

Customer Rights & Grievance Redressal Policy

Introduction:

In the present scenario of competitive banking, excellence in customer service is the most important tool for sustained business growth. Since inception, our Bank has attached high priority to customer satisfaction. Over the years, steps have been taken to come out with a number of initiatives aimed at achieving high standards of customer satisfaction and complaint free branch network.

In today's competitive environment, excellence in customer service is of paramount importance. Induction of new customers and retention of existing customers can only happen if prompt customer service is provided. Apart from qualitative customer service, the Bank should adopt a policy of customer protection, which is an integral aspect of customer confidence and reliability.

In the light of the above, the interest and rights of the customers assume great importance and relationship between both the parties should be cordial, based on mutual trust and transparency. With a view to exhibiting transparency the Bank has implemented '**Customer Rights Policy**'.

The objective of the Policy is to enumerate 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.

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

- improved customer protection by assuming great importance and relationship between both the parties, which is an integral aspect of customer confidence and reliability
- minimizing instances of customer complaints & grievances through proper service delivery and review mechanism
- to ensure prompt redressal of customer complaints and grievances.

With a view to exhibiting transparency, the Bank has adopted '**Customer Rights & Grievance Redressal Policy**', fully described in the following policy statements.

Objectives:

The objective of the Policy is to enshrine 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.

Scope:

The policy is based on domestic experience and global best practices brought out to enhance customers' protection. 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. It covers five basic rights of customer such as Right to Fair Treatment, Right to Transparency, Fair and Honest Dealing, Right to Suitability, Right to Privacy and Right to Grievance Redress and Compensation.

Roles & Responsibilities:

A. Customer Rights:

1. Right to Fair Treatment

Both the customer and the Bank have a right to be treated with courtesy. The customer should 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 has to -

- i) Promote good and fair banking practices by setting minimum standards in all dealings with the customers;

- ii) Promote fair and equitable relationship between the bank and the customer;
- iii) Train the staff to improve the skills for attending 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;

While it shall be the endeavor 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 shall also be the bank's endeavor to encourage their customers to approach the bank's internal grievance redressal machinery and approach alternate fora after exhausting all their remedies under bank's internal grievance mechanism.

2. Right to Transparency, Fair and Honest Dealing

The Bank should make every effort to ensure that the contracts or agreements it frames 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 Banker, 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 Bank cannot threaten the customer with physical harm, exert undue influence, or engage in blatant harassment.

In pursuance of the above Right, the bank has to -

- 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;
- 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 where 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 their 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 a letter or Statement of Account, SMS or email as agreed by the customer at least one month prior to the revised terms and conditions becoming effective;

x) Ensure that such changes are made only with prospective effect after giving notice of one month. If the bank has made any change without giving such notice which is favorable to the customer, it will notify the change within 30 days of such change. If the change is adverse to the customer, prior notice of minimum 30 days will be provided and the customer may be provided options, to close the account or switch to any other eligible account without having to pay the revised charge or interest within 60 days of such notice;

xi) Provide information about the penalties leviable 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

- 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 are 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 the product / service and also provide direction to informational resources on similar products available in the market with a view 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 behavior 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 not unreasonable to the customer

3. 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. Such assessment will be appropriately documented in the it's records;

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.

4. Right to Privacy

Customers' personal information should be kept confidential unless they have offered specific consent to the Bank 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 writing
- b. 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.

5. Right to Grievance Redress and Compensation

The customer has a right to hold the Bank accountable for the products offered and to have a clear and easy way to have any valid grievances redressed. The Bank should also facilitate redress of grievances stemming from its sale of third party products. The Bank must communicate its policy for compensating mistakes, lapses in conduct, as well as non-performance or delays in performance, whether caused by the Bank 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 -

i) 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-day period will be reckoned after all the necessary information sought from the customer is received;

ii) 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).

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 Grievance 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. For this, the Bank has introduced "**Grievance Redressal Policy**" in detailed, as follows:

A. Reasons for Grievance:

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) The customer is having full right to register his complaint if he/she is not satisfied with the services provided by the Bank. He/she can give his/her complaint in writing, orally or over telephone. If customer complaint is not resolved within given time or if he/she is not satisfied with the solution provided by the bank, he/she can approach Banking Ombudsman with his/her complaint or other legal avenues available for grievance redressal.

B. Grievance Redressal Mechanism:

1. 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 endeavor 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. After examining the matter, we will send our final response or explain why we need more time to respond and shall endeavor to do so within 30 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 (Internal Machinery):

Bank is having a Nodal Department/Official for customer service at Head Office and each Regional Office, with whom customers with grievances can approach in the first instance and with whom the Banking Ombudsman and RBI can liaise.

