

# CUSTOMER SERVICE POLICY

**The following information must be provided**

Level	III
Type	Policy
Status	Final
Scope of application	Policy On Customer Service – For Clients

Issuer	Sanjiv Jhurani
Business line - Activity	Operations
Area	BNPP Bank - India
Subject	Policy On Customer Service

Author	Kapil Bhatia
Validator	G Mohan
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Date of approval	07/12/2012
Effective date	

**We recommend also providing the following information**

Higher-level procedure	
Main related procedures	
References to regulatory obligations	
Risks that the procedure is intended to cover	
Reference	

**Glossary**


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# CUSTOMER SERVICE POLICY

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- **Introduction**

Principle objective of any business is to generate “Customer”. Business can survive only because of its ability to generate and maintain customers by providing them the products/services they want in a way that surpasses their expectations.

Customer service has great significance in the banking industry. The banking system in India today has perhaps the largest outreach for delivery of financial services and is also serving as an important conduit for delivery of financial services. While the coverage has been expanding day by day, the quality and content of dispensation of customer service has come under tremendous pressure mainly owing to the failure to handle the soaring demands and expectations of the customers.

- **Definition of a Customer as per RBI guidelines:**

Broadly, a customer can be defined as a user or a potential user of bank services. So defined, a ‘Customer’ may include:

- a person or entity that maintains an account and/or has a business relationship with the bank;
  - one on whose behalf the account is maintained (i.e. the beneficial owner);
  - beneficiaries of transactions conducted by professional intermediaries, such as Stock Brokers, Chartered Accountants, Solicitors etc., as permitted under the law, and
  - any person or entity connected with a financial transaction which can pose significant reputational or other risks to the bank, say, a wire transfer or issue of a high value demand draft as a single transaction.
- **BNP Paribas’s Policy on Customer services: Focuses on improving customer service by**
    1. Constant Review
    2. Examination
    3. Evaluation
    4. Adopting and Implementing further improvements

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- ***With a view to improve our services:***

- (a) The Bank shall find out inadequacy, if any, in its banking services
- (b) The Bank would Benchmark the current level of services
- (c) The Bank would Review the progress periodically
- (d) The Bank would work towards enhancing timeliness and quality
- (e) The Bank shall rationalize processes in line with technological evolution
- (f) Suggesting incentives to facilitate change on ongoing basis
- (g) Holding monthly customer service committee meetings

**BNPP defines Customer as per Customer Service Policy as:**

- a. A person or entity that maintains an account and/or has a business relationship with the bank;
- b. One on whose behalf the account is maintained (i.e. the beneficial owner);
- c. Beneficiaries of transactions conducted by professional intermediaries, such as Stock Brokers, Chartered Accountants, Solicitors etc., as permitted under the law, and
- d. Any person or entity connected with a financial transaction which can pose significant reputational or other risks to the bank, say, a wire transfer or issue of a high value demand draft as a single transaction.

- ***General Guidelines – BNP Paribas Customer Service Policy***

- 1) Provide better customer service
- 2) Periodically study their system and its impact on customer service
- 3) Provision for general management of branches. The policy includes the following:

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- (a) providing infrastructure facilities by branches by bestowing particular attention to providing adequate space, proper furniture, drinking water facilities, with specific emphasis on senior citizens, disabled persons, and pensioners.
- (b) Enquiry-cum-reception counters at large / bigger branches
- (c) displaying indicator boards at all the counters in English, Hindi as well as in the concerned regional language wherever necessary.
- (d) Respective Department Heads/Branch Managers to ensure employees' response to customers and for helping out customers in putting in their transactions through their customer service Desk.
- (e) use of Hindi (wherever required) and regional languages in transacting business by banks with customers, including communications to customers wherever required.
- (f) reviewing and improving upon the existing security system in branches so as to instill confidence amongst the employees and the public
- (g) wearing on person an identification badge displaying photo and name thereon by the employees
- (h) Periodic change of desk and entrustment of elementary supervisory jobs.
- (i) Training of staff in line with customer service orientation. Training in Technical areas of banking to the staff at delivery points. Adopting innovative ways of training / delivery ranging from job cards to roving faculty to video conferencing.
- (j) visit by senior officials from the Corporate Office at periodical intervals for on the spot study of the quality of service rendered by the branches.
- (k) rewarding the Best branches from customer service point of view by annual awards/running shield.
- (l) Customer service meetings.
- (m) holding customer relation programmes and periodical meetings to interact with different cross sections of customers for identifying action points to upgrade the customer service with customers.

