



**KERALA GRAMIN BANK  
HEAD OFFICE :: MALAPPURAM**

**STRATEGIC PLANNING & DEVELOPMENT WING**

**POLICY ON  
CUSTOMER SERVICE,  
CUSTOMER RIGHTS,  
CUSTOMER PROTECTION,  
CUSTOMER COMPENSATION  
AND  
CUSTOMER GRIEVANCE REDRESSAL MECHANISM  
FOR THE FINANCIAL YEAR 2025-26  
VERSION 6.0**

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## **1. PART – A :: CUSTOMER SERVICE POLICY**

### **1.1. Introduction**

Customer service has assumed great significance in the banking industry. The banking system in India today has perhaps the largest outreach for delivery of financial services and is also serving as an important conduit for delivery of financial services. While the coverage has been expanding day by day, the quality and content of dispensation of customer service has come under tremendous pressure mainly due to the soaring demands and expectations of the customers.

The enormity and complexity of banking operations gives rise to complaints on deficiencies in services. The inadequacies in banking services available to the common man has to be looked into and there is a need to benchmark the current level of service, review the progress periodically, enhance the quality, rationalize the process taking into account the technological developments.

Depositors' interests form the focal point of the regulatory frame work in India. There is a widespread feeling that the customer does not get satisfactory service even after demanding it and there has been a total disenfranchisement of the depositor. There is therefore, a need to reverse this trend and start a process of empowering the depositor.

Broadly, a customer can be defined as a user or a potential user of bank services. So defined, a "Customer" may include:

- A person or entity that maintains an account and /or has a business relationship with the Bank.
- One on whose behalf the account is maintained (i.e. the beneficial owner)
- Beneficiaries of transactions conducted by professional intermediaries such as Stock Brokers, Chartered Accountants, Solicitors etc., as permitted under the law and
- Any person or entity connected with the financial transactions which can pose significant reputational or other risks to the Bank, say, a wire transfer or issue of a high value demand draft as a single transaction.

Keeping the above in view the Bank has formulated a comprehensive customer service policy which includes Deposit policy, Cheque Collection Policy, Customer compensation Policy and customer Grievance Redressal Policy.

### **1.2. GENERAL**

#### **1.2.1. General Management of Branches**

- a) The Bank will provide infrastructural facilities to branches by bestowing particular attention to provide adequate space, proper furniture, drinking water facilities etc.
- b) Bank will display indicator Boards in English & Malayalam at the counters. Business posters will be in English and Regional Language.

- c) Use English and Malayalam in transacting business with customers including communications to customers.
- d) Review and improve upon the existing security system of the branches so as to instill confidence amongst the employees and the public.
- e) Train the staff in line with customer service orientation. Training in technical areas of banking to the staff at delivery points.
- f) Senior Officials from controlling office and Head Office will visit branches at periodical intervals for on the spot study of the quality of service rendered by the branches.

### **1.2.2. Customer Service: Institutional Framework**

Matters relating to customer services will be deliberated by the Board to ensure that the instructions of the regulators are implemented meaningfully. Commitment to hassle-free service to the customer at large and the common person in particular will be under the overall supervision of the Board.

### **1.2.3. Monitoring the Implementation of the Awards under Banking Ombudsman Scheme:**

Bank will ensure that the Awards of the Banking Ombudsman are implemented expeditiously and with the active involvement of the Top Management. Further with a view to enhance the effectiveness

- a) Bank will place the awards given by the Banking Ombudsman before the Board to enable them address the issues of systemic deficiencies, if any, existing in the bank brought out by the awards and
- b) Place all the awards remaining unimplemented for more than three months with the reasons thereof before the Board to enable them to take remedial action.

### **1.2.4. Branch Level Customer Service Committees:**

In order to encourage a formal channel of communication between the customers and the bank at the branch level, the Bank will take necessary steps for strengthening the Branch level committees with greater involvement of customers. Branch level Customer Committee will meet at least once in a month to study the complaints/ suggestions and evolve ways and means of improving customer service.

### **1.2.5. Nodal Department/Official for Customer Service:**

Strategic Planning & Development Wing will be the Nodal Department for customer service and General Manager, overseeing Strategic Planning & Development will be the Nodal Official for customer service at Head Office. At the Regional Office, the Regional Manager will be the Nodal Official for customer service.

### **1.3. Giving Publicity to the Policies**

The Bank will ensure that wide publicity is given to the comprehensive Customer Service Policy, which includes Customer Rights Policy, Deposit Policy, Cheque Collection Policy, Customer Compensation Policy and Customer Grievance Redressal Policy. Bank will place the policy details prominently on the web-site. The customers will be clearly apprised of the assurances of the bank on the services on these aspects at the time of establishment of initial relationship be it as a depositor, borrower or otherwise. Any changes in the policies will also be duly informed to the customers by putting in the bank's web-site or notice board.

### **1.4. Financial Inclusion:**

#### **1.4.1. Basic Savings Bank Accounts:**

With a view to achieving the object of greater financial inclusion, the Bank will make available a Basic Savings Bank account with 'nil' or very low minimum balances as well as charges that would make such accounts accessible to vast sections of population. The nature and number of transactions in such accounts could be restricted, but made known to the customer in advance in a transparent manner. Wide publicity will be given to BSB account by including them on our web-site and indicating the facilities and charges in a transparent manner. The number of such deposit accounts opened by the bank will be reported to the authorities, periodically.

#### **1.4.2. IT Enabled Financial Inclusion:**

Bank endeavours to fully meet the objective of greater financial inclusion with affordable infrastructure and low operational costs with the use of appropriate technology, thereby lowering the transaction costs to make small transactions viable. Bank will scale up its financial inclusion efforts by utilizing appropriate technology. Solutions which are highly secure, amenable to audit and that will follow widely accepted open standards to allow interoperability among the different systems adopted by the different banks will be considered.

#### **1.4.3. Printed Material in Bilingual Form:**

In order to ensure that banking facilities percolate to the vast sections of population, bank will make available printed material used by retail customers including account opening forms, pay-in-slips, pass books etc. in English and Malayalam, the Regional Language.

#### **1.4.4 Display of information regarding Local Level Committees set up under the National Trust for the Welfare of Persons with Autism, Cerebral Palsy, Mental Retardation and Multiple Disabilities Act, 1999**

Bank should ensure that the branches display in a conspicuous place

- (i) Essential details about the facilities under the enactment (Mental Disabilities Act);
- (ii) The fact that the parties can approach the Local Level Committees, for the purpose of issuance of the certificate and that the certificate issued under the Mental Disabilities Act is acceptable; and

The details of the Local Level Committees in that area. The information shall be displayed in the local language and English / Hindi (or both). Banks are advised to strictly comply with the above orders of the Court.

#### **1.4.5 Operation of Accounts by**

##### **Old /Incapacitated Persons/Visually Impaired person**

#### **Types of sick / old / incapacitated account holders**

The cases of sick / old / incapacitated account holders fall into following categories:

- (a) An account holder who is too ill to sign a withdrawal form cannot be physically present in the Bank to withdraw money from his bank account but can put his/her thumb impression on the withdrawal form;
- (b) An account holder who is not only unable to be physically present in the Bank but is also not even able to put his/her thumb impression on the withdrawal form due to certain physical incapacity.

#### **Operational Procedure**

With a view to enabling the old / sick account holders operate their bank accounts, Bank may follow the procedure as under:-

- (a) Wherever thumb or toe impression of the sick/old/incapacitated account holder is obtained, it should be identified by two independent witnesses known to the Bank, one of whom should be a responsible bank official.
- (b) Where the customer cannot even put his / her thumb impression and also would not be able to be physically present in the bank, a mark can be obtained on the withdrawal form which should be identified by two independent witnesses, one of whom should be a responsible bank official.
- (c) The customer may also be asked to indicate to the Bank as to who would withdraw the amount from the bank on the basis of withdrawal form as obtained above and that person should be identified by two independent witnesses. The person who would be actually drawing the money from the Bank should be asked to furnish his signature to the bank.

#### **Opinion of IBA in case of a person who cannot sign due to loss of both hands**

Opinion obtained by the Indian Banks' Association from their consultant on the question of opening of a bank account of a person who has lost both his hands and could not sign the cheque / withdrawal form is as under :

"In terms of the General Clauses Act, the term "Sign" with its grammatical variations and cognate expressions, shall with reference to a person who is unable to write his name, include "mark" with its grammatical variations and cognate expressions. The Supreme Court has held in AIR 1950 – Supreme Court, 265 that there must be physical contact between the person who is to sign and the signature can be by means of a mark. This mark can be placed by the person in any manner. It could be the toe impression, as suggested. It can be by means of a

mark which anybody can put on behalf of the person who has to sign, the mark being put by an instrument which has had a physical contact with the person who has to sign”.

## **2. PART – B :: CUSTOMER RIGHTS POLICY**

### **2.1. Introduction**

Customer protection is an integral aspect of financial inclusion. The following comprehensive Customer Rights Policy based on domestic experience and global best practices is brought out to enhance such protection.

