

Ujjivan Small Finance Bank

Customer Grievance Redressal Policy

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1. Introduction

Ujjivan Small Finance Bank (hereinafter referred to as “the Bank”), being a service industry player, needs to have a focused and pinpointed approach towards customer service. Moreover, the competitive market scenario makes it imperative for the Bank to have a robust mechanism in place to resolve/ address customer complaints in a timely and effective manner and for compensating customers for financial losses, if any. The Bank will strive to provide the highest quality of customer service to ensure continued customer satisfaction, retention and sustained growth of products and services.

A customer complaint may be genuine or may be a result of misunderstanding about the product or service. To facilitate the customers to raise their grievances, the Bank has put an appropriate mechanism in place for redressal of customer grievances.

2. Objective

The Bank, through a comprehensive Customer Grievance Redressal Policy, intends to put in place systems, procedures and review mechanism for minimizing instances of customer dissatisfactions and to ensure prompt redressal of customer complaints and grievances. Additionally, the key objectives of this policy are as under:

- Ensure unbiased, fair and just treatment to customers, including both depositors and borrowers, on an ongoing basis
- Protect customers against fraud, deception or unethical practices
- Consistently assess the impact of services in order to serve clients better
- Put in place a formal grievance redressal mechanism for customers
- Ensure speedy and efficient resolution of customer issues with adherence to basic principles of transparency and integrity
- Educate the customers about alternate escalation mechanisms within and outside the Bank, for resolution of the complaints / issues if they are not satisfied with the Bank's response
- Ensure that there is a mechanism for compensating customers expeditiously for any financial loss incurred by them on account of deficiencies in services

3. Applicability

The policy document shall cover the details of grievance redressal mechanism for customers and the procedures the employees at the Bank need to follow when such a complaint arises whether at the Unbanked Rural Centres (URCs) or branches. The policy will apply to employees of the Bank as well as Business Correspondents (BCs)/ Agents and shall be applicable to all customers catered to by branches or by BCs of the Bank. The policy will cover all the products and services offered by the Bank including third party products distributed by the Bank across its delivery channels.

4. Governance Structure

In line with RBI guidelines, the Bank will have grievance redressal mechanism at three levels i.e. the Board, Senior Management and Branches. The Customer Service Committee at the Board level shall assess and review the overall implementation of customer service policies and the functioning of the grievance redressal mechanism. The Standing Committee on Customer Service at Senior Management level shall serve as a micro level executive committee for driving the implementation of customer service policies and grievance redressal mechanism. The Standing Committee will act as a bridge between the various departments / functional units of the Bank and Customer Service Committee of the Board. The Branch Level Customer Service Committee shall act as a formal channel of communication between the customers and the Bank at the branch level. The detailed responsibilities of each of the aforesaid Committees are elaborated as under:

4.1 Customer Service Committee of the Board

The Committee shall be chaired by the designated independent director of the Board and report to the Board of the Bank. The Committee shall comprise the Board of Directors and CEO & Managing Director of the Bank.

The Committee shall include experts and representatives of customers as invitees and may also invite the Chairman of the Board to attend the meetings as and when such need arises. The Committee shall meet at least four times in a year to review customer service/ customer care aspects, and to understand difficulties faced by the customers and to get feedback on ways to improve customer service.

The primary responsibilities of the Committee are as under:

1. Review and approve Comprehensive Deposit Policy (including matters such as treatment of death of a depositor for operations in such accounts) and Customer Grievance Redressal Policy of the Bank
2. Take regular inputs on customer experience and service delivery from the Standing Committee on Customer Service, which in turn shall obtain inputs from Branch Level Customer Service Committees and give suitable recommendations on key areas of improvement.
3. Review product approval process with respect to suitability and appropriateness for the customers
4. Review the audit findings on quarterly basis of the services rendered to the customers
5. Review results of on-going survey of customer satisfaction and provide recommendations for improvements in quality of customer service
6. Review the details of the number of claims received pertaining to deceased depositors and those pending beyond the stipulated period, giving reasons
7. Review the consolidated report on the implementation of the Grievance Redressal Mechanism
8. Review plans and functions of Service Quality department and its performance
9. Assess borrower complaints emanating out of improper behaviour of recovery agents, non-availability of recovery agents leading to penalties for borrowers, etc. and also address challenges faced by recovery agents in high risk areas

10. Place all the awards given by the Banking/Integrated 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
11. Place all the awards remaining unimplemented for more than three months with the reasons therefor before the Customer Service Committee to enable the Customer Service Committee to report to the Board such delays in implementation without valid reasons and for initiating necessary remedial action.
12. Review, on a quarterly basis, the position of the complaints against the Bank with the BO offices/ Consumer Courts/ Courts and analyse the reasons for these complaints not getting resolved by the Bank itself

4.2 Standing Committee on Customer Service

The Standing Committee on Customer Service will be chaired by the CEO & Managing Director and will include Chief Business Officer, Chief Operating Officer, Head of Human Resources, Head of Channels, Chief Risk Officer, Head of Compliance and other invited Senior Management, if any as its members. The standing committee shall include non-officials as its member to enable an independent feedback on the quality of customer service rendered by the Bank. The Standing Committee on Customer Service shall meet at least on a bi-monthly basis to review the implementation of customer service initiatives across the Bank.