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- (n) clearly establishing a New Product and Services Approval Process which should require approval by the Board especially on issues which compromise the rights of the Common Person.
- (o) appointing Quality Assurance Officers who will ensure that the intent of policy is translated into the content and its eventual translation into proper procedures.

- **Institutional Framework**

Bank’s Boards Involvement – The Board of the Bank would be responsible for meaningful implementation of instruction for customer services.

The minutes of the Standing Committee on customer services to be placed before Management Committee of Bank for comments.

- **Role of Customer Service Committee of the Bank**

- (a) formulate of a Comprehensive Deposit Policy
- (b) issues such as the treatment of death of a depositor for operations of his account
- (c) product approval process with a view to suitability and appropriateness
- (d) the Committee could also examine any other issues having a bearing on the quality of customer service rendered

- **Monitoring and implementing of awards under the Banking Ombudsman Scheme**

Customer Service Committee would

- ensure that the Awards of the Banking Ombudsmen are implemented expeditiously and with active involvement of Top Management
- address issues of systemic deficiencies existing in banks, if any, brought out by the awards
- report to the Board delays in implementation of awards beyond three months without valid reasons and for initiating necessary remedial action.
- Thus these two committees re-enforce each other

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## Standing Committee and its function

The Standing Committee on Customer service constituted and would be

- Chaired by COO of the Bank
- All department heads including business lines and compliance as its members

The Functions of Standing Committees is to ensure:

- Effective and timely implementation of RBI instruction on Customer Service
- Receiving Feedback to check implementation of instructions
- To review the practice and procedures prevalent in the bank and take necessary corrective action
- A brief report on the performance of the Standing Committee during its tenure indicating, inter alia, the areas reviewed, procedures / practices identified and simplified/ introduced would be submitted periodically to the Customer Services Committee of the Board.
- the Standing Committee will act as the bridge between the various departments of the bank and the Board / Customer Service Committees of the Board.
- **Branch Level Customer Service Committees:**
  - Branch level customer Service Committees established involving across various customer segments
  - Would meet at least once in a month to review complaints, suggestion, difficulties faced by customers/members and suggest ways to improve customer service.

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- ***Would in turn report to Customer Service Committee of the Board Nodal department/ official for customer service***

The bank would have a nodal department / official for customer service:

- (i) at their branches
- (ii) at their Compliance Dept.

with whom customers with grievances can approach in the first instance and with whom the Banking Ombudsman and RBI can liaise.

- ***Board approved policies on Customer Service***

The Bank would have a board approved policy for the following:

#### ***1) Comprehensive Deposit Policy***

- Transparent and comprehensive policy setting out
  - (a) the rights of the depositors in general and small depositors in particular.
  - (b) all aspects of operations of deposit accounts, charges leviable and
  - (c) other related issues to facilitate interaction of depositors at branch level
- The Policy would also be explicit in regard to secrecy and confidentiality of the customers

#### ***2) Cheque Collection Policy***

- The bank has a comprehensive and transparent policy taking into account its technological capabilities, systems and processes adopted for clearing arrangements and other internal arrangements for collection through correspondents.
- The policy covers the following three aspects:
  - (a) Immediate Credit for local / outstation cheques
  - (b) Time frame for Collection of Local / Outstation Instruments
  - (c) Interest payment for delayed collection

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**3) Customer Compensation Policy**

- The Bank has a Customer Compensation Policy duly approved by its Board.
- The Banks policy incorporate the following aspects:-
  - (a) Erroneous Debits arising on fraudulent or other transactions
  - (b) Payment of interest for Delays in collection
  - (c) Payment of interest for delay in issue of duplicate draft
  - (d) Other unauthorized actions of the bank leading to a financial loss to customer