The Customer Rights Policy enshrines basic rights of the customers of the banks regulated by the Reserve Bank of India. It spells out the rights of the customer and also the responsibilities of the Bank. The Policy applies to all products and services offered by the Bank or its Agents, whether provided across the counter, over phone, by post, through interactive electronic devices, on internet or by any other method.

### **2.2. Right to Fair Treatment**

Both the Customer and the Bank have a right to be treated with courtesy. The customer shall not be unfairly discriminated against on grounds such as gender, age, religion, caste and physical ability when offering and delivering financial products.

In pursuance of the above Right, bank will:

- i) Promote good and fair banking practices by setting minimum standards in all dealings with the customers.
- ii) Promote a fair and equitable relationship between the bank and the customer.
- iii) Train Bank Staff attending to the customers, adequately and appropriately.
- iv) Ensure that Staff Members attend to customers and their business promptly and courteously.
- v) Treat all customers fairly and not discriminate against any customer on grounds such as gender, age, religion, caste, literacy, economic status, physical ability, etc. Bank may, however, have special schemes or products which are specifically designed for members of a target market group or may use defensible, commercially acceptable economic rationale for customer differentiation. Bank may also have schemes or products as part of an affirmative action such as for women or backward classes. Such schemes / products will not tantamount to unfair discrimination. The rationale for such special schemes or terms will be explained by bank wherever required.
- vi) Ensure that the above principle is applied while offering all products and services.
- vii) Ensure that the products and services offered are in accordance with relevant laws and regulations.
- viii) While it shall be the endeavour of the bank to provide their customers with hassle free and fair treatment, bank would expect their customers to behave courteously

and honestly in their dealings with the bank. It is observed that in many cases, there is a lapse on the part of the customers in protecting their information regarding account, passwords, Card and PIN etc. In view of the above customers are advised to ensure the following:

- a) Maintaining passwords and PIN secrecy
  - b) Ensuring safety of Credit and Debit Cards
  - c) Proper usage of cheques and safe custody of unused cheques
  - d) Not disclosing cards/accounts information
  - e) Registering of Mobile number and e-mail ID for getting alerts for transactions
  - f) Informing the bank at designated numbers immediately in case of loss of cards
- ix) It shall also be the bank's endeavour to encourage their customers to approach the bank's internal grievance redressal machinery and approach alternate forum after exhausting all their remedies under bank's internal grievance mechanism. In case of any Grievances, Customer may approach the concerned branch office at first level and in case if he/she is not satisfied with the reply given by the Bank Branch, he/she shall approach the Chief Customer Service Officer (who acts as an Internal Ombudsman of the Bank for the speedy and satisfactory redressal of the complaints). The details of the CCSO are as below:

The General Manager,  
Strategic Planning & Development Wing  
Kerala Gramin Bank  
Head Office, KGB Towers  
AK Road, Uphill, Malappuram 676 505.

Tel No. 0483 2735145,

email id : [customercare.kgb@keralagbank.com](mailto:customercare.kgb@keralagbank.com),  
[pdwing.kgb@keralagbank.com](mailto:pdwing.kgb@keralagbank.com)

The availability of CCSO not only provides early and faster redressal of grievances but also saves time in approaching other agencies like BO (Banking Ombudsman) / CDRF (Consumer Disputes Redressal Forum), etc.

### **2.3. Right to Transparency, Fair and Honest Dealing**

The financial services provider (Bank) shall make every effort to ensure that the contracts or agreements, which are framed, are transparent, easily understood by and well communicated to the common person. The product's price, the associated risks, the terms and conditions that govern use over the product's life cycle and the responsibilities of the customer and financial service provider, should be clearly disclosed. The customer should not be subject to unfair business or marketing practices, coercive contractual terms or misleading representations. Over the course of their relationship, the financial services provider cannot threaten the customer with physical harm, exert undue influence, or engage in blatant harassment.



In pursuance of the above Right, the Bank will:

- i. Ensure complete transparency so that the customer can have a better understanding of what he or she can reasonably / fairly expect from the Bank. While maintaining transparency, it shall be ensured by the Bank that no confidential matters will be disclosed;
- ii. Ensure that the Bank's dealings with the customer rest on ethical principles of equity, integrity and transparency;
- iii. Provide customers with clear information about its products and services, terms and conditions, and the interest rates / service charges in simple and easily understandable language, and with sufficient information so that the customer could be reasonably expected to make an appropriate and informed choice of product;
- iv. Ensure that all terms and conditions are fair and set out the respective rights, liabilities and obligations clearly and as far as possible in plain and simple language;
- v. Make known the key risks associated with the product as well as any features that may especially disadvantage the customer to him/her. Most Important Terms and Conditions (MITC) associated with the product or service will be clearly brought to the notice of the customer while offering the product. In general, it will be ensured that such terms will not inhibit a customer's future choice;
- vi. Provide information on interest rates, fees and charges either on the Notice Board in the branches or website or through help-lines or help-desk and wherever appropriate the customer will be informed directly;
- vii. Display the tariff Schedule on their website and a copy of it will be made available at every branch for customer's perusal. Also will display in its branches a notice about the availability of the Tariff Schedule at the branch;
- viii. Give details, in our Tariff Schedule, of all charges, if any, applicable to the products and services chosen by customer;
- ix. Inform the customer of any change in the terms and conditions through the website and Notice Board of the Bank as and when the revised terms and conditions become effective;
- x. Ensure that such changes are made only with prospective effect and the information to the customer is given as and when the changes become effective;

The provision for giving 30 days on making any adverse changes may be made with the following terms;

- a) Notice shall be issued on effecting the adverse changes and not on prior basis.
- b) The customer shall be given 60 days' time to opt out/close the account.
- c) In case, if the customer opts out/closes the account within the period of 60 days, for such period the revised charge/ interest will be applied.
- xi. Provide information about the penalties that will be levied in case of non-observance / breach of any of the terms and conditions governing the product/ services chosen by the customer;
- xii. Display on public domain the Banks' Policies on Deposits, Cheque Collection,

Grievance Redressal, Compensation and Collection of Dues and Security  
Repossession;

- xiii. Make every effort to ensure that staff dealing in a particular product is properly trained to provide relevant information to customers fully, correctly and honestly;
- xiv. Ensure to communicate to the applicant within a reasonable time period as decided by the bank about the acceptance / non-acceptance of applications submitted for availing a product / service and convey in writing the reasons for not accepting / declining the application. Such period will be notified in the bank's website and also in the application of the particular product or service;
- xv. Communicate unambiguously the information about:
  - a. discontinuation of particular products,
  - b. relocation of their offices
  - c. changes in working hours
  - d. change in telephone numbers
  - e. closure of any office or branch

Such information shall be given with advance notice of at least 30 days. Also affirms that disclosure of information is an on-going process through the life-cycle of the product / relationship and will be diligently followed by them. Ensure to use all possible channels of communication, including web-site, to ensure that information on all changes is made known to the customer upfront;

- xvi. Advise the customer at the time of selling the product of the rights and obligations embedded in law and/or banking regulation including the need to report any critical incidents that the customer suspect, discover or encounter;
- xvii. The bank's staff members shall, when approached by the customer for availing a product or service, provide all relevant information related to their product / service to enable the customer to make an informed decision;
- xviii. Not terminate a customer relationship without giving reasonable or contractual prior notice to the customer;
- xix. Assist the customer in all available ways for managing his/her account, financial relationship by providing regular inputs in the bank's realms such as account statements/passbooks, alerts, timely information about the product's performance, term deposits maturity etc.;
- xx. Ensure that all marketing and promotional material is clear and not misleading;
- xxi. Not threaten the customer with physical harm, exert influence or engage in behaviour that would reasonably be construed as unwarranted harassment. Ensure adherence only to the normal appropriate business practices;
- xxii. Ensure that the fees and charges on products/services and its structure are reasonable.

## **2.4. Right to Suitability**

The products offered should be appropriate to the needs of the customer and based on an assessment of the customer's financial circumstances and understanding.

In pursuance of the above Right, the Bank will:

- i) Ensure that it has a Board approved policy for assessing suitability of products for customers prior to sale;
- ii) Endeavour to make sure that the product or service sold or offered is appropriate to the customer's needs and not inappropriate to the customer's financial standing and understanding based on the assessment made by it.
- iii) Sell third party products only if it is authorized to do so, after putting in place a Board approved policy for marketing and distributing third party financial products;
- iv) Not compel a customer to subscribe to any third party products as a quid-pro-quo for any service availed from the bank;
- v) Ensure that the products being sold or service being offered, including third party products, are in accordance with extant rules and regulations;
- vi) Inform the customer about his responsibility to promptly and honestly provide all relevant and reasonable information that is sought by bank to enable them to determine the suitability of the product to the customer.

## **2.5. Right to Privacy**

Customers' personal information should be kept confidential unless they have offered specific consent to the financial services provider or such information is required to be provided under the law or it is provided for a mandated business purpose (for example, to Credit Information Companies). The customer should be informed upfront about likely mandated business purposes. Customers have the right to protection from all kinds of communications, electronic or otherwise, which infringe upon their privacy.

