

**POLICY ON CUSTOMER RIGHTS - 2023-24**  
**&**  
**POLICY ON PRODUCT SUITABILITY - 2023-24**

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# **1. POLICY ON CUSTOMER RIGHTS - 2023-24**

## **1. INTRODUCTION:**

The Policy on Customer Rights enshrines basic rights of the customers of the banks regulated by the Reserve Bank of India. It spells out the rights of the customer and also the responsibilities of the bank. The Policy applies to all products and services offered by the bank or its agents, whether provided across the counter, over phone, by post, through interactive electronic devices, on internet or by any other method.

## **2. RIGHT TO FAIR TREATMENT :**

Both the customer and the Bank have a right to be treated with courtesy. The customer should not be unfairly discriminated against on grounds such as gender, age, religion, caste and physical ability when offering and delivering financial products.

In pursuance of the above Right, Bank will -

- Promote good and fair banking practices by setting minimum standards in all dealings with customers.
- Promote a fair and equitable relationship between the bank and the customer.
- Train bank staff attending to customers, adequately and appropriately.
- Ensure that staff members attend to customers promptly and courteously.
- Treat all our customers fairly and not discriminate against any customer on grounds such as gender, age, religion, caste, literacy, economic status, physical ability, etc. Bank may, however, have special schemes or products, which are specifically designed for members of a target market group or may use defensible (justifiable), commercially acceptable economic rationale for customer differentiation. Bank may also have schemes or products as part of an affirmative action such as for women or backward classes. Such schemes / products will not tantamount to unfair discrimination. The rationale for such special schemes or terms will be explained wherever required.
- Ensure that the above principle is applied while offering all products and services.
- Ensure that the products and services offered are in accordance with relevant laws and regulations.

**Further Bank will also,**

Provide the banking facilities for senior citizens, differently abled persons and visually impaired persons like providing preferential assistance at branches, cheque book facility, automatic conversion of status of accounts, additional facilities to visually impaired customers and ease of filing form 15G/H.

Further bank shall provide the facility of door step banking for senior citizens of more than 70 years of age and differently abled or infirm persons (having medically certified chronic illness or disability) including those who are visually impaired, subject to request letter from the account holder.

This facility will be provided through outsourced service provider for the time being. Presently Bank shall be providing this facility 'Mandatorily' at all branches situated at Metro Centres subject to the terms and conditions of doorstep banking. In all other branches Bank shall provide the service on a 'best effort basis'. Further, Bank shall display and update the list of branches offering such doorstep banking services on bank's website regularly.

While it shall be the endeavour of the bank to provide their customers with hassle free and fair treatment, bank would expect their customers to behave courteously and honestly in their dealings with the bank.

It shall also be the bank's endeavour to encourage their customers to approach the bank's internal grievance redressal machinery and approach alternate forum after exhausting all their remedies under bank's internal grievance mechanism.

**3. RIGHT TO TRANSPARENCY, FAIR AND HONEST DEALING :**

In pursuance of the above Right, Bank will -

- Ensure complete transparency so that customers can have a better understanding of what he or she can reasonably / fairly expect from the Bank.
- Ensure that the bank's dealings with customers rest on ethical principles of equity, integrity and transparency.
- Provide customers with clear information about Bank's products and services, terms & conditions, and the interest rates / service charges in simple and easily understandable language, and with sufficient information so that customers

could be reasonably expected to make an appropriate and informed choice of product.

- Ensure that all terms & conditions are fair and set out the respective rights, liabilities and obligations clearly and as far as possible in plain and simple language;
- Make known the underlying features associated with the product that may be especially disadvantage to the customers. Most Important Terms and Conditions (MITC) associated with the product or service will be clearly brought to customer notice while offering the product. In general, it will be ensured that such terms will not inhibit our customer's future choice.
- Provide information on interest rates, fees and charges either on the Notice Board in the branches or website or through help-lines or help-desk and where appropriate customers will be informed directly.
- Display the tariff schedule in Bank's website and a copy of it will be made available at every branch for customer's ready reference. Also will display in its branches a notice about the availability of the Tariff Schedule at the branch.
- Give details, in our Tariff Schedule, of all charges, if any, applicable to the products and services chosen by our customers.
- Provide information about the penalties leviable in case of non-observance / breach of any of the terms & conditions governing the product / services chosen by customers.
- Display on public domain the Banks' Policies on Deposits, Cheque Collection, Grievance Redressal, Compensation and Collection of Dues and Security Repossession.
- Make every effort to ensure that staff dealing in a particular product is properly trained to provide relevant information to our customer fully, correctly and honestly.
- Ensure to communicate to customer within a reasonable time period as decided by the bank about the acceptance / non-acceptance of applications submitted for availing a product / service and convey in writing the reasons for not accepting / declining the application.

