



SBM Bank India Ltd

Complaints Handling Policy

Synopsis of Complaints Handling Policy

➤ Objective:

The Complaints Handling Policy aims to:

- Provide a framework for SBM India employees to handle customer complaints
- Ensure consistency within SBM India in handling and resolving complaints
- Ensure that customers including borrowers are treated fairly at all times
- Ensure complaints received are dealt with on time and with courtesy
- Ensure that customers are informed of the various avenues open to escalate their grievance/complaint within the organisation and the alternative remedies available to them
- Co-ordinate at an appropriate level when dealing with complaints related to products of third parties for resolution of complaints outside the organization
- Institute leading practices in customer complaint management

Understand root cause of complaints, review the delivery standards, update the training program and implement deterrent and disciplinary measures.

➤ Roles & Responsibilities:

Complaints Handling Standards to be observed: All employees receiving customer complaints must adhere to following principles:

1. **Listen** to the customer's complaint without interruption and take notes if needed.
2. **Acknowledge & Apologize** for any inconvenience the customer may have experienced.
3. **Ask Clarifying Questions** when needed on customer's complaint to ensure details are properly understood.
4. **Discuss** with the customer as to what is understood to be their specific issue.
5. **Validate** the correctness of the specific issue and understanding of the customer's situation.
6. **Assume ownership** for complaint resolution and raise issue with the appropriate personnel as per the internal procedures
7. **Set Expectations** for how quickly the problem will be resolved.
8. **Follow Up** and keep the customer informed of the progress until closure.
9. **Ensure** that the customer understands the final resolution.

➤ Authority level

1. Head of Customer Service (SBM India)

The Head of Customer Service is accountable for the quality of service rendered and the policy's effectiveness in addressing the complaints.

2. Relationship Managers

The Relationship Manager or CSA managing the complaint to have authority to settle complaints.

To expedite the complaints handling process and setup a system to route complex complaints to the appropriate authority, the settlements table, in line with the Chart of Authority.

Operational Guidelines for Complaint Handling

Filing a Complaint

SBM India has a 3-tier approach for managing complaints - at Branch, at Head Office and the Chief Executive Officer Level.

Complaints received at each level should be immediately acknowledged, assigned a unique identification reference ID and dealt with appropriately.

A customer may choose to file a complaint anonymously. It is to be ensured that these are dealt with appropriately while maintaining confidentiality of the complainant.

Bank to ensure right channels are available to customers for filing a complaint, directly in-person (at the branch/Head Office), through the website, or through a letter or e-mail addressed to SBM India.

Banking Ombudsman

Customers have option to approach Banking Ombudsman if are concerned if no response in one month.

Response to Complaints

- i. Complaints should be processed in a timely and efficient manner. SBM India should establish process to ensure timely and efficient response to complaints handling.
- ii. SBM India's goal is to address complaints at first contact. All customer' complaints shall be acknowledged within 3 working days. The written acknowledgement should provide the name, job title and contact details of the person handling the complaint.
- iii. Every complaint should be assigned a unique reference ID to ensure its tracking and closure.
- iv. The complaints to be classified as per its nature in line with SBM's internal procedures. Where necessary, customers to be informed of progress of their complaint. Internal escalation process within 7 business days.
- v. Simple complaints (that are not of a serious nature and requiring no investigation or consultation) to be resolved within 4 working days. Complaints requiring internal consultation and/or no extensive investigation to be resolved within 10 working days. Complaints of serious nature and/or requiring extensive investigation, SBM shall strive to reply to customers within one month and complainants shall be kept informed of the progress.

Policy Review

The Complaints Handling Policy will be reviewed at least once a year or more frequently (if required) by Risk Management Team, SBM India. Further, inputs from the India CEO will also be sought at the time of the review.

POLICY AMENDMENT AUTHORITY

Risk Management Committee, SBM India must recommend to the Board any changes or amendments to the policy for their approval.

