



Grievance Redressal Policy

Introduction

Shivalik Small Finance Bank has adopted the following policy, in respect of handling customer complaints/grievances, in line with the Quality Policy of the Bank. With a view to ensure consistent superior service experience, the Bank shall provide a responsive, fair, expeditious and customer-centric query/complaint management procedures to all external customers.

In view of above the Bank shall:

- Ensure visibility and accessibility of complaint handling process to all complainants by providing access to Grievance Redressal policy to customers
- Handle complaints promptly, professionally & in a transparent and fair manner
- Ensure objectivity in the complaint handling process
- Ensure confidentiality of Complainants information unless required for addressing the complaint
- Ensure clear accountability for resolving and reporting of complaints

Objective

The objective of the policy is to:

- Ensure all customers are provided courteous, timely and fair resolution to problems
- Customers are given full support on the complaints raised and are made aware about the complete scenario so that the customer is satisfied and retained
- Ensure that all the Bank employees work in good faith and without prejudice towards the interest of the customers
- Ensure adherence to all relevant Regulatory & Statutory requirements as mandated by RBI and mentioned in the Shivalik Grievance redressal policy
- Continually improve its processes & systems by taking inputs from customers, employees, and other interested parties

Applicability/Coverage

Shivalik Small Finance Bank understands the importance to classify & differentiate complaints from queries. The policy clearly defines the two.

- **Defining “Complaint”:**
A complaint may be defined as "An expression of dissatisfaction made to an organization, related to its products and services, or the complaints-handling process itself, where a response or resolution is expected.
A complaint may be expressed in person, over the telephone or in writing.
- **Defining “Query”:**
A query can be defined as a question, often expressing doubt about something, or looking for an

answer from an authority. A query is:

- a) A form of questioning, in a line of enquiry
- b) In nature of a request for information or guidance
- c) Where there is an expectation from the customer – for data / clarification

Note: The Policy will be applicable to all customers including customers from rural/SHG background.

Customer Complaints Resolution Process

Ways of Contacting the Bank

At Shivalik, we are committed for providing the best customer service. Still if any point the customer feels uncomfortable in any situation, he can get in touch with us by different ways.

In person	Visit the Branch and speak to any official or can drop in the complaint in the complaint box or can get the complained filed in the register
Mobile	Can send “UNHAPPY” message on 9266680802
In writing	Can send the email on customercare@shivalikbank.com .
Bank’s Website	Customer can log in the complaint by writing in the “complaints/suggestion” link available in the homepage of the Bank’s website www.shivalikbank.com

Three Level Grievance Redressal Mechanism

Level 1: Branch Channel

- Customer can visit our branch and log his complaint in the complaint register maintained at all our branches (during working hours of the branch) or drop the complaint in the complaint box
- Customers can also give their views during customer meets where they can give their opinions/feedback on products & services of the Bank.

Level 2

- If the resolution is not provided by the Level 1 within the prescribed timeframe (as per Annexure-1A*) or resolution provided does not meet customer’s expectation/requirement, then customer can approach our Cluster Heads/Department Heads
- Contact details of Cluster Head are mentioned below as well as the same are available at all our branches under Escalation Matrix

Level 3

- If the resolution provided at Level 2 does not meet customer’s expectation or not provided within 7 days, then he can write to our Principal Nodal Officer at Head Office at the following email address - pno@shivalikbank.com
- Contact details of Principal Nodal Officer (Operations Head – Mr. Ravi Ratnaker Singh) will be made available at all our branches and our website. Escalation matrix is given below-

1st Level:

Name of the Official	Designation	Contact No.	E-mail ID
	Branch Head		

2nd Level:

Name of the Official	Designation	Contact No.	E-mail ID
	Cluster Head		

***Note: Annexure-1A is uploaded on the portal along with the policy.**

3rd Level:

Principal Nodal Officer: If customer is not satisfied even after escalating the issue at 1st and 2nd level, he can further escalate the matter to the Principal Nodal Officer as per following details:

Name: **Mr. Ravi Ratnaker Singh**

Mobile: 9776640005

E-mail Id: pno@shivalikbank.com

Internal Ombudsman of the Bank:

The Internal Ombudsman (IO) is an independent authority and is not a Shivalik Small Finance Bank employee. The Internal Ombudsman of the Bank is a retired or serving officer, not below the rank of Deputy General Manager or equivalent of another bank/Financial Sector Regulatory Body, having necessary experience of minimum seven years of working in areas such as banking, regulation, supervision, payment, and settlement systems and/or consumer protection. The Internal Ombudsman will deal only with the complaints that have already been examined by the Bank's internal grievance redressal mechanism and have remained partly or wholly un-redressed. Complaints related to frauds, misappropriation, etc. in respect of deficiency of service and cases pending such as consumer forum, courts cases, debt recovery, etc. would not be examined by the IO. The decision of Internal Ombudsmanshall be binding on the Bank. In case of disagreement with the Internal Ombudsman's decision, the Bank may obtain approval of the Executive Director/Managing Direction/CEO in charge of customer service ofthe Bank. All such cases shall be subsequently reviewed by the Customer Service Committee of the Board.

Shivalik Follows This Golden Rule "First Contact Is the Last Contact for the Customer"

- Once the customer contacts any of the Shivalik Bank staff then he shall become the "First Contact" and instead of passing the complaint to any other officer he shall be responsible for providing the solution to the customer by contacting the concerned authority. Also, the ticket for the said complaint shall be raised immediately and shared with customer.
- Simultaneously customer will be informed about the proceedings happening about the complaint and keep in touch till the problem gets resolved

Time Frame and Nature of Feedback

- We shall respond within 3 working days to the customer's complaint. A range of turnaround time for different types of Complaints and Queries is defined as per Annexure 1 A
Nature of Complaint and Query can fall in any of the following categories:
- Transaction Related Complaints: Dealing with all customer transaction related matters including delay in collection of instruments/ remittance, NPCI settlement, transaction failures including electronic banking transactions using Net Banking, Mobile Banking, E-Commerce, POS, ATMs, etc.
- Account Related Complaints: Deals with general account complaints such as dispute on charges/interest, disposal of deceased cases, transfer of account, etc.

- Banking Channel Complaints: ATM, CDM, net banking, mATM, mobile banking, etc.
- Complaints received from regulatory bodies
- Staff behavior
- Other: Includes credit related decisions, fraud in the Account etc.

Complaint Reference Number

Bank shall record the complaints with a reference number and shall provide the same to customers immediately at the time of reporting the complaint.

Internal Machinery to Handle Complaints/Grievances

Executive Committee

Bank has framed Executive committee in which CEO and other senior functionaries of the Bank participate on monthly basis and review the following:

- Complaints received from the Regulator
- Internal complaints received, resolved, and pending with root cause analysis and action steps to reduce complaints
- Effectiveness of the Grievance Redressal mechanism adopted by the Bank
- Any other items concerning customer service.

Nodal/Principal Officer for Handling Customer Services and Complaints

Bank has appointed a senior officer of the bank as Nodal/Principal officer who will be responsible for implementation of customer services and complaints resolution in the entire Bank. The details of the Nodal officer will be displayed in every branch.

Customer Service Committee in Branches

Each Branch would have a Service Committee comprising of senior members of the Branch team, viz. Branch Head, Branch Operations Manager etc. The Committee will sit on monthly basis for review. The functions of the Committee are:

- Meet selected customers on a regular basis to ascertain their feedback & comments on the service levels rendered by the Branch
- Ensure that all regulatory & internal instructions regarding customer service are followed by the branch
- Evaluate feed-back on quality of customer service receive from various quarters
- Identify & work on action steps to enhance the level of customer service offered by the Branch
- The Complaints, analyses, and action points thereon, would be shared with the Head – Customer Service for further branch wise analyses and presentation to the standing committee on customer service and customer service committee of the Board

Reporting of Unauthorized Transactions by Customers to Bank (Electronic Banking Transactions):