The primary responsibilities of the Committee shall be as under:

- (1) Ensure timely and effective compliance of the RBI instructions on customer service
- (2) Obtain independent feedback on the quality of customer service to ascertain if the action taken by the other departments are in tune with the spirit and intent of such instructions
- (3) Review existing practices and procedures which may lead to frequent customer complaints, and initiate necessary corrective action on an ongoing basis to improve these procedures
- (4) Review the functioning of grievance redressal mechanism at all levels, the types and status of customer complaints received and actions taken thereof.
- (5) Review the status of complaints against the Bank with the BO offices/ Consumer Courts/ Courts and recommend actions for speedy resolution of pending complaints
- (6) Submit a report on the areas reviewed, procedures/ practices identified and simplified to the Customer Service Committee of the Board on a periodic basis
- (7) Examine the quarterly reports submitted by the Branch Level Customer Service Committees and provide relevant feedback to the Customer Service Committee of the Board.

4.3 Branch Level Customer Service Committees

The Branch Level Customer Service Committee will be responsible for strengthening of customer service at branch level as well as at the level of URCs through interaction with diverse set of customers. This committee will conduct monthly meetings with customers including depositors and borrowers and senior citizen customers to study customer grievances, cases of delay and other difficulties faced by the customers. It will also provide a forum for the customers to provide their feedback/ suggestions and help the Bank in evolving ways to improve customer service.

The Branch Level Customer Service Committees may also submit quarterly reports giving inputs/ suggestions to the Standing Committee on Customer Service thus enabling the Standing Committee to examine them and provide relevant feedback to the Customer Service Committee of the Board for necessary policy/ procedural action.

5. Role of Branches and Unbanked Rural Centres (URCs) in Customer Grievance Redressal

The customer service framework will be embedded into the Bank's culture across the Head Office, Regional offices, phone banking centres, branches, URCs and BCs / Agents in order to drive the larger objective of creating an intuitive customer experience. Each customer touch point within the Bank will strive towards creating a lasting and an enduring impression in the customers' mind through prompt, fair, transparent and courteous services, ease and convenience of accessibility, faster resolution of grievances and its communication to customers.

Every branch of the Bank will follow the below mentioned measures with respect to the customer grievance handling which may arise either at the Branch / URCs or through usage of technology and helpline:

- (1) All branches and URCs will have "Enquiry" or "May I Help You" counters either exclusively or combined with other duties, located near the entry point of the banking hall. Such counters manned by Customer Care Representatives (CCRs) will facilitate redressal of customer queries and complaints pertaining to day-to-day operations.
- (2) CCR will ensure employees' timely response to customer requests at branch/ URCs and help out customers in putting in their transactions.
- (3) The branches will hold Customer Service meetings to interact with different cross sections of customers including senior citizens, for identifying action points to upgrade the customer service.
- (4) The display of information including the grievance redressal mechanism in the branches will be done in English, Hindi and the concerned regional language.
- (5) The branches will maintain a complaint/ suggestion box and display a notice requesting the customer to approach the Branch Manager if the complaint is not redressed.
- (6) A complaint book with perforated copies in each set, as per the format prescribed by IBA, will be maintained at each of the branches of the Bank to register complaints of the customer.

6. Role of Controlling Offices and Head Office in Customer Grievance Redressal

The Bank's Service Quality Department (SQD) at its Head Office shall oversee the implementation of the customer complaint handling mechanism for the entire bank. This Department shall be headed by a Principal Nodal Officer (PNO) (National Manager – Service Quality). The Bank shall also appoint a Regional Nodal Officer (Regional Manager – Service Quality) for each of the Regions to ensure smooth resolution of customer grievances. The Principal Nodal Officer and Regional Nodal Officer at Head Office and Regional Office levels shall be the point of contact with whom the BO, Indian Banks' Association (IBA) and RBI can liaise for resolution of customer complaints.

SQD will ensure regular trainings of branch staff are conducted to assist them in handling customer queries during normal course of operations and ensure that relevant information is provided fully and correctly.

The SQD shall ensure that following details are displayed in the branch and on the website of the Bank as applicable.

- (1) Names of officials who can be contacted for redressal of complaints along with direct telephone number, fax number, complete address and email address
- (2) Details of Regional Nodal Officer and Principal Nodal Officer
- (3) Names and other details of CEO & Managing Director and other business heads to enable customers to approach them if required
- (4) Contact details of the BO Offices of the respective areas
- (5) Code of Bank's Commitment to Customers framed by Banking Code and Standards Board of India (BCSBI).
- (6) Detailed Grievance Redressal Mechanism

The Bank shall also place the statement of complaints as a part of Annual Report for information of the general public at the end of each financial year. This statement should include all the complaints received at the Head Office / Controlling Office level as also the complaints received at the branch level.

The role of controlling offices (regional offices) and head office (SQD) in tracking and resolution of customer complaints are further elaborated in paragraph 7 below.