POLICY DOCUMENT

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1 INTRODUCTION

1.1 Definition

SBM Bank (India) defines the term 'complaint' as any expression of dissatisfaction (justified or unjustified) or grievance conveyed to SBM India either orally or through any channel by its customers. It can be about a staff member, a product, service, process, service failure, delays, errors, or malfunctioning of automated systems. A complaint is not a query (even if about something that is incorrect) or a request for information. A complaint can be made within a period of 7 years from the date of the incident which caused the customer to be aggrieved.

Definition of Customers

For the purpose of this policy, a customer may be defined as a user or a potential user of services and products. So, a 'Customer' may include:

1. A person or an entity that maintains an account and/or has a business relationship with SBM India
2. One on whose behalf the account is maintained (i.e. the beneficial owner)
3. Beneficiaries of transactions conducted by entities or professional intermediaries of SBM, as permitted by law
4. Any person or entity connected with a financial transaction which can pose significant reputational or other risks to SBM India, say, a wire transfer or issue of a high value demand draft as a single transaction

Refer to the [Annexure 2](#) for the relevant RBI sources related to this policy supplement. Any updates in the relevant RBI circulars with regards to Complaint Handling Policy, would supersede the policy supplement statements given here and would accordingly need to be incorporated in the next revision of the supplement.

For the purpose of this policy, "SBM India" refers to India operations of the Group.

1.2 Purpose and scope

The Complaints Handling Policy aims to:

- ② Provide a framework for SBM India employees when handling complaints from customers
 - ② Ensure consistency within SBM India in handling and resolving complaints from customers
 - ② Ensure that customers including borrowers are treated fairly at all times
 - ② Ensure complaints raised by customers are dealt with on time and with courtesy
 - ② Ensure that customers are fully informed of the various avenues open to them to escalate their grievance/complaint within the organisation and the alternative remedies available to them
 - ② Co-ordinate at an appropriate level when dealing with complaints related to products of third parties for resolution of complaints outside the organization
 - ② Institute leading practices in customer complaint management
- Understand the root cause of complaints and, based thereon, review the delivery standards, update the training program and implement deterrent and disciplinary measures.

2 COMPLAINTS HANDLING - GENERAL PRINCIPLES

- 1) **Fairness:** The complaint handling policy shall recognize the need to be fair to both to the complainant and the business unit or person against whom the complaint is made.
- 2) **Visibility:** The complaints handling policy shall be well publicized to consumer / clients and staff, and shall include information for customers about the right to complain.
- 3) **Access:** The complaints handling process shall be accessible to all and ensure that information on making and resolving a complaint is readily available.
- 4) **Responsiveness:** The complaints policy shall mandate that complaints be treated courteously and addressed within the specified timelines.
- 5) **Reviews:** The complaints handling process shall be reviewed regularly to ensure that it is efficiently delivering effective outcomes

3 ROLES & RESPONSIBILITIES

3.1 Complaints Handling Standards to be observed by SBM India

All employees receiving customer complaints must adhere to the following principles:

1. **Listen** to the customer's complaint without interruption and take notes if needed as per internal procedures
2. **Acknowledge & Apologize** for any inconvenience the customer may have experienced
3. **Ask Clarifying Questions** when needed about the customer's complaint to ensure details of the situation are properly understood
4. **Discuss** with the customer as to what is understood to be their specific issue
5. **Validate** the correctness of the specific issue and understanding of the customer's situation
6. **Assume ownership** for complaint resolution and raise issue with the appropriate personnel as per the internal procedures
7. **Set Expectations** for how quickly the problem will be resolved
8. **Follow Up** and keep the customer informed of the progress until closure
9. **Ensure** that the customer understands the final resolution

3.2 Authority level

3.2.1 Head of Customer Service (SBM India)

The Head of Customer Service is accountable for the quality of service rendered and the policy's effectiveness in addressing the complaints.

3.2.2 Complaints Officers (SBM India)

The Relationship Manager or CSA managing the complaint must have the authority to settle complaints including redressal where appropriate or must have ready access to those who have the necessary authority.

To expedite the complaints handling process and setup a system to route complex complaints to the appropriate authority, the settlements table, in line with the Chart of Authority, helps to define the limits within which the complaints officers can operate.