**4) Customer Grievance Redressal Policy**

- The Bank have a well documented Customer Grievance Redressal Policy duly approved by the Board

***Giving publicity to the policies***

- The bank ensures that wide publicity is given to the above policies formulated by:
  - (a) placing on the web-site
  - (b) displaying them on the notice board in its branches.
- The customers have been clearly apprised of the assurances of the bank on the services on these aspects at the time of establishment of the initial relationship be it as a depositor, borrower or otherwise.
- Further, the Bank keeps the customers duly informed of the changes in the policies formulated by them from time to time.
- **Printed material**  
In order to ensure that banking facilities percolate to the vast sections of the population, The Bank would make available all printed material used by customers including account opening forms, pay-in-slips, passbooks etc.

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- **Opening / Operation of Deposit Accounts**

- **Customer Identification Procedure for individual accounts**

Guided by RBI instructions on KYC / AML for opening of accounts.

Note:

- There will not be separate KYC on transfer of accounts from one branch to another (in India).
- As per RBI circular, Unique ID for each client is required (UCIC).  
The bank proposes to use the National Id for this purpose. However actual implementation will be based on future guidelines from RBI.

**Photographs of depositors**

The Bank obtains and keeps on record photographs of all depositors/account holders in respect of accounts opened by them are subject to the following clarifications:

- (a) The instructions cover all types of deposits including fixed, recurring, cumulative, etc.
- (b) They apply to all categories of depositors, whether resident or non-resident. Only Banks, Local Authorities and Government Departments (excluding public sector undertakings or quasi-Government bodies) will be exempt from the requirement of photographs.
- (c) The banks will not insist on photographs in case of accounts of staff members only (Single/Joint).
- (d) The banks would obtain photographs of all persons authorized to operate the accounts viz., Savings Bank and Current accounts without exception
- (e) The banks would obtain photographs of the 'Pardanishin' women.

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- (f) The banks would obtain one copy of photograph and obtaining photocopies of driving licenses/passport containing photographs in place of photographs would not be acceptable.
- (g) The banks would not ordinarily insist on the presence of account holder for making cash withdrawals in case of 'self' or 'bearer' cheques unless the circumstances so warrant. The banks would pay 'self' or 'bearer' cheques taking usual precautions.
- (h) Photographs would not be a substitute for specimen signatures.
- (i) Only one set of photographs would be obtained and separate photographs would not be obtained for each category of deposit. The applications for different types of deposit accounts would be properly referenced.
- (j) Fresh photographs would not be obtained when an additional account is desired to be opened by the account holder.

In the case of operative accounts, viz. Savings Bank and Current accounts, Photographs of persons authorized to operate them would be obtained. In case of other deposits, viz., Fixed, Recurring, Cumulative, etc., photographs of all depositors in whose names the deposit receipt stands would be obtained except in the case of third party deposits/deposits in the name of minors where guardians' photographs would be obtained.

***Minimum balance in savings bank accounts***

At the time of opening the accounts, the Bank inform their customers in a transparent manner the requirement of

- (i) maintaining minimum balance and
- (ii) levying of charges etc., if the minimum balance is not maintained.

Any charge levied subsequently would be transparently made known to all depositors in advance with one month's notice.

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The banks would inform, at least one month in advance, the existing account holders of any change in the prescribed minimum balance and the charges that would be levied if the prescribed minimum balance is not maintained.

***Purchase of Local Cheques, Drafts, etc., during suspension of Clearing***

The Bank would take into consideration such factors as creditworthiness, integrity, past dealings and occupation of the constituents, while purchasing the cheque/drafts issued in their favor, at their request, so as to guard themselves against any possibility of such instruments being dishonored subsequently

***Issuance of Passbooks to Savings Bank Account holders (Individuals)***

The bank offers the facility of sending statement of account and as per the choice made by customer, the bank would issue daily/weekly/monthly statement of accounts. The cost of providing such Pass Book or Statements should not be charged to the customer.

