

# **Customer Rights Policy**

**(For the Period 2022-25)**

## **I. INTRODUCTION:**

A comprehensive Policy to protect Customer Rights has been approved by the Bank's Board. The policy which is as under should be followed by all the branches, offices, departments and the staff in all the units and establishments in letter & spirit so that Bank's customers experience Customer Delight.

## **II. OBJECTIVES:**

The objective of the policy is to document the basic rights of customers of the Bank within the regulatory framework. The policy envisages that a customer should be treated with fairness and dignity, and all dealings of Bank with customers must take place in an honest and transparent manner. With this end in view, the rights of customers and the Bank's responsibility towards them are being clearly laid down herein.

## **III. SCOPE:**

The Policy brings within its fold all the products and services which are on offer at Bank or through its agents. The mode of extending service is immaterial. Thus, regardless of a service being extended across Bank's counter or through phone, by post, through interactive electronic devices or internet, or by any other method, the instant policy will cover the same with equal gravitas.

## **IV. VALIDITY:**

The Policy will be valid for three financial years i.e. over the period covering FY 2022-23, FY 2023-24 and FY 2024-25. The Policy will be reviewed from time to time, and modifications if any will be incorporated therein based on (1) the directives and other guidelines issued by RBI or any other regulatory authority or self-regulatory body, or, (2) evolving and developing industry standards and best practices. Incorporation of modifications in the policy will be done with due approval from the Board.

## **V. COVERAGE OF THE POLICY:**

Instant Customer Rights Policy covers all the customers of Bank including, apart from those who seek to establish a regular banking relationship, also those who approach Bank for a singular or a limited set of transactions. It casts compliance responsibility on staff at all the branches, offices, and departments handling banking transactions and related activities.

## **VI. CONTOURS OF THE POLICY**

The policy has been formulated basically after the Model given by the IBA, which in turn had taken into consideration comments and feedback on the draft of the Charter of Customer Rights published by RBI, the latter having covered the five basic customer rights. The five basic customer rights which were posted by RBI on its website and responses, and feedback on which were taken into consideration by RBI, are as under.

1. Right to Fair Treatment
2. Right to Transparency and Honest Dealing
3. Right to Suitability
4. Right to Privacy
5. Right to Grievance Redressal and Compensation

### **1. Right to Fair Treatment**

The bank is committed to ensuring as under.

- i. Good and fair banking practices are put in place; setting minimum standards in all dealings with the customers is a part thereof.
- ii. Bank will provide at least a minimum of banking facilities of receipt and payment of cash /cheque, remittances, exchange of soiled notes, etc. at its counters.
- iii. Bank will offer digital banking and payment systems in a secure, convenient and robust technological environment.
- iv. Relationship between Bank and customer is fair & equitable;
- v. Staff of Bank attending to the customers is adequately and appropriately trained;
- vi. Staff members attend to the customers and their business promptly and courteously;
- vii. All the customers are treated fairly and there is no discrimination 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 that are specifically designed for members of a targeted market group, or the Bank may use a defensible and commercially acceptable economic rationale for customer differentiation. It is also possible that Bank may have schemes or products as part of an affirmative action to benefit categories of customers such as women or backward classes who deserve special help to bring them on par with the rest of the privileged sections of the population. Such schemes/products will not amount to unfair discrimination. The rationale for such special schemes or terms will be explained by Bank wherever called upon to do so;
- viii. Bank, while offering any new product or service will examine all the guidelines given by the regulatory authorities and self-regulatory bodies like RBI, SEBI, IBA, etc. to ensure that products and services offered are in accordance with the relevant laws, regulations, and norms.
- ix. While it shall be the endeavour of the Bank to provide hassle-free and fair treatment to customers, Bank would also expect customers to behave courteously and fairly in their dealings with Bank.

