CAPITAL SMALL FINANCE BANK LIMITED

Grievance Redressal Policy (Updated Up to February 09,2023)

CAPITAL SMALL FINANCE BANK LIMITED

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Grievance Redressal Policy

In the present scenario of competitive banking, excellence in customer service is the most important tool for sustained business growth. Customer complaints are part of the business life of any corporate entity. This is more so for banks because banks are service organizations. As a service organization, customer service and customer satisfaction should be the prime concern of any bank. The bank believes that providing prompt and efficient service is essential not only to attract new customers, but also to retain existing ones. This policy document aims at minimizing instances of customer complaints and grievances through proper service delivery and review mechanism and to ensure prompt redressal of customer complaints and grievances. The review mechanism should help in identifying shortcomings in product features and service delivery. Customer dissatisfaction would spoil bank's name and image. The bank's policy on grievance redressal follows the under noted principles.

- Customers be treated fairly at all times.
- Complaints raised by customers are dealt with courtesy and on time.
- Customers are fully informed of avenues to escalate their complaints/grievances within the
 organization and their rights to alternative remedy, if they are not fully satisfied with the
 response of the bank to their complaints.
- Bank will treat all complaints efficiently and fairly as they can damage the bank's reputation and business if handled otherwise.
- The bank employees must work in good faith and without prejudice to the interests of the customer.

In order to make bank's redressal mechanism more meaningful and effective, a structured system needs to be built up towards such end. Such system would ensure that the redressal sought is just and fair and is permissible within the given frame-work of rules and regulation. The policy document would be made available at all branches. The concerned employees should be made aware about the Complaint handling process.

1. The customer complaint arises due to

- **1.1.** The attitudinal aspects in dealing with customers.
- **1.2.** Inadequacy of the functions / arrangements made available to the customers or gaps in standards of services expected and actual services rendered.

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

2. Mandatory display requirements:

It is mandatory for the bank to provide:

- **2.1.** Appropriate arrangement for receiving complaints and suggestions.
- **2.2.** The name, address and contact number of Nodal Officer(s).
- **2.3.** Contact details of Banking Ombudsman of the area.

2.4. Code of bank's commitments to customers/Fair Practice code.

3. Applicability/Coverage

- **3.1.** Across all the branches of the bank;
- **3.2.** Across Head Office departments and its personnel involved in functioning of operations of the bank:
- **3.3.** Across Third party products distributed/referred by the bank.
- **3.4.** Across Pension account holders under Atal Pension Yojana or any other pension scheme serviced by the bank.
- **3.5.** Across any other schemes introduced by Government and serviced by the bank.
- **3.6.** Across services provided as Banker to Issue

4. Internal Machinery to handle Customer complaints/grievances

4.1. Lodgment of Complaints by the customer

The branch is provided with a Customer Complaint Register where the customer can register his/her complaint. Further, a sealed Complaint box is also available in the branch premises where the customer has an option to drop his/her written complaint. All the complaints routed through the complaint register and complaint box are forwarded to the Branch Manager for the possible resolution. Alternatively, the customer can also speak to the branch officials for resolution of their issues.

The customer can also lodge his/her complaint through "Customer Grievance/ Feedback form" link in the homepage of the Bank's website, where the same is directly forwarded to the Nodal Officer of the bank for resolution.

Further, the customer can also share his/her grievance through a letter/email to the addresses/mail ids displayed in the escalation matrix at the branches and on the website. The customer can also telephonically contact and submit his/her grievance.

4.2. Recording & tracking of complaints

All the complaints received by the Bank (at branch/ Head Office) are recorded and tracked for an end-to-end resolution. Complaints received are lodged in Complaint Management System (CMS) of the bank and accordingly are assigned to the respective branch/department for resolution.

4.3. Acknowledgement

Acknowledgement of the grievance is given to the customer through a Complaint number, as mandated by the Regulator.

