KARNATAKA GRAMEENA BANK Head Office, Ballari

Customer Grievance Redressal Policy 2025-26

Version	1.0

Strategic Planning and Development Wing

HO, Ballari

<u>Index</u> <u>CUSTOMER GRIEVANCE REDRESSAL POLICY OF THE BANK FOR THE YEAR 2025-2</u>6

SI No.	CONTENTS	Page no
Α	Objectives	4
1	The customer complaint arises due to	4
В	Organisational Setup and Roles & Responsibilities	5
2	Internal Machinery to handle customer complaints / grievances	5
2.1	Complaint Redressal Mechanism	5
	Complaint Redressal Mechanism at Branch	6
	Complaint Redressal Mechanism at Regional Office	8
	Complaint Redressal mechanism at Head Office	8
C	Reporting structure/ requirements	12
	Grievance Escalation System	12
3	Online grievance Redressal System (PGRS)	13
4	Integrated Ombudsman Scheme 2021	14
D	Strategies for meeting objectives	15
5	Standing Committee Meeting on Customer Service	15
6	Customer Service Committee of the Board	15
7	Nodal Officials to handle the complaints & grievances	16
8	Mandatory display requirements	16
9	Resolution of Grievances	17
10	Time Frame	17
E	Limit Structure/ Trigger Mechanism	17
11.1	Dispute Redressal Mechanism (Technology Products)	17
11.2		19
	Exception Handling	21
	Charge Backs	21
	Credit/ Debit Adjustments	21
12	Net Banking	21
13	Mobile Banking	22
14	Interaction with Customers	22
15	Sensitizing the staff on handling complaints	23
16	Home Loans - Levy of fore closure charges/ Pre Payment Penalty	23
17	Uniformity on Intersol Charges	23
18	Charges for sending SMS alerts	24
19	Grievance Redressal on complaints against outsourced agencies/	24
	employees	
19.1	Recovery Agents (Monitored by R&L Wing)	24
19.2	Call Center Service (Monitored by DIT/DBS Wing)	25
19.3	Business Correspondents (Monitored by Financial Inclusion Wing)	25
19.4	Formation of Women SHG & Facilitation in crediting of SHG/JLG	25

20	Strengthening of Grievance Redress Mechanism in Banks	26
21	Handling of Complaints related to vigilance, bribery & corruption:	26
22	Complaints related to Credit Information Companies (CIC): (Monitored by Recovery, Legal and Fraud Prevention Wing)	27
F	Compliance / Monitoring of Implementation of the Policies By all branches/ Circle Office/ Head Office	27
	Disclaimer	28

A. OBJECTIVES:

In the present scenario of competitive banking, excellence in customer service is the most important tool for sustained business growth. Since inception of our Bank high priority has been attached to customer satisfaction. Over the years, steps have been taken to come out with a number of initiative aimed at achieving high standards of customer satisfaction and complaint free branch network. Customer complaint is part of the business life of any corporate entity. As a service organization, customer service and customer satisfaction is the prime concern of the Bank. We believe that providing prompt and efficient service is essential not only to attract new customers, but also to retain existing ones. This policy document aims at minimizing instances of customer complaints and grievances through proper service delivery and review mechanism and to ensure prompt redressal of customer complaints and grievances. The review mechanism will help in identifying shortcomings in product features and service delivery.

The Bank's policy on Grievance Redressal follows the under noted principles:

- a) Our customers will be treated fairly at all times.
- b) Complaints raised by our customers will be dealt with courtesy and in time.
- c) Our customers will be fully informed of avenues to escalate their complaints/grievances within the organization and their rights to alternative remedy, if they are not fully satisfied with the response of the bank to their complaints.
- d) Our Bank will treat all complaints efficiently and fairly as they can damage the Bank's reputation and business if handled otherwise.
- e) Our employees will work in good faith and without prejudice to the interests of the customer.
- f) Complaints emanating from rural areas and those relating to financial assistance to priority sector and Government Poverty alleviation programme also form part of the above process.

In order to make Bank's redressal mechanism more meaningful and effective, a structured system will function at Branches/ Regional Offices/Head Office, which will ensure that redressal sought is just and fair and is within the given framework of rules and regulation.

This policy document will be made available at all branches. All the employees will be made aware about the complaint handling process to ensure better customer service and general awareness in the Bank.

1. The customer complaint arises due to:

- a) The attitudinal aspects in dealing with customers.
- b) Inadequacy of the functions/ arrangements made available to the customers or gaps in standards of services expected and actual services rendered.
- c) Malfunctioning of Technology products.

