



Key Operating Document

# Complaints Handling, Reporting and Controls – Corporate Bank Global

Breaches of provisions within this document may result in disciplinary action, up to termination of employment. Concerns regarding violations of the provisions are to be escalated according to the "Raising Concerns (including Whistleblowing) Policy – Deutsche Bank Group".

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### Local Requirements for DB India

A. This document should be read in conjunction with:

- RBI Master Circular on Customer Service in Banks – <https://rbidocs.rbi.org.in/rdocs/notification/PDFs/59FM04072F58B1DD44DFADD486B9B0A59E9D.PDF>
- RBI Circular no. CEPD.CO.PRD.Cir.No.01/13.01.013/2020-21 dated January 27, 2021 on Strengthening of Grievance Redress Mechanism in Banks
- SEBI Investor Charter for Custodians and DDP - SEBI/HO/FPIC/P/CIR/2021/691 dated 17 Dec 2021.
- PFRDA notification on Redressal of Subscriber Grievance, gazette notification dated 29th Jan 2015 no. PFRDA/12/RGL/139/1 including any amendments thereto

B. Additional regulatory requirements in India

As per Reserve Bank of India (RBI), following key guidelines to be adhered for an effective Complaint management system.

- Any Complaint received through any channel will be recorded by the Bank.
- Acknowledgement of Complaint along with Service Request number / Email acknowledgment should be provided to Client on recording the Complaint.
- Intimation for Complaint closure should be mandatorily sent to the Client, guiding the Client as below :-

[“If you are not satisfied with our response, you may approach the Banking Ombudsman appointed by Reserve Bank of India. Kindly log on to our website for details of the Banking Ombudsman Scheme and procedure for lodging Complaint.](#)

[https://www.deutschebank.co.in/downloads/Banking\\_Ombudsman\\_Contacts.pdf](https://www.deutschebank.co.in/downloads/Banking_Ombudsman_Contacts.pdf)

- Each Deutsche Bank AG (customer-facing) branch will display the complete contact details (Phone Number, Email ID and Fax Number) of the Branch Manager, Regional Manager, Principal Nodal Officer and Banking Ombudsman of the Area prominently on the notice board of the branch. The contact details are also available on the Bank’s website
- A copy of the Banking Ombudsman Scheme (including Scheme for Digital Transaction) and BCSBI Codes of the Bank’s commitment to customers is available with each branch manager and accessible to customer as the BO Scheme and BCSBI codes are also displayed on the website of the bank.

[https://www.deutschebank.co.in/Important\\_Information.html?link=footer](https://www.deutschebank.co.in/Important_Information.html?link=footer)

- Escalation matrix & Turnaround Time applicable to Complaint received through normal channels will not be applicable to customer Complaint received from RBI / Banking Ombudsman / Senior Management / BCSBI / Enforcement Directorate. The response on all customer Complaint received through RBI / Banking Ombudsman / BCSBI will be highlighted to the Compliance Department. The response on the customer Complaint received from Law Enforcement authorities like Police, court notices, CBI, TRAI etc., should be highlighted to Legal.
- Due care to be exercised to avoid incorrect closure of a Complaint. If the information gathered from the customer is inadequate, the customer shall be contacted to ascertain all relevant details.
- Customer Complaint leading to or likely to lead to payment of compensation and / or waiver of charges shall be intimated to CB BM and Business head prior to confirming the compensation amount to the customer.

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- As required by the Reserve Bank of India and for better oversight & governance by EXCO, on Half Yearly basis, a Service Deck shall be submitted to EXCO (format given in Section E below). Such service deck should provide total no. of Complaints, pending Complaints, Complaint from Banking Ombudsman with status and steps taken to avoid recurrence. The present teams responsible to place the Service Deck in the EXCO are PCC and CB.

As per Securities and Exchange Board of India (SEBI), following are the key requirements to be adhered to for recording Client Complaints with respect to custodian and DDP services.

- SEBI expects attending to Client queries with an acknowledgement or response within 48 hours and attending to Grievance Redressal with an acknowledgement within 48 hours and redress within 30 days. The SEBI Charter also directs the Custodian and DDP to display a report on the Organizations website providing details of Monthly, Yearly (Month wise) and 3 Yearly (Year wise) Grievance statistics on a monthly basis. (Annexure – B of the Charter).

As per Pension Fund Regulatory and Development (PFRDA), following are the key requirements to be adhered to for receiving & resolving client complaints with respect to custodian

- PFRDA expects custodian to clearly defines a method/procedure for receiving, registering, acknowledging and effectively disposing off of grievances received from clients in a prompt and fair manner. PFRDA regulations also directs the requirement of a two level grievance redressal policy, which is as follows:

**Level 1 :** Clients have the option to raise their queries / complaint to Relationship Manager / Customer Services Manager / Sales Manager (RM/CSM/SM) assigned to them. Alternatively, customers can lodge their grievance or complaint through any of the following channels that is available in the respective departments.

