

GRIEVANCE REDRESSAL POLICY

1. Introduction:

- 1.1. Bank is essentially an institution engaged in meeting financial as well as non-financial service needs of the society. Given this, customer service takes the center stage in the banking business. In the present scenario of competitive banking, an excellent customer service is the most important tool for sustained business growth.
- 1.2. As a service organization, customer service and customer satisfaction should be the prime concern of any bank. The bank believes that providing prompt and efficient service is essential not only to attract new customers, but also to retain existing ones. This policy document 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 review mechanism should help in identifying shortcomings in product features and service delivery.

2. Objective:

- 2.1. The Objective of the policy is to spell out the framework for Grievance Redressal in the Bank entailing adherence to the provisions prescribed by the Reserve Bank of India (RBI).
- 2.2. The bank's policy on grievance redressal follows the under noted principles:
 - a) All customers are treated fairly and without bias at all times.
 - b) All complaints received from customers are dealt with courtesy as per defined timelines
 - c) Customers are fully informed of avenues to escalate their complaints/grievances within the Bank and their rights to alternative remedy, if they are not fully satisfied with the response of the Bank to their complaints.
 - d) The employees shall work in good faith and without prejudice towards the interest of the customer

3. Applicability/Coverage:

The grievance redressal mechanism will be applicable and cover complaints received from all customers of the Bank including customers of third party products as well as complaints emanating from rural areas and those relating to financial assistance to Pri-

ority Sector and Government's Poverty Alleviation Programmes. The grievance redressal channels of the bank shall also be available to deal with issues relating to services provided by Outsourced Agencies.

4. **Customer Service Principles:** The Bank's Customer Service Delivery will be based on the following principles:

4.1. **Courtesy** – Every customer will be shown due courtesies, whether or not the Bank is in a position to meet his/her needs. Staff will always be polite in their spoken words, body language and demeanour. Courtesy will be shown in all circumstances, even in difficult situations where the customer does not show similar courtesy in return.

4.2. **Ethics and Transparency** – Every dealing with customer will be done in an honest, equitable, ethical and fair manner. Complete, clear and precise information will be provided, as per extant guidelines, to the customers in response to their queries.

4.3. **Speed and Timeliness** – Customer's needs and instructions should always be given top priority and taken care of promptly without any undue delay. Commencement of banking business and opening of counter services should be done in time rendering uninterrupted service during business hours.

4.4. **Efficiency and Accuracy** – All customer instructions should be executed efficiently and accurately. The information provided by the Bank to the customer should be factual, accurate and unambiguous.

4.5. **Concern** – The bank will always be concerned for the well-being of its customers. Anticipating the customer's problems and guiding them shows that Bank cares for them and is equally concerned.

4.6. **Communication** – Communication with customers should be clear and effective. The Bank will always welcome opinion and suggestions from customers and such opinions/ suggestions will be seriously evaluated, and, if found to be feasible, will be subsequently implemented.

5. **Grievance Redressal Mechanism:**

5.1. The Bank shall follow the principle of "**First Contact Resolution**", i.e., all efforts to be made to resolve the grievance to full satisfaction of the complainant at the point of first contact.

5.2. All efforts shall be made to resolve the grievance to the full satisfaction of the complainant at the point of first contact so as to prevent further escalation of the grievance to external forums like, BO, CEPC, CPGRAMS, INGRAM, etc.