7. Complaints Handling and Resolution Process

A 'complaint' means a representation in writing or through electronic means containing a grievance alleging deficiency in banking service.

The Bank's grievance redressal mechanism provides for a comprehensive framework for registration, tracking, resolution and analysis of customer complaints. A robust review mechanism will assist the Bank in identifying and resolving gaps in the customer service, product features and the delivery of the products through its own branches, URCs and BCs/ agents.

7.1 Types of Complaints

- (1) **Transaction related:** Deposit/ cash related/ opening of account/ transfer of account/ closure of account/ miss- selling/ debiting of erroneous charges/ claims on deceased depositors' accounts/ TDS related /service charge related, cheque clearance related, etc.
- (2) **Branch related:** Basic facilities to customers/ ambience/ customer service area/ long queue, etc.
- (3) **Staff related:** Alleged harassment, misbehaviour/ use of rude language, alleged bribery etc.
- (4) **Lending related:** Delayed disbursals, loan modifications, excessive follow-up for collections, improper behaviour of recovery agents, discrimination based on gender, caste, religion, loan frauds, FinTech/ digital lending related and such other lending related complaints.
- (5) **Deposit related:** Delay in repayment of deposit, incorrect TDS deduction, renewal of deposits, incorrect interest calculation, non-receipt of preferential interest rate (for senior citizens), Delay in interest credit due to holidays, interest certificate not received on time etc.
- (6) **Technology related:** Disputed ATM transaction/ POS transaction/ Internet banking transaction/Mobile banking transaction/ RTGS/ NEFT. As per the RBI's Master Circular – Mobile Banking transactions in India – Operative Guidelines for Banks, updated as on January 10, 2020, in cases where the customer files a complaint with the Bank disputing a transaction, it would be the responsibility of the service providing bank, to expeditiously redress the complaint. Customer complaints / grievances arising out of mobile banking facility would be covered under the Integrated Ombudsman Scheme, 2021.
- (7) **Business Correspondent/ Agent related/ Vendor related:** Misbehaviour/ use of rude language, mis-selling of products, levy of fees/ commission/ additional charges, technology related issues at BC outlets, non-availability of the BC agents at field level, denial of services to customers, etc. This shall also include misbehaviour/use of rude language by connectors, recovery agents, verification agencies, Deposit sourcing consultants, Vendors and Vehicle repossession agents, Terminations on account of frauds committed by collections agents proven in the investigation on the basis of customer complaints and grievances shall be reported to Indian Banks' Association (IBA), Collection Policy of the Bank shall be referred for detailed guidelines.

- (8) Grievances arising out of the Cash Management Services being offered by the Bank
- (9) Complaints emanating from rural areas and those relating to financial assistance to Priority Sector and Government's Poverty Alleviation Programmes.
- (10) Grievances arising from Bank guarantee services being offered by the Bank.
- (11) Grievances related to mis-selling of products through insurance telesales.
- (12) Grievance arising from accounts being restricted on Operation due to non-KYC updation (for the period from May 2021 to March 2022)

The customer complaints received by the Bank shall be categorized by the Bank internally on the basis of the criticality and severity of the complaint, which shall be guided by the Bank's Standard Operating Procedures (SOPs). While all categories of grievances shall be dealt with the same urgency and speed, the resolution provided and the action taken may vary on the basis of the severity.

Further, the "policy to avoid mis-selling" is included in this document as Annexure 1 which shall apply to any customer communication regarding all products and services offered by the Bank or for which it acts as an agent, whether provided across the counter, over phone, by post, through interactive electronic devices, on internet or by any other method. This policy seeks to lay down standards for suitable recommendations/ sales to customers/ stakeholders.

Lodging of ATM related Complaints

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

- (a). ATM ID shall be displayed clearly in the premises to make use of it while making a complaint / suggestion
- (b). Information that complaints should be lodged at the branches where customers maintain accounts to which ATM card is linked
- (c). Telephone numbers of help desk / contact persons of the ATM owning bank to lodge complaint / seek assistance
- (d). Uniform Template (as given in Annexure 2) for lodging of complaints relating to ATM transactions.

To improve the customer service through enhancement of efficiency in ATM operations, bank shall initiate following actions:

- (g). Message regarding non-availability of cash in ATMs shall be displayed before the transaction is initiated by customer
- (h). Make available forms for lodging the complaints with name and phone number of the officials with whom they have to be lodged
- (i). Make available sufficient toll-free phone numbers for lodging complaints / reporting and blocking lost cards and also attend the requests on priority

Mobile numbers / e-mail IDs of the customers are 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.

Handling Grievances Related to Bank's UPI Acquirer Solution

The Bank's Grievance Redressal Mechanism shall include the mechanism to handle the complaints related to the Bank's UPI Application.

Handling Insurance Related Grievance

The Banks grievance redressal mechanism shall be further strengthened to ensure that the grievances raised by the policy holders/customers relating to their insurance policies, are addressed within the timelines as stipulated under the Regulations. The Authority will also be kept informed about the number, nature and other particulars of the complaints received from such clients in format and manner as may be specified by the Authority. Customer shall be allowed to approach any of the offices or call centre of the Bank to register a complaint.

