

Strictly for Internal use only

Kotak Mahindra Bank

GRIEVANCE REDRESSAL POLICY

Version no.	Policy Name	Reviewed by	Approved by	Date
1.00	Grievance Redressal Policy	-	Board of Directors	09-03-2007
1.01	Grievance Redressal Policy	-	Board of Directors	09-03-2008
1.02	Grievance Redressal Policy	Head- Service Quality	Board of Directors	15-03-2019
1.03	Grievance Redressal Policy	Head- Service Quality	Board of Directors	22-10-2019
1.04	Grievance Redressal Policy	Head- Customer Experience	Board of Directors	27-12-2023
1.05	Grievance Redressal Policy	Head- Customer Experience	Board of Directors	18-05-2024
1.06	Grievance Redressal Policy	Head- Customer Experience	Board of Directors	11-09-2024

Notice to the Reader

This policy document is the property of Kotak Mahindra Bank Limited and is for use only by Kotak Mahindra Bank Limited or any of its group companies. It must not be copied, disclosed, circulated or referred to in correspondence with external parties or discussed with any other third party other than for any regulatory requirements without prior written consent from Head of Compliance or any other nominated personnel authorized by the Bank for this purpose.

Contents

1	Policy for grievance redressal	1
1.1	Introduction	1
1.2	Objective	1
1.3	Internal Machinery to handle Customer complaints/ grievances	3
1.4	Mandatory display requirements	8
1.5	Resolution of Grievances	8
1.6	System to capture complaints:	9
1.7	Sensitizing operating staff on handling complaints	10
1.8	Grievance Handling Machinery for services provided by Outsourced Agencies	10
1.9	Analysis and Disclosure of Complaints	10
1.10	Record Keeping	11
1.11	Customer Feedback	11
1.12	Process improvements to enhance customer experience:	11

1 Policy for grievance redressal

1.1 Introduction

In the present scenario of competitive Banking, excellence in Customer Experience is the most important tool for sustained Business growth. As a service Organization, Customer centricity is our prime focus. We believe that providing prompt and efficient service is essential to retain existing customer. The bank follows a holistic approach towards setting up service standards and continuously improvising customer experience based on market practice as well as customer feedback across multiple channels.

The bank ensures to provide multiple modes to customers to provide feedback on the services of the Bank as well as lodge their grievances. The bank aims to ensure quick and effective handling of customer grievance, as well as prompt corrective & preventive action (including correction of the process, wherever required) in order to avoid recurrence of grievances.

To make the Bank's Redressal mechanism more meaningful and effective, a structured system has been built. The system would ensure that the redressal sought is just and fair and is within the given framework of rules and regulation. All employees must be aware of the grievance redressal process.

In order to meet the above objective, the bank has outlined a framework for redressal of customer grievances and documented it in the form of a policy for the reference of customer touchpoints. The bank shall ensure that the Customer Grievance Redressal Policy is also available in public domain (on its website and at branches).

1.2 Objective

The objective of the policy is to ensure that:

1. All customers are always treated fairly
2. Complaints raised by customers are dealt with empathy and on time
3. Customers are fully informed of avenues to escalate their complaints/ grievances within the Organization and their rights to alternate remedies, if they are not fully satisfied with the response of the Bank to their complaints.
4. The Bank employees work in good faith and without prejudice to the interest of the customer

Guiding Principles of Grievance redressal at Bank

- **Being Transparent:** The customer shall be provided with the details of channels .The turnaround time for issues to be redressed shall be communicated transparently through the various service channels.
- **Ease of access:** A suitable mechanism must therefore exist for receiving and redressing customer grievances courteously promptly and satisfactorily.
- **Ease of Escalation:** If the customer is not satisfied with the resolution, clear information of the escalation matrix to be given on Bank's website along with Turnaround time so that he/she can approach and register a grievance for early resolution. Additionally, in case the complaint is rejected, email communication to customer shall clearly inform of the escalation matrix.
- **Regularly seek feedback:** Bank will closely listen to the voice of the customer to make appropriate changes to the product and process to suit the needs of the customer
- **Continuous improvement Culture:** The bank through appropriate forums will get to the root cause of issues and implement solutions to improve customer experience on an ongoing basis.

Definition of Complaint, Request:

KMBL defines a **complaint** for an issue reported by customer expressing dissatisfaction & services not being delivered about a promised product, service(s) or any other grievance(s). Complaints could be on account of breach in committed turnaround time, unfulfilled promise or non-fulfilment of a request placed with the bank.

Request refers to any fulfilment action that the customer asks on account of his relationship with the bank. Requests will have specific turnaround time that will be communicated to the customer.

The customer is having full right to register his complaint if he is not satisfied with the services provided by the bank. He can give his complaint in writing, orally or over telephone. If customer's complaint is not resolved within given time or if he is not satisfied with the solution provided by the bank, he can approach Banking Ombudsman with his complaint or other legal avenues available for grievance redressal.

