

Aditya Birla Idea Payments Bank Limited

Customer Grievance Redressal Policy

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1. Introduction

Aditya Birla Idea Payments Bank (hereinafter referred to as “the Payments Bank”), being a service industry player, needs to have an ongoing and focused approach towards customer service. Moreover, the competitive market scenario makes it imperative for the Payments Bank to have a robust mechanism in place to address and resolve customer complaints promptly and for compensating customers. Furthermore, the RBI Master Circular on Customer Service in Banks dated July 1, 2015 in clause 3.4 requires banks to have a well-documented Customer Grievance Redressal Policy duly approved by their Boards.

The Payments Bank will strive to provide the highest quality of customer service to ensure continued customer satisfaction, retention and sustained growth of products and services. It shall also operationalize a mechanism for effective redressal of customer grievances.

2. Objective

The Payments Bank, through a comprehensive Customer Grievance Redressal Policy, intends to put in place systems, procedures and a review mechanism for minimizing instances of customer complaints and grievances and to ensure prompt and effective redressal of customer complaints and grievances.

Additionally, the key objectives of this policy are as under:

- Ensure adherence to the basic principles of transparency and integrity
- Ensure courteous and expedient resolution of customer issues
- Ensure that the systems in place for grievance redressal facilitate fair and timely resolution of customer requests and complaints
- Deliver consistently high standards of customer service which helps to differentiate the Payments Bank from its competitors
- Ensure unbiased, fair and just treatment to customers on an ongoing basis
- Educate the customers about alternate escalation mechanisms within and outside the Payments Bank, for resolution of the complaints/issues if they are not satisfied with the Payments Bank's response
- Ensure customers are compensated for any financial loss incurred by them on account of service gaps

3. Applicability

The policy will apply to employees of the Payments Bank as well as Business Correspondents/Agents and shall be applicable in respect of all customers catered to by branches and by Business Correspondents / CSPs / Agents. The policy will cover all the products and services offered by the Payments Bank, including third party products distributed by the Payments Bank.

The policy document would be made available to all Business Correspondents / CSPs / Agents and branches and placed on the banks website.

4. Governance Structure

In line with RBI Guidelines¹, the Payments Bank will have a grievance redressal mechanism at three levels, i.e. the Board, Head Office, Circle/District Level and Access Points.

- The Customer Service Committee at the Board level shall assess and review the overall implementation of customer service policies and initiatives.
- The Nodal Grievance Redressal Officer shall serve as a focal point for driving the implementation of customer service policies and initiatives and shall act as a bridge between the various units of the Payments Bank and Customer Service Committee of the Board.
- The Circle/District Level Grievance Officers shall act as a formal channel of communication between the customers and the Payments Bank and support agent supervision.

The detailed responsibilities of each of the aforesaid are elaborated below:

4.1 Customer Service Committee of the Board

The Customer Service Committee is responsible to oversee the implementation of service initiatives and customers compensation across the Payments Bank. The Committee meets once each quarter and formulates policies on customer service, customer experience and customer compensation, assesses the customer service governance structure and suggests improvements to the quality of Customer Services based on inputs from within the Payments Bank and from customers of the Payments Bank.

4.2 Grievance Redressal Cell (GRC) and Nodal Grievance Redressal Officer

The Payments Bank shall set up a Grievance Redressal Cell at its Head Office to oversee the implementation of the customer complaint handling mechanism of the Payments Bank. The cell shall be headed by a Nodal Grievance Redressal Officer. The Payments Bank shall also appoint a concerned officer for each of the Circle/District level Offices to ensure smooth resolution of customer grievances. The concerned officer shall be the point of contact with whom the Banking Ombudsman and RBI can liaise for resolution of customer complaints.