1. All complaints shall be recorded in the complaints system/register and due acknowledgement shall be issued to customers if the complaints are submitted in writing
2. All the personnel across the Bank who directly or indirectly deal with customers shall be provided training to handle insurance related complaints.
3. The complaints of the customer shall be duly reviewed and if required, investigated suitably and adequately.
4. Customer will be duly responded with review or investigation findings within prescribed regulatory timelines along with information regarding escalation matrix, in case customer is not satisfied with the response of the Bank they can approach the Ombudsman.
5. As and when required, a complaint will be dealt at the appropriate senior level of the Bank for timely and proper resolution.
6. The above services will be met through service level agreement with Insurers for smooth operation.

Handling Grievance Related to Atal Pension Yojana

The Banks grievance redressal mechanism shall be further strengthened to ensure that the grievances raised by the subscribers related to Atal Pension Yojana, are addressed within the timelines as stipulated under the Regulations. The Authority will also be kept informed about the number, nature and other particulars of the complaints received from such clients in format and manner as may be specified by the Authority. Customer shall be allowed to approach any of the offices or call centre of the Bank to register a complaint.

Subscribers can approach Ombudsman appointed by Pension Fund Regulatory and Development Authority (PFRDA) for resolution of complaints or grievances as per PFRDA (Redressal of Subscriber Grievance) Regulations, 2015. The PFRDA ombudsman scheme has been included as Annexure 3 to this policy.

Resolution of Grievances – Internal Machinery and Time Frame – Offline

The compliant resolution framework shall adhere to the TAT as specified internally which may vary from time to time.

At Branch Level:

Customer care representative & Branch Manager will be responsible for the resolution of the complaints/grievances in respect of customer's service by the Branch

An acknowledgement should be given to the customer immediately on receipt of complaint in writing.

At Regional Level:

If the Branch Manager feels that it is not possible at his/her end to solve the problem, then it may be referred to Regional Nodal Officer of the Bank at the Regional Office.

At Head Office Level:

If the Regional Nodal Officer feels that it is not possible at his/her end to solve the problem, then it may be referred to the Principal Nodal Officer.

In line with requirement of Para 6 of RBI's Guidelines on Digital Lending dt. 02 September, 2022, The Bank shall ensure the Lending Service Provider (LSP) shall have a Nodal Grievance Redressal Officer. Such nodal grievance officer shall redress all the Nodal Grievance Redressals on the Digital complaints.

If the customer does not receive a reply within 30 days or is unsatisfied with the reply, he/she can escalate the matter to RBI/Integrated Ombudsman or any other related appellate authority.

7.2 Registration & Tracking of Complaints

- The customer will be able to register the complaint through multiple channels which may include:
 - Complaint form/ suggestion box
 - Complaints register or oral complaints at the branches/ URCs and Regional Offices
 - Complaint calls to CCR of Branches and URCs/ Branch Manager/ Customer Care Number/ Regional Nodal Officer
 - Grievances received through post, emails or through internet or mobile banking and form provided in Bank's website
 - A Complaint Form, along with the name of the regional nodal officer for complaint redressal, will be provided in the homepage itself to facilitate complaint submission by customers
 - Complaints received through BO, BCSBI, Centralized Public Grievance Redress & Monitoring System (CPGRAMS) of the Government of India
- The customer will be given an acknowledgement on same day for complaints received at branches/ URCs by way of a reference number. All customer complaints received through digital channels and phone calls will be acknowledged through emails/ SMS as applicable. Complaints received through post by regional & head offices will be replied with an acknowledgement letter within 2 working days.
- A copy of the complaint registered will be sent to the Regional Office of the Bank electronically through an advanced digital complaint tracking system along with remarks by the CCR of Branch & URCs or Branch Manager mentioning a suitable time frame for resolution of the complaint. The Branch Manager shall ensure that the complaints are resolved within the timelines as stipulated in the SOPs, if the complaints are received through complaint/ suggestion box or complaint register. For any customer complaints received through alternate channels such as customer care numbers,

website, or emails or through external channels such as BO, BCSBI or CPGRAMS, the respective Regional Nodal Officer of the region shall ensure that the complaints are assigned to the respective branch/ business and functional units responsible for resolution within the stipulated timelines as specified in the SOPs.

- The Regional Nodal Officers and PNO shall review the complaints and action taken report at the end of every month.
- An advanced Customer Relationship Management solution will be implemented for registering and tracking all complaints received across multiple channels, which shall also be accessible to the branches/ URCs and Regional Offices who can monitor and update the status of the complaints. Each of these complaints will be assigned a unique tracking number which will be shared with the customer for future reference and monitoring purpose. The system will also facilitates auto escalation of complaints to supervisors and Regional Nodal Officers when a complaint breaches predefined resolution timeline.