Applicability and coverage of the Policy:

- The policy is applicable to all branches and all personnel working in branches & Offices.
- Applicable to Central Office departments and its personnel involved in functioning of overseas and domestic operations of the Bank.
- Customers from rural areas.
- Third party product distributed/ referred by the Bank.
- Any schemes introduced by the Government and serviced by the Bank.
- Applicable to Business Correspondents and Outsourced employees.
- Customers availing Small Saving Schemes of Government of India.
- Customers opening account under Pradhan Mantri Jan Dhan Yojana.
- Applicable to Agency Bank Business & any other Government related Businesses
- All products sold by the bank from time to time.

1.3 Internal Machinery to handle Customer complaints/ grievances

Customers who wish to provide feedback or send in their complaint may use the following channels available with the bank

Level 1

1. Customer Experience Centre:

Customers can contact our Phone Banking officers over the phone for resolution of issues. at (24x7 Help line: 1860 266 2666)

2. Net Banking / Web form:

Customers can register their concern by logging in through the net banking section available on the website www.kotak.com. Alternatively, they can also use the web form in our website www.kotak.com

3. Branch:

Customer can interact with the branch officials for resolution of their issues or register their grievances digitally at branches and seek complaint reference no. over the counter. The details of branches to be available in the website www.kotak.com.

4. Write to us:

Kotak Mahindra Bank Ltd. P.O.Box: 16344, Mumbai – 400013.

Level 2

Nodal Officer

The Bank has appointed Nodal officers to handle complaints escalated to them. The details of the Nodal officers are available on the Bank website.

1. Write to Nodal Officer

Nodal Officer.

Address: Kotak Infiniti, 4th Floor , Zone 4
Bldg No.21, Infinity Park,
Off Western express Highway,
General AK Vaidya Marg,
Malad (E) , Mumbai – 400097

Email id: nodalofficer@kotak.com

2. Online Web form:

Online Level 2 web form: www.kotak.com

3. Call Nodal Officer

Mon to Fri (10.00 am to 6.00 pm)

Telephone No: As updated in the banks website

- Nodal office at HO will acknowledge the customer issue and record in the system.
- Bank has a defined turnaround time of 2 working days.
- If the customer is not satisfied with the response offered then customer may choose to refer the matter to Level 3 (Principal Nodal officer).

Level 3

PNO

In case, the customer is not satisfied with the response received from Level 1 and 2, then he/she can write to the Principal Nodal Officer, Customers can choose to call at the PNO desk number as available on the Bank's website

Customer can raise the concern with Principal Nodal Officer using the below channels:

1. Write to: Principal Nodal Officer

Principal Nodal Officer

Address: Kotak Infiniti, 4th Floor , Zone 4
Bldg No.21, Infinity Park,
Off Western express Highway,
General AK Vaidya Marg,
Malad (E) , Mumbai – 400097
Email id: pno@kotak.com

2. Online Web form:

Online Level 3 web form: www.kotak.com

3. Call Principal Nodal Officer

Mon to Fri (10.00 am to 6.00 pm)

Telephone No: As updated in the banks website

- Principal Nodal officer office will acknowledge the customer issue and record in the System.
- If the grievance is not resolved within a month at the bank level then the customer may choose to refer the matter to Banking Ombudsman. The details of the same is available in our website www.kotak.com in the Grievance Redressal Section.

Appointment of Internal Ombudsman

Profile of the Internal Ombudsman: As per the Internal Ombudsman guidelines issued on 29 Dec 23, The Internal Ombudsman shall either be a retired or serving officer, in the rank equivalent to a General Manager of another bank / Financial Sector Regulatory Body / NBSP / NBFC / CIC, having necessary skills and experience of minimum seven years.

Present incumbents will continue till their contract period. All new hires will be as per the IO guidelines issued on 29 Dec 23. And their compensation will be duly approved and signed-off by the Customer service committee of the Bank board.

In line with RBI guidelines , the Bank has incorporated the role of an Internal Ombudsman, who is an independent authority to review the Grievances raised by customers. The Internal Ombudsman will share an independent view and be a part of Bank's grievance redressal mechanism. The decision taken by the Internal Ombudsman will be binding on the Bank.

If the customer is not satisfied with the response or have not received a response from the Bank within a month, then he/she can file a complaint with Banking Ombudsman. The details of the same is updated on the Bank's website.

The Internal Ombudsman shall , on a quarterly basis, analyse the pattern of complaints such as product/ category wise, consumer group wise, geographical location wise and suggest remedies root cause of complaints of similar / repeat nature and those that require policy level changes in the regulated entity.