In pursuance of the above Right, Bank will:

- i) Treat customer's personal information as private and confidential (even when the customer is no longer banking with us), and, as a general rule, not disclose such information to any other individual/institutions including its' subsidiaries / associates, tie-up institutions etc. for any purpose unless :
  - a) The customer has authorized such disclosure explicitly in
  - b) writing Disclosure is compelled by Law / Regulation;
  - c) Bank has a duty to the public to disclose i.e. in public interest

- d) Bank has to protect its interests through disclosure
  - e) It is for a regulatory mandated business purpose such as disclosure of default to Credit Information Companies or Debt Collection Agencies
- ii) Ensure such likely mandated disclosures be communicated immediately to the customer in writing;
- iii) Shall not use or share customer's personal information for marketing purpose, unless the customer has specifically authorized it;
- iv) Shall adhere to Telecom Commercial Communications Customer Preference Regulations, 2010 (National Customer Preference Registry) issued by Telecom Regulatory Authority of India, while communicating with customers.

## **2.6. Right to Grievance Redressal and Compensation**

The customer has a right to hold the financial services provider accountable for the products offered and to have a clear and easy way to have any valid grievances redressed. The provider should also facilitate redressal of grievances stemming from its sale of third party products. The financial services provider must communicate its policy for compensating mistakes, lapses in conduct, as well as non-performance or delays in performance, whether caused by the provider or otherwise. The policy must lay out the rights and duties of the customer when such events occur.

In pursuance of the above Right, Bank will:

- i) Deal sympathetically and expeditiously with all things that go wrong;
- ii) Correct mistakes promptly;
- iii) Cancel any charge that has been applied wrongly and by mistake;
- iv) Compensate the customer for any direct financial loss that might have been incurred by the customer due to its lapses.

The Bank will also:

- i. Place in public domain its Customer Grievance Redressal Policy, including the Grievance redressal procedure available for the customer;
- ii. Place in public domain the compensation policy for delays / lapses in conducting / settling customer transactions within the stipulated time and in accordance with the agreed terms of contract;
- iii. Ensure to have a robust and responsive grievance redressal procedure and clearly indicate the grievance resolution authority who shall be approached by the customer;
- iv. Make grievance redressal mechanism easily accessible to customers;
- v. Advise the customer about how to make a complaint, to whom such a complaint is to be made, when to expect a reply and what to do if the customer is not satisfied with the outcome;

- vi. Display name, address and contact details of the Grievance Redressal Authority / Nodal Officer. The time limit for resolution of complaints will be clearly displayed / accessible at all service delivery locations;
- vii. Inform the complainant of the option to escalate his complaint to the Banking Ombudsman if the complaint is not redressed within the pre-set time;
- viii. Place in public domain information about Banking Ombudsman Scheme;
- ix. Display at customer contact points the name and contact details of the Banking Ombudsman under whose jurisdiction the bank's branch falls.

Further, the Bank will:

- a. Acknowledge all formal complaints (including complaints lodged through electronic means) within three working days and work to resolve it within a reasonable period, not exceeding 30 days (including the time for escalation and examination of the complaint by the highest ranking internal official responsible for grievance redressal). The 30 days period will be reckoned after all the necessary information sought from the customer is received;
- b. Provide aggrieved customers with the details of the Banking Ombudsman Scheme for resolution of a complaint if the customer is not satisfied with the resolution of a dispute, or with the outcome of a dispute handling process;

In addition, the Bank will:

- a. Clearly spell out, at the time of establishing a customer relationship, the liability for losses, as well as the rights and responsibilities of all parties, in the event of products not performing as per specifications or things going wrong. However, the bank will not be liable for any losses caused by extraneous circumstances that are beyond its reasonable control (such as market changes, performance of the product due to market variables, etc.).
- b. Ensure the customer is refunded without delay and demur, if it cannot show beyond reasonable doubt to the customer on any disputed transaction (along with interest/charges).

### **3. PART – C :: CUSTOMER PROTECTION POLICY**

#### **3.1.Limiting Customer Liability in unauthorized Electronic Banking Transactions**

With the increased thrust on financial inclusion and customer protection and considering the recent surge in customer grievances relating to unauthorised transactions resulting in debits to their accounts/ cards, the criteria for determining the customer liability in these circumstances have been reviewed. The revised directions in this regard are set out below.

##### **Strengthening of systems and procedures**

Broadly, the electronic banking transactions can be divided into three categories

- (i) Remote/ online payment transactions (transactions that do not require physical payment instruments to be presented at the point of transactions e.g. internet banking, mobile banking, card not present (CNP) transactions), Pre-paid Payment Instruments (PPI), and
- (ii) Face-to-face/ proximity payment transactions (transactions which require the physical payment instrument such as a card or mobile phone to be present at the point of transaction e.g. ATM, POS, etc.
- (iii) AePS (Aadhaar Enabled Payment System) related transactions done through AePS where customer can withdraw amount upto a specified limit.

The systems and procedures in bank to be designed to make customers feel safe about carrying out electronic banking transactions. To achieve this, bank will put in place:

- a) appropriate systems and procedures to ensure safety and security of electronic banking transactions carried out by customers;
- b) robust and dynamic fraud detection and prevention mechanism;
- c) mechanism to assess the risks (for example, gaps in the bank's existing systems) resulting from unauthorised transactions and measure the liabilities arising out of such events;
- d) appropriate measures to mitigate the risks and protect themselves against the liabilities arising therefrom; and
- e) a system of continually and repeatedly advising customers on how to protect themselves from electronic banking and payments related fraud.

#### **3.2 Reporting of unauthorised transactions by customers to banks**

Bank will ask their customers to mandatorily register for SMS alerts and wherever available register for e-mail alerts, for electronic banking transactions. The SMS alerts will be sent to the customers irrespective of the transaction amount, while email alerts will be sent, wherever registered. The customers will be advised to notify the bank of any unauthorised electronic banking transaction at the earliest after the occurrence of such transaction, and will be informed that the longer the time taken to notify the bank, the higher will be the risk of loss to the bank/ customer. To facilitate this, bank has provided customers with access through multiple channels (SMS (24x7) and reporting to home branch (during working hours)) for reporting unauthorised transactions that have taken place and/ or loss or theft of payment instrument such as card, etc. Bank will strive to provide other modes for fraud reporting in future.

Bank will provide customers with the SMS Service number in the transaction alert SMS itself, to instantly respond and the customers do not have to search for a web page or an e-mail address to notify the objection, if any. A direct link for lodging the complaints, with specific option to report unauthorised electronic transactions is provided by bank on home page of their website. The loss/ fraud reporting system will also ensure that immediate response (including auto response) is sent to the customers acknowledging the complaint along with the registered complaint number. The communication systems used by bank to send alerts and receive their responses thereto will record the time and date of delivery of the message and receipt of customer's response, if any, to them. The banks will not offer facility of electronic transactions, other than ATM cash withdrawals, to customers who do not provide mobile numbers to the bank. On receipt of report of an unauthorised transaction from the customer, bank will take immediate steps to prevent further unauthorised transactions in the account.

### **3.3.Limited Liability of a Customer**

#### **(a) Zero Liability of a Customer**

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

- a) Contributory fraud/ negligence/ deficiency on the part of the bank (irrespective of whether or not the transaction is reported by the customer)
- b) 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 unauthorised transaction to the bank. Any loss occurring after the reporting of the unauthorised transaction will be borne by the bank.
- (ii) In cases where the responsibility for the unauthorised electronic banking transaction lies neither with the bank nor with the customer, but lies elsewhere in the system and when there is a delay (of **four to seven working days** after receiving the communication from the bank) on the part of the customer in notifying the bank of such a transaction, the per transaction liability of the customer shall be limited to the transaction value or the amount mentioned in Table 1, whichever is lower.

**Table 1****Maximum Liability of a Customer**

Type of Account	Maximum liability (Rs.)
<input type="checkbox"/> BSBD Accounts	5,000
<input type="checkbox"/> All other SB accounts <input type="checkbox"/> Pre-paid Payment Instruments and Gift Cards <input type="checkbox"/> Current/ Cash Credit/ Overdraft Accounts of MSMEs <input type="checkbox"/> Current Accounts/ Cash Credit/ Overdraft Accounts of Individuals with annual average balance (during 365 days preceding the incidence of fraud)/ limit up to Rs.25 lakh <input type="checkbox"/> Credit cards with limit up to Rs.5 lakh	10,000
<input type="checkbox"/> All other Current/ Cash Credit/ Overdraft Accounts Credit cards with limit above Rs.5 lakh	25,000

Further, if the delay in reporting is beyond **seven working days**, the customer shall bear the full liability.

Overall liability of the customer in third party breaches, as detailed above, where the deficiency lies neither with the bank nor with the customer but lies elsewhere in the system, is summarised in Table 2:

**Table 2****Summary of Customer's Liability**

Time taken to report the fraudulent transaction from the date of receiving the communication	Customer's liability (Rs.)
Within 3 working days	Zero liability
Within 4 to 7 working days	The transaction value or the amount mentioned in Table 1, whichever is lower
Beyond 7 working days	Full liability including interest charged/losses suffered, if any

The number of working days mentioned in Table 2 will be counted as per the working schedule of the home branch of the customer excluding the date of receiving the communication.

