



DHANLAXMI BANK

GRIEVANCE REDRESSAL POLICY

Version: 2024

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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 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.

A complaint is a communication received by the Bank through any means (Oral/written Letter/e-mail/phone) which expresses dissatisfaction about any aspect of the Bank's Products, Services, Employee behavior/attitude, Processes, Systems, etc.

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. Customer dissatisfaction would spoil Bank's name and image. The Bank's policy on grievance redressal follows the under noted principles.

- Customers to 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.
- 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 would be made available at Bank's website/all branches. The concerned employees should be made aware about the Complaint handling process.

2. Objective/Scope

The Grievance Redressal Policy aims to have a seamless redressal of customer grievances and to be fair, consistent and in accordance with the extant rules and regulations.

2.1 The customer complaint arises mainly due to:

- a) The attitudinal aspects in dealing with customers
- b) Inadequacy of the functions/arrangements made available to the customers
- c) Gaps in standards of services expected and actual services rendered.

- d) Errors
- e) Inability of the front line to solve the customer issue
- f) Lack of information about escalation / redressal mechanism.

The customer is having full right to register his/her complaint if he/she is not satisfied with the services provided by the bank. He can give his complaint in writing, e-mail, orally or over telephone or through Bank's website. If 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.

3. Internal Machinery to handle customer complaints/ grievances

3.1 Branch Level Customer Service Committee

The Bank recognizes that customers' expectations/requirements/grievances will be taken care through personal interaction with customer by Bank staff. For this purpose, all branches will arrange a Branch Level Customer Service Committee, comprising of Branch staff and customers (including one Senior Citizen) as members meet on every month to study complaints/suggestions, cases of delay, difficulties faced / reported by customers or members of the Committee and evolve ways and means of improving customer service. The branch would invite customers also to this meeting. The suggestions / feedback so received are compiled on a quarterly basis analyzed and conveyed to concerned department for necessary action. Reports on the Branch Level Customer Service Committee are placed to Standing Committee on Customer Service on every quarter.

3.2 Standing Committee on Customer Service

The Standing Committee on Customer Service will be chaired by the Managing Director/ Executive Director of the Bank. Besides two to three senior executives of the bank, the committee would also have two to three non-officials as members. The committee would have the following functions.

- Evaluate feed-back on quality of customer service received from various quarters. The committee would 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 shall be responsible to ensure that all regulatory instructions regarding customer service are followed by the bank. Towards this, the committee would obtain necessary feedback from Regional Managers / Functional heads.
- The committee shall also consider unresolved complaints/grievances referred to it by functional heads responsible for redressal and offer their advice.
- The committee would submit report on its performance to the Customer Service Committee of the board at quarterly intervals.

3.3 Customer Service Committee of the Board

This sub-committee of the Board would 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 tri-ennial audit of such services. The Committee would monitor the progress in bringing about improvements in the quality of

services provided to customers and monitor the customer service measures and new initiatives implemented by the Bank. The Committee would review the implementation of guidelines and procedures prescribed by RBI that have a bearing on customer service of the Bank and make suitable recommendations. 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.

3.4 Nodal Officer and other designated officials to handle complaints and grievances

Nodal Officers of each region shall handle complaints under their respective region / mapped to them. Principal Nodal Officer and the designated department shall be responsible for the implementation of customer service measures and complaint handling for the entire Bank. The names of functionaries responsible for customer service and grievance redressal at the field level will be appropriately displayed on branch notice boards and Bank's website.

4. Mandatory display requirements

It is mandatory for the Bank to provide:

- Appropriate arrangement for receiving complaints and suggestions.
- The name, address and contact number of Nodal Officer(s)
- Contact details of Banking Ombudsman of the area
- Code of bank's commitments to customers/Fair Practice code
- Salient features of Reserve Bank -Integrated Ombudsman Scheme (RB-IOS) 2021

5. Registration of complaints by customers

- a) Complaints through Customer Care: Customers can lodge a complaint through Bank's Customer Care by calling 044 42413000 or mailing to customercare@dhanbank.co.in. Customer Care shall act as first point contact for the customers.
- b) Complaints in Person: Customers can use complaint cum suggestion box / complaint book, kept at branch to register their Complaint / Feedback / Suggestions.
- c) Complaints by Letter: The Customers can register their Complaints / Feedbacks / Suggestions in writing addressed to Branch, Regional Offices or Corporate Office.
- d) Complaints over Phone: Customers can register their complaints through the phone numbers published in the website.
- e) Complaints through E-mail: Customer can also submit complaint by post or through email.
- f) Complaints through website: Customers can also register their complaint through Bank's website.
- g) Complaints through Netbanking/Mobile Banking for disputed transactions.