The Internal ombudsman shall furnish periodic reports on his/her activities to the Committee of the Board handling customer service and protection, preferably at quarterly intervals , but not less than half yearly intervals (latest RBI Master Direction, Dec.2023)

The Internal Ombudsman shall be designated as an ex-officio member or permanent invitee to the meetings of the committee of the Board of regulated entity handling customer service and protection.

Number of Internal Ombudsman appointed by the bank will be a function of the total complaints being received.

The internal Ombudsman shall be provided adequate infrastructure and personnel to carry out the roles and responsibilities appropriately & efficiently.

1.3.1 Standing committee on Customer service

The Standing committee on Customer Service may be chaired by the CMD, Jt MD or Dy MD or ED and include non-officials as its members to enable an independent feedback on the quality of customer service rendered by the bank. The committee is responsible for the following functions:

- Evaluate feed-back on quality of Customer service received from various quarters. The committee would also review comments/feed-back /complaints on implementation of commitments in the Code of Bank's Commitments to Customers.
- The Committee is 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 regional managers/ functional heads.
- The committee also considers unresolved complaints/grievances referred to it by functional heads responsible for redressal and offers their advice in return.
- The committee submits a report on its performance to the Customer service committee of the board at Quarterly intervals.

1.3.2 Branch level Customer Service Committee –

Branch Level Customer Service Committees (BLCSC/Parichay) at the branches shall be constituted, in order to encourage a formal channel of communication between the

customers and the Bank. Such committees would also include their customers too. A senior citizen customer may preferably be included therein.

The BLCSC shall meet at least once in a month to study complaints/suggestions, cases of delay, difficulties faced/reported by customers/members of the Committee and evolve ways and means of improving customer services.

The BLCSC shall also submit quarterly reports giving inputs/suggestions to the Designated Team for onward submission to the Standing Committee on Customer Services for their examination.

1.3.3 Reserve Bank of India – Banking Ombudsman Scheme:

If the customer's complaint is not resolved within the given timeline of one month, or if he is not satisfied with the resolution provided by the Bank, he can approach Banking Ombudsman with his complaint. Details of Banking Ombudsman are already displayed at branches and on Bank's website.

1.3.4 Customer service committee of the Board

This committee includes experts and representatives of customers (selected on random sampling) as invitee to enable the bank to formulate policies and assess the compliance there of internally with a view of strengthening the corporate governance structure and also to bring about on-going improvements in the quality of Customer Service provided by the Banks. This Committee also reviews the functioning of Standing Committee on Customer Service. The committee is responsible for the following functions.

- To formulate the deposit policy
- Annual Customer satisfaction survey
- To look at and decide on policy matters pertaining to Customer Service
- To issue guidelines to the Standing committee on matters relating to Customers
- To seek and obtain feedback from the standing committee on areas pertaining to Customer Service in terms of trends of complaints, service issues etc
- Review and suggest a way forward on the reports put up by the standing committee pertaining to complaint cases of delays
- To have an oversight over the implementation of RBI's circulars on the Customer Service issues
- To look at all awards given by the Integrated ombudsman and to address issues of system deficiencies brought out by awards. Also, to look at reasons for awards which have remained unimplemented for more than 3 months if any.
- To review the performance of the Internal Ombudsman

1.3.5 Escalation to Regulator

Reserve Bank of India – Banking Ombudsman Scheme:

If the customer's complaint is not resolved within the given timeline of one month, or if he is not satisfied with the resolution provided by the Bank, he can approach Banking Ombudsman with his complaint. Details of Banking Ombudsman are already displayed at branches and on Bank's website.

1.4 Mandatory display requirements

It is mandatory for the bank to provide;

- Appropriate arrangement for receiving complaints and suggestions.
- Prominently display at the branches, the names of the officials who can be contacted for redressal of complaints, together with their telephone number, complete address and email address, for proper and timely contact by the customers and for enhancing the effectiveness of the redressal machinery.
- 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.
- Bank will also display on its website the names and other details of the officials at Head Office/Zonal Office/Regional Office who can be contacted for redressal of complaints including the names of the Nodal Officers/Principal Nodal Officer. Contact details, name, complete address, telephone number and email address of the Nodal Officer/Principal Nodal Officer be displayed on Bank's website.
- Bank shall also display on the website, the names and other details of its CMD/CEO to enable their customers to approach them in case of need, if necessary.
- These details are already made available on the Bank's website www.kotak.com

1.5 Resolution of Grievances

Every complaint has a specified turnaround time. Customer, at the time of login of complaint, would ordinarily be informed of the same.