B. ORGANISATIONAL SETUP AND ROLES & RESPONSIBILITIES:

(Monitored by Head office SP&D Wing)

2. Internal Machinery to handle customer complaints/ grievances

- a) If the customer wants to make a complaint, we will inform:
 - i. Where to make complaint
 - ii. How a complaint should be made
 - iii. When to expect a reply
 - iv. Whom to approach for redressal
 - v. What to do if customers are not happy about the outcome
- b) The Bank will inform customers where to find details of procedures for handling complaints fairly and quickly.
- c) If the customer complaint is received in writing, we will endeavour to send an acknowledgement/ a response within a week. If customer complaint is relayed over phone at our designated telephone helpdesk or customer service number, we shall provide a complaint reference number and keep customers informed of the progress within a reasonable period of time.
- d) If the complaint is through any other mode like **Call Centre-1800 102 5250**, letter, email, tele phone etc. the same should be recorded/ registered in respective grievance Redressal portal/package like PGRS etc., immediately after receipt of customer complaint.
- e) After examining the matter, we will send our final response or explain why we need more time to respond and shall endeavour to do so within 21 days of receipt of complaint and will tell customers to take their complaint further if they are still not satisfied.

2.1 Complaint Redressal Mechanism in our Bank:

Bank is having a nodal department/ official for customer service in HO and in each controlling office (Regional Office), with whom customers with grievances can approach in the first instance and with whom the Banking Ombudsman and RBI can liaise.

The General Manager, Credit Wing shall act as the Nodal Officer for monitoring of Credit Related grievances forwarded by the Ministry for taking appropriate action on merits.

Any complaint received through legal channel/advocates office will be replied by the recipient Branch/RO/HO after obtaining vetting from Legal Section of RO or Legal Section, R&L Wing at Head office.

2.1.1 At Branch:

Resolution of Grievances

Branch Manager will be responsible for the resolution of the complaints/ grievances in respect of customer service by the Branch. He/ she would be responsible for ensuring closure of all complaints received at Branches. It is his/ her foremost duty to see that the complaint should be resolved completely to the customer's satisfaction and if the customer is not satisfied, then he shall be provided with alternate avenues to escalate the issue if the same is not resolved within the stipulated period.

If the Branch Manager feels that it is not possible at his/ her level to solve the problem, he/ she may refer the case to Regional Office/ Head Office for guidance. Similarly, if Regional Office find that they are not able to solve the problem; such cases may be referred to the Principal Nodal Officer of the Bank.

All complaints received by the Bank Branches outside to online grievance portals are to be entered in designated grievance Redressal packages i.e. PGRS(Public Grievance Redressal System), on the same day of receipt of the complaint and due process to be followed further.

- i. Suggestion Box and complaint Book are provided in all the branches. Any written complaint is instantly and promptly acknowledged.
- ii. The Complaint Registers are to be kept at prominent place which would make it possible for the customers to enter their grievances. The register shall be in perforated copies in each set so that the acknowledgement to the customers would be provided instantly and an intimation to the controlling office.
- iii. At every office of the Bank a notice requesting the customer "To meet the Branch Manager" shall be displayed with regard to Grievances, if it remains unredressed.
- iv. A copy of the complaint is required to be forwarded to the concerned controlling office of the bank along with the remark of the branch manager within a time frame (Within a maximum of 7 days depending upon the nature of Grievances)
- v. All branches should maintain a separate complaint register for entering all the complaints/ grievances received by them directly or through RO/HO and other sources. These registers should be maintained irrespective of the fact whether a complaint is received or not in the past. Branch to maintain a separate file for customer complaints received through letters and related communications and grievance portal/package generated complaint number / reference to be inscribed on all such complaints which are received outside to grievance portal/

package and entered in the package .

- vi. The complaint registers maintained by branches shall be scrutinized by the concerned Region Nodal Executive during his periodical visit to the branches and his observations/ comments recorded in the relative visit reports.
- vii. Bank having computerized operation may adopt the aforesaid format and generate copies electronically namely PGRS (Public Griviance Redressal System) in which all the complaints are registered and redressed. The data is maintained in the package electronically.
- viii. Grievances/ complaints relating to congestion in banking premises should be examined by the bank's internal inspectors/ auditors on a continuing basis and action taken for augmentation of space, where ever necessary, keeping in view the availability of larger accommodation in the same locality at a reasonable rent and other commercial considerations.
 - ix. Counter staff are provided with training and additional inputs.
 - x. If counter staff/ supervisor is unable to resolve a grievance, the Branch-in-charge shall intervene and try to resolve the issue.
 - xi. Customers' Day is observed on 15th of every month. On this day, branch in-charge will make himself/ herself available at the branch between 3 P.M. and 5 P.M. to meet customers without any prior appointment.

Branch Level Customer Service Committees

Banks were advised to establish Customer Service Committees at branch level. In order to encourage a formal channel of communication between the customers and the bank at the branch level, banks should take necessary steps for strengthening the branch level committees with greater involvement of customers. It is desirable that branch level committees include their customers too. Further, as senior citizens usually form an important constituent in banks, a senior citizen may preferably be included therein. The Branch Level Customer Service Committee at Head Office may meet at least once 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 service.