All the complaints received through various channels shall be acknowledged within a day or two. An automated SMS/Email alert shall be sent to the complainant's registered mobile number/Email ID along with the complaint ID/ticket number.

Every complaint lodged at various channels shall be resolved/closed within TAT, with an appropriate document / mail.

6. Resolution of Grievances

At Branch Level: Branch Manager is responsible for the resolution of complaints/grievances in respect of customer's service by the branch. He would be responsible for ensuring closure of all complaints received at the branch. It is his foremost duty to see that the complaint should be resolved completely to the customer's satisfaction and if the customer is not satisfied, then he should be provided with alternate avenues to escalate the issue. If the branch manager feels that it is not possible at his level to solve the complaint, he can refer the case to controlling office for guidance. Similarly, if controlling office finds that they are not able to solve the problem such cases may be referred to the Nodal Officer.

At Regional Office Level: Customers who are not satisfied with the resolution from the branch can take up the same with respective Regional Head. The complaint will be redressed within 10 working days from the date of receipt of the complaint at RO level.

At Corporate Office Level: In case of dissatisfaction with the resolution provided at Regional Office or the complaint remains unresolved within the stipulated period, complainant can escalate the same to the office Principal Nodal Officer at Corporate office. The complaint will be redressed within 10 working days from the date of escalation.

7. Grievance Redressal Mechanism and Time frame

Complaint received is analyzed from all possible angles. Communication of Bank's stand on any issue to the customer is a vital requirement. Complaints received which would require some time for examination of issues involved shall be informed to the customer. Branch shall try to resolve the complaint within specified time frames, decided by the bank.

Specific time schedule shall be set up for acknowledgement and redressal of complaints and disposing them at all levels including branches, Regional Office and Corporate Office.

Acknowledgement of complaints shall be made within **a day or two on** receipt of the complaints at all channels. Complaints received / escalated to any of the levels, i.e., Branch / Regional Office, Principal Nodal Officer at Corporate Office, shall be redressed within 10 working days, if it can be redressed at that level. When a complaint is to be escalated to the next higher level, further 10 working days time frame is to be observed at each tier of redressal forum. Thus, if a complaint is escalated in a step-by-step manner from Branch / RO and further to Principal Nodal Officer at CO, the same is to be redressed within a maximum period of 30 working days. In case the redressal of a complaint requires more than the stipulated time, the same shall be intimated to the complainant.

7.1 Complaints related to POS/Digital transactions

While the Bank shall endeavor to reduce all complaints in the shortest possible time, it is recognized that longer time would be required to resolve complaints relating to Point of Sales (POS) and e-commerce. This

is due to the dependency on external parties. Such complaints shall be resolved within a period of 45 days.

7.2 Complaints related to Third Party Products

As the business of the Bank is expanding with the distribution of third-party products and with the engagement of Fintech and other service providers to market and manage Bank's own products and services, the Grievance Redressal Mechanism of the Bank is committed to build suitable framework to cover such third-party processes as well.

a) Complaints redressal on third party products distributed by the Bank:

The customers can raise the complaints related to Third party products distributed by the bank to the Bank or the partner. Bank shall ensure the partner has appropriate grievance redressal policy and process in place. All complaints received at Bank level will follow the complaints management process. At partner level, Bank shall ensure the complaints are properly recorded and resolved within timeframe prescribed by regulator. Corporate review/analysis of all complaints reported at Bank/partner level will be done by Bank.

b) Complaints redressal on Products and Services offered in partnership with third parties or third-party service providers

The customers can raise the complaints to the Bank or to the partner. Bank shall ensure the partner has appropriate grievance redressal policy and process in place. Bank shall ensure the complaints received at both the ends are properly resolved and recorded.

Such complaints shall be resolved within a period of maximum 30 days.

8. Interaction with customers

Bank recognizes that customer's expectation/requirement/grievances can be better appreciated through personal interaction with customers by bank's staff. Structured customer meets, say once in a month will give a message to the customers that the bank cares for them and values their feedback/suggestions for improvement in customer service. Many of the complaints arise on account of lack of awareness among customers about bank services and such interactions will help the customers appreciate banking services better. As for the bank the feedback from customers would be valuable input for revising its product and services to meet customer requirements.

9. Sensitizing Operating Staff on Handling Complaints

Staff should be properly trained for 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. Imparting soft skills required for handling irate agitated customers, to be will be an integral part of the training programs schedule. It would be the responsibility of the Nodal Officer to ensure that internal machinery for handling complaints/grievances operates smoothly and efficiently at all levels. He should give feedback on training needs of staff at various levels to the Human

Resource Department.