The Turnaround time (TAT) for the top few complaint types is as below:

Top Complaints	TAT in working days
Cash Withdrawal Dispute Other Bank ATM	41
Cash W/d Dispute - Kotak ATM	16
CC Non Fraud Settled Txn Dispute	91
Collection Executive Behavior	9
DC Non Fraud Settled Txn Dispute	91

Toll services not-availed	28
PG-Net Banking txn Dispute	6
Maintenance Related Complaints related to Agency business including Direct & Indirect Tax, Pension, RBI Bonds or any other agency business	15 72 hours

1.6 System to capture complaints

Bank has in place a CRM system to enable efficient and effective tracking and resolution of complaints. All complaints from the customers, shall be logged into CRM. With this the bank shall not only ensure that all complaints received are recorded or resolved, but shall also ensure effective monitoring /escalation mechanism to the senior functionary responsible so as to make sure that none of the complaints remain unresolved

Complaints on credit cards received at the Customer Experience Centre (Telephonically or through online web form) will be captured at the time of customer connecting with KMBL and be referred to the appropriate backend unit for necessary resolution as per the committed time lines.

All complaints received by Senior Management at the corporate office or at the Chairman / Managing Director's desks shall be handled by a dedicated team under the Grievance Redressal desk. The team will also look in to Complaints received through the below mentioned channels on priority:

- Reserve Bank of India complaints received at Corporate Office
- Government of India complaints received at Corporate Office
- Consumer Forum complaints received at Corporate Office

Complaints shall be resolved in a proper and time bound manner with detailed resolution to the customer. In case the resolution needs time, an interim response, acknowledging the complaint shall be issued.

Bank will have necessary management information systems to facilitate the top management to review the status of complaints received / resolved.

Bank has 3 level structure of complaint handling. Level-1 Branch/Customer Experience Centre/Online channel/ Social Media, Level-2 Nodal Officer, Level-3 Principal Nodal Officer.

The bank recognizes that customer's expectation/requirement/grievances can be better appreciated through personal interaction with customers by bank's staff. Periodic

customer meets 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. Bank would also facilitate for providing customer feedback on the bank's website.

1.7 Sensitizing operating staff on handling complaints

Staff should be made aware of the complaints handling and properly trained for handling complaints. We are dealing with people and hence difference of opinion and areas of friction can arise. It would be the responsibility of the Principal Nodal Officer/ Nodal Officer to ensure that internal machinery for handling complaints/grievances operates smoothly and efficiently at all levels. The PNO/NO should give feedback on training needs of staff at various levels to the HR Dept.

KMBL Staff managing customers to be trained on complaint management and Grievance Redressal aspect right from initial induction phase. Bank is confident that with an open mind and a smile on their face, we should be able to win customer's confidence

Periodic reinforcements should be done for effective resolution of issues. Training and awareness measures to have the following key objectives:

- Ensure prompt response
- Provide complete resolution
- Ensure retention and business maximization
- Minimize escalations by getting it right first time
- Overall Customer Satisfaction

1.8 Grievance Handling Machinery for services provided by Outsourced Agencies

The Grievance Handling Machinery of the Bank, as stated in para above, will also be available to deal with issues relating to services provided by Outsourced Agencies.

1.9 Analysis and Disclosure of Complaints

The Bank places before the Board, a statement of complaints and its analysis along with the financial results as recommended by the Committee on Procedures and Performance Audit on Public Services (CPPAPS).

Details of Complaints and Awards passed by the Banking Ombudsman needs to be disclosed in the financial statements under Notes to Accounts as per the Master Circular – Disclosure in Financial Statements - Notes to Accounts in the prescribed format.

The complaints are analysed:

- To identify customer service areas in which complaints are frequently received
- To identify frequent sources of complaint

- To identify system deficiencies
- To initiate appropriate action to make the grievance redressal mechanism more effective.
- Review of Branch Level Customer Service Committee Meeting
- Analysis of BO Awards and Appeals to the Appellate Authority

Further, a detailed statement of complaints and its analysis are placed on the website for information of the general public at the end of each financial year.

1.10 Record Keeping

The complaint records are to be maintained for a minimum period of ten years from the date of resolution. The Complaint records to be easily traceable and made available for future reference as per requirements of various stakeholders.

1.11 Customer Feedback

The Bank shall have a structured mechanism to gauge customer satisfaction with the banks services through periodic customer surveys. In addition to the periodic surveys conducted to gauge satisfaction with the transactions, specific surveys shall be conducted to obtain customer feedback on Complaints management. Feedback to be sought from customers at the various channels of interaction to ensure a robust complaint management system.

1.12 Process improvements to enhance customer delight:

The product teams, Service Quality, customer experience, Service channels and other business units shall ensure that the information on customer complaints is used for necessary process improvement. The objective should be to get to the root cause of the issue and resolve it. It should help the bank to improve its policies, processes and lead to efficiency in its operations. Number of complaints, Types of Complaints, Products emanating more complaints and process emanating more complaints are constantly monitored. Thresholds are defined and deviation from the threshold like +ve and -Ve are analyzed and findings are shared in relevant forum based on the RCA . RCA forms a critical part in complaint reduction and Kotak emphasis is always on reducing the complaints.