



Customer Grievance Redressal Policy

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Particulars	Name	Date
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	Name	Date
Revised by	Uma Parte, BNS Mumbai	Nov 29, 2021
Checked by	K Raghavan BNS Mumbai, Kunda Jadhav, CAO Mumbai	Dec 01, 2021

Reviewed by	Sujoy Saha, Compliance	
Approved by	MANCOM	

1. Introduction

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 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.

1.1 Complaint:

A Complaint is:

1. A grievance/ protest/ grumble.
2. Customer disputing non-conformance of services/ products/ processes.
3. An error committed by the bank.

1.2 The customer complaint arises due to;

- a. The attitudinal aspects in dealing with customers
- b. 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 or she is not satisfied with the services provided by the bank. He or she can give the complaint in writing, orally or over telephone. If customer's complaint is not resolved within given time or if he or she is not satisfied with the solution provided by the bank, he or she can approach Banking Ombudsman with the complaint or other legal avenues available for grievance redressal.

2. Internal Machinery to handle Customer complaints / grievances

2.1 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 triennial 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. This committee is also responsible for examining loan policies and service issues for the individual as a borrower.

2.2 Standing Committee on Customer Service

At Branch levels, the Standing Committee on Customer Service will be chaired by the Branch Manager/Operation Manager of the bank. Besides the Credit Manager / Customer Service Head of the bank, the committee would also have an eminent customer of the Bank 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 zonal/regional managers/ functionalheads.
- The committee also would consider unresolved complaints/complaints related to non-compliance with the Code/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.

2.3 Complaint Register

Complaint books are kept at each and every branches of the Bank. Complaint books are maintained in the format as specified by the Indian Bank Association (IBA) with adequate number of perforated copies. The complaints register maintained by the branch is scrutinized by the Head of Operations.

Procedure for Filing a Complaint

- (1) The complaint may be lodged online through the portal designed for the purpose (<https://cms.rbi.org.in>).
- (2) The complaint may also be submitted through electronic or physical mode to the Centralised Receipt and Processing Centre as notified by the Reserve Bank. The complaint, if submitted in physical form, shall be duly signed by the complainant or by the authorised representative. The complaint shall be submitted in electronic or physical mode in such format and containing such information as may be specified by Reserve Bank.

Resolution of Complaints

The Regulated Entity shall, on receipt of the complaint, file its written version in reply to the averments in the complaint enclosing therewith copies of the documents relied upon, within 15 days before the Ombudsman for resolution. Provided that the Ombudsman may, at the request of the Regulated Entity in writing to the satisfaction of the Ombudsman, grant such further time as may be deemed fit to file its written version and documents.

Award by the Ombudsman:

The Award passed under sub-clause (1) shall lapse and be of no effect unless the complainant furnishes a letter of acceptance of the Award in full and final settlement of the claim to the Regulated Entity concerned, within a period of 30 days from the date of receipt of the copy of the Award.

Provided that no such acceptance may be furnished by the complainant if he has filed an appeal under sub-clause (3) of clause 17.

The Regulated Entity shall comply with the Award and intimate compliance to the Ombudsman within 30 days from the date of receipt of the letter of acceptance from the complainant, unless it has preferred an appeal under sub-clause (2) of clause 17.

Regulated Entity to Display Salient Features of the Scheme for Knowledge of the Public:

- (1) The Regulated Entity to which the Scheme is applicable shall facilitate the smooth conduct of the Scheme by ensuring meticulous adherence to the requirements under the Scheme, failing which, the Reserve Bank may take such action as it may deem fit.
- (2) The Regulated Entity shall appoint a Principal Nodal Officer at their head office who shall not be a rank less than a General Manager or an officer of equivalent rank and shall be responsible for representing the Regulated Entity and furnishing information on behalf of the Regulated Entity in respect of complaints filed against the Regulated Entity. The Regulated Entity may appoint such other Nodal Officers to assist the Principal Nodal Officer as it may deem fit for operational efficiency.
- (3) The Regulated Entity shall display prominently for the benefit of their customers at their branches/places where the business is transacted, the name and contact details (Telephone/mobile number and E-mail ID) of the Principal Nodal Officer along with the details of the complaint lodging portal of the Ombudsman (<https://cms.rbi.org.in>).
- (4) The Regulated Entity to which the Scheme is applicable shall ensure that the salient features of the Scheme are displayed prominently in English, Hindi and the regional language in all its offices, branches and places where the business is transacted in such a manner that a person visiting the office or branch has adequate information on the Scheme.
- (5) The Regulated Entity shall ensure that a copy of the Scheme is available in all its branches to be provided to the customer for reference upon request.
- (6) The salient features of the Scheme along with the copy of the Scheme and the contact details of the Principal Nodal Officer shall be displayed and updated on the website of the Regulated Entity.