- Branches/Bank must ask the customers to mandatorily register for SMS alerts, and whenever

available, register for e-mail alerts for electronic banking transactions

- The customers are advised to notify the bank of any unauthorized electronic banking transaction at the earliest after the occurrence of such transaction, and informed that the longer the time taken to notify the bank, the higher will be the risk of loss to the bank/customer
- To facilitate this, bank provides services through multiple channels to raise the concerns via. phone banking (Card Blocking 24X7), SMS banking, e-mail, reporting to home branch, etc.
- The loss/fraud reporting system ensures that immediate response is sent to the customers acknowledging the complaint along with the registered complaint number.
- The internet banking and other digital channels are not offered to customers with no mobile number
- The Customer service committee of the Board/Board of the bank will periodically review the unauthorized electronic banking transactions reported by customers or otherwise, as also the action taken thereon, the functioning of the grievance redressal mechanism and take appropriate measures to improve the systems and procedures

Limited Liability of a Customer

Zero liability of a customer

A customer's entitlement to zero liability shall arise where the unauthorized transactions in the following cases:

- Contributory fraud/negligence/deficiency on the part of the bank (irrespective of whether or not the transaction is reported by the customer)
- 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 communication from the bank regarding the authorized transaction.

Limited liability of a customer

A customer shall be liable for the loss occurring due to unauthorized transactions in the following cases:

- In cases where the loss is due to negligence by a customer, such as where he has shared the payment credentials, 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
- 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 the customer notifies the bank of such a transaction within four to seven working days of receiving a communication of the transaction, the per transaction liability of the customer shall be limited to the transaction value or the amount mentioned in below table, whichever is lower.

Maximum Liability of a customer	
Type of Account	Maximum Liability (₹)
• BSBDA	5,000
• All other SB Accounts • Pre-Paid Payment Instruments and Gift Cards • Current/Cash Credit/Overdraft Accounts of MSMEs	10000

<ul style="list-style-type: none"> Current Accounts/Cash Credit/Overdraft Accounts of Individuals with annual average balance (for 365 days preceding the incidence of fraud)/ limit up to Rs.25 lakh 	10000
<ul style="list-style-type: none"> Credit cards with limit up to Rs. 5 lakhs 	25,000

- Further, if the delay in reporting is beyond seven working days, the customer liability shall be determined as per the bank's Board approved policy. Bank shall provide the details of their policy regarding customers' liability formulated in pursuance of these directions at the time of opening the accounts. Bank shall also display their approved policy in public domain for wider dissemination. The existing customers must also be individually informed about the bank's policy
- Overall liability of the customer in third party breaches, as detailed in paragraph a(ii) and paragraph b(ii) above, where the deficiency lies neither with the bank nor with the customer but lies elsewhere in the system, is summarized in the below mentioned table:

Summary of Customer's Liability	
Time taken to report the fraudulent transaction from the date of receiving the communication	Customer's liability (₹)
Within 3 working days	Zero liability
Within 4 to 7 working days	The transaction value or the amount mentioned in the above table, whichever is lower
Beyond 7 working days	As per bank's Board approved Policy: <ol style="list-style-type: none"> Up to 50% of the claim amount, CEO's approval is required. Above 50% to 75% of the claim amount, EC approval is required. Above 75%, Board's approval is required.

Reversal Timeline for Zero Liability/Limited Liability

- On being notified by the customer, the bank shall credit (shadow reversal) 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 (without waiting for settlement of insurance claim, if any). The credit shall be value dated to be as of the date of the unauthorized transaction
- Further, bank ensures that:
 - A complaint is resolved and liability of the customer, if any, established and the customer is compensated as per provisions (as stated in above paragraphs),

within such time as may be specified in the bank's Board approved policy, but not exceeding 90 days from the date of receipt of the complaint

- b) Where it is unable to resolve the complaint or determine the customer liability, if any, within 90days, the compensation as prescribed (in the above paragraphs) is paid immediately to the customer; and
- c) 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

Time Frame for Response

Standard Turnaround Time (TAT) for broad level of queries / Complaints mentioned in Annexure - 1A (range of TATs applicable for Complaints or queries within a broad classification).

Amendment of the Policy

Any amendments to this policy will be approved by the Board of Directors (BOD) of the Bank.