The General Manager, PDMCR Dept. at Head Office shall act as the Principle Nodal Officer to ensure monitoring of Credit related grievances forwarded by the Ministry for taking appropriate action on merits.

2.1.1 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 is not possible at his/her level to solve the problem, he/she may refer the case to Regional Office or Head Office for guidance. Similarly, if Regional Office finds that they are not able to solve the problem, such cases may be referred to the Principal Nodal Officer (GM-PDMCR Dept.) of the Bank.

1. Suggestion Box and complaint Book are provided in all the branches. Any written complaint is instantly and promptly acknowledged.
2. The Complaint Registers are to be kept at prominent place which would make it possible for the customers to enter their grievances. The register shall be in perforated copies in each set so that the acknowledgement to the customers would be provided instantly and an intimation to the controlling office.
3. At every office of the Bank, a notice requesting the customer "to meet the Branch Manager" shall be displayed with regard to Grievances, if it remains un-redressed.
4. 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 10 days depending upon the nature of Grievances)
5. All branches should maintain a separate complaints 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.

6. The complaint registers maintained by branches shall be scrutinized by the concerned Regional Manager during his periodical visit to the branches and his observations/ comments recorded in the relative visit reports.

7. 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.

8. Counter staff are provided with training and additional inputs.

9. If counter staff/Supervisor is unable to resolve a grievance, the branch in- charge shall intervene and try to resolve the issue.

10. Customers" Day is observed on 15th 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.

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 Regional Office on Customer Service thus enabling the Regional Office to examine them and provide relevant feedback to the Customer Service Committee of the B for necessary policy/procedural action.

11. Customer Service Committee meeting is held every month at all Branches and Regional Offices. 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.

12. 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.

2.1.2 At Regional Office:

- a. Regional Manager holds responsible for resolution of complaints at Regional Office.
- 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. The Officers of Regional Office visit branches periodically and submit a report on Customer Service, as per the detailed checklist
- e. Officer in Charge of Customer Relationship Management Cell 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.
- f. Wherever deficiencies are noticed, disciplinary action shall be recommended against erring employees to HO.

Still there may be some aggrieved customers, who write to Head office.

2.1.3 At Head Office:

- i. A full-fledged Customer Relationship Management Cell is functioning at PDMCR Department, Head Office, overseen by 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 RO/Branches for speedy redressal and followed up till final redressal letter is sent to the complainant duly explaining the decision taken on the complaint.
- iv. On 15th of every month, Customers' Day is observed between 3 p.m. and 5 p.m. during which our overseeing Executives are available for meeting the public / Customers without prior appointment.
- v. Bank shall place a statement of complaints before 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. The Bank shall disclose following details along with financial results:
 - A. Customer Complaints
 - a) No. of complaints pending at the beginning of the year
 - b) No. of complaints received during the year
 - c) No. of complaints redressed during the year
 - d) No. of complaints pending at the end of the year
 - B. Awards passed by the Banking Ombudsman
 - a) No of un-implemented awards at the beginning of the year.
 - b) No. of awards passed by the banking Ombudsman during the year
 - c) No. of Awards implemented during the year
 - d) No. of un-implemented awards at the end of the year

Further, bank shall place a detailed statement of complaints and its analysis in the web-site for information of the general public at the end of each financial year by including all complaints pertaining to ATM card issues.

C REPORTING STRUCTURE/REQUIREMENTS

2.1.4 Grievance Escalation System:

- a. 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 7 days from the date of receipt.
- b. The Branch-in-charge will analyze the complaint and if need be he/she will contact the complainant personally and resolve the complaint.
- c. A complaint redressal letter will be sent to complainant, if the complaint is resolved at Branch level. The Branch will also send the details of the grievance received at periodical intervals to Regional Office.
- d. If the Branch-in-charge is not able to resolve the complaint within 7 days, the complaint will be referred by the Branches to the concerned Regional Office along with their comments/replies for further action.
- e. The complaints referred to Regional Office will be analyzed by Customer Relationship Management Cell and based on the explanation received from the Branch, RO will send a suitable reply to complainant.
- f. If the reply received from the Branch is not satisfactory and if Regional Office cannot resolve the complaint within 7 days from the date of receipt of complaints, the same will be referred to Customer Relationship Management Cell at Head Office along with their comments/explanations. The Regional Office will also send the details of the

complaints received directly by them and not settled within seven days to Customer Relationship Management Cell, Head Office along with their comments/replies.