2.4 Nodal Officer and other designated officials to handle complaints and grievances

Bank would appoint a Nodal Officer who will be responsible for the implementation of customer service and complaint handling for the entire bank.

Mr. K Raghavan , Manager GWO India, is the Nodal Officer of the Bank.

The Nodal Officer is responsible for the following actions:

3. Mandatory display requirements

It is mandatory for the bank to provide;

- Appropriate arrangement for receiving complaints and suggestions.
- The name, address and contact number of Nodal Officer(s)
- Contact details of Banking Ombudsman of the area
- Code of bank's commitments to customers/Fair Practice code
- Process for filing written complaints as well as escalation process for resolution of the complaints.

4. Regularly reporting of Complaints to the Management

Bank places a statement of complaints before the Management in the Compliance Committee with root cause analysis of the complaints received, statement of complaints is also disclosed along with financial results. Unimplemented awards of the Banking Ombudsman are also disclosed along with the financial results.

Statement of complaints placed before the management in the compliance committee is analysed as follows:

1. Identify customer service areas (root cause analysis), in which complaints are frequently received.
2. Identify frequent sources of complaints.
3. Identify System deficiencies.
4. Initiate appropriate action to make Grievance Redressal mechanism more effective.

FORM OF COMPLAINT (TO BE LODGED) WITH THE OMBUDSMAN

[Clause 11(2) of the Scheme]

(TO BE FILLED UP BY THE COMPLAINANT)

All the fields are mandatory except wherever indicated otherwise

To

The Ombudsman

Madam/Sir,

Sub: Complaint against (place of Regulated Entity's branch or office)

of ... (name of the Regulated Entity)

Details of the complaint:

1. Name of the complainant

2. Age (years).....

3. Gender.....

4. Full address of the complainant

.....

.....

Pin Code

Phone No. (if available).....

Mobile Number.

E-mail (if available)

5. Complaint against (Name and full address of the branch or office of the Regulated Entity)

.....

.....

Pin Code

6. Nature of relationship/account number (if any) with the Regulated Entity

.....

7. Transaction date and details, if available

.....

(a) Date of complaint already made by the complainant to the Regulated Entity

(Please enclose a copy of the complaint)

.....

(b) Whether any reminder was sent by the complainant? Yes/No

(Please enclose a copy of the reminder)

.....

8. Please tick the relevant box (Yes/No)

Whether your complaint: (i)	is sub-judice/under arbitration ¹ ?	Yes	No
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(ii)	is made through an advocate, except when the advocate is the aggrieved party?	Yes	No
(iii)	has already been dealt with or is under process on the same ground with the Ombudsman?	Yes	No
(iv)	is in the nature of general complaint/s against Management or Executives of a Regulated Entity?	Yes	No
(v)	is on account of a dispute between Regulated Entities?	Yes	No
(vi)	involves employer-employee relationship?	Yes	No

¹ **Complaint is sub-judice/under arbitration** if the complaint in respect of the same cause of action is already pending/dealt with on merits by any Court, Tribunal or Arbitrator or any other Authority, whether individually or jointly.

9. Subject matter of the complaint

.....

10. Details of the complaint:

(If space is not sufficient, please enclose a separate sheet)

.....

.....

.....

..... 17

11. Whether any reply has been received from the Regulated Entity within a period of 30 days of receipt of the complaint by it? Yes/No

(if yes, please enclose a copy of the reply)

12. Relief sought from the Ombudsman

.....

.....

(Please enclose a copy of documentary proof, if any, in support of your claim)

13. Nature and extent of monetary loss, if any, claimed by the complainant by way of compensation (please refer to clauses 15 (4) & 15 (5) of the Scheme)

Rs.....
.....

14. List of documents enclosed:

Declaration

(i) I/We, the complainant/s herein declare that:

a) the information furnished above is true and correct; and

b) I/We have not concealed or misrepresented any fact stated above, and in the documents submitted herewith.

(ii) The complaint is filed before the expiry of a period of one year reckoned in accordance with the provisions of clause 10 (2) of the Scheme.

Yours faithfully

(Signature of the Complainant/Authorised Representative)

AUTHORISATION

If the complainant wants to authorise a representative to appear and make submission on her/his behalf before the Ombudsman, the following declaration should be submitted:

I/We hereby nominate Shri/Smt as my/our authorised representative whose contact details are as below:

Full Address

.....

.....

Pin Code

Phone No:.....

Mobile Number.

E-mail

(Signature of the Complainant)

Disclosure

Every year, Scotiabank will disclose the following brief details for the information of all the stake holders. All units in Scotiabank, India have to share the details of complaints received and disposed during the year, to the Nodal Officer on 31st March every year for consolidation by the Nodal Officer and submit the same in the below format to our Finance Department, for review by Statutory auditors and for incorporating the same in the annual report of Scotiabank, India for the financial year April to March every year.