4 OPERATIONAL GUIDELINES FOR COMPLAINT HANDLING

4.1 Filing a Complaint

SBM India has a 3-tier approach for managing complaints, namely at Branch, Head Office and the Chief Executive Level. Complaints received at each level should be immediately acknowledged, assigned a unique identification reference ID and dealt with appropriately.

A customer may choose to file a complaint anonymously. The bank should also ensure that these are dealt with appropriately while maintaining the confidentiality of the complainant.

SBM India should ensure right channels are available to customers for filing a complaint. SBM India should have appropriate mechanisms in place to receive complaints from customers directly in-person (at the branch/Head Office), through the website, or through a letter or e-mail addressed to SBM India.

4.1.1 Tier 1

Customers can explain the details of issue/ complaint to any SBM India staff member by:

1. Visiting any of the bank's service units; relevant addresses may be found at www.sbmgroup.mu
2. Contacting the bank's Customer Service Executives on the following: Telephone: (91) (22) 4302888
Fax : (91) (22) 2284 2966
3. Writing a letter to SBM India at the following address:
Address: The Compliance Manager
SBM Bank (Mauritius) Ltd
101 Raheja Centre, Free Press Journal Marg, Nariman Point
Mumbai 400 021
INDIA

The SBM India staff members should then log the complaint or write to the relevant Unit Leader. Note: The Chief Executive Officer, SBM India is the Nodal Officer who will be responsible for the implementation of customer service and complaint handling for the entire India operation.

4.1.2 Tier 2

If a customer is not satisfied with the response that SBM India has provided or has not heard from SBM India within 10 working days, the issue can be escalated by writing to the address mentioned below:

Nodal Officer

SBM Bank (Mauritius) Ltd

101 Raheja Centre, Free Press Journal Marg, Nariman Point

Mumbai 400 021
INDIA
Email: sbm@sbmgroup.mu

4.1.3 Tier 3

If the customer still feels that his/her concerns have still not been fully addressed or if he/she does not hear from the Head of Customer Service within 7 working days, he/she may write to -

The Chief Executive
SBM Bank (Mauritius) Ltd.
101 Raheja Centre, Free Press Journal Marg, Nariman Point
Mumbai 400 021
INDIA
Email: sbm@sbmgroup.mu

4.1.4 Banking Ombudsman

In the event that customers have not received any response within one month from the date the Bank first received their representation, or if the customer is dissatisfied with the response given by SBM India, he/she may write to the Banking Ombudsman of the area concerned.

The Banking Ombudsman Scheme, 2006 was introduced with the objective of enabling resolution of complaints relating to provision of banking services and resolving disputes between a bank and its constituent through the process of conciliation, mediation and arbitration in respect of deficiencies in customer service. After detailed examination of the complaints / grievances of customers of banks and after perusal of the comments of banks, the Banking Ombudsmen issue their awards in respect of individual complaints to redress the grievances.

The contact details of the banking ombudsman of the area are displayed at each branch.

SBM India should follow the following additional guidelines while dealing with complaints:

1. Complaints/suggestions box - Complaints/suggestions box should be provided at each office of SBM India. Further, at every office of SBM India a notice requesting the customers to meet the branch manager regarding grievances may be displayed.
2. Complaint Book /Register -. A Complaint book with perforated copies in each set of three should be introduced. The complainant should be given an acknowledgement instantly and a copy of the complaint is required to be forwarded to the concerned Controlling Office of SBM India along with the remark of the Branch Manager within the specified time frame. The complaints registers maintained by branches should be scrutinized by the concerned Regional Manager during his periodical visit to the branches and his observations/comments recorded in the relative visit reports.
3. Complaint Form - A complaint form, with the name of the Nodal Officer for complaint redressal, may be provided in the homepage itself to facilitate complaint submission by customers.

Standard customer complaint form will be made available across all the channels. The complaint form should also indicate that the first point for redressal of complaints is SBM India itself and that complainants may approach the Banking Ombudsman only if the complaint is not resolved at SBM India level within a month.