- g. Customer Relationship Management Cell, Head Office will analyze the complaint and the replies received from Branch and Regional Office. On placing the matter before appropriate authorities a decision is taken on the complaint. A complaint redressal letter is sent to the complainant from Head Office and suitable instructions are passed on to Branch, Regional Office for taking action in the deficient areas.
- h. 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.
- i. Bank shall constitute special squads to look into the areas in which the number of complaints is large or on the increase. Bank shall arrange to include one or two sessions on customer service, public relations etc., in training programmes conducted.

2. Online Grievance Redressal System

The Online Grievance Redressal Mechanism is made available in the Banks Website. This package enables the customers to register their complaints online through our website. This package records a complaint and provides mail to the concerned department through a separate mail id provided i.e. **apgbcomplaints@apgb.in**.

HO follows up on each case and redresses the issue to the satisfaction of the customer. The information about redressing the issue is given to the customer by mail.

4. Banking Ombudsmen:

Bank is displaying the Integrated Ombudsman Scheme, 2021 of the Reserve Bank of India to public in Bank's website. It is convening existing 1. The Banking Ombudsmen Scheme – 2006, 2) The Ombudsman Scheme for Non-Banking Financial Companies – 2018 and 3). The Ombudsman Scheme for Digital Transaction-2019. The copy of the scheme is also made available at all the Branches through Cir. No.309-2021-BC-PDFID dated 20.12.2021. If the customer is not satisfied with Bank's response at any of the escalating matrix or he/she wishes to pursue other avenues for redressal of grievance, he/she may approach Banking Ombudsman appointed by Reserve Bank of India under the Integrated Ombudsman Scheme, 2021.

Details:

1. Where the complaints are not redressed within one month, the concerned Branch / Controlling Office shall forward a copy of the same to the concerned Nodal Officer under the Integrated Ombudsman Scheme, 2021 and keep him updated regarding status of the complaint. This would enable the Nodal Officer to deal with any reference received from the Banking Ombudsman regarding the complaint more effectively. Further, it is also necessary the customer is made aware of his rights to approach the concerned Banking Ombudsman in case he is not satisfied with the bank's response.
2. Bank shall appoint Principal Nodal Officer of sufficiently senior level, not below the rank of a General Manager under Banking Ombudsman Scheme.
3. In the final letter sent to the customer regarding redressal of the complaint, bank shall indicate that complainant can also approach the concerned Banking Ombudsman. The details of the concerned Banking Ombudsman shall also be included in the letter.

The complaints received from Banking Ombudsman will be acknowledged by Nodal Officer and should be redressed with in stipulated timelines.

The complaints received including awards from the Ombudsman to the Bank has to be placed before the Board of the Bank along with the following, periodically with a Board Note for perusal in every Board Meeting.

- a) No of un-implemented awards at the beginning of the Quarter.

- b) No. of awards passed by the banking Ombudsman during the Quarter
- c) No. of Awards implemented during the Quarter
- d) No. of un-implemented awards at the end of the Quarter

The complaints received at branch level should be redressed without giving much scope for reference of the Banking Ombudsman.

D. STRATEGIES FOR MEETING OBJECTIVES

5. Nodal Officer and other designated officials to handle complaints and grievances.

5.1 At Head Office:

Nodal Officer:

The Bank has nominated General Manager, PDMCR Dept., Head Office, Kadapa as **PRINCIPAL NODAL OFFICER**, who is monitoring the implementation of Customer Service and complaint handling for the entire Bank.

5.2 At Regional Office:

Regional Manager 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.

6. Mandatory display requirements

The Bank has made it mandatory to display the following at Branches and at our website www.apgb.in for the benefit of our customers:

1. Details on appropriate arrangements made for receiving complaints and suggestions.
2. The name, address and contact number, fax number and email address etc, of Nodal Officer(s) who can redress the complaints.
3. Contact details of Banking Ombudsman of the area.
4. Details of Code of Bank's commitments to customers/Fair practice code (BCSBI).
5. Prominently display at the branches, the names of the Officials who can be contacted for redressal of complaints, together with their direct contact No., 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 Integrated Banking Ombudsman Scheme-2021.
7. Bank shall display on its website, the names and other details of Officials at their Head Office/ Regional Offices who can be contacted for redressal of complaints including the names of the Nodal Officers / Principal Nodal Officer.
8. Further, Bank shall also display in its website, the names and other details of its Chairman and also Line Functioning Heads for various operations to enable their customers to approach them in case of need, if necessary.
9. Banks shall give wide publicity to the grievance redressal machinery through advertisements and also by placing them on its website.
10. The details including name, complete address, telephone / fax number, e-mail address, etc., of the Principal Nodal Officer shall be displayed in the Website of the bank preferably on the first page of 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.

7. 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 Principal Nodal Officer of the Bank.

8. 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 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 RBI/MOF MPs/VVIPs	21 days	15 days
Complaints from PM's 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.

