CUSTOMER 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 more so for Banks because they are service organizations. As a service organization, customer service and customer satisfaction should be the core concern of any bank. At Model Co-operative Bank Ltd., customer service is the essence of is business strategy. The Bank believes that providing prompt and efficient service is essential not only to attract new customers, but also to retain existing ones. The policy aims at minimizing instances of customer complaints and grievances through proper service delivery and review mechanism and to ensure prompt redressal of customer grievances.

Reference to Regulatory Circulars / Guidelines

Master Circular on 'Customer Service in Banks' bearing reference no. RBI/2014-15/72DBOD No.Leg.BC.21/09.07.006/2014-15 dated July 1, 2014

Applicability

This policy is applicable to all branches, offices, all personnel, including outsourced employees working at various locations of M/s. Model Co-Operative Bank.

Policy is intended to specify the framework of Grievance Redressal mechanism of the Bank and regulatory reporting thereof etc.

INTRODUCTION

A Customer Grievance Redressal Policy is a structured framework designed to address and resolve customer complaints efficiently, transparently and fairly. This is done with a view for Banks to implement such policies to enhance customer satisfaction, maintain trust and comply with regulatory guidelines such as those set by the Reserve Bank of India or other relevant authorities.

OBJECTIVE

To ensure a prompt and fair resolution of customer complaints and to enhance customer satisfaction through a transparent and responsive mechanism.

PRINCIPLES

- Fair Treatment: To ensure all customers are treated fairly and with courtesy at all times and without prejudice to the interests of the customer. There should be no discrimination between customers. Each customer should be treated at par with other customers
- 2) Timely Resolution: To address and resolve customer complaints in an efficient and timely manner.
- 3) Accessibility: To provide accessible channels for customers to lodge/ escalate their grievances within the Bank and their rights to alternative remedy if the resolution is not to their satisfaction.
- 4) Transparency: To maintain transparency in the complaint handling process and keep customers informed and

5) To make Bank's redressal mechanism more meaningful and effective so that the solution offered is just and fair and within the given frame-work of rules and regulations of the Bank and Regulators.

Definition of Complaint, Request and Enquiry:

- **a. Complaint:** A lapse or gap in service delivery vis-a-vis the standard expectations as per banking rules and regulations as well as RBI guidelines. Complaints could be on account of breach in committed turnaround time (TAT), non-fulfilment of admissible request placed with the bank.
- **b.** Request: The act of asking for something admissible/ lawful that the customer asks for in regards to his relationship with the bank. Requests will have specific turnaround time (TAT) depending on its nature.
- **c. Enquiry:** Any information that the customer seeks regarding the product or service.

Modes to lodge a complaint / grievance:

Customers can register their complaints at any branch, either by personal visit or over the telephone or through their registered e-mail ID. Complaint Register will also be made available at all branches for recording of the complaints.

Customers can directly send their complaints at our dedicated email ID customercare@modelbank.in,

If the customer's complaint is not resolved or not satisfied with the resolution provided by the Branch, then the said customer can further approach Banking Ombudsman, RBI. Details of the Banking Ombudsman are displayed at branches and on Bank's website.

Generally, the Turnaround time (TAT) will be as below: Sr. No

Sr.	Type of Complaints	TAT (in working
No		days)
1	Related to Passbook printing, mobile number/address/ PAN updation, Charges, FD related, Inward / Outward	3 days
2	Related to Account opening, KYC, Interest application, TDS, DEAF, Loans, Recovery, Staff behaviour, Shares, Dividend on shares, Death claim, FOREX, etc	3 days
	Dispute in cash withdrawal from other than Model Bank ATM / Debit Card	5 days
	Dispute regarding Mobile Banking / UPI / ECom / POS	30 days
	RTGS/NEFT	Next working day
3	Related to CIBIL	30 days

Zero Liability of Customer

A customer's entitlement to zero liability shall arise where the unauthorized transaction occurs in the following events:

- 1. Contributory fraud/negligence/deficiency on the part of the bank (irrespective of whether or not the transaction is reported by the customer).
- 2. Third party breach where the deficiency lies neither with the bank nor with the customer but lies elsewhere in the system, and the customer notifies the bank within three working days of receiving the system driven SMS from the bank regarding unauthorized transaction.

Limited Liability of a customer

- a. A customer shall be liable for the loss occurring due to unauthorized transactions in the following cases:
- b. In cases where the loss is due to negligence by a customer, for e.g. sharing of confidential details by customer i.e. payment credentials or any critical key parameters like his birth date, CIF Id, PAN, etc. which helped the fraudster to do the fraud OR clicking any unauthorized link by the customer OR installing any type of remote control software application/s on mobile handset, the customer will bear the entire loss until he reports the unauthorized transaction to the Bank. Any loss occurring after the reporting of the unauthorized transaction shall be borne by the Bank. However, merely dropping an e-mail after office hours will not be considered as communication for reporting of unauthorized transaction on immediate basis. The said mail will be considered on next working day.
- c. In cases where the responsibility for the unauthorized electronic banking transaction lies neither with the bank nor with the customer, but lies elsewhere in the system and when there is a delay (of four to seven working days after receiving system driven SMS from the bank regarding unauthorized transaction) on the part of the customer in notifying the bank of such a transaction, the transaction liability of the customer shall be limited to the transaction value or the amount
- d. Further, if the delay in reporting is beyond 7 working days, entire liability shall be of Customer
- e. Overall liability of the customer in third party breaches, where the deficiency lies neither with the bank nor with the customer but lies elsewhere in the system, is summarized below:

As per RBI's circular number RBI/ 2017-18/15 DBR No.Leg.BC.78/09.07.2017-18 dated 6th July 2017

Time taken to report the fraudulent transaction from the date of receiving the communication from Bank	Customer's liability
Within 3 working days	Zero Liability
Within 4 to 7 working days	
1. SB accounts	
2. Current / Cash Credit/ Overdraft Accounts of MSMEs	10,000
3. Current Accounts/ Cash Credit/ Overdraft Accounts of Individuals with annual average balance (during 365 days preceding the incidence of fraud)/ limit up to Rs.25 lacs	
4.All other Current/Cash Credit/overdraft accounts	25,000
Beyond 7 working days	Entire liability of
	customer

On being notified by the customer, the bank shall credit the amount involved in the unauthorized electronic transaction to the customer's account within 10 working days from the date of such notification by the customer. The credit shall be value dated to be as of the date of the unauthorized transaction.

Bank should resolve a complaint within 90 days from the date of receipt of the complaint and should compensate the customer, if any, as per above mentioned provisions. If Bank is unable to resolve the complaint or determine the customer liability, if any, within 90 days, the compensation as prescribed above is to be paid to the customer.

Time Frame for Complaint handling process.

Customers have a right to register a complaint. The Branch Manager is responsible for resolution of grievances in respect of customer service at the Branch. He would be responsible for closure of all complaints received at Branches. It is his prime responsibility to ensure that the complaint is resolved promptly upto the customer's satisfaction within time frame decided by the Bank and if the customer is not satisfied, he should provide alternate avenues to escalate the issue.

If the Branch Manager feels that it is not possible to solve the complaint at his level within seven (7) days, he should refer it to the Manager/ Senior Manager/ authority at the Operation Department, Head Office. The Manager/ Senior Manager/ authority at the Operation Department, Head Office, if not resolve the complaint at their level within next 7 days, they should refer the complaint to Nodal Officer to redress the grievances within next 16 days.

The Branch Manager at Branch Level, the Manager/ Senior Manager/ authority at the Operation Department, Head Office and Nodal Officer should try to resolve the complaint promptly and within the specified time frame decided by the Bank which should not exceed 30 days. The Communication of the Bank's stand on any issue to the customer is of prime importance. Complaints which require time for investigation of issues should be acknowledged promptly and If need of more time depending upon the nature of complaint Interim reply to be sent to customer.

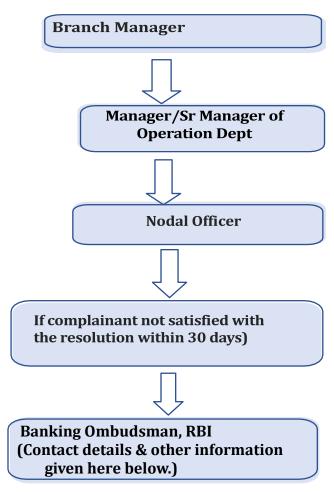
Escalation Matrix:

Level 1: Branch Manager

Level 2: Manager/Senior Manager/Authorised official of Operation Dept.

Level 3: Nodal Officer

Organization Structure:



Mandatory requirements:

Complaint cum Suggestion Box is provided in the Banking Hall.

Complaint Book / Register made available with the Branch Manager.

All branches should maintain a separate complaint register. These registers should be maintained irrespective of the fact whether a complaint is received or not in the past. The concern Nodal Officer, Head Office Authority during his periodical visit to the branches should take review of the observations/comments recorded in complaints registers maintained by branches.

Display the names of the bank officials like Nodal Officer and/or other Officer who can be contacted for redressal of complaints, together with their name, contact number, e-mail details and office address at prominent place on the notice board of branches. At the same time, name and address of the Banking Ombudsman (RBI) also to be displayed on the Branch notice board.

Details of Nodal Officer: Mr. Naresh Thakur

Address: Asst. General Manager, Operation Dept.,

Model Co-operative Bank Ltd., 501, Central Plaza, 166, CST Rd., Kalina, Santacruz East, Mumbai-400098.

Email: nodalofficer@modelbank.in

Contact details of Banking Ombudsman of the area

Mumbai (I)	Smt. Taksha Mishra
Districts of Mumbai, Mumbai	C/o Reserve Bank of India,
Suburban & Thane	4 th Fl., RBI Byculla Office Building,
	Opp. Mumbai Central Railway Station,
	Byculla, Mumbai 400 008
	Email: cms.bomumbai1@rbi.org.in
Mumbai (II)	Shri Sanjay Kumar
Maharashtra & Goa (Except the	C/o Reserve Bank of India,
Districts of Mumbai, Mumbai	4 th Fl., RBI Byculla Office Building,
Suburban & Thane)	Opp. Mumbai Central Railway Station,
	Byculla, Mumbai 400 008
	Email: cms.bomumbai1@rbi.org.in