10. Internal Ombudsman

The Internal Ombudsman (IO) mechanism is set up in view to strengthen the internal grievance redressal system of the Bank. It also ensures that the customer complaints are redressed at the Bank's level itself by an independent apex level authority placed at the highest level of Bank's grievance redressal mechanism so as to minimize the need for customers to approach any other fora for redressal.

The Standard Operating Procedure for escalating partially / wholly rejected customer complaints to Internal Ombudsman is stated below:

- 1) The Internal Ombudsman shall not handle complaints received directly from the complainants or members of the public but deal with the complaints that have already been examined by the regulated entity and partly or wholly rejected.
- 2) Any rejection of complaints partly /wholly by Bank will be done only after consultation/concurrence with IO for all the complaints coming under the jurisdiction of Internal Ombudsman.
- 3) Bank shall also furnish in writing in its reply to complainant that, the complaint has been inspected by Bank's Internal Ombudsman and his concurrence obtained for rejection. If the customer is not satisfied by the resolution provided by Bank, he/ she may approach the Banking Ombudsman.

11. Integrated Ombudsman scheme 2021

The first point for redressal of complaints is the Bank itself. The complainant may approach Banking Ombudsman as per the Integrated Ombudsman scheme 2021 only if the complaint is not resolved at the Bank's level within 30 days or the customer is not satisfied with the reply provided by the Bank.

For the information of customers, the stipulations for filing a complaint with Reserve Bank Integrated Ombudsman are furnished below:

11.1 Grounds for non-maintainability of a complaint under the scheme

- 1) No complaint for deficiency in service shall lie under the Scheme in matters involving:
 - (a) commercial judgment/commercial decision of a Regulated Entity;
 - (b) a dispute between a vendor and a Regulated Entity relating to an outsourcing contract;
 - (c) a grievance not addressed to the Ombudsman directly;
 - (d) general grievances against Management or Executives of a Regulated Entity;
 - (e) a dispute in which action is initiated by a Regulated Entity in compliance with the orders of a statutory or law enforcing authority;
 - (f) a service not within the regulatory purview of the Reserve Bank;
 - (g) a dispute between Regulated Entities; and
 - (h) a dispute involving the employee-employer relationship of a Regulated Entity.
- 2) A complaint under the Scheme shall not lie unless:

(a) the complainant had, before making a complaint under the Scheme, made a written complaint to the Regulated Entity concerned and -

(i) the complaint was rejected wholly or partly by the Regulated Entity, and the complainant is not satisfied with the reply; or the complainant had not received any reply within 30 days after the Regulated Entity received the complaint; and

(ii) the complaint is made to the Ombudsman within one year after the complainant has received the reply from the Regulated Entity to the complaint or, where no reply is received, within one year and 30 days from the date of the complaint.

(b) the complaint is not in respect of the same cause of action which is already-

(i) pending before an Ombudsman or settled or dealt with on merits, by an Ombudsman, whether or not received from the same complainant or along with one or more complainants, or one or more of the parties concerned;

(ii) pending before any Court, Tribunal or Arbitrator or any other Forum or Authority; or, settled or dealt with on merits, by any Court, Tribunal or Arbitrator or any other Forum or Authority, whether or not received from the same complainant or along with one or more of the complainants/parties concerned;

(c) the complaint is not abusive or frivolous or vexatious in nature;

(d) the complaint to the Regulated Entity was made before the expiry of the period of limitation prescribed under the Limitation Act, 1963, for such claims;

(e) the complainant provides complete information as specified in clause 11 of the Scheme;

(f) the complaint is lodged by the complainant personally or through an authorised representative other than an advocate unless the advocate is the aggrieved person.

11.2 Procedure for Filing a Complaint with Reserve Bank Integrated Ombudsman: -

- (1) The complaint may be lodged online through the portal designed for the purpose (<https://cms.rbi.org.in>).
- (2) The complaint may also be submitted through electronic or physical mode to the Centralised Receipt and Processing Centre as notified by the Reserve Bank. The complaint, if submitted in physical form, shall be duly signed by the complainant or by the authorised representative. The complaint shall be submitted in electronic or physical mode in such format and containing such information as may be specified by Reserve Bank.

12. **Analysis and Disclosure of complaints**

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.

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 Bank's website for information of the general public at the end of each financial year.

13. Policy Revision

This policy is subject to revision based on the extant RBI and IBA guidelines from time to time. Review of the policy will be carried out on an annual basis.