Branches/Regional Offices will send action taken report on complaints received at their end to Head Office at the end of every month.

E. LIMIT STRUCTURE/TRIGGER MECHANISM

9.1 DISPUTE REDRESSAL MECHANISM: TECHNOLOGICAL PRODUCTS:

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.

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) Make available sufficient toll-free phone numbers for lodging complaints / reporting and blocking lost cards and also 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 a 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 for 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. 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, latest by June 30, 2011, a system of online alerts for all types of transactions irrespective of the amount, involving usage of cards at various channels. This measure is expected to encourage further usage of cards at various delivery channels. Banks should provide 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.

9.2 ATM FAILED TRANSACTIONS:

The complaints regarding non-materialized ATM transactions can be grouped as under:

- a. Our Debit Cards used at our ATMs attached to the branch of issue.
- b. Our Debit Cards used at our ATMs not attached to the branch of issue.
- c. Other Bank cardholder using his card at our ATM
- d. Our Debit Cards used at other Bank ATMs.

In terms of Reserve Bank of India guidelines, the wrongful debit in the customer's account on account of ATM failed transactions shall be reversed within T+5 Calendar days (T is the ATM transaction date). If the customer's account is not credited on T+5 days, then a penalty of Rs.100/- per day to be paid *Suo Moto* (Penalty to be paid without customers asking).

Any customer is entitled to receive such compensation for delay, if a claim is lodged with the issuing bank within 60 days of the date of the transaction. The claim preferred after 60 days but within 120 days, known as good faith claim, is settled through NPCI- DMS without penalty.

All disputes regarding ATM failed transactions 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.

9.3 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 Card Centre, DIT at Head Office, Kadapa.

9.4 Charge Backs:

It is obligatory on the part of the card issuer member to resolve and settle all adjustments pertaining to the cardholder transaction arising out of error, within 120 days after date of original transaction provided a claim is lodged with the issuing bank within 60 days of the date of the transaction. The card issuer member shall furnish all documents in support of cardholder's transaction dispute. If the acquirer member bank does not honor the cardholder dispute, the acquirer member bank shall submit a representation within 5 working days after the charge back initiated date.

A charge back form may be submitted by an issuer to NFS (National Financial Switch) in response to a cardholder dispute using the appropriate form. NFS will in turn forward the charge back form to the concerned member bank after making necessary adjustments in the daily settlement report.

9.5 Credit/Debit Adjustments

Acquirer Member Bank should take appropriate measures to adjust cardholder's balance arising out of error, identified during EOD balancing. However, it is obligatory on the part of all acquirer Member Banks to submit adjustment details along with appropriate documents to NPCI, within 17 working days after the settlement date of the original transaction. An issuer bank may at its discretion accept an adjustment beyond the specified period.

NFS will in turn forward the adjustment form to the concerned member bank after making necessary adjustments in the daily settlement report.

9.6 Representation

An acquirer member bank shall submit a representation in order to reverse a cardholder's dispute. The representment shall be submitted within 5 working days after the settlement dates of cardholder's dispute along with all relevant documents.

10. Net Banking:

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

1. For availing Net Banking facility (User creation)

2. Reset of Login/Profile password (In case the customer is not able to reset the login password online using the option available in Net Banking home page)
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. Modification of details like address, Mobile number and e-mail Id
5. Activation of Net Banking facility

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

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

Grievances related to Net Banking facility and non-receipt/delayed receipt of OTP shall be handled by Payment Systems and Alternate Delivery Channels Group of DIT.

11. Mobile Banking:

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
- C. Unlocking Mobile Banking

Grievances which could not be resolved at the Branch level shall be handled by DIT.

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

12. Interaction with Customers

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 appreciate the banking services better. The feedback from customers would be a valuable input for revising our product and services to meet customer requirements.

13. Sensitizing the operating staff on handling complaints

Our staff will be properly trained for handling complaints. During all the Training Sessions at our Training Centres i.e., APIBM - Anantapur & Kadapa, the importance of handling complaints is explained to all the participants and they are trained to deal with customer complaints.

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.

14. 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.

Service charges of Rs.15/- per quarter per customer and applicable GST and Cess thereon are being collected for sending SMS alerts to customers. The same may be reviewed periodically.

Monitoring and Oversight Mechanism:

Effective implementation and monitoring of the **Customer Rights & Grievance Redressal Policy** is the responsibility of the branches and controlling authorities i.e. Regional Offices/Head Office.

Periodicity of Review: Frequency of the review of the policy will be one year. However, the policy will be reviewed before the expiry date if there is any change in the guidelines issued by RBI or the Bank during the operative period.

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