**3.6. Reversal Timeline for Zero Liability/ Limited Liability of customer**

On being notified by the customer, the bank will credit (shadow reversal) the amount involved in the unauthorised electronic transaction to the customer's account within 10 working days from the date of such notification by the customer without waiting for settlement of insurance claim, if any. Bank will, at its discretion, decide to waive off any customer liability in case of unauthorised electronic banking transactions even in cases of customer negligence. The General Manager, Digital Banking Services Wing will be the authority to take decision on such waiving off. The credit will be value dated to be as of the date of the unauthorised transaction.



Further, bank shall ensure that:

- (i) a complaint is resolved and liability of the customer, if any, within 90 days from the date of receipt of the complaint, and the customer is compensated as per provisions detailed above;
- (ii) where it is unable to resolve the complaint or determine the customer liability, if any, within 90 days, the compensation as prescribed above is paid to the customer; and
- (iii) in case of debit card/ bank account, the customer does not suffer loss of interest, and in case of credit card, the customer does not bear any additional burden of interest.

### **3.4.Burden of Proof**

The burden of proving customer liability in case of unauthorised electronic banking transactions will lie on the bank.

### **3.5.Reporting and Monitoring Mechanism**

The bank will put in place a suitable mechanism and structure for the reporting of the customer liability cases to the Customer Service Sub-committee of the Board. The reporting will, *inter alia*, include volume/ number of cases and the aggregate value involved and distribution across various categories of cases viz., card present transactions, card not present transactions, internet banking, mobile banking, ATM transactions, etc. The Customer Service Committee in Head Office will review once in every quarter, the unauthorised electronic banking transactions reported by customers or otherwise, as also the action taken thereon, the functioning of the grievance redressal mechanism and take appropriate measures to improve the systems and procedures. All such transactions will be reviewed by the bank's internal auditors.

## **4. PART – D :: CUSTOMER COMPENSATION POLICY**

### **4.1. Introduction**

The objectives of this Policy is to provide a system whereby the bank compensates 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.

The Policy covers compensation for financial losses which customer might incur due to deficiency in the services offered by the bank, which can be measured and as such the commitments under this Policy are without prejudice to any right the bank will have in defending the position before any forum duly constituted to adjudicate banker - customer disputes.

### **4.2. Unauthorized / Erroneous Debit**

a) If the bank has raised an unauthorized/erroneous direct debit to an account, the entry will be reversed immediately on being informed of the erroneous debit, after verifying the position. In the event the unauthorized/erroneous debit has resulted in a financial loss for the customer by way of reduction in the balance applicable for payment of interest on savings bank deposit or payment of additional interest to the bank in a loan account, the bank will compensate the customer for such loss. Further, if the customer has suffered any financial loss incidental to return of a cheque or failure of direct debit instructions due to insufficiency of balance, on account of the unauthorized/ erroneous debit, the bank will compensate the customer to the extent of such financial losses.

b) In case verification of the entry reported to be erroneous by the customer does not involve a third party, the bank shall arrange to complete the process of verification within a maximum period of 7 working days from the date of reporting of erroneous debit. In case, the verification involves a third party, the bank shall complete the verification process within a maximum period of one month from the date of reporting of erroneous transaction by the customer.

### **4.3. ECS Direct Debits/Other Debits to Accounts**

a) The bank will undertake to carry out direct debit/ ECS debit Instructions of customers in time. In the event the bank fails to meet such commitments customer will be compensated to the extent of any financial loss the customer would incur on account of delay in carrying out the instruction/failure to carry out the instructions.

b) The bank would debit the customer's account with any applicable service charge as per the schedule of charges notified by the bank. In the event the bank levies any charge in violation of the arrangement, the bank will reverse the charges when pointed out by the

customer subject to scrutiny of agreed terms and conditions. Any consequential financial loss to the customer will also be compensated.

#### **4.4. Payment of Cheques after Stop Payment Instructions:**

In case a cheque has been paid after stop payment instruction is acknowledged by the bank, the bank shall reverse the transaction and give value-dated credit to protect the interest of the customer. Any consequential financial loss to the customer will be compensated as provided under para 1 above. Such debits will be reversed within 2 working days of the customer intimating the transaction to the bank.

#### **4.5. Crediting of Proceeds of Instruments Expressed in Foreign Currencies:**

a) The services of other agencies are utilized for collecting the instruments expressed in foreign currencies, tendered by customers. Bank would not compensate the customer for delays in collection of cheques, as the bank would not be able to ensure timely credit from overseas banks. It is the bank's experience that time for collection of instruments drawn on banks in foreign countries, differ from country to country and even within a country, from place to place. The time norms for return of instruments cleared provisionally also vary from country to country. Bank, however, would consider upfront credit against such instrument by purchasing the cheque/instrument, provided the conduct of the account has been satisfactory in the past. However, the bank will compensate the customer for undue delays in affording credit, once proceeds are credited to the Account of the Bank. Such compensation will be given for delays beyond one week from the date of credit to Bank's Account after taking into account normal cooling period stipulated. The compensation in such cases will be worked out as follows:

Interest for the delay in crediting proceeds as indicated in the collection policy of the bank. Such compensation shall be paid at the rate of interest applicable to NRE SB a/c in respect of Non-Resident clients and domestic SB a/cs in case of resident customers.

#### **4.6. Remittances in India:**

The compensation on account of delays in collection of instruments would be as indicated in the bank's collection policy, which is reproduced below for information:

Payment of Interest for delayed Collection of Outstation Cheques:

As part of the compensation policy of the bank, the bank will pay interest to its customer on the amount of collection instruments in case there is delay in giving credit beyond the time period mentioned above. Such interest shall be paid without any demand from customers in all types of accounts. There shall be no distinction between instruments drawn on the bank's own branches or on other banks for the purpose of payment of interest on delayed collection.

Interest for delayed collection shall be paid at the following rates:

- a) Where the delay in collection of cheques is beyond 14 days i.e. the permitted period for collection, interest will be paid at the rate applicable to term deposits for respective period of delay.
- b) In case of extraordinary delay, i.e. delays exceeding 90 days interest will be paid at the rate of 2% above the corresponding Term Deposit rate.
- c) In the event the proceeds of cheque under collection were to be credited to an overdraft/loan account of the customer, interest will be paid at the rate applicable to the loan account. For extraordinary delays i.e. beyond 90 days delay, then interest will be paid at the rate of 2% above the rate applicable to the loan account.

Note:

- 1. It may be noted that interest payment as given above would be applicable only for instruments sent for collection within India.
- 2. The payment of interest for the delay in collection of outstation instruments are not applicable to non-negotiable instruments viz. prize winning lottery tickets and proceeds of matured deposit receipts of other banks etc.

The bank's compensation policy for financial loss suffered by the customers due to loss of instrument after it has been handed over to the bank for collection by the customer would also be as indicated in our collection policy. The same is extracted below for information:

**Cheques / Instruments lost in transit / in clearing process or at paying bank's branch:**

In the event a cheque or an instrument accepted for collection is lost in transit or in the clearing process or at the paying bank's branch, the bank shall immediately on coming to know of the loss, bring the same to the notice of the account holder in writing so that the account holder can inform the drawer to record stop payment and also take care that cheques, if any, issued by him / her are not dishonoured due to non-credit of the amount of the lost cheques / instruments. The bank would provide all possible assistance to the customers to obtain a duplicate instrument from the drawer of the cheque. The bank will compensate the account holder in respect of instruments lost in transit in the following way:

- i. In case intimation regarding loss of instrument is conveyed to the customer "beyond" the time limit stipulated for collection i.e., 14 days, interest will be paid for the period exceeding the stipulated collection period at the rates specified above.
- ii. In addition, bank will pay interest on the amount of the cheque for a further period of 15 days at Fixed Deposit rate to provide for likely further delay in obtaining duplicate cheque/ instrument and collection thereof.

iii. The bank would also compensate the customer for any reasonable charges he/she incurs in getting duplicate cheque/instrument upon production of receipt, in the event the instrument is to be obtained from a bank/ institution who would charge a fee for issue of duplicate instrument and also reasonable charges incurred for stopping payment of the cheque”.

#### **4.7. Violation of the Code by Bank's Agent**

In the event of receipt of any complaint from the customer that the bank's representative / courier has engaged in any improper conduct or acted in violation of the Code of Bank's Commitment to Customers which the bank has adopted voluntarily, bank shall take appropriate steps to investigate and to handle the complaint and to compensate the customer for financial losses, if any.

#### **4.8. Force Majeure**

The bank shall not be liable to compensate customers for delayed Credit if some unforeseen event (including but not limited to civil commotion, sabotage, lockout, strike or other labour disturbances, accident, fires, natural disasters or other "Acts of God", war, damage to the bank's facilities or of its Sponsor Bank, absence of the usual means of communication or all types of transportation, etc., beyond the control of the bank prevents it from performing its obligations within the specified service delivery parameters.