- Communicate unambiguously the information about –
  - Discontinuation of particular products.
  - Relocation of their offices.
  - Changes in working hours.
  - Change in telephone numbers.
  - Closure of any office or branch.

with advance notice of at least 30 days. Also affirms that disclosure of information is an on-going process through the life-cycle of the product / relationship. All possible channels of communication, including web-site, will be used to ensure that information on all changes are made known to customer upfront;

- Advise customer at the time of selling the product of the rights and obligations embedded in law and/or banking regulation including the need to report any critical incidents that the customer suspect, discovers or encounters.
- Ensure that bank's staff members shall, when approached by customers for availing a product or service, provide all relevant information related to the product / service and also provide direction to informational resources on similar products available in the market with a view to enable our customer to make an informed decision.
- Not terminate customer relationship without giving reasonable or contractual prior notice to our customer.
- Assist our customer in all available ways for managing his/her account, financial relationship by providing regular inputs in the bank's realms such as account statements/passbooks, alerts, timely information about the product's performance, term deposits maturity etc.
- Ensure that all marketing and promotional material is clear and not misleading.
- Not threaten our customer with physical harm, exert influence or engage in behavior that would reasonably be construed as unwarranted harassment. Ensure adherence only to the normal appropriate business practices.
- Ensure that the fees and charges on products/services and its structure are not unreasonable to customers.

#### **4. RIGHT TO SUITABILITY:**

The products offered by the Bank are appropriate to the needs of the customer and based on an assessment of the customer's financial circumstances and understanding.

In pursuance of the above Right, Bank will -

- Ensure that Bank has Board approved policy for assessing suitability of products for customers, prior to sale.
- Endeavour to make sure that the product or service sold or offered is appropriate to the customer's needs and not inappropriate to the customer's financial standing and understanding, based on the assessment made by it.
- Sell third party products only if it is authorized to do so for marketing and distributing third party financial products.
- Not compel a customer to subscribe to any third party products as a quid-pro-quo for any service availed from the bank.
- Ensure that the products being sold or service being offered, including third party products, are in accordance with extant rules and regulations;
- Inform the customer about his responsibility to promptly and honestly provide all relevant and reasonable information that is sought by bank to enable them to determine the suitability of the product to the customer.

#### **5. RIGHT TO PRIVACY:**

Customers' personal information should be kept confidential unless they have offered specific consent to the financial services provider or such information is required to be provided under the law or it is provided for a mandated business purpose (for example, to credit information companies). The customer should be informed upfront about likely mandated business purposes. Customers have the right to protection from all kinds of communications, electronic or otherwise, which infringe upon their privacy.

**In pursuance of the above Right, Bank will -**

- i) Treat customer's personal information as private and confidential (even when customer is no longer banking with us), and, as a general rule, not disclose such

information to any other individual/institutions including its subsidiaries / associates, tie-up institutions etc. for any purpose unless:

- Customers have authorized such disclosure explicitly in writing.
  - Disclosure is compelled by law/regulation.
  - Bank has a duty to the public to disclose i.e. in public interest.
  - Bank has to protect its interests through disclosure.
  - It is for a regulatory mandated business purpose such as disclosure of default to credit information companies or debt collection agencies.
- ii) Not use or share customer's personal information for marketing purpose, unless customers have specifically authorized it.
- iii) Shall adhere to Telecom Commercial Communications Customer Preference Regulations, 2010 (National Customer Preference Registry) issued by Telecom Regulatory Authority of India, while communicating with customers.

#### **6. RIGHT TO GRIEVANCE REDRESS AND COMPENSATION:**

The customer has a right to hold the financial service provider accountable for the products offered and to have a clear and easy way to have any valid grievances redressed. The provider should also facilitate redress of grievances stemming from its sale of third party products. The financial service provider must communicate its policy for compensating mistakes, lapses in conduct, as well as non-performance or delays in performance, whether caused by the provider or otherwise.

##### **In pursuance of the above Right, Bank will:**

- Deal sympathetically and expeditiously with all things that go wrong.
- Correct mistakes promptly.
- Cancel any charge that has been applied wrongly and by mistake;
- Compensate customers for any direct financial loss that might have been incurred by customers due to its lapses.

##### **Bank will also:**

- Place in public domain its Customer Grievance Redressal Policy, including the grievance redressal procedure available for the customer.

- Place in public domain the compensation policy for delays / lapses in conducting / settling customer transactions within the stipulated time and in accordance with the agreed terms of contract.
- Ensure to have a robust and responsive grievance redressal procedure and clearly indicate the grievance resolution authority who shall be approached by the customer.
- Make grievance redressal mechanism easily accessible to customers.
- Advise customers about how to make a complaint, to whom such a complaint is to be made, when to expect a reply and what to do if customer is not satisfied with the outcome;
- Display name, address and contact details of the Grievance Redressal Authority / Nodal Officer. The time limit for resolution of complaints will be clearly displayed / accessible at all service delivery locations.
- Inform the complainant of the option to escalate his complaint to the Banking Ombudsman if the complaint is not redressed within the pre-set time.
- Place in public domain, information about Banking Ombudsman Scheme.
- Display at customer contact points, the name and contact details of the Banking Ombudsman under whose jurisdiction the bank's branch falls.