7.3 Resolution of Complaints / Grievances

1. The CCR of the Branch & URC is primarily responsible for resolving the customer complaints and Branch Manager will monitor the resolution of complaints pertaining to his/ her Branch, complaints received through alternate channels and complaints pertaining to BCs/ agents within his/her branch's area of operation and ensure that these complaints are not escalated.
2. The governance structure for addressing complaints against BCs has been outlined in the policy on Business Correspondents of the Bank
3. The Bank will put in place appropriate procedures along with timelines to redress the complaints received for transactions undertaken through various channels such as branches, internet banking, mobile banking and BCs.
4. The customer grievance escalation mechanism will be displayed in the branches and on the website.
5. The timeframe for resolution of complaint will be communicated to the customer and in case, additional time will be required for redressing the grievance, an interim response will be sent to the customer.
6. A dedicated Service Quality Department at the Head Office and Regional Offices will review the quality of the classification and assignment of complaints and check whether the resolution is complete and appropriate.

7.4 Escalation of Complaints

The Bank shall adopt a four-tier approach for handling escalation of complaints/ grievances by the customer. Escalations of customer complaints/ grievances will be handled in a structured manner as mentioned below:

Level of Escalation	Official to be approached	Channel to be followed
First Level	Customer Care Representative/ Branch Manager or Branch Operations Officer	In-person/ Call/ In writing
Second Level	Regional Nodal Officer (Regional Manager – Service Quality)	In writing i.e email/ physical letter/ Call
Third Level	Principal Nodal Officer (National Manager- Service Quality)	In writing i.e email/ physical letter/ Call
Fourth Level	Managing Director	In writing
Fifth Level	BO/ CPGRAMS/INGRAMS	Call/ In writing/ Internet (through portal)

- The Bank shall inform the customer that if his complaint is not resolved to his satisfaction at branch level, he may approach the Regional Nodal Officer, whose details are displayed in branches and on the website. If the complaint is still not satisfactorily resolved, the Bank shall inform the customer to approach the Principal Nodal Officer in the Head Office for resolution of the complaint. The Bank will ensure that appropriate efforts are made to resolve the escalated complaint within the Bank itself. In case of inability to resolve the complaint within the Bank, appropriate reasons will be documented for non-resolution of such complaints.

▪ **Internal Ombudsman Scheme:**

RBI has directed all Banks including SFBs to appoint Internal Ombudsman as an independent authority to review complaints that were partly or wholly rejected by the bank. The main aim of IO Scheme is to strengthen the internal grievance redressal system of bank, to ensure that the complaints of the customers are redressed at the level of the bank and to minimize the need for the customers to approach external forums for redressal.

The Bank shall appoint the Internal Ombudsman as per eligibility criteria provided in RBI's Internal Ombudsman Scheme, 2018. The Bank should also formulate a SOP for providing operating guidelines to Internal Departments for an effective implementation of the Scheme

- The Bank will inform the customer to approach BO if he doesn't receive a response from the Bank for his complaint within the period of 1 month from the date of his complaint. The customer can also approach BO if the Bank rejects the complaint, or if he is not satisfied with the resolution provided by the Bank for his complaint. The bank will inform customers that the first point for redressal of complaints is the Bank itself and that complainants may approach the Integrated Ombudsman only if the complaint is not resolved at the bank level within a month. In case of inability to handle the complaint within the Bank, appropriate measures will be taken to educate and guide the customer to approach the external avenues as under:
- BO Scheme of RBI at Regional level follows a fast track approach toward resolution of customer complaints with respect to services rendered by banks. The details of the Scheme along with contact details to approach these offices will be available in the branches/ URCs and also displayed on the website of the Bank.

- The customer may also approach Government of India through online CPGRAMS available on www.pgportal.gov.in.
- The customer may alternatively approach Department of Consumer Affairs (DoCA) platform through INGRAM available at <http://consumerhelpline.gov.in/>.

The Bank shall put in place operational guidelines to handle escalation of customer complaints through external entities such as Integrated Ombudsman/ BCSBI/ CPGRAMS/INGRAM .

8. Customer Compensation

The Bank will compensate the customer for financial losses, if any, only after proper verification in the following cases:

- (1) Erroneous/ unauthorized debit to customer account also covering transaction failures through Mobile, Internet and Digital Channels but debited to customer account
- (2) Failure to execute direct debit/ ECS debit instructions
- (3) Payment made under cheque after acknowledging stop payment instructions
- (4) Delayed collection of local/ outstation cheque
- (5) Lost cheques/ instruments while in transit, during clearing or at the Branch
- (6) Violation of code by the Banks' staff or agent
- (7) Delay in credit for failed ATM transactions
- (8) Mis-selling of third party products (either through direct sales or telesales)
- (9) Delay in credit to customer's account
- (10) Delay in payment of Bank Guarantee upon invocation by beneficiary /incorrect charges levied on bank guarantee issuance or cancellation
- (11) Direct losses on account of internet banking security breaches
- (12) Incorrect authorisation or decline of transactions through Digital channels that result in inconvenience to customers

The procedure for the pay-out of compensation amount shall be in line with the Bank's Customer Compensation Policy. The pay-out of compensation shall be approved as per the approval matrix outlined in the Delegation of Financial Authority approved by the Board.