***Entries in passbooks / statement of accounts***

- (i) The Bank would give constant attention to ensure entry of correct and legible particulars in the pass books and statement of accounts.
- (ii) Bank would avoid inscrutable entries in pass books / statement of accounts and ensure that brief, intelligible particulars are invariably entered in pass books / statement of account

***Providing monthly statement of accounts***

- (i) The Bank ensures that they adhere to the monthly periodicity while sending statement of accounts.

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(ii) Further, banks would advise their Inspecting Officers to carry out sample check at the time of internal inspection of CCA to verify whether the statements are being dispatched in time.

***Address / Telephone Number of the Branch in Pass Books / Statement of Accounts***

The Bank would ensure that full address / telephone number of the branch is invariably mentioned in the Pass Books / Statement of Accounts issued to account holders

***Issue of Cheque Books***

Banks would issue cheque books with larger number of (20/25/50/100) leaves if a customer demands the same and also ensure that the same is provided to client within a reasonable time frame on demand.

***Writing the cheques in any language***

All cheque forms should be printed in English. The customer would, however, write cheques in Hindi, English or in the concerned regional language.

➤ ***Dispatching the cheque book by courier***

The Bank would refrain from obtaining undertakings from depositors that we will dispatch the cheque book at your risk and responsibility, without providing them opportunity to collect the cheque book at branch counters and ensure that cheque books are delivered over the counters on request to the depositors or his authorized representative.

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➤ **Bank's policy on Acceptance of cheques bearing a date as per National Calendar (Saka Samvat) for payment**

Cheques bearing date in Hindi as per the National Calendar (Saka Samvat) should, be accepted by banks for payment, if otherwise in order.

The banks would check the Gregorian calendar date corresponding to the National Saka calendar in order to avoid payment of stale cheques

• **Term Deposit Account**

➤ **Issue of term deposit receipt**

Bank would issue term deposit receipt indicating therein full details, such as, date of issue, period of deposit, due date, applicable rate of interest, etc.

➤ **Transferability of deposit receipts**

Term deposits would be freely transferable from one office of bank to another.

➤ **Disposal of deposits**

Advance instructions from depositors for disposal of deposits on maturity would be obtained in the application form/request letter itself.

Wherever such instructions are not obtained, banks would ensure sending of intimation of impending due date of maturity to their depositors as a rule in order to extend better customer service.

➤ **Notifying the change in interest rates**

Change in interest rate on deposits would be made known to customers as well as bank branches expeditiously.

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➤ **Payment of interest on fixed deposit –**

**Method of calculation of interest**

We will follow guidelines issued by Indian Banks Association (IBA) from time to time in this regard.

**Premature withdrawal of term deposit**

The Bank on request from the depositor, will allow withdrawal of a term deposit before completion of the period of the deposit agreed upon at the time of making the deposit.

The bank would determine its own penal interest rate of premature withdrawal of term deposits.

The bank would ensure that the depositors are made aware of the applicable penal rate along with the deposit rate.

While prematurely closing a deposit, interest on the deposit for the period that it has remained with the bank will be paid at the rate applicable to the period for which the deposit remained with the bank and not at the contracted rate.

No interest would be payable, where premature withdrawal of deposits takes place before completion of the minimum period prescribed.

However, the bank, at its discretion, would disallow premature withdrawal of large deposits held by entities other than individuals and Hindu Undivided Families.

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To notify such depositors of its policy of disallowing premature withdrawal in advance, i.e., at the time of accepting such deposits.

➤ ***The Bank's Policy on Renewal of Overdue deposits***

- (i) the Board has a transparent policy in this regard and
- (ii) the customers are notified of the terms and conditions of renewal including interest rates, at the time of acceptance of deposit.
- (iii) The policy is non-discretionary and nondiscriminatory.

➤ ***Addition or deletion of the name/s of joint account holders***

Bank at the request of all the joint account holders, would allow the addition or deletion of name/s of joint account holder/s if the circumstances so warrant or allow an individual depositor to add the name of another person as a joint account holder.

However, in no case would the amount or duration of the original deposit undergo a change in any manner in case the deposit is a term deposit.