- 5.3. Complaints may be received by the Bank from its customers at all levels - Branches, Banking Units, Housing Finance Centers, Cluster Offices, Regional Offices, Zonal Offices and Head Office as well other customer contact points such as Phone Banking Center, Bandhan Bank website, Customer Care mail IDs. Issues raised by customers on social media platforms like facebook, twitter, linkedin, etc. will also be treated as complaints, wherever applicable. The Banking Operations & Customer Service Department at Head Office will act as the nodal department for management of all complaints received by the Bank.
- 5.4. All complaints shall be registered in the complaint management application of the Bank and tracked till closure.
- 5.5. A complaint redressal mechanism, as mentioned below, shall be put in place by the Bank for resolving customer complaints expeditiously, to bring about more transparency and to assist in creating a positive image of the Bank amongst its customers.
6. **Channels for receiving Customer Grievances / Complaints, turnaround time for resolution and Grievance escalation matrix:**
- 6.1. **Level 1 – Branch / Phone Banking Center / Banking Unit / Housing Finance Center / Social Media**
- 6.1.1. Customer can fill up the complaint form (available in our branches or in the website) or just write a letter and submit it to the Branch Head, or any officer, of any one of our branches. Each branch will also have a complaints/suggestions box installed, which will be cleared on a daily basis by the authorized officer.
- 6.1.2. Customers may call our Toll free number at **1800-258-8181** and lodge a complaint.
- 6.1.3. Branch Head will be responsible for resolution of complaints received in his / her branch.
- 6.1.4. Head Phone Banking Center will be responsible for resolution of complaints received at the Phone Banking Center over telephone. He / she will also be responsible for complaints received by mail in the ID customer@bandhanbank.com.
- 6.1.5. Head Marketing will be responsible for tracking the complaints received through Social Media platforms. The complaints received through social media platforms will promptly be forwarded to the Grievance Redressal Team / Phone Banking Team for redressal.
- 6.1.6. Each complaint will be resolved within 7 days. In case the resolution lies with some other department / branch of the bank, or involves fraud cases, legal cases and cases, which need retrieval of documents and old records the resolution time,

would be up to 10 working days. If any case needs additional time, the Bank will inform the customer of the reasons for and provide expected time lines for resolution.

6.2. Level 2 – Cluster Offices

6.2.1. If the customer is not satisfied with the resolution provided and prefer to escalate the complaint, he may do so to the concerned Cluster Head (contact details available in the branches) or the Bank's Nodal Officers to Banking Ombudsman of the concerned area (list available in our website). Alternatively, the customer may also directly escalate to our Head Office (details given below).

6.2.2. The Cluster Head will relook into the matter and resolve the complaint within 8 days from receipt of the complaint at Cluster Office. If any case needs additional time, the Bank will inform the customer of the reasons for and provide expected time lines for resolution.

6.3. Level 3 – Head Office

6.3.1. If the customer is not satisfied with the steps taken by the Branch / Cluster Head, he may escalate the complaint to Head-Banking Operations and Customer Service at Head Office.

6.3.2. Head-Banking Operations and Customer Service will look into the matter and arrange to send the reply to the complainant within 15 days of receipt of the complaint at Head Office.

6.4. Internal Ombudsman (I.O.):

6.4.1. The Internal Ombudsman (I.O.) mechanism had been set up by RBI with a view to strengthen the internal grievance redressal system of banks and to ensure that the complaints of the 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 fora for redressal.

6.4.2. I.O. shall examine all customer grievances including complaints of deficiency in service on the part of the bank as also those listed under Clause 8 of the Banking Ombudsman Scheme, 2006 received by banks and which are partly or wholly rejected by bank's internal grievance redressal mechanism, except the following:

6.4.3. Complaints related to frauds, misappropriation etc., except in respect of deficiency of service, if any, on the part of the bank

6.4.4. Complaints/references relating to a) internal administration, b) human resources, c) pay and emoluments of staff;

6.4.5. References in the nature of suggestions, requests for concessions in rate of interest charged, rejection of loan proposal, modifications in sanction terms and conditions, enhancement in credit limit, waiver / waive-off of loans, etc., which are primarily in the nature of commercial decisions.

6.4.6. Complaints which have been decided by or are already pending in other fora such as consumer fora, Courts, Debt Recovery Tribunals, etc.

6.5. Banking Ombudsman:

6.5.1. It will be made known to the customer that if he / she had not received any reply within 30 days after lodging the complaint with the Bank or is not satisfied with the resolution provided by the Bank, then he / she may approach the Banking Ombudsman for resolution, within one year after the complainant has received the reply from the Bank or, where no reply is received, within one year and 30 days from the date of the complaint. Any customer aggrieved by an act or omission of the Bank resulting in deficiency in service may file a complaint personally or through an authorised representative as defined under clause 3(1)(c) of the Integrated Ombudsman Scheme, 2021. List of Banking Ombudsman Offices with contact details will be notified in bank's website as well as in the branches in line with the RBI Integrated Ombudsman Scheme, 2021. Bank will appoint a Principal Nodal Officer (PNO) at its Head Office as per clause number 18(2) of the RBI Integrated Ombudsman Scheme, 2021. The Principal Nodal Officer shall be responsible for representing the Bank and furnishing information on behalf of the Bank in respect of complaints filed against the Bank. Details of the Principal Nodal Officer as well as the list of the nodal officers to the various offices of the Banking Ombudsman will also be published in bank's website.