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## **5. PART – E :: CUSTOMER (COMPLAINTS) GRIEVANCE REDRESSAL MECHANISM**

### **5.A. OBJECTIVES:**

In the present scenario of competitive banking, excellence in customer service is the most important tool for sustained business growth. Since inception of our Bank high priority has been attached to customer satisfaction. Over the years, steps have been taken to come out with a number of initiative aimed at achieving high standards of customer satisfaction and complaint free branch network. Customer complaint is part of the business life of any corporate entity. As a service organization, customer service and customer satisfaction is the prime concern of the Bank. We believe 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 will help in identifying shortcomings in product features and service delivery.

### **The Bank's policy on Grievance Redressal follows the under noted principles:**

- a) Our customers will be treated fairly at all times.
- b) Complaints raised by our customers will be dealt with courtesy and in time.
- c) Our customers will be 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.
- d) Our Bank will treat all complaints efficiently and fairly as they can damage the Bank's reputation and business if handled otherwise.
- e) Our employees will work in good faith and without prejudice to the interests of the customer.
- f) Complaints emanating from rural areas and those relating to financial assistance to priority sector and Government Poverty alleviation programme also form part of the above process.

In order to make Bank's redressal mechanism more meaningful and effective, a structured system will function at Branches/ Regional Offices/Head Office, which will ensure that redressal sought is just and fair and is within the given framework of rules and regulation.

This policy document will be made available at all branches. All the employees will be made aware about the complaint handling process to ensure better customer service and general awareness in the Bank.

#### **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 or gaps in standards of services expected and actual services rendered.
- c) Malfunctioning of Technology products.

**B. ORGANISATIONAL SETUP AND ROLES & RESPONSIBILITIES:**  
**(Monitored by Customer care cell, SPD wing, HO)**

**2. Internal Machinery to handle customer complaints/ grievances**

- a) If the customer wants to make a complaint, we will inform:
  - i. Where to make complaint
  - ii. How a complaint should be made
  - iii. When to expect a reply
  - iv. Whom to approach for redressal
  - v. What to do if customers are not happy about the outcome
- b) The Bank will inform customers where to find details of procedures for handling complaints fairly and quickly.
- c) If the customer complaint is received in writing, we will endeavour to send an acknowledgement/ a response within a week. If customer complaint is relayed over phone at our designated telephone helpdesk or customer service number, we shall provide a complaint reference number and keep customers informed of the progress within a reasonable period of time.
- d) If the complaint is through any other mode like Call Centre, letter, email, tele phone etc. the same should be recorded/ registered in respective grievance Redressal portal/package like CPGRS/CCR/CTS etc., immediately after receipt of customer complaint.
- e) After examining the matter, we will send our final response or explain why we need more time to respond and shall endeavour to do so within 21 days of receipt of complaint and will tell customers to take their complaint further if they are still not satisfied.

**2.1 Complaint Redressal Mechanism in our Bank:**

Bank is having a nodal department/ official for customer service in HO and in each Regional Office, with whom customers with grievances can approach in the first instance and with the HO unit the Banking Ombudsman and RBI can liaise.

All credit related grievances will be routed through the credit department of RO/ HO before disposal.

Any complaint received through legal channel/advocates office will be replied by the recipient branch/RO/HO after obtaining vetting from Legal Section of RO or Legal Section, RL& FP Wing at Head office.

***At Branch:***

**Resolution of Grievances**

Branch Manager will be responsible for the resolution of the complaints/ grievances in respect of customer service by the Branch. He/ she would be responsible for ensuring closure of all complaints received at Branches. It is his/ her 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 shall be provided with alternate avenues to escalate the issue if the same is not resolved within the stipulated period.

If the Branch Manager feels that it is not possible at his/ her level to solve the problem, he/ she may refer the case to Regional Office/ Head Office for guidance. Similarly, if Regional Office find that they are not able to solve the problem; such cases may be referred to the HO customer care cell, SPD Wing.

- Suggestion Box and complaint Book are provided in all the branches. Any written complaint is instantly and promptly acknowledged.
- The Complaint Registers are to be kept at prominent place which would make it possible for the customers to enter their grievances.
- A copy of the complaint is required to be forwarded to the concerned controlling office of the bank along with the remark of the branch manager within a time frame (Within a maximum of 7 days depending upon the nature of Grievances).
- All branches should maintain a separate complaint register for entering all the complaints/ grievances received by them directly or through RO/HO and other sources. These registers should be maintained irrespective of the fact whether a complaint is received or not in the past. Branch to maintain a separate file for customer complaints received through letters and related communications and grievance portal/package generated complaint number / reference to be inscribed on all such complaints which are received outside to grievance portal/ package and entered in the package.
- The complaint registers maintained by branches shall be scrutinized by the concerned Regional Executive during his periodical visit to the branches and his observations/ comments recorded in the relative visit reports.
- Grievances/ complaints relating to congestion in banking premises should be examined by the bank's internal inspectors/ auditors on a continuing basis and action taken for augmentation of space, where ever necessary, keeping in view the availability of larger accommodation in the same locality at a reasonable rent and other commercial considerations.
- Counter staff are provided with training and additional inputs.
- If counter staff/ supervisor is unable to resolve a grievance, the Branch-in-charge shall intervene and try to resolve the issue.
- Customers' Day is observed on 15<sup>th</sup> of every month. On this day, branch in-charge will make himself/ herself available at the branch between 3 P.M. and 5 P.M. to meet customers without any prior appointment.

## **2.2. Branch Level Customer Service Committees**

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 customer care section attached to SPD Wing of ROs thus enabling ROs to examine them and provide relevant feedback to the Customer care cell at HO. Customer care cell at HO will place the matter before the customer care committee of the Board on every quarter. Committee of the Board for necessary policy/ procedural action.

- Customer Service Committee meeting is held every month at all Branches/ Regional Offices/ and HO. The sole task of the Committee is to find out ways and means to



render service to the satisfaction of the Customers. For this purpose, Committee will meet regularly at stipulated intervals to discuss in detail the strengths and deficiencies of the services presently rendered and take steps to improve it.

- Special Customers' Meet is conducted on special occasions.
- Every year, during November Customer Fortnight is observed to create awareness among Public as well as staff for achieving the objective of Complaint free branch network, and to also highlight our products and services.
- Both the Drop box facility and the facility for acknowledgement of the cheques at regular collection counters shall be available to the customers and no branch shall refuse to give an acknowledgement if the customer tenders the cheque at the counters.
- Bank shall ensure that customers are not compelled to drop the cheques in drop box.
- Bank shall invariably display on the cheque drop box itself that 'Customers can also tender the cheques at the counters and obtain acknowledgement on the pay-in- slips.' This message is displayed in English, Hindi and the concerned regional language of the state.
- On 15<sup>th</sup> of every month, Customers' Day is observed between 3 P.M. and 5 P.M. during which Branch manager should be available for meeting the public/ Customers without prior appointment.

### **2.3 At Regional Office:**

- a. Regional Manager, Chief Manager and Senior Manager SPD wing forms the customer service committee at RO..
- b. By and large, complaints are redressed within shortest possible time.
- c. Whenever it is not possible and more cross checking is required, steps are taken to settle the matter within a reasonable time.
- d. Regional manager/ Chief Manager at Regional Office contact the aggrieved customers as and when necessary, meet him personally with the Branch Manager, for ensuring timely redressal of the complaint.
- e. Wherever deficiencies are noticed, accountability is fixed and erring employees punished.

### **2.4. At Head Office:**

- i. A full-fledged Customer Service Section is functioning at Customer Service cell, SPD , Head Office, overseen by Asst.General Manager and General manager.
- ii. An acknowledgement is sent to the customer immediately on receipt of the complaint.
- iii. Thorough analysis of the complaint is done and necessary instructions are given to ROs/Branches for speedy redressal and followed up till final reply is sent to the complainant duly explaining the decision taken on the complaint.
- iv. On 15<sup>th</sup> of every month, Customers' Day is observed between 3 p.m. and 5 p.m. during which overseeing Executives are available for meeting the public/ Customers without prior appointment.
- v. Bank shall place a statement of complaints before the Customer Service Committee of the Board along with an analysis of the complaints received. The complaints shall be analyzed to identify customer service areas in which the complaints are frequently received, to identify frequent sources of complaints, to identify systemic deficiencies and for initiating appropriate action to make the grievance redressal mechanism more effective.
- vi. Root Cause Analysis of the complaints will be conducted by the owner / user Wings

- in co-ordination with Customer Service Vertical.
- vii. The Bank shall disclose following details along with financial results:

**A. Summary information on complaints received by the bank from customers and from the Office of Banking Ombudsman.**

Sl no			Previous year	Current year
		Complaints received by the bank from its customers		
1		Number of complaints pending at beginning of the year		
2		Number of complaints received during the year		
3		Number of complaints disposed during the year		
	3.1	Of which, number of complaints rejected by the bank		
4		Number of complaints pending at the end of the year		
		Maintainable complaints received by the bank from Office of Banking Ombudsman.		
5		Number of maintainable complaints received by the bank from OBOs		
	5.1	Of 5, number of complaints resolved in favour of the bank by Bos		
	5.2	Of 5, number of complaints resolved through conciliation/mediation/advisories issued by Bos		
	5.3	Of 5, number of complaints resolved after passing of Awards by BOs against the bank		
6		Number of Awards unimplemented within the stipulated time (other than those appealed)		

**B. Top five grounds of complaints received by the bank from customers**

Grounds of complaints, (i.e. complaints relating to)	Number of complaints pending at the beginning of the year	Number of complaints received during the year	% increase/decrease in the number of complaints received over the previous year	Number of complaints pending at the end of the year	Of number of complaints pending beyond 30 days
1	2	3	4	5	6
Current Year					
Ground – 1					
Ground – 2					
Ground – 3					
Ground – 4					
Ground – 5					
Others					
Total					
Previous Year					
Ground – 1					
Ground – 2					
Ground – 3					
Ground – 4					
Ground – 5					
Others					
Total					

**Master list of grounds of complaints to be used for disclosure on the top five ground-wise receipt of complaints by banks.**

1. ATM/Debit Cards
2. Credit Cards
3. Internet/Mobile/Electronic Banking
4. Account opening/difficulty in operation of accounts
5. Mis-selling/Para-banking
6. Recovery Agents/Direct Sales Agents
7. Pension and facilities for senior citizens/differently abled
8. Loans and advances
9. Levy of charges without prior notice/excessive charges/foreclosure charges
10. Cheques/drafts/bills
11. Non-observance of Fair Practices Code
12. Exchange of coins, issuance/acceptance of small denomination notes and coins
13. Bank Guarantees/Letter of Credit and documentary credits
14. Staff behaviour
15. Facilities for customers visiting the branch/adherence to prescribed working hours by the branch, etc.
16. Others

Further bank shall place a detailed statement of complaints in the web-site for information of the general public at the end of each financial year.

#### **2.4 Board of Directors**

- ✓ Shall drive the effective management of Grievance Redressal Policy.
- ✓ Provide senior management with clear guidance and direction.
- ✓ Review the Grievance Redressal Policy annually and if necessary, revise them in tune with extant regulatory guidelines.
- ✓ Matters relating to customer service should be deliberated by the Board to ensure that the instructions are implemented meaningfully.

Commitment to hassle-free service to the customer at large and the Common Person in particular under the oversight of the Board should be the major responsibility of the Board.

#### **3. Role of the Customer Service Committee**

Customer Service Committee of the Board, illustratively, could address the following:

- ✓ Monitoring the implementation of awards under the Banking Ombudsman Scheme.
- ✓ The Committee should also play a more pro-active role with regard to complaints/ grievances resolved by Banking Ombudsmen of the various States.
- ✓ The Committee could also examine any other issues having a bearing on the quality of customer service rendered.

Further, with a view to enhance the effectiveness of the Customer Service Committee, banks should also:

- a) Place all the awards given by the Banking Ombudsman before the Customer Service Committee to enable them to address issues of systemic deficiencies existing in banks, if any, brought out by the awards; and
- b) Place all the awards remaining unimplemented for more than three months with the reasons therefore before the Customer Service Committee of the Board to enable the Customer Service Committee to report to the Board such delays in implementation without valid reasons and for initiating necessary remedial action.

#### **C. REPORTING STRUCTURE/ REQUIREMENTS:**

##### **Grievance Escalation System:**

- f. Customers can lodge their complaints directly to Branch-in-charge and it will be the responsibility of the Branch-in-charge to resolve the complaint within 5 days from the date of receipt.
- g. The Branch-in-charge will analyze the complaint and if needed he/ she will contact the complainant personally and resolve the complaint.
- h. A complaint redressal communication will be sent to complainant.
- i. If the Branch-in-charge is not able to resolve the complaint within 5 days, he has to escalate the same the respective RO.
- j. The complaints referred to Regional Office will be analyzed by SPD wing at RO and based on the explanation received from the Branch, RO will send a suitable reply to complainant.
- k. If Regional Office cannot resolve the complaint within 5 days from the date of

escalation of complaints the same will be escalated to Customer care cell at HO attached to SPD Wing.

- l. The complaints referred to HO will be analyzed by Customer care cell and based on the explanation received from the Branch/RO/ respective Wing a suitable reply to complainant will be sent from HO customer care cell, SPD Wing.
- m. Compliant redressal/ closure intimation with complaint status & tracking link will be communicated to the complainant through SMS/email/letter/any other mode of communication approved by the Bank.
- n. Bank shall critically examine on an on-going basis as to how grievances redressal machinery is working and whether the same has been found to be effective in achieving improvement in customer service in different areas.

#### **D. STRATEGIES FOR MEETING OBJECTIVES:**

##### **Standing Committee Meeting on Customer Service**

In order to benchmark the current level of service, review the progress periodically, enhance the timeliness and quality, rationalize the processes taking into account technological developments and suggest appropriate incentives to facilitate change on an ongoing basis the Standing Committee on Customer Service is functioning.

The Standing Committee on Customer Service will be chaired by the General Manager with the following officials as members.

- 1.AGM, SPD wing
- 2.AGM Credit Wing
- 3.AGM RL Wing
- 4.AGM/ CM HR Wing
- 5.AGM IT Wing

##### **The Committee is having the following functions:**

- i) To convene meeting every quarter.
- ii) The committee would submit report on the deliberations of the meeting to the customer service committee of the board at quarterly intervals.
- iii) Evaluate feedback on quality of customer service received from various quarters. The committee would also review comments/ feedback on customer service, implementation of commitments in the Code of Bank's Commitments to customers received from BCSBI.
- iv) 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 feedback from Regional Managers/ Functional heads.
- v) The committee would consider unresolved complaints/ grievances referred to it by functional heads responsible for redressal and offer its advice.

#### **4.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 annual survey of depositor satisfaction. 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 the Standing Committee on Customer Service.

## **5.Nodal Officer and other designated officials to handle complaints and Grievances**

### **5.1.At Head Office:**

#### **Principal Nodal Officer:**

The Bank has nominated General Manager, SPD Wing as PRINCIPAL NODAL OFFICER, who is monitoring the implementation of Customer Service and complaint handling process for the entire Bank.

### **5.2.At Regional Office:**

Regional Manager at RO is handling the complaints received directly from customers of that region. Customer Service Committees are in place in all the Regional Offices to look into implementation of customer service.

### **5.3.Mandatory display requirements**

The Bank has made it mandatory to display the following at Branches and at our corporate website [www.canarabank.com](http://www.canarabank.com) for the benefit of our customers:

1. Details on appropriate arrangements made for receiving complaints and suggestions.
2. The name, address and contact number, email address etc, of Nodal Officer(s) who can redress the complaints.
3. Website details of Ombudsman (<https://cms.rbi.org.in>) where customer can file complaint online.
4. Details of Code of Bank's commitments to customers/ Fair practice code.
5. Prominently display at the branches, the names of the Officials who can be contacted for redressal of complaints, together with their direct Telephone No., complete address (not Post Box No.) and e-mail address, etc., for proper and timely contact by the customers and for enhancing effectiveness of the redressal machinery.
6. The names of the Officials displayed at the branches who can be contacted for redressal of complaints shall also include the name and other details of concerned Nodal Officer appointed under the new Integrated Ombudsman Scheme, 2021, in the Circle.
7. Bank shall display on its website, the names and other details of Officials at their Head Office/ s who can be contacted for redressal of complaints including the names of the Nodal Officers/ Principal Nodal Officer.
8. Banks shall give wide publicity to the grievance redressal machinery through advertisements and also by placing them on its website.
9. The details including name, complete address, telephone number, e-mail address, etc., of the Principal Nodal Officer shall be displayed in the portal of the bank preferably on the website so that the aggrieved customer can approach the Bank with a sense of satisfaction that he/ she has been attended at a senior level.

### **5.4.Resolution of Grievances**

Branch Manager is responsible for the resolution of complaints/ grievances in respect of customer service at 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 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 Regional Office/ for guidance. Similarly, if Regional Office/ finds that they are not able to solve the problem such cases may be referred to the customer care cell of HO SPD Wing..

- **Time Frame**

Complaints received will be seen in right perspective and will be analyzed from all possible angles. Specific time schedule is set up for handling complaints and disposing them at all levels including Branches/ Regional Offices/ s and Head Office. The Branch Manager will try to resolve the complaint within specified time frames decided by the Bank.

**Time Schedule for Redressal of Complaints:**

	Stipulated by Ministry of Finance	Adopted by Bank
General Complaints	30 days	21 days
Complaints forwarded by MOF MPs/VVIPs	21 days	15 days
Complaints forwarded by RBI	15 Days	15 days
Complaints from PMs office	15 days	7 days

All the complaints received will be acknowledged immediately. In cases where complaints received would require some time for examination, the same will be informed to customer through an interim reply.