The Grievance Redressal Cell shall ensure that the following details are displayed in the branches, CSP locations and on the website of the Payments Bank:

¹ i. RBI circular on Operating Guidelines for Payments Banks (RBI/2016-17/80 DBR.NBD. No.25/16.13.218/2016-17) dated October 6, 2016

ii. RBI circular on 'Master Circular on Customer Service in Banks' (RBI/2015-16/59 DBR No.Leg.BC. 21/09.07.006/2015-16) dated July 1, 2015

- Names of officials who can be contacted for redressal of complaints along with direct telephone number, fax number, complete address and email address. This will also include the name and details of the concerned Nodal Officer appointed under the Banking Ombudsman Scheme, 2006
- Details of the Head of Grievance Redressal Cell and concerned officers at each of the regions/zone
- Names and other contact details of CEO/MD and other business heads to enable customers to approach them if required
- Contact details of the Banking Ombudsman Offices in the respective areas

4.3 Circle/District Level Customer Service Officers (Area Bank Managers)

The Circle/District Level Customer Service Officers also known as Area Bank Managers will be responsible for strengthening the customer service at the Circle/District level, through interaction with a diverse set of customers. These officers will schedule monthly interactions with customers at the Circle/District level to identify and understand customer grievances, cases of delays in receipt of remedial action and other difficulties faced by the customers. It also provides a forum for customers to provide their feedback/suggestions and enable the Payments Bank in working towards evolving its processes to improve customer service.

On a quarterly basis, the Circle/District level officers will review the audit findings of the services rendered to the customers

The Circle/District Level Customer Service Officers may also submit quarterly reports providing inputs/suggestions to the Nodal Grievance Redressal Officer to examine them and provide relevant feedback to the Customer Service Committee of the Board for necessary policy/procedural action.

5. Role of Access Points/CSPs and Branches in Customer Grievance Redressal

The customer service framework will be embedded into the Payments Bank's culture across the Head Office, Circle Offices, branches and Corporate BCs / agents in order to drive the larger objective of driving an intuitive customer experience. Each customer touch point with the Payments Bank will serve towards creating a lasting impression in the customer's mind through a seamless experience, ease of accessibility, faster resolution of complaints and transparency in communication. The Payments Bank in the near and short-term will create an extensive and ubiquitous network comprising of access points, branches, controlling offices and technology enabled BCs/agents to enable consumers to transact (store, pay and cash-out) easily from their bank accounts.

Every access point/CSP location (including branches) of the Payments Bank will follow the below mentioned measures with respect to customer grievance handling:

- The display of information including the grievance redressal mechanism at the CSP/branch locations will be done in English, Hindi and the concerned regional language
- Regular training of branch/CSP staff for customer service orientation to be conducted to ensure that relevant information is provided by the staff to customers fully, correctly and honestly.
- There will be regular audits of customer service and customer surveys.

The following measures should be additionally followed at branches of the Payment Bank:

- All branches, 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.
- Roving officials will be posted to ensure that employees are responding to customers and to assist customers in conducting in their transactions.
- The branches will normally function for public transactions at least for 4 hours on week days and will observe full working days on Saturdays other than the second and fourth Saturdays of the month.
- The branches will display a notice requesting the customer to approach the Branch Manager in case of any grievances/complaints.
- A complaint book with perforated copies in each set, will be maintained at each of the branches/offices of the Payments Bank to register complaints of the customer.

6. Complaints Handling and Resolution Process

A 'complaint' means a representation in writing or through electronic means containing a grievance alleging deficiency in the banking service received as mentioned in clause 8 of the Banking Ombudsman Scheme, 2006.

6.1 Categories of Complaints

- **Transaction related:** Deposit/cash related/opening of account/transfer of account/closure of account/claims on deceased depositors' accounts/TDS related/service charge related, etc.
- **Branch related:** Basic facilities to customers/ambience/Customer service area/long queue, etc.
- **Staff related:** Alleged harassment, misbehaviour/use of rude language, alleged bribery, mis-selling etc.
- **Technology related:** Disputed ATM transaction/POS transaction/Internet banking transaction/Mobile banking transaction/RTGS/NEFT
- **Business Correspondent 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.

The Payments 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 Payments Bank in identifying and resolving gaps in the customer service, product features and the delivery of the products through its own branches and business correspondents/agents.