6.5.2. There are 22 offices of Banking Ombudsman across the country. Our Regional Heads / Cluster Heads stationed at these or nearby locations will act as Nodal Officers in order to assist the Principal Nodal Officer of the Bank in liaising with the Banking Ombudsman. However, in some select centres, to overcome the distance factor, identified Branch Heads at these locations may function as Nodal Officers.

6.5.3. The Nodal Officer, on behalf of the Principal Nodal Officer, will be responsible receiving the complaints referred from the Office of the Ombudsman, investigating and taking corrective actions for resolution of the complaints and submitting the reply to B.O. Office well within the time lines allowed by B.O. They will be prompt in submitting any information called for by the B.O. The respective Nodal Officers shall register all such complaints in the complaint management

application of the Bank and shall also maintain records for future reporting / reference.

6.5.4. The Nodal Officer shall attend, without fail, all proceedings before the Banking Ombudsman (e.g. conciliation meetings) and shall be well prepared, with all the facts and figures, to be able to give a clear and accurate account of the matter under discussion from the bank's point of view.

6.5.5. The Nodal Officers will act under the guidance of the Branch Operations & Customer Service Department at Head Office. BOCS Department will be promptly intimated of any complaints received from B.O. Office.

6.5.6. All departments / verticals in the bank (e.g. business, legal, etc.) will provide all necessary support to the Nodal Officers for timely and satisfactory resolution of all complaints referred from Banking Ombudsman Offices.

6.5.7. The Nodal Officers, on behalf of the Principal Nodal Officer, will also be responsible for resolution of the complaints referred from Customer Education & Protection Department of RBI.

7. Complaints/suggestions box

7.1. Each branch should have a Complaints/suggestions box installed, which should be cleared on a daily basis.

8. Complaint Book

8.1. Complaint book with perforated copies should be available in the branches so as to instantly provide an acknowledgement to the customers. A copy of the complaint is required to be forwarded to the Cluster Office along with the remark of the Branch Manager.

9. Complaint Register

9.1. All branches should maintain a separate complaints register in the prescribed format given for entering all the complaints/grievances received by them directly or through their Head Office/Govt. These registers should be maintained irrespective of the fact whether a complaint is received or not in the past. The complaints registers maintained by branches should be scrutinized by the concerned Cluster Head during his periodical visit to the branches and his observations/comments recorded in the relative visit reports.

10. Display of the Grievance Redressal Mechanism

10.1. At each banking outlet a notice explaining the Grievance Redressal Mechanism of the bank shall be prominently displayed. A format of the display is annexed hereto.

Further, information relating to grievance redressal mechanism will be posted on the website of the Bank.

11. Monitoring System

- 11.1. As per directives of the Master Circular on Customer Service, the Bank will constitute three Committees for effective monitoring of customer service including grievance redressal:
- i. **Branch Level Customer Service Committee** - A monthly meeting will be held with customers at all branches.
 - ii. **Standing Committee on Customer Service** - This Committee will comprise of senior bank officials along with customer representatives, and will meet quarterly to review compliance with regulatory guidelines regarding customer service in banks and major/frequent areas of complaints.
 - iii. **Customer Service Committee of the Board** - This Committee will meet quarterly to review the effectiveness of customer service and grievance redressal mechanism of the Bank and to oversee working of the Standing Committee.

12. Reporting System

- 12.1. All complaints received have to be duly registered in the Complaints Management Application. It is the responsibility of the channel/branch/Nodal Officer that receives the complaint to ensure that the issue is resolved timely and due updation is made in complaint management application.
- 12.2. A consolidated report, providing insight into the volume and nature of complaints, received by the Bank as a whole and major/frequent areas of complaints warranting process review / procedural change, will be placed before the Bank's Customer Service Committee of the Board as an agenda item in each of the meetings conducted.
- 12.3. Experts/representatives of customers shall be invited to the meetings of the Customer Service Committee of the Board (CSCB). The selection of the customer's representative/expert would be done from a cross-section of customers from asset and liabilities.
- 12.4. A half-yearly memorandum containing a review of customer service aspects shall be submitted to the Board as per extant regulatory instructions.
- 12.5. Statement of complaints and unimplemented awards of the Banking Ombudsman will be disclosed by the Bank along with financial results.