



DHANLAXMI BANK

GRIEVANCE REDRESSAL POLICY 2019 - V 2.0

Date: 01-09-2019

DOCUMENT DETAILS

Document Title	Dhanlaxmi Bank – Grievance Redressal Policy
Document Version	2019 - V 2.0
Prepared By	Business Development and Planning Department
Reviewed By	Business Development and Planning Department
Approved by	Board of Directors, Dhanlaxmi Bank
Effective Date	01-09-2019

DOCUMENT CHANGE CONTROL

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DOCUMENT VERSION HISTORY

Sr.No.	Date of Document	Version	Remarks
1	16/07/2018	2018	Revised
2	01/04/2019	2019	Revised
3	16/08/2019	2019 - V 2.0	Revised

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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. 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 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 all branches. The concerned employees should be made aware about the Complaint handling process.

1.1 The customer complaint arises 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 complaint if he is not satisfied with the services provided by the bank. He can give his complaint in writing, 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.

1.2 Grievances relating to Branch Transactions:

i) In case of any difficulty in transactions, the customers may approach the staff / officer concerned or the Branch Manager, who will ensure that the customers banking needs are attended to. However, if this does not happen, customers may demand the complaint book which will be available in all branches and lodge a written complaint. A copy of the complaint shall be returned to customer with acknowledgement of receipt. The branch shall take efforts to ensure that the redressal of the complaint takes place expeditiously and in any case within a maximum period of ten days. If for any reason the branch is unable to redress the grievance within ten days, the customer will be informed of the reasons and the action taken for early redressal.

ii) In case of any difficulty with the branch or unsatisfactory reply in respect of complaint lodged with the Branch, the customer can approach the Regional Office under whose administrative control the Branch functions. The contact particulars of the Regional Office can be obtained from the Branch or from the Toll Free Helpline number. The Toll Free Helpline number will be made available on the Bank's website.

iii) The customers can also write to the Nodal Officer of the Bank at the Head Office. The address and contact details of the Nodal Officer of the Bank at the Head Office will be made available at the branches and website of the Bank. Customers may also obtain them by calling the Helpline numbers.

1.3 Grievances relating to Technology related transactions

Taking into account customers' expectations, lack of familiarity and the need for broadening customer base, the Bank will introduce an exclusive mechanism for redressal of grievances arising from use of alternate channels.

The customers may contact the nearest branch or email at customercare@dhanbank.co.in / customer.complaint@dhanbank.co.in for redressal of complaints.

1.4 Stipulations for filing a Complaint with Banking Ombudsman

For the information of our customers, we furnish below the stipulations for filing a complaint with Banking Ombudsman.

- A) The complainant, before making a complaint to the Ombudsman, should have made a written representation to the Bank, and the Bank should have either rejected the complaint, or the complainant had not received a reply within a period of one month after the complaint was received by the Bank, or the complainant was not satisfied with the reply given by the Bank.
- B) The complaint is made not later than one year after the complainant received Bank's reply to his/her representation or where no reply is received, not later than one year and one month after the date of the representation to the Bank.
- C) The complaint is not in respect of the subject matter, which was settled or dealt with on merits by the Banking Ombudsman in any previous proceedings, whether or not received from the same complainant or along with one or more complainants or one or more parties concerned with the subject matter.
- D) The complaint does not pertain to the same subject matter for which any proceedings before any court, tribunal, arbitrator or any other forum is pending or a decree or Award or order has been passed by such court, tribunal, arbitrator or forum.
- E) The complaint is not frivolous or vexatious in nature.
- F) The complaint is made before the expiry of the period of limitation prescribed under the Indian Limitation Act, 1963 for such claims.

The first point for Redressal of complaints is the Bank itself. The complainants may approach Banking Ombudsman only if the complaint is not resolved at the Bank level within a month.

The Reserve Bank of India has widened the scope of its Banking Ombudsman Scheme 2006, to include, inter alia, deficiencies arising out of sale of insurance/ mutual fund/ other third party investment products by banks. Under the amended Scheme (as amended upto July 1, 2017), a customer would also be able to lodge a complaint against the bank for its non-adherence to RBI instructions with regard to Mobile Banking/ Electronic Banking services in India.

As per the Ombudsman Scheme 2006 amendment a customer would be able to redress grievance for non-adherence to RBI instructions by banks with regard to Mobile Banking/ Electronic Banking services. Non-adherence to the instructions of Reserve Bank with regard to Mobile Banking / Electronic Banking service in India by the bank on any of the following:

- ❖ Delay or failure to effect online payment / Fund Transfer
- ❖ Unauthorized electronic payment / Fund Transfer.

2. Internal Machinery to handle Customer Complaints/ Grievances

2.1 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 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.

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 two to three senior executives of the bank, the committee would also have two to three eminent non-executives drawn from the public 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/feed-back on customer service and implementation of commitments in the Code of Bank's Commitments to Customers received from BCSBI.
- The Committee would 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.
- The committee also would 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.