**E. LIMIT STRUCTURE/ TRIGGER MECHANISM:**

**DISPUTE REDRESSAL MECHANISM: TECHNOLOGICAL PRODUCTS:**  
(Monitored by DBS Wing, HO)

Lodging of ATM related Complaints

The following information should be displayed prominently at the ATM locations: -

- i. ATM ID may be displayed clearly in the premises to make use of it while making a complaint/ suggestion.
- ii. Information that complaints should be lodged at the branches where customers maintain accounts to which ATM card is linked.
- iii. Telephone numbers of help desk/ contact persons of the ATM owning bank to lodge complaint/ seek assistance.

iv. Uniform Template for lodging of complaints relating to ATM transactions given in Annexure I.

To improve the customer service through enhancement of efficiency in ATM operations, banks are advised to initiate following action:

(i) Message regarding non-availability of cash in ATMs should be displayed before the transaction is initiated by customer

(ii) Make available forms for lodging the complaints with name and phone number of the officials with whom they have to be lodged

(iii) Toll-free numbers for lodging complaints / reporting and blocking lost cards etc., to be displayed and attend the requests on priority

(iv) Mobile numbers/ e-mail IDs of the customers may be registered to send alerts

In case of complaints pertaining to failed ATM transaction at other bank ATMs, the customer should lodge a complaint with the card issuing bank even if the transaction was carried out at another bank's ATM.

Transactions at ATM-Procedural Amendment - Pin Validation for Every Successive Transaction.

The process flow followed for ATM transactions varies from bank to bank. The type of card readers installed by each ATM vendor also contributes to the variation in the process flow. Security concerns arise in the case of certain type of card readers which facilitate multiple transactions without the need for pin validation for every successive transaction. The possibility of frauds/ misuse of cards are very high in a scenario where the card is inserted in such reader slots, the card holder fails to collect the card after the transaction is completed and the card is misused. This risk can be eliminated to a great extent if, for every transaction, the process flow demands pin validation. Hence each bank may ensure that the process flow is modified to provide the pin validation for every transaction, including balance enquiry facilitated through ATM. Further, as an additional safety measure, banks are advised that the time-out of sessions should be enabled for all screens/ stages of ATM transaction keeping in view the time required for such functions in normal course.

Non-adherence to the above provisions shall attract penalty as prescribed under the Payment and Settlement Systems Act 2007 (Act 51 of 2007).

Security Issues and Risk mitigation measures - Online alerts to the cardholder for usage of credit/ debit cards.

Banks were mandated to send online alerts to the cardholders for all Card Not Present (CNP) transactions for the value of ₹5000/- and above. In view of the incidents of unauthorized / fraudulent withdrawals at ATMs that came to the notice of RBI, Banks were advised to put in place, a system of online alerts for all types of transactions irrespective of the amount, involving usage of cards at various channels and hence the same was implemented by the Bank. This measure encourages further usage of



cards at various delivery channels. Banks provides easier methods (like SMS) for the customer to block his card and get a confirmation to that effect after blocking the card.

#### Security Issues and Risk mitigation measures related to Card Not Present (CNP) transactions

Banks have been mandated to necessarily put in place additional factor of authentication/ validation based on information not visible on the cards for all on- line Card not Present (CNP) transactions in a phased manner, starting with online transactions followed by Interactive Voice Response (IVR), Mail Order Telephone Order (MOTO) and Standing Instructions (SI). In the case of MOTO and SI transactions, it has been stated that in case of customer complaint regarding issues, if any, arising out of transactions effected without the additional factor of authentication after the stipulated date, the issuer bank has to reimburse the loss to the customer further without demur.

#### **FAILED TRANSACTIONS:**

Harmonization of Turn Around Time (TAT) and customer compensation for failed transactions using authorized Payment Systems

Sl. no.	Description of the incident	Framework for auto-reversal and compensation	
		Timeline for auto-reversal	Compensation payable
I	II	III	IV
1	Automated Teller Machines (ATMs) including Micro-ATMs		
A	Customer's account debited but cash not dispensed.	Pro-active reversal (R) of failed transaction within a maximum of T + 5 days.	₹ 100/- per day of delay beyond T + 5 days, to the credit of the account holder.
2	Card Transaction		
A	<u>Card to card transfer</u> Card account debited but the beneficiary card account not credited.	Transaction to be reversed (R) latest within T + 1 day, if credit is not effected to the beneficiary account.	₹ 100/- per day of delay beyond T + 1 day.

B	<u>Point of Sale (PoS) (Card Present) including Cash at PoS</u>  Account debited but confirmation not received at merchant location i.e., charge-slip not generated.	Auto-reversal within T + 5 days.	₹ 100/- per day of delay beyond T + 5 days.
C	<u>Card Not Present (CNP) (e-commerce)</u>  Account debited but confirmation not received at merchant's system.		
3	Immediate Payment System (IMPS)		
A	Account debited but the beneficiary account is not credited.	If unable to credit to beneficiary account, auto reversal (R) by the Beneficiary bank latest on T + 1 day.	₹100/- per day if delay is beyond T + 1 day.
4	Unified Payments Interface (UPI)		
A	Account debited but the beneficiary account is not credited (transfer of funds).	If unable to credit the beneficiary account, auto reversal (R) by the Beneficiary bank latest on T + 1 day.	₹100/- per day if delay is beyond T + 1 day.
B	Account debited but transaction confirmation not received at merchant location (payment to merchant).	Auto-reversal within T + 5 days.	₹100/- per day if delay is beyond T + 5 days.
5	Aadhar Enabled Payment System		
A	Account debited but transaction confirmation not received at merchant location.	Acquirer to initiate "Credit Adjustment" within T + 5 days.	₹100/- per day if delay is beyond T + 5 days(where "T" is the date of transaction).
B	Account debited but beneficiary account not credited.		

All disputes regarding ATM failed transactions to be settled within 120 days from the date of transaction shall be settled by the issuing bank and the acquiring bank through National Payment Corporation of India only. No bilateral settlement arrangement outside the dispute resolution mechanism available with the system provider is permissible.

However, ATM failed transactions beyond 120 days from the date of transaction be settled by issuing bank and acquiring bank through bilateral arrangement on good faith claim basis.

The number of free transactions permitted per month at other bank ATMs to Saving Bank account holders shall be inclusive of all types of transactions, financial or non- financial.

All disputes regarding ATM failed transactions shall be settled by the issuing bank and the acquiring bank through the ATM System Provider only. No bilateral settlement arrangement outside the dispute resolution mechanism available with the system provider is permissible. This measure is intended to bring down the instances of disputes in payment of compensation between the issuing and acquiring banks.

## **6.Exception Handling:**

Exception transactions are those that cannot be reconciled or reported as erroneous by a card holder. Members should collaboratively endeavour to settle discrepancies in settlement, if raised by other member banks, and all such discrepancies should be resolved amicably as per settlement procedure document, by Reconciliation Vertical, Operations Wing, HO.

### **6.1.Charge Backs:**

Chargeback can be raised within 60 days from the next day of the transaction. Charge back should be accepted or represented by acquirer bank within 5 days of raising the chargeback. Good faith chargeback can be raised within 61 to 120 days from the date of transaction. Good faith charge back should be accepted or represented by acquirer Bank within 15 days of raising the good faith chargeback.

### **6.2.Credit/ Debit Adjustments:**

All credit adjustments are to be raised within T+5 days. All Debit adjustments are to be raised within T+10 days.

### **6.3.Net Banking:**

(Monitored by DBS WING, HO IT Wing)

Grievances related to the following shall be redressed by the concerned branch:

1. For availing Net Banking facility (User creation)
2. Reset of Login password (In case the customer is not able to reset the login password online using the option available in Net Banking home page) - Now customers can unlock login password.
3. Unlock (In case the customer is not able to reset the login password online using the option available in Net Banking home page)
4. Reset of Login (other than online) and Transaction password
5. Modification of details like address, Mobile number and e-mail Id
6. Activation of Net Banking facility

Now, the Bank has enabled user creation, creation of login password, Transaction Password, Unlock/ resetting of password and regenerate OTP by the customers themselves by using internet facility.

Other grievances such as non-receipt of password PIN mailer and any Net Banking issues which could not be resolved at the Branch level shall be handled by Internet and Mobile Banking Section of Digital Banking Service Vertical, HO.

If grievances are technology related, customer care cell has to take up the matter with IT Wing/DBS Wing for resolving the same.

## **7.Mobile Banking:**

(Monitored by DBS Wing, IT Wing)

Grievances related to the following shall be redressed by the concerned branch:

- A. Registration for Mobile Banking facility
- B. Activation of Mobile Banking facility after MPIN change by the customer

Grievances which could not be resolved at the Branch level shall be handled by Internet and Mobile Banking Section of Digital Banking Service Vertical, Information Technology Wing, HO.

If grievances are technology related, Internet and Mobile Banking Section has to take up the matter with the Mobile Banking group of TO Vertical for resolving the issues and communicating the same to the customer.