4. SBM India should also specify a time frame for resolving customer complaints at each level and further ensure that complaints emanating from rural areas also form part of the same redressal process. For detailed procedures on the grievance redressal machinery, SBM India should follow the guidelines mandated by the Master Circular on Customer Service in Banks.

5. SBM India shall ensure that:

(i) a complaint in respect of unauthorized electronic transactions is resolved and liability of the customer, if any, established within such time, as specified in the bank's Board approved policy on Customer Compensation, but not exceeding 90 days from the date of receipt of the complaint, and the customer is compensated as per RBI's regulatory guidelines / provisions specified on Customer Protection – Limiting Liability of Customers in Unauthorized Electronic Banking Transactions from time to time;

(ii) where it is unable to resolve the complaint or determine the customer liability, if any, within 90 days, the compensation as prescribed in RBI guidelines on Customer Protection – Limiting Liability of Customers in Unauthorized Electronic Banking Transactions is paid to the customer; and (iii) in case of debit card/ bank account, the customer does not suffer loss of interest, and in case of credit card, the customer does not bear any additional burden of interest.

6. The Master Circular of Reserve Bank of India on Customer Services in Bank will be the guiding document in resolution of complaints/ grievances of the customers on various operational issues

4.2 Response to Complaints

- i. Complaints should be processed in a timely and efficient manner. SBM India should establish internal SLAs to ensure timely and efficient response to complaints handling.
- ii. SBM India's goal is to address complaints at first contact. All customer' complaints shall be acknowledged within 3 working days and an acknowledgement slip/copy should be given to the customers when the complaint is made The written acknowledgement should provide the name, job title and contact details of the person handling the complaint.
- iii. Every complaint should be assigned a unique reference ID to ensure tracking and closure of the complaint
- iv. The complaints shall be classified as per their type in line with SBM India's internal procedures. Where necessary, customers shall be kept informed of the progress of their complaint and SBM India's internal escalation process within 7 business days.
- v. Simple complaints (that are not of a serious nature and requiring no investigation or consultation) to be resolved within 4 working days. Complaints requiring internal consultation and/or no extensive investigation to be resolved within 10 working days Complaints of serious nature and/or

requiring extensive investigation, SBM shall strive to reply to customers within one month and complainants shall be kept informed of the progress.

- vi. If complaints are received by letters or email, the Nodal Officer should send the acknowledgement of the complaint to the customer by post or e-mail as the case may be.

4.2.1 Nodal Officers

SBM India should have a nodal department / official for customer service in the Head Office and each controlling office, whom customers with grievances can approach in the first instance and with whom the Banking Ombudsman and RBI can liaise.

The Nodal Officer in India is responsible for the implementation of customer service and complaints handling for the entire operations of SBM India. The Nodal Officer should also ensure that customers are educated regarding the complaint handling procedures of SBM India through periodic campaigns.

SBM India should ensure that:

1. Contact details including name, complete address, telephone / fax number, email address, etc., of the Principal Nodal Officer who will be a Senior Officer of the Bank have been prominently displayed in the portal of SBM India preferably on the first page of the web-site.
2. Grievance Redressal Mechanism (GRM) is simple & easy for customers. Call centers & customer care units have quick authentication processes for a better call center experience.
3. Where complaints are not redressed within one month, the concerned branch / Controlling Office should forward a copy of the same to the concerned Nodal Officer under the Banking Ombudsman Scheme and keep him updated regarding the status of the complaint.
4. The names and other details of the CEO and Business Heads for various operations are also displayed on the website to enable the customers to approach them in case of need, if necessary.

4.2.2 Customer Service Committee

SBM India has constituted a Customer Service Committee as one of its eight board level Committees. The committee includes experts and representatives of customers as invitees to enable SBM India to formulate policies and assess the compliance thereof internally. The committee aims at strengthening the corporate governance structure in the banking system and also to bring about ongoing improvements in the quality of customer service provided by SBM India.

SBM India has also established a branch level customer service forum to encourage a formal channel of communication between the customers and SBM India at the branch level. The branch level forum should meet at least once a month to study complaints/suggestions, cases of delay; difficulties faced / reported by customers / members of the forum and evolve ways and means of improving customer service.