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

Head – Business Development & Planning is responsible for the implementation of customer service 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.

3. 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

4. Resolution of Grievances

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 problem 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.

4.1 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 should invariably be acknowledged promptly. Branch manager should try to resolve the complaint within specified time frames, decided by the bank. Branch and Regional office must send action taken report on complaints received to the head office at the end of every month.

Specific time schedule may 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 will be made within a maximum of 3 days of receipt of the complaints at all levels. Complaints received / escalated to any of the levels, i.e. Branch / Regional Office, Principal Code Compliance Officer at Corporate Office, Managing Director 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 Nodal Officer at CO and further to Managing Director 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.

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 will be resolved within a period of 45 days.

Time Frame for Resolution of ATM & Net Banking Complaints

ATM Complaints

As per the Circular OPS/091/2010-11, the Turn Around Time (TAT) for ATM- Domestic transactions complaint is 7 working days & the TAT for resolving international ATM cash withdrawal complaint is 50 days, from the date of receipt of the complaint.

Sl	Complaint Type	TAT
1	ATM – Domestic Trans	7 working days with effect From 1 st July 2011
2	ATM – International Trans	50 days
3	POS – Settled Trans	12 Weeks [30+2 days for settlement + 30+2 days for retrieval request and / Or 45+2 days for chargeback]
TAT is computed from date of complaint being received by the bank		

As per RBI circular DBR.No.Leg.BC.78/09.07.005/2017-18 Dated July 6, 2017, Customer Protection – Limiting Liability of Customers in Unauthorised Electronic Banking Transactions, the liability of customer is defined as follows.

Limited Liability of a Customer

(a) Zero Liability of a Customer

A customer's entitlement to zero liability shall arise where the unauthorised transaction occurs in the following events:

- (i) Contributory fraud/ negligence/ deficiency on the part of the bank (irrespective of whether or not the transaction is reported by the customer).
- (ii) Third party breach where the deficiency lies neither with the bank nor with the customer but lies elsewhere in the system, and the customer notifies the bank within three working days of receiving the communication from the bank regarding the unauthorised transaction.

(b) Limited Liability of a Customer

A customer shall be liable for the loss occurring due to unauthorised transactions in the following cases:

(i) In cases where the loss is due to negligence by a customer, such as where he has shared the payment credentials, the customer will bear the entire loss until he reports the unauthorized transaction to the bank. Any loss occurring after the reporting of the unauthorized transaction shall be borne by the bank.

The cardholder shall bear the loss sustained up to the time of notification to the bank of any loss, theft or copying of the card but only up to a certain limit (of fixed amount or a percentage of the transaction agreed upon in advance between the cardholder and the bank), except where the cardholder acted fraudulently, knowingly or with extreme negligence.

Net Banking Complaints

TAT is a maximum of 5 working days if the issue has to be resolved from Bank side.

General scenarios are affixed for reference.

Sr. No	Issue	Reason	Solution
1	Unable to login to net banking	Customer not registered for Net banking.	Customer has to submit SRF to branch and the same should be forwarded to CPC through DCAMS. CPC will process the same.
2	Unable to login to net banking	Customer entering wrong password	Password can be generated by customer himself using his/her debit card details
3	Unable to activate net banking	Mobile number omitted to register in OTP application	This should be reported to CPC and they will process the same.
4	Account summary is showing but unable to debit account	Net banking flag is not ticked in CBS	Branch can do the flagging in CBS
5	Unable to login to net banking	Card not available	Customer has to submit SRF to branch and the same should be forwarded to CPC through DCAMS. CPC will process the same.
6	Unable to login to net banking	Card not activated	Customer has to do a ATM transaction. After that, customer can generate password
7	Unable to login to net banking	Card is not present under the current customer ID. This is mainly happened on customer ID change cases.	Customer has to submit SRF to branch for a new card and the same should be forwarded to CPC through DCAMS. CPC will process the same.

5. 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. 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.

6. 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 HR Dept.

7. Internal Ombudsman

The Internal Ombudsman 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 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 Bank has appointed an executive in the cadre of Deputy General Manager as Internal Ombudsman of the Bank under the provisions of Internal Ombudsman Scheme 2018. The Standard Operating Procedure for escalating partially / wholly rejected customer complaints to Internal Ombudsman is stated in the following:

1. The customer complaints as mentioned in clause no. (2) of Chapter III (8. Jurisdiction) of Internal Ombudsman Scheme 2018 are coming under the scope of Internal Ombudsman.
2. Any such customer complaints that remain pending for a period more than two weeks from the date of receipt of the complaint or above the respective TAT (whichever is earlier), is to be reported/escalated by the respective departments to the Office of Internal Ombudsman. It is to be ensured that the final decision or reply on the complaint should be provided within 30 days from the receipt of the complaint.
3. The decision of the Internal Ombudsman shall be mandatorily included in the information

submitted by the Bank to the Banking Ombudsman, while furnishing documents related to the complaints received in the office of Banking Ombudsman.

8. **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.