## **8.Interaction with Customers**

(Monitored by Customer care cell, HO)

Customer's expectation/ requirement/ grievances can be better understood through personal interaction with customers by Bank's staff. Structured customer meets 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 to appreciate the banking services better. The feedback from customers would be a valuable input for revising our product and services to meet customer requirements.

## **9.Sensitizing the operating staff on handling complaints**

Our staff will be properly trained for handling complaints. During all the Training Sessions the importance of handling complaints is explained to all the participants and they are trained to deal with customer complaints. Nodal Officer of the Bank will ensure that internal machinery for handling complaints/ grievances operates smoothly and efficiently at all levels and he will be giving feedback on training needs of staff at various levels to the Human Resources Wing.

Redressal of complaints emanating from rural areas and those relating to financial assistance to Priority Sector and Governments Poverty Alleviation Programme also form part of the above process.

The existing grievance policy adopted, approved by the Board and published in our website is applicable to the complaints emanating from rural areas also.

Toll Free Number (Call ) 1800 -425-4000 has been introduced as a part of One bank, One number concept. This satisfies the requirements of Rural Customers also

## **10. Uniformity in Intersol Charges:**

With the introduction of Core Banking Solution (CBS), it is expected that customers of the bank would be treated uniformly at any sales or service delivery point. It is, therefore, bank is not discriminating against the customers on the basis of one branch

being designated as 'home' or 'base' branch where charges are not levied for products/ services and other branches of the same bank being referred to as 'non- home' branch. As such, if a particular service is provided free at 'home' branch, the same shall be available free at 'non

home' branches also. There shall not be any discrimination as regards intersol charges between similar transactions done by customers at 'home branch' and 'non home' branches. (Page 33-point no. 6.6 of RBI Master Circular on Customer Service 2015 dated 01.07.2015.)

## **11. Charges for sending SMS alerts:**

With a view to ensuring reasonableness and equity in the charges levied by the bank for sending SMS alerts to customers, bank is leveraging the technology available and the telecom service providers to ensure that such charges can be levied on all customers on actual usage basis.

These charges shall not be applicable to PMJDY accounts, BSBD accounts and staff accounts. Grievance Redressal on complaints against outsourced agencies/employees:

Bank outsources few activities which are customer facing like Recovery Agent, Business Correspondent, Call Centre employees, Operators at Aadhar Seva Kendra, Direct Selling Agents etc., who are monitored by respective wings. The Bank shall take adequate steps for redressal of grievances against its outsourced Vendor/ Employees within TAT and keep the Authority informed about the number, nature and other particulars of the complaints received.

### **11.1.Recovery Agents (Monitored by RL&FP Wing)**

The Borrower having any grievance/complaint against any Recovery Agent / Agency may bring the same to the notice of the in-charge of the Branch at the first instance. If the grievance/ complaint is not redressed to the satisfaction of the Borrower, he can file a written complaint to the Grievance Redressal Cells at within whose jurisdiction the Branch or the Office of the Bank is located not later than 21 days from the date of cause of action.

On receipt of the written complaint, the in-charge of the Grievance Redressal Cell at shall as expeditiously as possible, and in any case not later than 21 days from the date of receipt of the complaint, initiate appropriate steps for redressal of the complaint unless the nature of complaint is such that it requires verification of voluminous facts and figures. If complaint is not resolved within the TAT, interim reply shall be given to the customer.

### **11.2 .Call Center Service (Monitored by Customer care cell, SPD Wing, HO)**

Concerned Branch/Section/official from Bank has to ensure that any complaint pertaining to call centre vendor/outsourced agency, received directly from customer through any mode, is to be sent to Customer Care Cell, SPD Wing, Head Office for follow up and redressal.

The complaints pertaining to Call Centre will be analyzed and resolved by Marketing Operations Section by carrying out the Root Cause Analysis and obtaining observations/inputs from the concerned Stakeholders.

A suitable reply regarding resolution/action taken will be sent by Customer Service Vertical, Operations Wing, HO to the complainant directly or through proper channel within 21 working days of receipt of complaint.

### **11.3.Business Correspondents (Monitored by Financial Inclusion Wing)**

Whenever complaints are received on conduct/activities of Business Correspondents, the Terminal ID will be blocked immediately and Business Correspondent Section, Financial Inclusion Wing, HO will advise Regional Office to investigate and submit the report along with recommendation. Based on the facts and recommendation received from Regional Office, BC Section will instruct Corporate BC to replace the BC Agent or release the blocked Terminal IDs as the case may be.

The complaint has to be looked into from fraudulent angle also by Regional Office. It has to arrive at a logical conclusion on whether to lodge a complaint against Business Correspondent Agent with police authority or otherwise based on the nature of the complaint. Before lodging

such police complaint, Regional Office shall take up the matter with – Legal Section for proper guidance.

While submitting Investigation Report along with RO Recommendation, Regional Office shall confirm that complaint has been analyzed from under fraudulent angle also.

#### **12.1 Formation of Women SHG & Facilitation in crediting of SHG/JLG.**

(Monitored by Credit Wing)

Borrower having any grievance/complaint against any Agency under Tie Up arrangement for formation of Women SHG & facilitation in credit to SHGs under Core Agriculture:

1. May bring the same to the notice of the in-charge of the Branch at the first instance.
2. If the grievance/ complaint are not redressed to the satisfaction of the Borrower, he can file a written complaint to the respective RO.
3. On receipt of the written complaint, the Regional manager as expeditiously as possible, and in any case not later than 14 days from the date of receipt of the complaint, initiate appropriate steps for redressal of the complaint unless the nature of complaint is such that it requires verification of voluminous facts and figures.
4. If RO is unable to resolve the complaint the same should be referred to customer care cell, HO SPD wing and SPD Wing to resolve the same with in the next 10 days in consultation with HO Credit wing and intimate the matter to the customer.

### **13. Strengthening of Grievance Redress Mechanism in Banks:**

In the Statement on Developmental and Regulatory Policies dated January 27, 2021 Reserve bank of India (RBI) putting in place a comprehensive framework comprising of enhanced disclosures by banks on customer complaints, recovery of cost of redress from banks for the maintainable complaints received against them in OBOs (Office of the banking Ombudsman) in excess of the peer group average, and undertaking intensive review of the grievance redress mechanism and supervisory action against banks that fail to improve their redress mechanism in a time bound manner.

### **14. Handling of Complaints related to vigilance, bribery & corruption: (Vigilance Wing)**

All Complaints which involve vigilance angle to be referred to Vigilance Wing like bribery, corruption, fraud by employee etc., and received through any mode like CPGRS /email/letter (hard copy) will be handled by Vigilance Wing. Such Complaints received in CPGRS package will flow automatically to Vigilance Wing. As per CVC guidelines, anonymous complaints will be lodged with no action.

If complainant basis details and contact number is available, the Wing will analyse and refer the case to Circle Vigilance Officer for preliminary investigation. Upon receipt of the same, Chief Vigilance Officer can decide on further detailed investigation or to advise Circle for placing it to SASC (Staff Accountability Screening Committee) for analysis and provide a feasible reply to the complainant and initiate any corrective Action. An interim reply will be sent to customer in case of delay in concluding the complaint.

In case of further detailed investigation is ordered by CVO, a detailed investigation will be conducted through HO inspection Wing and the above referred procedure will follow. If lapses are crystalized against the staff, IAC will be placed before CVO for determination of Vigilance Angle.

If there is no staff lapse identified, the matter will be closed with the approval of CVO.

**F. COMPLIANCE/ MONITORING OF IMPLEMENTATION OF THE POLICIES**

Implementation of policy at Branches will be checked by Inspection Wing during RBIA & Concurrent inspection and deviations will be reported to Circles/ Customer Service Vertical, Operations Wing, HO & to Audit committee of the Board.

Overseeing Executive of Operations/ Customer Service Section in Circle to ensure that all Regional offices are adhering to the Policy guidelines.

Overseeing Executive of Operations/ Customer Service Section in Regional Office to ensure that all Branches are adhering to the policy guidelines.

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**Annexure-I**

**ENCLOSURE TO 11.1.iv Uniform**

Template To: The Branch Manager

\_\_\_\_\_ (Name of the Bank)

\_\_\_\_\_ (Name of the Branch) \*

\_\_\_\_\_ (Name of the City)

1	<u>Customer Information:</u>  Name of the Customer : Account No. : Debit Card/ ATM Card No :
2	<u>ATM Information:</u>  ATM ID/ Location, if ID is not available: Name of the ATM Bank
3	<u>Nature of the Complaints</u>  a) Complaint relating to Cash Withdrawal:  Amount requested for withdrawal : (Rs. ) Amount actually disbursed at ATM : (Rs. ) Amount to the account debited : (Rs. ) Date of transaction : (Rs. ) Time of transaction : (Rs. )  c) Other complaint :
4	<div style="display: flex; justify-content: space-between;"><div>Date: <u>Holder</u></div><div><u>Signature of the Card</u></div></div> <div style="text-align: center; margin-top: 10px;">Contact Tel/ Mobile No.</div>

*\*(Name of the Bank Branch where cardholder account is maintained which is linked to ATM card*