6.2 Registration and Tracking of Complaints

1. The customer can register his/her complaint through multiple channels which may include:
 - a. Toll free Customer care numbers/interactive voice response (IVR) / Select Customer Service Point / Branch/Area Bank Managers at Circle/District level
 - b. Online grievances received through Complaint Forms on website and through chat application available on website
 - c. Grievances received through emails
 - d. Mobile application / Internet Banking
 - e. Complaints received through Banking Ombudsman (BO), Centralized Public Grievance Redress & Monitoring System (CPGRAMS) of the Government of India

2. The customer will be given an acknowledgement of his complaint instantly. All customer complaints received through digital channels will be acknowledged through emails/SMS.
3. For any customer complaints received through customer care numbers, website, or emails, or through external channels such as the Office of the Banking Ombudsman, or CPGRAMS, it will be ensured that the complaints are assigned to the respective department responsible for resolution, within the stipulated timelines as specified in the operational guidelines.
4. All complaints will be recorded in the CRM system and tracked and monitored centrally at the Central/Head Office.
5. An automated system will be devised to record digitally the customer complaints received through multiple channels, which shall also be accessible to the branches and Circle/Regional offices to monitor and update the status of the complaint. Each of these complaints will be assigned a unique tracking number which will be shared with the customer for future reference and monitoring purpose.

6.3 Resolution of Complaints/Grievances

1. The concerned authority of the Circle/Circle head will monitor the resolution of complaints pertaining to his/her governance area, complaints received through alternate channels and complaints pertaining to BCs/agents within his circle/region and ensure that these complaints are not required to be escalated.
2. The governance structure for addressing complaints against BCs has been outlined in the policy on Business Correspondents of the Payments Bank
3. The Payments Bank will put in place appropriate procedures along with timelines to redress the complaints received for transactions undertaken through digital channels
4. A customer grievance escalation mechanism will be displayed in the branches/CSP locations and on the website.
5. The resolution of the complaints will be done in a courteous and timely manner to ensure customer satisfaction.
6. 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 with an update will be sent to the customer.
7. A dedicated Customer Grievance Cell at the Head Office will review the quality of the classification and assignment of complaints and check whether the resolution is complete and correct.

6.4 Escalation of Complaints

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

Level of Escalation	Official to be approached	Channel to be followed	Time frame for next level escalation
First Level	Branch Level officers/ Area Bank Managers at Circle/District Level	In-person/Call/Email	10 days
Second Level	Specialised Grievance Redressal Team	Call/E-mail	10 days
Third Level	Nodal Grievance Redressal Officer	Call/E-mail	10 days
Fourth Level	Banking Ombudsman/ CPGRAMS	Call/E-mail/Internet (through portal)	one month from complaint, or the bank rejects the complaint, or if the complainant is not satisfied with the reply given by the bank.

1. The Payments Bank shall inform the customer that if his complaint is not resolved to his satisfaction, he may approach the Circle/District Level officers, whose details are displayed in CSP locations/ branches and on the website. If the complaint is still not satisfactorily resolved, the Payments Bank shall inform the customer to approach the Nodal Grievance Redressal Officer at the Head Office for resolution of the complaint. The Payments Bank will ensure that appropriate efforts are made to resolve the escalated complaint within the Payments Bank itself. In case of an inability to resolve the complaint within the Payments Bank, appropriate reasons will be documented for non-resolution of such complaints.
2. If the customer is still not satisfied, the Payments Bank shall inform the customer that he may approach the Banking Ombudsman within one month from the date of the complaint.
3. In case of an inability to handle the complaint within the Payments Bank, appropriate measures will be taken to educate and guide the customer to approach the external avenues as under:
 - a. Banking Ombudsman Scheme of the Reserve Bank of India 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 and also displayed on the website of the Payments Bank.
 - b. The customer may also approach Government of India through online Centralized Public Grievance Redressal and Monitoring System available on www.pgportal.gov.in.

The Payments Bank shall put in place operational guidelines to handle escalation of customer complaints through external entities such as Banking Ombudsman/ CPGRAMs.