- Dedicated hotline: +91 (22) 7180-3000 ; or
- By way of call / e-mail to service managers whose details are provided to clients from time to time
- Via E- mail to Grievance Redressal Officer; or

**Level 2 :** In case of non-resolution, complaints can be immediately escalated to Chief Grievance Redressal Officer. Complaint of this nature will be considered for priority resolution.

**Level 3:** If the complainant is still not satisfied with the redressal of his grievances or if it has not been resolved by the intermediary by the end of 30 days of the filing of the complaint, client may escalate the grievance to the National Pension System Trust in accordance with the provisions contained in Pension Fund Regulatory and Development Authority (Redressal Of Subscriber Grievance) Regulations , 2015. If the grievance remains unresolved after its receipt at the National Pension System Trust, on the expiry of a period of 21 days from the receipt thereof, the complainant may file a representation with the Ombudsman, appointed by the Authority.

### C. Complaint received through other agencies

DB India may receive customer Complaint through RBI, Banking ombudsman, TRAI, consumer forums or any other government, quasi-government or regulatory agency. Customer Complaint

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received as mentioned above should be treated in line with process for **Escalation Complaint** by the respective Products.

Any rejections or denial will be first discussed with the Internal Ombudsman before sending the final response. Response to the Complaint is then intimated to the customer and to RBI / Banking Ombudsman / escalating authority. The Internal Ombudsman (IO) desk has been set up and as per the process, cases will be discussed with the IO, wherever necessary. The cost of redress of such maintainable Complaints may be recovered by the Office of the BO in case the number of Complaints exceeds the peer group average. The calculation and methodology is given under RBI circular no. CEPD.CO.PRD.Cir.No.01/13.01.013/2020-21 dated January 27, 2021 on Strengthening of Grievance Redress Mechanism in Banks.

**“Maintainable Complaints** as per BO Scheme 2006 is as follows:

No Complaint to the BO shall lie unless –

- a. The complainant had, before making a Complaint to the BO, made a written representation to the bank and the bank had rejected the Complaint or the complainant had not received any reply within a period of one month after the bank received the representation or the complainant is not satisfied with the reply given by the bank
- b. The Complaint is made not later than one year after the complainant has received the reply of the bank to his representation or, where no reply is received, not later than one year and one month after date of representation to the bank
- c. The complaint is not in respect of the same cause of action which was settled or dealt with on merits by the BO in any previous proceedings whether or not received from the same complainant or along with one or more complainants or one or more of the parties concerned with the cause of action
- d. The Complaint does not pertain to the same cause of action, for which any proceedings before any court, tribunal or arbitrator or any other forum is pending or a decree or Award or order has been passed by any such court, tribunal, arbiter or forum
- e. The Complaint is not frivolous or vexatious in nature
- f. The Complaint is made before the expiry of the period of limitation prescribed under the Indian Limitation Act, 1963 for such claims”

Complaint received through NSDL / CSDL: Stock Exchanges and Depositories disseminate customer Complaint to Brokers and Depository Participants respectively, through physical letter or e-mail. In case of any DP related Complaint, NSDL / CDSL will send a letter or e-mail to custody. If the Complaint pertains to GTB, custody will forward the letter / e-mail to respective GTB service team for action on the Complaint. GTB Service Team will follow the internal procedure for Complaint redressal (as mentioned above). GTB Service Team will directly update the Complaint status to NSDL / CDSL (for them to further update the status in SCORES system). All stock brokers and depository participants are directed to address / redress the Complaint within 15 days from the receipt of the Complaint. In case additional information is required from the complainant, the same shall be sought within 7 days from the receipt of the Complaint. In such cases, the period of 15 days shall run from the receipt of additional information’.

In case of a Complaint/grievance received related to accounts of National Pension System, the same will be received via

- Dedicated hotline: +91 (22) 7180-3000 ; or

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- By way of call / e-mail to service managers whose details are provided to clients from time to time
- Via E- mail to Grievance Redressal Officer

The above complaints should be closed within a period of 30 days. The closure will be on receipt of such communication and acceptance of the redressal from the complainant. If there is no communication received from the complainant within 45 days, the Complaint shall be treated as closed.

### D. Roles and responsibilities

- The responsibility of ensuring correctness and completeness of the data being provided to the CCM Service team shall lie with the respective CB Product service teams. CCM Service team is only responsible for consolidating the data received from the various divisions and shall not verify its correctness or completeness. In case of changes the same shall be agreed mutually. Since the reporting is currently half-yearly, respective CB Product service teams can share the data to the CCM service team by 5th Oct & 5th April each year.
- The CCM Service team shall send the compiled Service Deck to PCC for onward submission to the ExCo.
- In case the Complaint data is not received by the agreed date, then it will be presumed that there are no Complaints to report for that period. CCM Service team will not track nor follow up for the data from the respective CB Product service teams.
- Respective CB Product service teams must ensure the MIS includes Complaints handled by their business operations.
- Respective Heads of CB Product service teams must ensure that the Complaint data should be reconciled and tallied with the MIS sent to their regional / global product lines.
- The respective Heads of CB Product service teams shall also ensure that they are in compliance with all the regulations, policies and guidelines on Complaint-handling, including the process laid down in this document.
- Any Product-line reporting will be managed by the respective CB Product service teams.