Finance Team will circulate the below table to all business units and gather the information in the below format.

As per RBI Circular ref: RBI/2020-21/87 - CEPD. CO. PRD. Cir. No.01/13.01.013/2020-21 dated January 27, 2021, the grievance Redress Mechanism is required to be strengthened. We give below the full guideline on the same as per the referred circular

Strengthening of Grievance Redress Mechanism in Banks			
The framework for strengthening grievance redress mechanism in banks will have the following major components:			
I. Enhanced disclosures on complaints			
2. Disclosures serve as an important tool for market discipline as well as for consumer awareness and protection. Appropriate disclosures relating to the number and nature of customer complaints and their redress facilitate customers and interested market participants to better differentiate among banks to take an informed decision in availing their products and services. To ensure provision of relevant and important information in this regard to bank customers and other stakeholders, the current set of disclosures made by the banks are being enhanced as indicated below:			
Disclosures by banks			
3. Disclosures currently made by banks regarding customer complaints and grievance redress in their annual report are made in terms of Para 16.4 of the Master Circular on 'Customer Service in Banks' dated July 01, 2015 ¹ .			
In line with para 4 of annexure to RBI circular on Strengthening of Grievance Redress Mechanism in Banks dated January 27, 2021 for financial year 2020-21, BNS India will make following disclosure in its financial statement/annual accounts:			
Enhanced disclosures to be made by banks on complaints and grievance redress			
Summary information on complaints received by the bank from customers and from the			
OBOs			
Sr. No	Particulars	Previous year	Current year
	Complaints received by the bank from its customers		
1	Number of complaints pending at beginning of the year		
2	Number of complaints received during the year		
3	Number of complaints disposed during the year		

	3.1. - Of which, number of complaints rejected by the bank		
4	Number of complaints pending at the end of the year		
	Maintainable complaints received by the bank from OBOs		
5	Number of maintainable complaints received by the bank from OBOs		
	5.1 - Of 5, number of complaints resolved in favour of the bank by BOs		
	5.2 - Of 5, number of complaints resolved through conciliation/mediation/advisories issued by BOs		
	5.3 - Of 5, number of complaints resolved after passing of Awards by BOs against the bank		
6	Number of Awards unimplemented within the stipulated time (other than those appealed)		

Note: Maintainable complaints refer to complaints on the grounds specifically mentioned in BO Scheme 2006 and covered within the ambit of the Scheme.

Top five grounds of complaints received by the bank from customers			
Grounds of complaints, (i.e. complaints relating to)	Number of complaints pending at the beginning of the year	Number of complaints received during the year	% increase/ decrease in the number of complaints received over the previous year
1	2	3	4
	Current Year		
Ground - 1			
Ground - 2			
Ground - 3			
Ground - 4			
Ground - 5			

Others			
Total			
	Previous Year		

Ground - 1			
Ground - 2			
Ground - 3			
Ground - 4			
Ground - 5			
Others			
Total			

Note: The master list for identifying the grounds of complaints is provided in Appendix 1.

II. Recovery of cost of redress of complaints from banks

5. At present, redress of complaints under BO Scheme, 2006 (BOS) is cost-free for banks as well as their customers. Given that the banker-customer relationship is the primary relationship, the main responsibility of customer grievance redress lies with banks. With a view to ensure that banks discharge this responsibility effectively, the cost of redress of complaints will be recovered from those banks against whom the maintainable complaints in the OBOs exceed their peer group average as detailed in para 7 below. However, grievance redress under BOS for customers will continue to remain cost-free.

6. To operationalize the cost-recovery framework for banks, peer groups based on the asset size of banks as on March 31 of the previous year will be identified, and peer group averages of maintainable complaints received in OBOs would be computed on the following three parameters:

- average number of maintainable complaints per branch;
- average number of maintainable complaints per 1,000 accounts (total of deposit and credit accounts) held by the bank; and
- average number of maintainable digital complaints per 1,000 digital transactions³ executed through the bank by its customers.

7. The cost of redressing complaints in excess of the peer group average will be recovered from the banks as follows:

- excess in any one parameter - 30% of the cost of redressing a complaint (in the OBO) for the number of complaints in excess of the peer group average;
- excess in any two parameters - 60% of the cost of redressing a complaint for the number of complaints exceeding the peer group average in the parameter with the higher excess;
- excess in all the three parameters – 100% of the cost of redressing a complaint for the number of complaints exceeding the peer group average in the parameter with the highest excess.

8. The cost of redress to be recovered in this respect will be the average cost of handling a complaint at the OBOs during the year.