9. Disclosure of Customer Complaints

As per RBI Circular on **Strengthening of Grievance Redress Mechanism in Banks** dated **January 27, 2021**, the Bank shall disclose in annual report, summary information regarding the complaints handled by them; and certain disclosures were also being made in the Annual Report of the Ombudsman Schemes published by the Reserve Bank in the below format:

Summary information on complaints received by the bank from customers and from the OBOs			
Sr. No	Particular	Previous Year	Current Year
	Customer 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 OBOs				
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)		

Note: Maintainable complaints refer to complaints on the grounds specifically mentioned in BO Scheme 2006 and covered within the ambit of the Scheme.

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 5, 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					

The master list for identifying the grounds of complaints provided under RBI circular is as below:

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

10. Reporting Requirements

The Committee shall report to the Board, on a periodic basis, the following key aspects of customer service:

- (1) Detailed memorandum of customer service / customer care aspects in the bank once every six months
- (2) All awards received from the Banking Ombudsmen to report delays in implementation without valid reasons and for initiating necessary remedial action
- (3) Gaps in implementation of code of conduct towards customers
- (4) Changes required in products/ services/ procedures to improve customer service
- (5) Instances of mis-selling of products
- (6) Position of complaints against the Bank with BO & Consumer Courts
- (7) Root cause analysis of the top five complaints category for each quarter

The Bank shall ensure that the following reports are submitted to the Customer Service Committee - Board:

- i. Quarterly: A report on the areas reviewed, procedures/ practices identified and simplified and trends of cases where customer compensation is being paid
- ii. Quarterly: Audit findings of the services rendered to the customers

- iii. Quarterly: Results of survey of customer satisfaction include the aspects of mis-selling
- iv. Quarterly: Statement of complaints along with an analysis of the complaints. The complaints should be analysed:
 - (a) to identify customer service areas in which the complaints are frequently received;
 - (b) to identify frequent sources of complaint;
 - (c) to identify systemic deficiencies; and
 - (d) to initiate appropriate action to make the grievance redressal mechanism more effective.
- v. Quarterly: Changes required in products/ services/ procedures to avoid payment of compensation
- vi. Quarterly: Position of complaints against the Bank with BO/Courts/Consumer Courts
- vii. Quarterly: Root cause analysis of the top five complaints category for each quarter
- viii. Quarterly: Instances of mis-selling of products
- ix. Quarterly: Any customer service impact due to downtime of IT systems or failure of business continuity plans
- x. Quarterly: Borrower complaints emanating out improper behaviour of recovery agents
- xi. Annually: Challenges faced by recovery agents in high risk areas (where borrowers threaten the recovery agents)
- xii. Quarterly: Any adverse reporting in media with respect to customer servicing
- xiii. Quarterly: Trend analysis of the category of complaints for which compensation is paid/ payable
- xiv. Semi-annually: Detailed memorandum on the customer care aspects which shall also include the details of the compensation paid during the year and the number of complaints for which compensation was paid
- xv. Quarterly: Report consisting of customers' feedback received through monthly Branch Level Customer Service Committee meetings and actions taken.
- xvi. Quarterly: A brief report on the performance of the Standing Committee indicating the areas reviewed, procedures / practices identified and simplified / introduced
- xvii. Quarterly: Progress made for providing ramps at the entrance of the bank branches.
- xviii. Quarterly: Details of the number of claims received pertaining to deceased depositors at an ongoing interval
- xix. Quarterly: Customer complaint report covering below:
 - (a) Details of customer complaints received including complaints received by Head Office/Regional Office/,
 - (b) Turnaround time of resolution
 - (c) Brief details of resolution provided
 - (d) Complaints unresolved for more than 30 days with reasons

11. Integrated Ombudsman Scheme 2021 as released on 12 November,2021

The bank has adopted RBI's integrated ombudsman scheme as released on 12 November,2021 as a part of Grievance Redressal policy. The scheme is attached as an Annexure 4 of the policy.

12. Record Keeping

The records pertaining to customer complaints shall be maintained for a minimum period of 5 years from the date of resolution. Moreover, timely backup of system data of complaints shall be taken to ensure availability of data at all times.

13. Policy Review & Updates

This Board approved policy will be reviewed as and when required or at least on an annual basis for incorporating changes and regulatory updates, if any, in overall grievance redressal mechanism, to improve customer experience and satisfaction.

Last date of review: November 19, 2022

14. Regulatory References

- RBI Master Circular on Customer Service in Banks dated July 1, 2015
- IBA Model Policy for Grievance Redressal in Banks
- IBA Fair Practice Code
- IBA Fair Practice on Lending
- IBA Model Customer Rights Policy
- BCSBI Code of Commitment to Customers
- Integrated Ombudsman Scheme, 2021
- PFRDA Circular No. PFRDA/2020/35/OMBD/1
- RBI Digital Lending Guidelines dated Sep 02, 2022

Annexure 1: Policy to avoid mis-selling

1. Introduction

Ujjivan Small Finance Bank (USFB) believes in being fair with its stakeholders. This policy seeks to document the practices and procedures to be followed by the Bank's employees when selling any products/ services.