The Bank would at its discretion, and at the request of all the joint account holders of a deposit receipt, allow the splitting up of the joint deposit, in the name of each of the joint account holders only, provided that the period and the aggregate amount of the deposit do not undergo any change

NRE and NRO deposits should be held jointly as per extant guidelines of RBI

➤ ***Bank's Policy on Payment of interest on accounts frozen by banks***

Bank at times is required to freeze the accounts of customers based on the orders of the enforcement authorities.

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The issue of payment of interest on such frozen accounts was examined by Indian Banks' Association and the Bank would follow the procedure detailed below in the case of Term Deposit Accounts frozen by the enforcement authorities:

- (i) A request letter would be obtained from the customer on maturity. While obtaining the request letter from the depositor for renewal, banks would also advise the Customer to indicate the term for which the deposit is to be renewed. In case the depositor does not exercise his option of choosing the term for renewal, banks would renew the same for a term equal to the original term.
- (ii) No new receipt would be issued. However, suitable note would be made regarding renewal in the client account.
- (iii) Renewal of deposit would be advised by registered letter / speed post / courier service to the concerned Government department under advice to the depositor. In the advice to the depositor, the rate of interest at which the deposit is renewed would also be mentioned.
- (iv) If overdue period does not exceed 14 days on the date of receipt of the request letter, renewal would be done from the date of maturity. If it exceeds 14 days, banks would pay interest for the overdue period as per the policy adopted by them, and would keep it in a separate interest free sub-account which should be released when the original fixed deposit would be released. Further, with regard to the savings bank accounts frozen by the enforcement authorities, banks would continue to credit the interest to the account on a regular basis.

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• **Bank’s policy on Acceptance of cash over the counter**

Bank would not design any product which is not in tune with the basic tenets of banking.

The Bank would ensure that their branches invariably accept cash over the counters from all their customers who desire to deposit cash at the counters

Banks would refrain from incorporating clauses in the terms and conditions which restricts deposit of cash over the counters

• **Opening accounts in the name of minors with Mothers as guardians**

The Bank would instruct their branches to allow minors’ accounts (fixed and savings only) with mothers as guardians to be opened, whenever such requests are received by them subject to no over drawing in such accounts.

• **Opening of Current Accounts – Bank’s Policy**

✓ Keeping in view the importance of credit discipline for reduction in NPA level of banks, the Bank would , at the time of opening current accounts, insist on a declaration to the effect that the account holder is not enjoying any credit facility with any other bank

✓ Banks would scrupulously ensure that their branches do not open current accounts of entities which enjoy credit facilities (fund based or non-fund based) from the banking system without specifically obtaining a No-Objection Certificate from the lending bank(s).

Bank would open current accounts of prospective customers in case no response is received from the existing bankers after a minimum waiting period of a fortnight.

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If a response is received within a fortnight, banks would assess the situation with reference to information provided on the prospective customer by the bank concerned and are not required to solicit a formal no objection, consistent with true freedom to the customer of banks as well as needed due diligence on the customer by the bank

- In case of a prospective customer who is a corporate or large borrower enjoying credit facilities from more than one bank, the banks would exercise due diligence and inform the consortium leader, if under consortium, and the concerned banks, if under multiple banking arrangement.

- ***Bank' Policy on Levy of Service Charges***

- ***Fixing service charges by banks***

While fixing service charges for various types of services like charges for cheque collection etc., bank would ensure that the charges are reasonable and - are not out of line with the average cost of providing these services.

Banks would also take care to ensure that customers with low volume of activities are not penalized.

Banks would make arrangements for working out charges with prior approval of their Boards of Directors as recommended above and operationalise them in their branches as early as possible.

- ***Ensuring Reasonableness of Bank Charges***

Bank would also follow the guidelines provided by the Banking Codes and Standards Board of India (BCSBI), Reserve Bank of India and other regulators.

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➤ **Service at the counters**

• **Banking hours / working days of bank branches**

The Bank would normally function for public transactions at least for

- (i) 4 hours on week days
- (ii) and 2 hours on Saturdays

in the larger interest of public and trading community.

• **Changes in banking hours**

In order to safeguard banks' own interest, a bank closing any of its offices on a day other than a public holiday, would give due and sufficient notice to all the parties concerned who are or are likely to be affected by such closure.