III. Intensive Review of Grievance Redress Mechanism

9. Reserve Bank will undertake, as a part of its supervisory mechanism, annual assessments of customer service and grievance redress in banks based on the data and information available through the Complaint Management System, and other sources and interactions. Banks identified as having persisting issues in grievance redress will be subjected to an intensive review of their grievance redress mechanism to better identify the underlying systemic issues and initiate corrective measures. The intensive review shall include, but will not be limited to, the following areas:

i. Adequacy of the customer service and customer grievance redress related policies.

ii. Functioning of the Customer Service Committee of the Board.

iii. Level of involvement of the Top Management in customer service and customer grievance related issues.

iv. Effectiveness of the grievance redress mechanism of banks.

10. Based on the review, a remedial action plan will be formulated and formally communicated to the banks for implementation within a specific time frame. In case no improvement is observed in the grievance redress mechanism within the prescribed timelines despite the measures undertaken, the bank(s) will be subjected to corrective actions through appropriate regulatory and supervisory measures.

Strengthening of Grievance Redress Mechanism in Banks
Master list of grounds of complaints to be used for disclosure on the top five ground-wise receipt of complaints by banks under Para 4 of the Annex
1. ATM/Debit Cards
2. Credit Cards
3. Internet/Mobile/Electronic Banking
4. Account opening/difficulty in operation of accounts
5. Mis-selling/Para-banking

6. Recovery Agents/Direct Sales Agents
7. Pension and facilities for senior citizens/differently abled
8. Loans and advances
9. Levy of charges without prior notice/excessive charges/foreclosure charges
10. Cheques/drafts/bills
11. Non-observance of Fair Practices Code
12. Exchange of coins, issuance/acceptance of small denomination notes and coins
13. Bank Guarantees/Letter of Credit and documentary credits
14. Staff behaviour
15. Facilities for customers visiting the branch/adherence to prescribed working hours by the branch, etc.

16. Others
¹ https://www.rbi.org.in/Scripts/BS_ViewMasCirculardetails.aspx?id=9862
² Maintainable complaints refer to complaints on the grounds specifically mentioned in BOS 2006 and are covered within the ambit of the Scheme.
³ 'Digital Transaction' means a payment transaction in a seamless system effected without the need for cash at least in one of the two legs, if not in both. This includes transactions made through digital / electronic modes <u>wherein both the originator and the beneficiary use digital / electronic medium to send or receive money.</u>

Nodal Officer

Scotiabank will appoint a Nodal Officer who will be responsible for the following:

- Implementation of all the regulatory instructions and codes issued by the RBI and Banking Codes and Standards Board of India (BCSBI) respectively.
- He would arrange resolving all complaints/grievances in respect of the customer service
- He would examine suggestions received from the customers for better customer service and arrange to implement them wherever feasible.
- Ensure closure of all complaints to the customer's satisfaction within the prescribed time schedule, if necessary, in consultation with the Chief Executive Officer.
- Ensure that complaints are closed only if the grievances are redressed to the satisfaction of the customers.
- To decide, in consultation with the Chief Executive Officer, as to whether appeal should be preferred or not, against award given by the Banking Ombudsman.
- In case, it is decided to honour the award given by the Banking Ombudsman, he would ensure implementation thereof within the time limit stipulated in the Banking Integrated Ombudsman Scheme 2021.

1. Resolution of Grievances

Branch Manager is responsible for the resolution of complaints/grievances in respect of customer's service by the branch. He would be responsible for ensuring closure of all complaints received at the branches. 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 he should be provided with alternate avenues to escalate the issue. If the branch manager feels that it is not possible at his level to solve the problem he can refer the case to the Nodal Officer.

Time frame

2.

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.

- If the complaint has been received in writing (e-mail/fax/courier), we will endeavor to send you an acknowledgement/response within a week. If your complaint is relayed over phone at our designated number or customer service number, we shall provide you a complaint reference number and keep you informed of the progress within a reasonable period of time.
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- After examining the matter, we will send you our final response or explain why we need more time to respond and shall endeavor to do so within four weeks of receipt of your complaint and will tell you how to complain further if you are still not satisfied.
- If the issue remains unresolved even after the expiry of the stipulated period, then it will be automatically escalated to the Nodal Officer, who would take immediate steps for resolution.

3. Interaction with customers

The bank recognizes that customer's expectation/requirement/grievances can be better appreciated through personal interaction with customers by bank's staff. Structured customer meets, say once in a month will give a message to the customers that the bank cares for them and values their feedback/suggestions for improvement in customer service. Many of the complaints arise on account of lack of awareness among customers about bank services and such interactions will help the customers appreciate banking services better. As for the bank the feedback from customers would be valuable input for revising its product and services to meet customer requirements.

Sensitizing operating staff on handling complaints

4.

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. All employees should ensure better customer service to avoid any complaints. 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.