Mis-selling refers to the deliberate, reckless, or negligent sale of products or services in circumstances where the contract is either misrepresented, or the product or service is unsuitable for the customer's needs. It also refers to making any deliberate or false statement made by the selling of products/ services.

This policy seeks to lay down standards for suitable recommendations/ sales to customers/ stakeholders. This policy shall also apply to any customer communication regarding all products and services offered by the Bank or for which it acts as an agent, whether provided across the counter, over phone, by post, through interactive electronic devices, on internet or by any other method.

2. Objectives of the Policy

The following are the objectives of the Policy:

- Ensure that customers are well-informed about the product features, applicable terms and conditions, charges and that they shall assume principal responsibility of safeguarding their interest before availing any products or services from the Bank.
- Address risks to customers stemming from insufficient, false or misleading disclosure, conflicts of interest, mis-selling and mis-representation.
- To address the issues of suitability and appropriateness of customers while selling any products or services
- To ethically disclose the terms and conditions of all products and services fairly and transparently before selling any products/ services.

3. Applicability

The policy is applicable to all its employees, business correspondents, outsourced partners, who are engaged into financial activities, channel partners providing third party products such as insurance companies and officers across all branches/ business segments of the Bank involved in banking and para-banking activities including sourcing of Pension products. While the provisions of this policy are directly applicable to most of the staff that are facing clients, all employees of the Bank shall be guided by the principles of this policy.

4. Governance Structure

The Customer Service Committee of the Bank reviews the customer complaints on mis-selling of products/ services and implements high standards of customer service to ensure that suitability and appropriateness of customer is factored in, before marketing any product/ service. The Committee also seeks to:

- Provide a framework for ongoing review of 'suitability and appropriateness' at each stage and incorporate minimum restrictions on customers/ specific transactions depending on the risk categorisation of the customer
- Define the authorities required to be involved in prescribing additional safeguards, disclosures and documentation for a particular customer/ transaction if necessary.
- Prescribe the process and procedures to be followed in case of customer disputes on account of mis-selling of any product/ service
- Note the customer claims/ litigations against the Bank relating to any product/ service whether owned or distributed
- Review suitability and appropriateness of customers and transactions undertaken on an annual basis and suggest modifications where deemed fit.

Additionally, the Product & Processes Approval Committee shall approve any new products/ services after ensuring that there are sufficient safeguards to prevent mis-selling. The Committee shall approve the product matrix defining the various criteria for which various categories of products can be sold to the relevant customers.

In order to ensure avoidance of mis-selling of products and services, the bank shall arrange a sample check on whether the customers are fully informed on the features of the products/ services and associated charges/ interest rates. In this respect, the Bank may adopt tele-verification of customers on sample basis for select products and services that are prone to mis-selling, including third party products. The cases of products/ services being mis-sold shall be shared with business supervisors. In case of any recurrence of mis-selling by same staff, the supervisors shall appropriately take disciplinary action as described in the policy on Code of Conduct. A report on instances of mis-selling and action taken shall be presented to customer service committee of the Management and of the board.

The Service Quality Group shall carry out customer service reviews which shall also include the aspects of mis-selling and shall report the findings to the Customer Service Committee of the Management and of the Board. The details of the same are included in the Customer Service Policy.

5. Scope of Mis-selling

The Bank shall offer any products, whether owned or third party, only to those users who understand the nature of the risks inherent in these transactions and shall ensure that products being offered are consistent with users' business, financial operations, skill & sophistication, internal policies as well as risk appetite. Mis-selling includes both actual and perceived mis-selling by the Bank. Inadequate understanding of risks and future obligations under the contracts by customers may lead to potential disputes, thereby leading to damage to the reputation of the Bank.

USFB will cater to a large segment which would not be familiar with the organised banking products and processes and hence there is greater risk of mis-selling due to lack of awareness. The Bank should carry out proper due diligence of the customer based on his/her risk categorisation and sell/ market products/ services to the customers based on their risk appetite. Customer suitability shall refer to all processes undertaken prior to on-boarding a customer. Appropriateness assessment refers to all processes undertaken prior to and in the course of a specific transaction with the client.

Bank shall ensure that the customer data collected including the KYC documents obtained shall not be utilized for mis-selling of the Products without specific and explicit consent obtained from the customers.

Further, as mandated by IRDA's guidelines for the development and implementation of a Suitability Index – Prospect Product Matrix by insurance companies and PFRDA's guidelines for sourcing subscribers of Atal Pension Yojana, the Bank's staff including agents, if any, shall recommend products based on the need and suitability of customers. These guidelines are currently applicable to all life, general and health insurance policies and Atal Pension Yojana subscription.