Following is the summary of the roles and responsibilities

Accepting Complaints	Respective CB Product service team
Resolution of Complaints	Respective CB Product service team
Communication with customer	Respective CB Product service team
Closure communication to customer	Respective CB Product service team
Reporting of Complaints to central team	Respective CB Product service team
Responsibility for correctness and completeness in reporting	Respective CB Product service team
CB-wide consolidation	CCM Service team
Preparation of the CB Service Deck	CCM Service team
Sending CB Service Deck to PCC for consolidation	CCM Service team
Division / product-line reporting	Respective CB Product service team

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Escalation to Nodal officer (> 1 month)	Respective CB Product service team
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E. Format of reporting to Branch management board (BMB) as mandated by the RBI

Following is the format that shall be used to place the half-yearly consolidated reporting to BMB.

### **CB Customer Service Update: <from date> to <to date>**

As per RBI' Master Circular on Customer Service in Banks ref. no. RBI/2015-16/59 DBR No.Leg.BC. 21/09.07.006/2015-16 dated July 1, 2015 wherein point 2.1.3 has directed banks to review customer service / customer care aspects and submit a detailed memorandum in this regard to the Board of Directors, once every six months and initiate prompt corrective action wherever service quality / skill gaps have been noticed.

Basis this direction, the following note has been prepared for the period **<from date> to <to date>**. We have analyzed the Complaints regularly and implemented certain process changes which has led to reduction in number of Complaints and no penalty has been levied on the bank by Banking Ombudsman for the period **<from date> to <to date>**.

The below data represents Complaints for CIB Clients received across Trade, CCM, SES, ICM, TAS products.

<b>Key Issues</b>	<b>Proposed Action</b>
Number of Banking Complaints	<ul style="list-style-type: none"> <li>- Complaints to be reviewed and controllable Complaints identified and discussed with the concerned departments for root cause analysis.</li> <li>- Necessary action initiated for reduction of the Complaints where possible.</li> </ul>
-RBI/ Consumer forum Complaints	<ul style="list-style-type: none"> <li>- Review pending Complaints.</li> <li>- All responses are routed through the nodal officer.</li> <li>- Rigorous tracking to ensure quick redressal.</li> </ul>
Unimplemented awards of Banking Ombudsman	<ul style="list-style-type: none"> <li>- Review the status of unimplemented awards of Banking Ombudsman</li> </ul>

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Complaint Reduction	- Meetings held with stakeholders to discuss initiatives to reduce repetitive Complaints.
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### 1. **Complaints from Customers** – Data for the reporting period <current reporting period>

Product	CCM	SeS	TF	TAS	CMFI
No. of Complaints pending at beginning of the period					
No. of Total Complaints received during the period					
No. of Complaints disposed during the period					
Out of which:					
No. of Complaints resolved within TAT					
No. of Complaints not resolved within TAT					
No. of Complaints rejected by the Bank					
No. of Open Complaints pending at the end of the period					
No. of Complaints escalated to the Nodal Officer					
Total					

Total number of Complaints received during <earlier reporting period> was XX as compared to for the period <current reporting period> which is XX.

### 2. **Top 5 grounds of Complaints received from Customers (Separate for every Product)**

Grounds of Complaints (refer Master list in Annex 1)	Number of Complaints pending at the beginning of the period	Number of Complaints received during the period	%age increase / decrease as against previous period	Number of Complaints pending at the end of the period	Of 5, number of Complaints pending beyond 30 days
1	2	3	4	5	6
Ground 1*					
Ground 2*					
Ground 3*					
Ground 4*					
Ground 5*					
Others					
Total					
	Previous period				
Ground 1*					
Ground 2*					

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Ground 3*					
Ground 4*					
Ground 5*					
Others					
Total					

\* Please give the type of Complaint here as per Master List in Annexure 1

3. **The total number of maintainable Complaints received through RBI/Banking Ombudsman** for the period **<current reporting period>** was:

Product	CCM	SeS	TF	TAS	CMFI
No. of maintainable Complaints received from OBO					
Out of which:					
No. of Complaints resolved in favour of Bank					
No. of Complaints resolved through conciliation / mediation / advisories issued by BOs					
No. of Complaints resolved after passing Awards by the BOs against the Bank					
No. of Awards unimplemented (other than those in appeal)					
Total					

4. List down **initiatives taken to reduce repetitive Complaints**