While declaring holidays the bank would avoid any infringement of any other relevant local laws such as Shops and Establishment Act, etc.

Further, the provisions, if any, in regard to the banks' obligations, to the staff under the Industrial Awards / Settlements, should be complied with. Clearing House authority of the place would also be consulted in this regard.

• **Commencement / Extension of working hours**

Commencement of employees' working hours 15 minutes before commencement of business hours would be made operative by bank at branches in metropolitan and urban centres. The bank would implement the recommendation taking into account the provisions of the local Shops and Establishments Act.

Bank would ensure that no counter remains unattended during the business hours and uninterrupted service is rendered to the customers. Further, the banks would allocate the work in such a way that no Teller counter is closed during the banking hours at their branches

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- **Extended business hours for non-cash banking transactions**

Bank would extend business hours for banking transactions other than cash, up till one hour before close of the working hours.

The following non-cash transactions would be undertaken by banks during the extended hours, i.e., up to one hour before the close of working hours:

**a) Non-voucher generating transactions :**

- (i) Issue of pass books/statement of accounts;
- (ii) Issue of cheque books ;
- (iii) Delivery of term deposit receipts/drafts;
- (iv) Acceptance of share application forms;
- (v) Acceptance of clearing cheques;
- (vi) Acceptance of bills for collection.

**b) Voucher generating transactions:**

- (i) Issue of term deposit receipts;
- (ii) Acceptance of cheques for locker rent due;
- (iii) Issue of travelers cheques;
- (iv) Issue of gift cheques;
- (v) Acceptance of individual cheques for transfer credit

- Such non-cash transactions to be done during the extended business hours would be notified adequately for information of the customers.
- The concerned banks would give to their constituents due notice about the functions to be undertaken during the extended banking hours through local newspapers, as

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also by displaying a notice on the notice board at the branch(es) concerned. Further, as and when the hours of business of any of the branches are extended, the concerned clearing house would be informed

- **Guidance to customers and Disclosure of Information**

- **Assistance/guidance to customers**

All branches, except very small branches would have “Enquiry” or “May I Help You” counters either exclusively or combined with other duties

- **Display of time norms**

Time norms for specialized business transactions would be displayed predominantly in the banking hall.

- **Display of information by banks –**

- **Comprehensive Notice Board**

- **Objective :**

- (i) one of the modes of imparting financial education.
- (ii) enabling customers to take informed decision regarding products and services of the bank
- (iii) make customers aware of their rights as also the obligations of the banks to provide certain essential services.
- (iv) disseminate information on public grievance redressal mechanism and enhance the quality of customer service in banks and improve the level of customer satisfaction.

- While displaying the information in the notice board, banks would also adhere to the following principles:

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- (a) The notice board would be updated on a periodical basis and the board would indicate the date up to which the board was updated (incorporated in the display board)
- (b) The bank will display the information in simple and readable form.
- (c) Information to be displayed in bilingual/trilingual language.

In addition to the above Board, the bank would also display details such as ‘Name of the bank / branch, Working Days, Working Hours and Weekly Off-days’ outside the branch premises.

The bank considers the additional option of having an e-notice board.

- **Website**

- The detailed information of the Notice Board would also be made available on the bank’s web-site. Bank would adhere to the broad guidelines relating to dating of material, legibility etc., while placing the same on their websites. The Bank would also ensure that the customers are able to easily access the relevant information from the Home Page of the bank’s web-sites. Further, the information relating to service charges and fees and grievance redressal would be posted compulsorily on the websites of the bank. The list of unclaimed deposits/inoperative accounts which are inactive / inoperative for ten years or more is to be displayed on website. Display of information relating to Interest Rates and Service Charges – Rates at a quick glance

The Bank would display the information related to interest rates and service charges as per the RBI prescribed format on their websites.