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

**The Bank will ensure as under.**

- i. The contracts or agreements it frames are transparent, easily understood by, and well communicated to, the common person. The price of any product, the associated risks, the terms and conditions that govern use over the product's life cycle, and the mutual responsibilities of the customer and financial service provider, are disclosed with clarity. The customers are not subject to unfair business or marketing practices, coercive contractual terms, or misleading representations. Throughout their relationship, the financial services provider cannot threaten the customer with physical harm, exert undue influence, or engage in blatant harassment.
- ii. There is complete transparency so that the customer can form an informed opinion regarding services & products on offer by the Bank; he has a better understanding of what he or she can reasonably / fairly expect from the Bank;
- iii. Bank's dealings with the customer are always founded on sound ethics and have qualitative ingredients of equity, integrity, and transparency;
- iv. Information about (a) Bank's products and services, (b) terms and conditions, and (c) the interest rates/service charges, is provided by the Bank to the customers in a simple and easily understandable language; and the information provided is sufficient to reasonably enable a customer to make an appropriate and suitable choice of the product;
- v. The terms and conditions stipulated by the Bank are always fair; and they set out respective rights, liabilities, and obligations of the Bank and the customer in plain and simple language as far as possible;
- vi. Most Important Terms and Conditions (MITC) associated with the product or service are brought to the notice of the customer while offering the product and such terms do not inhibit a customer's future choice;
- vii. Information regarding interest rates, fees, and charges is provided through the Notice Board. Further, wherever appropriate, the customer is informed directly;
- viii. The service charges manual, with sufficient information in respect of charges on all the products and services, is displayed on the website. A copy of the manual is made available at every branch on the customer's demand for his/her perusal;
- ix. Customers are informed about any change in the terms and conditions through a letter /SMS /email at least one month before the revised terms become effective.
- x. Bank's Policies on Deposits, Cheque Collection, and Grievance Redressal are displayed in the public domain;
- xi. The staff offering, processing or handling a particular product or service is properly trained to provide relevant information to customers in its true & complete aspects;
- xii. Communication in writing is sent to a loan applicant with reasons within a period not exceeding 23 working days about the sanction of loan or otherwise, provided the application is received with all the required papers/documents,
- xiii. Communication without any ambiguity is sent regarding-
  - a. Discontinuation of a particular product,
  - b. Relocation of an office/ Branch,

- c. Changes in working hours of any Branch/ Office,
  - d. Change in telephone numbers,
  - e. Closure of any office or branch,
  - f. Information regarding changes in penalties leviable in case of non - observance/breach of any of the terms and conditions governing the product/services chosen by the customers.
  - g. All the changes are made known to the customers upfront, through Notice board and/or publication on Bank's website giving advance notice of at least 30 days);
- xiv. Advice is sent to the customer at the time of selling a product regarding the rights and obligations embedded in law and/or banking regulation including the need to report any critical incidents that the customer suspects, discovers or encounters;
  - xv. When a customer approaches the Bank for availing a product or service, all the relevant information related to the product/service is provided to enable the customer to make an informed decision,
  - xvi. Relationship with a customer is not terminated without giving reasonable or contractual prior notice to him/her;
  - xvii. Assistance is provided to a customer in all available ways such as account statements/passbooks, alerts, timely information about the product's performance, term deposits' maturity etc. so that he/she can manage the account.
  - xviii. The Bank displays on its website all customer-centric policies as mandated by the regulatory authority viz. the policies on:
    - a. Deposits,
    - b. Cheque Collection
    - c. Grievance Redressal
    - d. Compensation
    - e. Collection of Dues and Repossession of Security
    - f. Customer rights
    - g. Customer Protection (Unauthorized Electronic Banking Transactions).
    - h. Limited liability in respect of unauthorized electronic banking transactions.
  - xix. All marketing and promotional material is clear and not misleading;
  - xx. Bank assists customers by providing them with the passbook/statement of accounts, alerts, timely information about products etc.;
  - xxi. In case of non-acceptance of request for any loan, the Bank will convey, in writing, the reasons for non-acceptance when asked for.
  - xxii. A customer is never threatened with physical harm, nor is any influence exerted on him/her, and staff members do not adopt behaviour that may lead to reasonably construing as unwarranted harassment.
  - xxiii. Only the normal appropriate business practice is adhered to;
  - xxiv. The fees and charges on products/services and their structure are not unreasonable to the customer.