4.2.2.1 Role of the Customer Service Forum

1. Evaluate feedback on quality of customer service and implementation of commitments
2. Ensure that all regulatory instructions regarding customer service are followed by SBM India. To achieve this, the forum should obtain necessary feedback from zonal/regional managers/functional heads
3. Consider unresolved complaints/grievances referred by functional heads responsible for redressal and provide their advice
4. Submit reports on its performance to the Risk Management committee of the board on a quarterly basis.
5. The Customer Service forum could also address the following:
 - a) formulation of a Comprehensive Deposit Policy
 - b) issues such as the treatment of death of a depositor for operations of his account
 - c) product approval process with a view to ensure suitability and appropriateness
 - d) annual survey of depositor satisfaction
 - e) Triennial audit of such services.

4.2.3 Customer Service Executive Forum

The Customer Service Executive Forum or the Standing Committee on Customer Service (to be undertaken as part of its responsibility by the existing Management forum at SBM India) is the micro level executive committee driving the implementation process and providing relevant feedback while the Risk Management Committee of the Board would oversee and review / modify the initiatives.

The Forum should also receive quarterly reports with inputs / suggestions from the branch level customer service committee, which would enable it to examine them and provide relevant feedback to the Risk Management Committee of the Board for necessary policy / procedural action.

4.3 Customer Rights during the Investigation Process

Customers have the right to enquire about the status of their complaint by contacting the relevant relationship manager or CSA who has been identified as handling their complaint.

4.4 Records / Systems

Complaints shall be recorded and analyzed. Where systemic trends and recurring problems are identified, feedback shall be provided to the operational risk forum on a monthly basis. Furthermore, SBM India shall aim to archive customer complaints for a period of 7 years.

4.5 Analysis and Disclosure of complaints

SBM India should place a statement of complaints before their Risk Management Committee along with an analysis of the complaints received annually. The complaints should be analyzed:

1. to identify customer service areas in which the complaints are frequently received;
2. to identify frequent sources of complaint;
3. to identify systemic deficiencies;
4. to initiate appropriate action to make the grievance redressal mechanism more effective.

5. to classify them based on exposure to various risks including reputational risks and devise response mechanism to match priority of such complaints

SBM India should disclose the following details along with their financial results

1. 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

2. Awards passed by the Banking Ombudsman

- a. No. of unimplemented Awards at the beginning of the year
- b. No. of Awards passed by the Banking Ombudsmen during the year
- c. No. of Awards implemented during the year
- d. No. of unimplemented Awards at the end of the year

This statement of disclosure should include all the complaints received at the Head Office / Controlling Office level as well as the complaints received at the branch level. However, where the complaints are redressed within the next working day, SBM India should not include the same in the statement of complaints.

4.6 Review of Complaints Handling Process

SBM India's complaints handling procedures and systems are to be annually reviewed to ensure optimum effectiveness and efficiency. Any need for improvement shall be appropriately raised and highlighted.

4.7 Mandatory display requirements

It is mandatory for the SBM India to provide to customers:

1. Appropriate arrangement for receiving complaints and suggestions.
2. The name, address and contact number of Nodal Officer(s)
3. Contact details of Banking Ombudsman of the area
4. Code of the bank's commitments to customers/Fair Practice code

These display requirements should be met through:

1. Display on notice boards at branches
2. Display on the official web site of the bank
3. the Customer Acceptance Document
4. Alerts from time to time around system / operative changes for accounts, on implementing RBI guidelines related to withdrawals / payments including card payments and online payments
5. Information access to customer help lines in branches

4.8 Interaction with customers

SBM India recognizes that the customer's requirements/ expectations/ grievances can be better appreciated through personal interaction with the customer by the bank's staff. Structured customer

meets once in a month will give a message to the customers that SBM India cares for them and values their feedback for improvement in customer service.