**I. Various Policies / Guidelines applicable to/of the Bank**

- (i) Citizen's Charter
- (ii) Deposit Policy
- (iii) Deceased Depositors Policy along with Nomination Rules
- (iv) Cheque Collection Policy
- (v) Fair Practices Code for Lenders

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(vi) Code for Collection of Dues and Repossession of Security

## **II. Complaints**

- (i) Grievance Redressal Mechanism
- (ii) Information relating to Banking Ombudsmen

## **III. Opening of Accounts**

- (i) Account Opening Forms
- (ii) Terms and Conditions
- (iii) Service Charges for various types of services
- (iv) Interest rates on Deposits
- (v) Minimum balances – along with corresponding facilities offered.

## **IV. Loans and Advances**

- (i) Documents relating to loans and advances
- (ii) Template of blank agreement to be executed by the borrower
- (iii) Terms and Conditions
- (iv) Interest rates on Loans and Advances

**Clients are made aware of above policies and encouraged to refer them to understand basic guidelines related to various products/services provided by the bank.**

### **• Customer Confidentiality Obligations**

- The scope of the secrecy law in India has generally followed the common law principles based on implied contract. The bankers' obligation to maintain secrecy arises out of the contractual relationship between the banker and customer, and as such no information should be divulged to third parties except under circumstances which are well defined.

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- The following exceptions to the said rule are normally accepted:
  - (i) Where disclosure is under compulsion of law
  - (ii) Where there is duty to the public to disclose
  - (iii) Where interest of bank requires disclosure and
  - (iv) Where the disclosure is made with the express or implied consent of the customer.
- Wherever banks desire to collect any information about the customer for a purpose other than KYC requirements, it would not form part of the account opening form. Such information would be collected separately, purely on a voluntary basis, after explaining the objectives to the customer and taking his express approval for the specific uses to which such information could be put. Banks would therefore, instruct all the branches to strictly ensure compliance with their obligations to the customer in this regard.
- ***Collecting Information from customers for cross-selling purposes***
  - Bank is aware, the information provided by the customer for KYC compliance while opening an account is confidential and divulging any details thereof for cross selling or any other purpose would be in breach of customer confidentiality obligations.
  - Bank would treat the information collected from the customer for the purpose of opening of account as confidential and not divulge any details thereof for cross selling or any other purposes. Bank would therefore, ensure that information sought from the customer is relevant to the perceived risk, is not intrusive, and is in conformity with the guidelines issued in this regard.

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- **Switching banks by customers**

Bank would ensure that depositors dissatisfied with customer service have the facility to switch banks and thwarting depositors from such switches would invite regulatory action.

- **Accepting standing instructions of customers**

Standing instructions should be freely accepted on all current and savings bank accounts. The scope of standing instructions service would be enlarged to include payments on account of taxes, rents, bills, school / college fees, licenses, etc.

- **Code of Bank's Commitment to Customers**

Bank would follow various provisions of the Code of Bank's Commitment to Customers, implementation of which is monitored by the Banking Codes and Standards Board of India (BCSBI).

- **Monitoring of Dormant Accounts**

Any transactions that are emanated from the clients in their dormant accounts, are checked by Operations and the concerned SBOs through 'Trouble Sheet' or related Inward / Outward Clearing Reports, by contacting clients for confirmation of the transactions and updating client's relationship status (contact details, etc.).

Operations and concerned SBOs refer the same to Compliance Department, through Lotus Notes giving details of transactions and information obtained from the clients, for validation before executing said transactions.

Based on monthly report on dormant accounts, branches to review the accounts and send 'Dormant Account Notification Letters' to concerned clients informing that their accounts are dormant and requesting clients for their acknowledgment of the letters.

As per regulatory guidelines the letter relating to inoperative / dormant to be sent to client/s at two stages.

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First, if account is inoperative / dormant for a period of 24 months , Bank to "treat" the account as inoperative / dormant and Bank to send letter to the client requesting client to give reasons for non operation and would give extended period of one year during which he can activate the account .

Second stage, the letter to the client to be sent at the end of 33 months i.e. (36 -3 ) , where Bank to inform client that at the end of 3 months, the account will be classified as inoperative / dormant as per RBI guidelines.

Branches (Operations and concerned SBOs), review all dormant accounts, and inform concerned Business Lines for their decision as to whether the accounts, which do not have clients' acknowledgments, can be continued or to be closed under intimation to Compliance Department for information.

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