### **3. Right to Suitability**

The Bank ensures as under.

- i. Products offered are appropriate to the needs of the customer and based on an understanding of and assessment by the bank of the customer's financial circumstances. Such assessment is appropriately documented;
- ii. There is a Board approved policy for assessing, prior to sale, suitability of products for customers;
- iii. Third-party products are sold only after the Bank is authorized to do so, and after putting in place a Board approved policy for marketing and distributing them;
- iv. A customer is not compelled to subscribe to any third-party product as a quid pro quo for service availed or to be availed from the Bank;
- v. The products being sold or services being offered, including third-party products & services, are in accordance with the extant rules and regulations;
- vi. The customer is informed about his responsibility to provide all the relevant and reasonable information sought by the Bank promptly and truthfully so that the Bank is able to determine the suitability of a product to the customer;
- vii. All the statutory guidelines of RBI / IRDA / SEBI in respect of para-banking activities (like sale of Insurance / other third-party products) are adhered to.

### **4. Right to Privacy**

Under the customers' Right to Privacy, Bank will ensure as under.

- i. Customer's personal information is kept confidential unless they offer specific consent to the financial services provider, or if such information is required to be provided under the law, or if it is provided for a mandated business purpose (for example, to credit information companies). The customer is informed upfront about likely mandated business purposes. Customers have the right to protection from all kinds of communication, electronic or otherwise, which infringe upon their privacy.
- ii. A customer's personal information is treated as private and confidential (even after his/her relationship with the Bank comes to an end).
- iii. Information such as above is not revealed, divulged or disclosed to any other individual/institution for any purpose unless,
  - a. There is an explicit & written authorisation from the customer for such disclosure;
  - b. There is a compulsion for disclosure under law/ regulation;
  - c. There is a duty on the part of the Bank to make the disclosure i. e. in the public interest;
  - d. Disclosure is warranted in Bank's own interests; or,
  - e. Disclosure is mandated by some regulations introduced for industry-wide or collective purposes, such as disclosure of default to credit information companies or debt collection agencies.
- iv. Such likely mandated disclosures are communicated immediately to the customer in writing.

- v. The customer's personal information is not used for marketing purposes (other than for cross-selling of our Banks products/services) unless the customer has specifically authorized it.
- vi. Bank adheres to Telecom Commercial Communications Customer Preference Regulations, 2010 (National Customer Preference Registry) issued by Telecom Regulatory Authority of India while communicating with customers.
- vii. The staff is made aware of the banker's obligation that secrecy arising out of the contractual relationship between the banker and customer must be maintained and no information of the customer should be divulged to third parties except under special circumstances which are well defined.

Every effort is made to ensure that there is no occasion such that the Bank discourages or turns away senior citizens and differently-abled persons from availing of banking facilities in branches.

- i. The bank is alive to the imperative need of the staff being sensitised to the requirements of senior citizens and differently-abled persons notwithstanding the desirability to push digital transactions and the use of ATMs.
- ii. The bank provides a clearly identifiable dedicated counter or a counter which provides priority to senior citizens and people who are differently-abled including visually impaired persons.
- iii. The facility is extended to issue cheque books to such customers whenever a request is received, through a requisition slip which is part of the cheque book issued earlier, or request received by any other mode. Further, in respect of a saving account, a minimum of 30 cheque leaves, free of charge, will be issued every year, if requested.
- iv. The facility is also provided to allow operations in accounts of the visually impaired customer through identification of thumb/toe impression/mark by two independent witnesses and authorizing a person who withdraws the amount on behalf of such a customer.
- v. Senior citizens and differently-abled persons are provided Forms 15G / H once a year (preferably in April ) to enable them to submit the same, where applicable, within the stipulated time.
- vi. In view of the difficulties faced by senior citizens of more than 70 years of age and differently-abled or infirm persons (having medically certified chronic illness or disability) including those who are visually impaired, concerted efforts are made to provide basic banking facilities, such as pick up of cash and instruments against receipt, delivery of cash against withdrawal from the account, delivery of demand drafts, submission of Know Your Customer (KYC) documents and Life certificate at the premises/ residence of such customers.