**Further, Bank will:**

- Acknowledge all formal complaints (including complaints lodged through electronic means) within three working days and work to resolve it within a reasonable period, not exceeding 30 days (including the time for escalation and examination of the complaint by the highest ranking internal official responsible for grievance redressal). The 30 day period will be reckoned after all the necessary information sought from the customer is received.
- Provide aggrieved customers with the details of the Banking Ombudsman Scheme for resolution of a complaint if the customer is not satisfied with the resolution of a dispute, or with the outcome of a dispute handling process.
- In addition, the bank will a) clearly spell out, at the time of establishing a customer relationship, the liability for losses, as well as the rights and responsibilities of all parties, in the event of products not performing as per

specifications or things going wrong. However, the bank will not be liable for any losses caused by extraneous circumstances that are beyond its reasonable control (such as market changes, performance of the product due to market variables, etc.). b) Ensure the customer is refunded without delay and demur, if it cannot show beyond reasonable doubt to the customer on any disputed transaction (along with interest/charges)

**7. POLICY REVIEW AND REVISION:**

This Policy will be reviewed annually and the Managing Director is authorised to modify/revise this policy based on the extant guidelines of RBI/IBA/BCSBI from time to time.

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## **2. POLICY ON PRODUCT SUITABILITY - 2022-23**

### **1. INTRODUCTION:**

Customer Service has great significance in the banking industry. The banking system in India today has perhaps the largest outreach and serves as an important conduit for the delivery of financial services. The vast network of branches spread across the country having millions of customers, complex variety of products & services offered, the varied institutional framework, add the enormity and complexity of banking operations in India.

The Charter of Customer Rights comprising the following five basic customer rights - (i) Right to Fair Treatment, (ii) Right to Transparency, Fair & Honest Dealing, (iii) Right to Suitability, (iv) Right to Privacy, (v) Right to Grievance Redress & Compensation.

A 'suitable product' is one which a client can be expected to manage with a low probability of serious hardship and a reasonable prospect that it will provide value. The Bank is committed to offer appropriate products based on the needs of the customer and on an assessment of the customer's financial circumstances & understanding.

### **2. BANK PRODUCTS:**

Bank is offering different types of products & services, keeping in view the appropriate needs of the customers.

In pursuance of the aforesaid Right to Suitability,

- Bank will provide all the relevant and reasonable information sought by the customers about the products to enable them to make investment according to their financial circumstances and understanding.
- Bank on regular intervals will provide all the information about our products through advertisement/display on notice board/information on our website/distribution of pamphlets & any other mode of communication to enable them to understand the pros & cons better.
- Bank will also disclose the commissions or fees if any, levied on the products or services rendered.

- Bank will inform the customer about his/her responsibility to provide promptly and honestly, all relevant and reasonable information that are sought by the Bank to enable us to determine the suitability of the product for them.
- Bank will inform the customer that assessment made, based on his/her financial standing & understanding, will be appropriately documented in the Bank records, for the future use.

### **3. THIRD PARTY PRODUCTS:**

Bank is offering different types of third party products and services, such as Mutual Funds, Life & General Insurance, etc. which are prepared by keeping the appropriate needs of the customers in mind.

In this connection,

- Bank will make sure that third party products are sold only by the companies which are duly authorised by the competent authorities like IRDA, SEBI etc.,
- Bank will make sure that the products or services sold or offered are appropriate to their needs.
- Bank will ensure that the products or services sold or offered is purely on voluntary basis. There is no 'linkage' either direct or indirect between the provision of banking services offered to our customers and use of the third party products. Further, products that are unsuitable to the customer will not be sold and customers will not be forced to avail the products.
- Bank will not solicit/undue influence a customer to subscribe to any third party product as a quid-pro-quo for any service offered by us.
- Bank will ensure that all investment and insurance products which we are selling are in accordance with extant rules & regulations.
- Bank will ensure that all investment and insurance products sold at the branches will be explained to the customers by personnel who are duly qualified to sell the products.
- Bank will apply appropriate customer due diligence measures before selling investment / insurance products to them.
- Bank will provide detailed terms & conditions of the product, which are being offered to them.

**4. POLICY REVIEW AND REVISION:**

This Policy will be reviewed annually and the Managing Director is authorised to modify/revise this policy based on the extant guidelines of RBI/IBA/BCSBI/IRDA/SEBI etc, from time to time.

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