6. Measures for mitigating risk from mis-selling

The Bank shall undertake the following measures in order to prevent mis-selling:

- The Bank shall ensure that all dealings with the customer are on the principles of equity, integrity and transparency.
- The Bank shall ensure that the marketing material, agreements/ contracts or terms and conditions circulated to the customer are comprehensible, transparent and easily understood by the customers. The customer communication should include the product's price, risks associated with the product, terms and conditions governing the products and clear rights and responsibilities of the customers and the Bank. The Bank shall ensure that the terms and conditions are communicated to the customers through various modes such as displays at the branches, call centre or website.
- The Branch Staff shall ensure that the customers are explained in understandable language, the details of the applicable service charges, processing charges, interest rates and taxes. The staff shall also explain the potential impact of the unforeseen variables that can have a bearing on the transaction and wherever appropriate, using vernacular language for describing the products
- The Branch staff shall explain to the customer, the implication of the transaction and possible negative outcomes of the transaction. The customer should not be subject to unfair business or marketing practices, coercive contractual terms or misleading representations.
- All information provided to the client as part of the pre-sale process including disclaimers, explanations, pay-off computations and such other documents should be annexed/referenced to the account opening form/ term sheet signed with the client.
- The Bank shall ensure that changes in the terms and conditions like interest rate shall be informed to the customers within a fortnight of the decision, only an increase in fees & charges etc. shall be informed to the customer's at least 1 month in advance to effective date of changes via display on notice board at branches and also on Bank's website. The Bank shall also provide the customer with the option of closing the account within 60 days of the date of receipt of notice if he is not in agreement with the changed terms, which may be adverse.
- The Bank shall provide adequate information on the penal charges leviable in case of performing/ not performing certain transactions eg. maintenance of balance, not transacting for a fixed tenor and such other transactions.
- The Bank shall ensure that adequate training facilities are available for the training of staff dealing in any particular product specifically third party products so that information is communicated fully, correctly and honestly. The Bank shall ensure all staffs involved in sales, both at field level and at backend such as phone-banking team, are trained on procedures to avoid mis-selling.
- The 'Product and Processes Approval Committee of the Bank shall ensure sufficient safeguard are considered to prevent mis-selling while approving any new products/ services. The Committee shall also define the criteria on which various categories of products can be sold to the relevant customers. The Product/ Marketing team and

Business Verticals shall ensure training of sales staff on features of products, terms and conditions, rates and charges and the customer segments for which a particular product can be sold.

- The process of communicating/ selling any products or services through phone banking channel should be monitored effectively to avoid mis-selling. The phone banking channel shall conduct quality audit of such calls on sample basis for detecting instances of mis-selling.
- Audit mechanism of the Bank shall include aspects relating to detection of mis-selling by staff. Periodical audit of branches/ visits to customers by Audit Officers shall be used for identifying instances of mis-selling/ reporting the same to Service Quality department and respective business verticals.

The Bank shall treat its customers fairly using the six concepts as mentioned below:

a) Confidence

The Bank shall have such systems and processes that foster confidence in the Bank by ensuring that there is fair treatment of customers. Customer centricity and sales suitability should be driven from the top and customer service committee should have complete oversight over the governance and controls to mitigate mis-selling.

b) Providing customers appropriate products and services

The Bank shall ensure that customers are sold products and services according to their requirements. The Bank should not bundle the product offering and help customer decide what is best in their interest.

c) Transparency

The Bank shall ensure that all its marketing/ promotional material is clear and transparent about the terms and conditions governing any product/ service. The Bank shall ensure that the pricing of the products is transparent, non-discriminatory and objective.

d) Providing information/education to customers

The Bank shall ensure that their staffs inform/educate appropriate products/ services to customers based on their age, financial capacity and needs.

e) Satisfactory Redressal System

The Bank shall put in place an effective grievance redressal system where the customer is able to communicate his/her dissatisfaction on any product/ service in a convenient and timely manner. The details of the grievance redressal system are covered in the Customer Grievance redressal Policy

f) Switch - Over

The Bank shall allow the customer to switch over to any account of his/her choice without excessive penalty/ imposition of penalty.

7. Record-keeping

The Bank shall retain all records as per the record retention policy of the Bank so as to permit the reconstruction of the customer transaction.

8. Policy Review and Updates

The policy shall be reviewed by the Board as and when required or at least annually for incorporating regulatory updates and changes, if any.

9. Regulatory References

- RBI Guideline on Comprehensive Guidelines on Derivatives – Modifications dated November 2, 2011
- IBA Model Customer Rights Policy
- BCSBI Code of Commitment to Customers

REQUEST TO CARDHOLDER

Please attach copies of your correspondence with the merchant, charge slips wherever applicable and any supplementary documents pertaining to the disputed transactions, as appropriate.

Annexure : (Please tick as appropriate)

- Correspondence copy with merchants
- Charge Slips Any other supplementary documents (Please specify)

DECLARATION & SIGNATURE

I hereby confirm that the averments made by me within this form are bona - fide and the information provided is true and accurate to the best of my knowledge and belief. In case the claim is determined by the Bank to be false or maliciously made, I shall be fully responsible for the consequences which may include civil/criminal lawsuit being initiated by the Bank.

Place Date Tel (+91)

Customer Signature

FOR BANK USE ONLY

Date:	Branch Employee Name:
Branch seal:	Employee ID & signature:

Annexure-3 - PFRDA Ombudsman Scheme for Grievances under NPS and APY



PFRDA
Circular-Ombudsm

Annexure-4 - Integrated Ombudsman Scheme, 2021

(As released on November 12,2021)



Reserve Bank -
Integrated Ombudsi