within 15 days of receipt of the complaint.

The complaint forwarded by the Nodal Officer at Corporate Office to the Regional Office to be redressed immediately and letter of redressal sent to the complainant under copy to the Nodal Officer within 15 days of receipt of the same at the Regional Office.

In case of complaints which may need longer time for examination/redressal of issues involved, a suitable letter acknowledging the complaint to be addressed to the complainant immediately

• **INTERACTION WITH CUSTOMERS**

The bank recognizes that customer's expectation/requirement/grievances can be better appreciated through personal interaction with customers by bank's staff. As for the bank the feedback from customers would be valuable input for revising its product and services to meet customer requirements.

All Heads of Branch and Regional Heads shall observe Customer Day on the 15th of every month at their office between 3 p.m. and 5 p.m. If 15th happens to be a Saturday/holiday, 'Customer Day' shall be observed on the succeeding working day.

A Notice regarding the availability of the Branch/Office Heads from 3 p.m. to 5 p.m. on the 15<sup>th</sup> of each month or the next working day, if 15th happens to be a Saturday/holiday, shall be prominently displayed on the Notice Board.

• **SENSITIZING OPERATING STAFF ON HANDLING COMPLAINTS**

We are dealing with people and hence difference of opinion and areas of friction can arise. With an open mind and a smile on the face we should be able to win the customer's confidence. The staff will be properly trained for handling complaints. The sessions on Customer Service, Communication Skills, are being included in the curriculum of different training programmes. The Nodal Officer, the General Manager-P&D will be responsible for the smooth functioning of internal machinery for handling complaints/grievances and will ensure that the system operates smoothly and efficiently at all levels. He will also be providing full feedback on training needs in customer service related areas to HO: HR Department and SIBM, Manipal.