7. Customer Compensation²

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

- Erroneous/unauthorized debit to customer account also covering transaction failures through Mobile, Internet and Digital Channels but debited to customer account
- Incorrect authorisation or decline of transactions through Digital channels that result in inconvenience to customers
- Failure to execute direct debit/ECS debit instructions
- Payment made under cheque after acknowledging stop payment instructions
- Delayed collection of local/outstation cheque
- Lost cheques/instruments while in transit, during clearing or at the Branch
- Violation of code by the Payments Bank's staff or agent
- Delay in credit of failed ATM transactions
- Mis-selling of third party products
- Delay in credit to customer's account
- Direct losses on account of internet banking security breaches

For the purpose of ascertaining any unauthorized debits, the Payments Bank shall complete the process of verification of such entry within 7 working days. In case of any cheques paid after stop payment instructions, the customer's account shall be given the credit of such erroneous credit within 2 working days of the customer intimating the transaction to the Payments Bank.

Interest on account of delayed collection of cheques shall be paid at the savings bank rate if the delay is up to 90 days³. If the delay is extraordinary i.e. above 90 days, then the savings deposit rate plus 2% will be payable to the customer. Similar compensation will need to be paid in case of loss of cheques in transit.

The compensation amount in the aforesaid cases will be limited to the direct financial loss suffered by the customer and as approved as per the approval matrix outlined in the Delegation of Financial Authority approved by the Board. The financial powers shall be delegated basis the amount of compensation and the seniority and experience of the officials with respect to the aforesaid matters.

² RBI circular on 'Master Circular on Customer Service in Banks' (RBI/2015-16/59 DBR No.Leg.BC. 21/09.07.006/2015-16) dated July 1, 2015.

³ The RBI Master Circular on Customer Service in Banks dated July 1, 2015 requires term deposit rates to be applied if there is a delay of more than 14 days. However, as Payments Banks are not permitted to issue term deposits, the interest rate on savings bank account deposits will be applied.

The Payments Bank shall compensate the customer on account of failed ATM transactions at INR 100/- per day if the Payments Bank is not able to resolve the complaint within 7 working days and if such complaint was lodged within 30 days of the date of the transaction.

If the Payments Bank is liable to pay to the customer, such compensation shall be paid to the customers under this policy within 10 working days of the completion of investigation.

8. Reporting Requirements

The following matters should be reported to the Customer Service Committee:

- Audit findings on quarterly basis of the services rendered to the customers
- Results of annual survey of customer satisfaction
- Status of implementation of Code of Conduct
- Report on performance of the Nodal Grievance Redressal Officer during its tenure indicating, inter alia, the areas reviewed, procedures/practices identified and simplified/introduced
- Statement of complaints along with an analysis of the complaints
- Position of pending complaints against the Payments Bank with the Banking Ombudsman offices/ Consumer Courts/ Courts
- Any customer service impact due to downtime of IT systems or failure of business continuity plans
- Any adverse reporting in media with respect to customer servicing

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

- Gaps in implementation of code of conduct towards customers
- Changes required in products/services/procedures to improve customer service
- Instances of mis-selling of products
- Position of complaints against the Payments Bank with Banking Ombudsman and Consumer Courts

The Nodal Grievance Redressal Officer shall present to the Board, on a half-yearly basis, a root cause analysis of the top five complaints category pertaining to that half-year. The Officer shall also present to the Board the detailed memorandum to the Board on a half-yearly basis on the customer care aspects.

The Payments bank will adhere to the regulatory disclose requirements in this regards.

9. Record Keeping

The records pertaining to customer complaints shall be maintained for a minimum period of eight 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.

10. 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.

11. Regulatory References

Name of the circular/statute	Circular reference / Statute section	Circular issuance date (last updated on)	Circular issuing authority
Operating Guidelines on Payment Banks	RBI/2016-17/80 DBR.NBD.No.25/ 16.13.218/2016- 17	October 6, 2016	RBI (DBR)
RBI Master Circular – Customer Service in Banks	RBI/2015-16/59 DBR No.Leg.BC.21/09. 07.006/2015-16	July 1, 2015	RBI (DBR)
Charter of Customer Rights	NA	December 3, 2014	RBI

Glossary

ATM	Automated Teller Machine
BC	Business Correspondents
BO	Banking Ombudsman
CEO	Chief Executive Officer
CPGRAMS	Centralized Public Grievance Redress & Monitoring System
IVR	Interactive Voice Response
MD	Managing Director
NEFT	National Electronic Funds Transfer
POS	Point of Sale
RBI	Reserve Bank of India
RTGS	Real Time Gross Settlement
TDS	Tax Deducted at Source