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

Under this policy, the Bank will ensure that the customer has the right to hold the Bank accountable for all the products offered and the right to get redressed any valid grievance, in respect of all products, including third-party products. The Bank also has a duty to communicate the compensation available to the customer for non-

performance, delays etc. Towards this, the Bank ensures as under.

- i. All the matters or interactions with customers going wrong are dealt with in an expeditious and diligent manner, with sensitivity towards and maintenance of the dignity of the customer.
- ii. All the mistakes on the part of the Bank or of its staff are owned up and corrected promptly.
- iii. Any charge that has been applied wrongly and by mistake is reversed promptly.
- iv. The customer is compensated for any direct financial loss that the customer may have incurred due to Bank's lapses.
- v. Appropriate arrangements are made for receiving complaints. Suggestions-cum-Complaint Register and Box are made available at branches.
- vi. Customer Grievance Redressal Policy, including the Grievance Redressal Procedure available to the customer, is placed in the public domain.
- vii. A robust and responsive grievance redressal procedure is ensured. The procedure clearly indicates the grievance resolution authority which should be approached by the customer.
- viii. Grievance redressal mechanism is made easily accessible to customers.
- ix. Customers are advised 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.
- x. Name, address and contact details of the Grievance Redressal Authority / Nodal Officer are displayed. The time limit for the resolution of complaints is also clearly displayed or made accessible at all service delivery locations.
- xi. The complainant is informed of the option to escalate his complaint to the Banking Ombudsman if the complaint is not redressed within the pre-set time.
- xii. Information about Banking Ombudsman Scheme is placed in the public domain.
- xiii. The name and contact details of the Banking Ombudsman under whose jurisdiction the bank's branch falls are displayed at all the customer contact points.
- xiv. The Bank Acknowledges all formal complaints (including complaints lodged through electronic means) within three working days and works to resolve them 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 is reckoned after all the necessary information sought from the customer is received.
- xv. At the time of establishing the customer relationship, liability for losses, as well as the rights and responsibilities of all parties, are clearly spelt out in the event of products not performing as per specifications or things going wrong. However, the bank is not liable for any losses caused by extraneous circumstances (such as market changes, the performance of the product due to market variables, etc.) that are beyond its reasonable control
- xvi. Bank has already placed on its website the Customer Grievance Redressal Policy, and the procedure which an aggrieved customer may follow including the information for approaching Ombudsman.

#### **6. ACKNOWLEDGEMENT OF COMPLAINT:**

- i. The Bank acknowledges all formal complaints (including complaints lodged through electronic means) within three working days; and works to resolve them within a reasonable period, not exceeding 30 days. The 30-day period is reckoned after all the necessary information sought from the customer to facilitate resolution is received.
- ii. An aggrieved customer is provided with the details of the Banking Ombudsman Scheme for the resolution of a complaint if he is not satisfied with its resolution or with the outcome of the dispute handling process.

#### **7. CUSTOMER RESPONSIBILITY:**

The Bank is committed to providing to customers excellent customer service, hassle-free and fair treatment, and quick redressal of grievances if any. However,

- i. The Bank will not be responsible for loss to the customer if the customer acts fraudulently and/or acts without reasonable care which has resulted in a loss to him/her.
- ii. The Bank will also not be responsible for the losses arising out of misuse of lost Pin, cheque book, passbook, compromise of passwords / secure or confidential information, suffered by the customer until the name of the Bank has been notified and has taken steps to prevent misuse.
- iii. The Bank will also not be liable for any losses caused by extraneous circumstances that are beyond its reasonable control.
- iv. The Bank will also expect that the customers behave courteously and honestly in their dealings with the Bank and would furnish correct personal details like address, mobile number and email address for speedy and effective communication when required.

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