4.4. Resolution of Grievances:

The Branch Manager is responsible for the resolution of complaints/grievances in respect of customer's service by the branch. For the complaints pertaining to Head Office department, the Head of Department shall be responsible for the resolution of such complaints/grievances.

Each would be responsible for ensuring closure of all complaints received. 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 the customer should be provided with alternate avenues to escalate the issue.

In case, if the branch manager feels that it is not possible at his level to solve the problem, he can refer the case to Head Office for guidance.

Complaints pertaining to Unauthorized Electronic Banking Transaction, the Bank has formulated a Board approved Customer Protection Policy (Unauthorized Electronic Banking Transactions) for unauthorized electronic banking transactions reported by customers. The policy covers in detail, the liability of a customer/bank in different scenarios.

4.5. Nodal Officer to handle complaints and grievances

The bank has appointed principal nodal officer and nodal officer for the implementation of customer service and complaint handling for the entire bank.

Nodal Officer

Mr. Harish Kumar Capital Small Finance Bank Ltd. MIDAS Corporate Park, Ground Floor, 37, G.T. Road, Jalandhar – 144001

Mobile: +91 75081-77304, Desk: +91 181 5025244

E-mail: nodal officer@capitalbank.co.in

Principal Nodal Officer

Mr. Harinder Singh Capital Small Finance Bank Ltd. MIDAS Corporate Park, Ground Floor, 37, G.T. Road, Jalandhar – 144001

Email: pno@capitalbank.co.in

4.6. Escalation Matrix/Time Frame

Complaint has to be seen in the right perspective because they indirectly reveal a weak spot in the working of the bank. Complaint received should be analyzed from all possible angles. Specific time schedule may be set up for handling complaints and disposing them at all levels including branches and head office. Branch manager should try to resolve the complaint within specified time frames, decided by the bank.

Communication of bank's stand on any issue to the customer is a vital requirement. Complaints received which would require some time for examination of issues involved should invariably be acknowledged promptly.

All the customer grievances received through mail, website, telephone, from the Banking Ombudsman, through post or any other medium shall be dealt in as per the below matrix:

Levels of Escalation	Authority	Turn Around Time (TAT)	
Level – I	Branch Manager (The first point of contact for immediate redressal of grievance)	Within 5 days of receipt of Complaint.	Auto escalation of unaddressed, partially or wholly rejected complaints to I.O. within a period of two weeks from the receipt of the same by the bank.
Level – II (If not satisfied at Level – I)	Cluster/Regional Office	Within 3 days of receipt of Complaint.	
Level – III (If not satisfied at Level – II)	Nodal Officer	Within 5 days of receipt of Complaint.	
Level – IV (If not satisfied at Level – III)	Principal Nodal Officer	Within 2 days of receipt of Complaint.	
	Internal Ombudsman (Customers need not approach the I.O. directly. Bank will internally escalate all the rejected/ partially accepted grievance cases to Internal Ombudsman for his consideration and final decision).	I.O. shall convey the final decision within 15 days of escalation of complaint to him/her.	
Level – V	(The final communication to the complainant shall mention that the complaint has been examined by the I.O. and still if he is not satisfied, he can approach the BO, i.e. Level VI).	Bank shall convey the final decision to the complainant within an overall period of 30 days from the date of receipt of the complaint.	
Level – VI	If not satisfied with the resolution provided by the bank, the customer can approach the Banking Ombudsman at Reserve Bank of India.		-

For BC related Grievance: Level 1 and Level 2 will be read as HOD – Retail Credit and HOD – Credit respectively.