It is mandatory for the SBM India to provide to customers:

- ☐ Appropriate arrangement for receiving complaints and suggestions.
- ☐ Customer education of the complaints handling procedure during new customer onboarding
- ☐ Access to the complaints handling form on the official website of the bank

For customers' accounts that are relationship managed, the Relationship Manager, Private or Personal Banker will be responsible for taking ownership of the complaint and communicating with the customer. For Non-relationship managed customers, the Compliance Officer or equivalent will call and manage the customers and will be responsible for post service recovery with the help of service units/support departments. The latter should ensure that requests sent to them by Complaints Cell are replied within one business day. If they require further time to investigate, they should keep Complaints Cell informed with clear target dates so that clients may be notified.

Further, periodic meetings will be held with customers to gather feedback on the quality of customer service. The output will feed into updating bank products & services to align them with customer requirements. Furthermore, it is incorporated as a part of the customer service forum's functions which evaluates this feedback and implementation of the commitments.

4.9 Time frame

Complaints received should be analyzed comprehensively by setting up specific time schedules for handling complaints and disposing them at all levels including branches, zonal and head office. The branch manager should try to resolve the complaint within specified time frames, decided by SBM India. Communication of the 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. Additionally the complainant may use the unique reference ID provided to him to enquire about the status of the complaint at any point during its redressal. SBM India will be responsible for ensuring timely response to complaints in line with internal SLAs and stipulated RBI timelines. Branch and zonal offices of SBM India should send an 'action taken report' on complaints received at the end of every month to the Risk Management Department.

4.10 Sensitizing operating staff on handling complaints

SBM India should ensure that the bank's staff should be properly trained for handling complaints. Imparting soft skills required for handling irate and agitated customers should be an integral part of the training schedule for the staff. It should be the responsibility of the Nodal Officer to ensure that internal machinery for handling complaints/grievances operates smoothly and efficiently at all levels. He/she should give feedback on training needs of the staff at various levels to the HR Department.

SBM India should further ensure the following:

1. The Nodal officer or HR Division will assess completion of the specific mandatory training programs for the staff in various departments handling various parts of the complaint management process.
2. New Joiners will be provided specific session of customer complaint management (bank's vision and policy) at the time of joining SBM India in the onboarding orientation.
3. The audit policy of SBM India across various types of audits will ensure required checks and audits of customer complaint management process and is implemented at the branches. This will include awareness of staff, collaterals, notices displayed, records management etc.

5 POLICY REVIEWS

This Complaints Handling Policy – India Supplement will be reviewed at least once a year or more frequently (if required) by Risk Management Team, SBM India. Further, inputs from the India CEO will also be sought at the time of the review.

6 POLICY AMENDMENT AUTHORITY

Risk Management Committee, SBM India must recommend to the Board any changes or amendments to the policy for their approval.

7 POLICY AUTHORIZATION

By their signatures below, on behalf of the Board, the Chief Executive Officer, SBM India and Head of Risk, SBM India hereby certify that this Policy has been drafted to comply with, and is in accordance with, practices at SBM India and will be fully adopted and adhered to.

8 LIST OF ACRONYMS

CSA	Customer Service Assistant
SLA	Service Level Agreements

ANNEXURE 1: AUTHORITY LIMITS

The Chief Executive for SBM India has the authority for settlement amounts up to INR 10,000. Any settlement beyond this amount requires the approval of the Group Chief Executive.

While the settlement limits at each level are enforceable, for those settlements within range, if the wider implications of the settlement are not clear or impact requires better judgment, the officer may refer to the next level of authority to assist resolving the complaint.

ANNEXURE 2: RBI SOURCES

The below document has been referred to while working on the India policy supplement of the Complaint Handling Policy:

- Master Circular on Customer Service in Banks DBOD No. Leg.BC. 21 /09.07.006/2015-16 dated July 01, 2015 <http://rbidocs.rbi.org.in/rdocs/notification/PDFs/69BC290613FC.pdf>
- RBI circular DBR. No.Leg.BC.78/09.07.005/2017-18 dated July 6, 2017 on Customer Protection – Limiting Liability of Customers in Unauthorised Electronic Banking Transactions

Any updates in the relevant RBI circulars with regards to Complaints Handling Policy, would supersede the policy supplement statements given here and would accordingly need to be incorporated in the next revision in the supplement.