Important notes:

- **1.** For complaints pertaining to Payment System or regulated by SEBI, the turnaround time shall be as mandated by the regulator.
- **2.** For all the complaints received from the Regulator, timelines as mandated by respective Regulator will be adhered to.
- **3.** If any case needs additional time, the Bank will inform the customer/regulator the reason of delay in resolution and provide expected time lines for resolution of the issue.
- **4.** The Bank holds the license of a Corporate Agent with IRDAI for solicitation of life and general insurance business. The Bank will ensure adherence to the IRDAI (Registration of Corporate Agents) Regulations, 2015 (Regulations) with respect to redressal of grievances relating to insurance. The Bank will acknowledge the complaint and facilitate redressal of the same within 14 days of the receipt of such complaint. The Bank will also ensure adherence to the Code of Conduct as prescribed under the Regulations through its Insurance Business Policy.
- **5.** In case of compliant pertaining to any pension scheme provide under National Pension System Point of Presence (POP), any subscriber whose grievance has not been resolved within thirty days from the date of receipt of the grievance by the bank, or who is not satisfied with the resolution provided by the bank, may register a grievance with the National Pension System Trust. In case, the customer is not satisfied with the resolution provided by the Trust, the customer may apply to the Banking Ombudsman at the below address:

The Ombudsman,

The office of Ombudsman O/o Pension Fund Regulatory and Development Authority,

Plot No - 14/A, Chhatrapati Shivaji Bhawan,

Qutab Institutional Area, New Delhi - 110016

Email ID: ombudsman@pfrda.org.in Landline No: 011-26517507 Ext 188

6. In case of complaint pertaining to Banker to Issue, any customer whose grievance has not been resolved within thirty days from the date of receipt of the grievance by the bank, or who is not satisfied with the resolution provided by the bank, may register a grievance with the Securities and Exchange Board of India.

4.7. Customer feedback

The Bank shall have a structured program of customer surveys that are conducted to understand customer satisfaction with the services provided by the bank. In addition to structured customer surveys, feedback from customers shall also be obtained through branch level service meets.

5. Forums to review customer grievance and enhance the quality of customer service

5.1. Branch Level Customer Service Committee

The Bank has constituted a Branch Level Customer Service Committee which shall act as a forum to enable customers meet and interact with the senior managers of the Bank with the following objectives:

• Collect customer feedback on services provided by the Bank

- Enable senior managers get first hand feel of requirements / demands
- Reduce information gap between customers and Bank
- Build trust amongst customers.

The details of the meetings, inputs/suggestions made at such meetings shall be reported on quarterly intervals to the Standing Committee on Customer Service for their examination and providing relevant feedback to the Customer Service Committee of the Board for necessary policy/procedural action.

5.2. Standing Committee on Customer Service

The Standing Committee on Customer Service will be chaired by the Managing Director of the bank. Besides three to four senior executives of the bank, the committee would also have eight to ten eminent non-executives drawn from the public as members.

The committee would have the following functions.

- Evaluate feed-back on quality of customer service received from various quarters. The committee would also review comments/feed-back on customer service and implementation of commitments in the Code of Bank's Commitments to Customers received from BCSBI.
- The Committee would be responsible to ensure that all regulatory instructions regarding customer service are followed by the bank. Towards this, the committee would obtain necessary feed-back from functional heads.
- The committee also would consider unresolved complaints/grievances referred to it by functional heads responsible for redressal and offer their advice.
- The committee would submit report on its performance to the Customer Service Committee of the Board at quarterly intervals.

5.3. Customer Service Committee of the Board

This sub-committee of the Board would be responsible for formulation of a Comprehensive Deposit Policy incorporating the issues such as the treatment of death of a depositor for operations of his account, the product approval process and the annual survey of depositor satisfaction and the tri-enniel audit of such services. The Committee would also examine any other issues having a bearing on the quality of customer service rendered. This Committee would also review the functioning of Standing Committee on Customer Service.

6. Sensitizing operating staff on handling complaints

Staff should be properly trained for handling complaints. We are dealing with people and hence difference of opinion and areas of friction can arise. With an open mind and a smile on the face we should be able to win the customer's confidence. Imparting soft skills required for handling irate customers, to be an integral part of the training programs. It would be the responsibility of the Nodal Officer to ensure that internal machinery for handling complaints / grievances operates smoothly and efficiently at all levels. He should give feedback on training needs of staff at various levels to the HR Dept.