The branch level committees may also submit quarterly reports giving inputs/ suggestions to the Standing Committee on Customer Service thus enabling the Standing Committee to examine them and provide relevant feedback to the Customer Service Committee of the for necessary policy/ procedural action.

i. Customer Service Committee meeting is held every month at all Branches and Regional Offices. The sole task of the Committee is to find out ways and means to render service to the satisfaction of the Customers. For this purpose, Committee will meet regularly at stipulated intervals to discuss in detail the strengths and deficiencies of the services presently rendered and take steps to improve it.

- ii. Special Customers' Meet is conducted on special occasions.
- iii. Every year, during November Customer Fortnight is observed to create awareness among Public as well as staff for achieving the objective of Complaint free branch network, and to also highlight our products and services.
- iv. Both the Drop box facility and the facility for acknowledgement of the cheques at regular collection counters shall be available to the customers and no branch shall refuse to give an acknowledgement if the customer tenders the cheque at the counters.
- v. Bank shall ensure that customers are not compelled to drop the cheques in drop box.
- vi. Bank shall invariably display on the cheque drop box itself that 'Customers can also tender the cheques at the counters and obtain acknowledgement on the pay-in- slips.' This message is displayed in English, Hindi and the concerned regional language of the state.
- vii. On 15th of every month, Customers' Day is observed between 3 P.M. and 5 P.M. during which Branch manager should be available for meeting the public/ Customers without prior appointment.

2.1.2 At Regional Office:

- a. Chief Manager / Assistant General Manager holding charge of SP&D Section/Customer Service Section at Regional office.
- b. By and large, complaints are redressed within shortest possible time.
- c. Whenever it is not possible and more cross checking is required, steps are taken to settle the matter within a reasonable time.
- d. The Executives of Regional Office visit branches periodically and submit a report on Customer Service, as per the detailed checklist.
- e. Chief Manager / Assistant General Manager in-charge of SP&D Section/Customer Service Section, Regional Office contact the aggrieved customers as and when necessary, meet him personally with the Branch Manager, for ensuring timely redressal of the complaint.
- f. Wherever deficiencies are noticed, accountability is fixed and erring employees punished.

2.1.3 At Head Office:

- a. A full-fledged Customer Service Section is functioning at SP&D Wing, Head Office, overseen by General Manager.
- b. An acknowledgement is sent to the customer immediately on receipt of the complaint.
- c. Thorough analysis of the complaint is done and necessary instructions are given to ROs/Branches for speedy redressal and followed up till final reply is sent to the complainant duly explaining the decision taken on the complaint.

- d. On 15th of every month, Customers' Day is observed between 3 p.m. and 5 p.m. during which overseeing Executives are available for meeting the public/ Customers without prior appointment.
- e. Special Customers' Meets are organized for different segments of the market, viz., Exporters, MSME, NRI, Agriculturists, etc, by respective divisions.
- f. Customer Satisfaction Surveys through In-house as well as by External agencies are conducted to assess the level of customer satisfaction.
- g. Bank shall place a statement of complaints before the Customer Service Committee of the Head Office along with an analysis of the complaints received. The complaints shall be analyzed to identify customer service areas in which the complaints are frequently received, to identify frequent sources of complaints, to identify systemic deficiencies and for initiating appropriate action to make the grievance redressal mechanism more effective.
- h. Root Cause Analysis of the complaints will be conducted by the owner / user division in co-ordination with Customer Service Section.
- i. The Bank shall disclose following details along with financial results.
- A. Summary information on complaints received by the bank from customers and from the Office of Banking Ombudsman.

Sl			Previous	Current
no			year	year
	Com	plaints received by the bank from its customers		
1		Number of complaints pending at beginning of		
		the year		
2		Number of complaints received during the year		
3		Number of complaints disposed during the year		
	3.1	Of which, number of complaints rejected by the bank		
4		Number of complaints pending at the end of the year		
		tainable complaints received by the bank from ce of Banking Ombudsman.		
5		Number of maintainable complaints received by the bank from OBOs		
	5.1	Of 5, number of complaints resolved in favour of the bank by Bos		
	5.2	Of 5, number of complaints resolved through conciliation/mediation/advisories issued by Bos		
	5.3	Of 5, number of complaints resolved after passing of Awards by BOs against the bank		
6		Number of Awards unimplemented within the stipulated time (other than those appealed)		

B. Top five grounds of complaints received by the bank from customers

Grounds of complaints, (i.e. complaints relating to)	Number of complaints pending at the beginning of the year	Number of complaints received during the year	decrease in the number	Number of complaints pending at the end of the year	Of 5, number of complaints pending beyond 30 days
	,		year		,
1	2	3	4	5	6
		Curre	ent Year		
Ground - 1					
Ground - 2					
Ground - 3					
Ground - 4					
Ground - 5					
Others					
Total					
		Previ	ous Year		
Ground - 1					
Ground - 2					
Ground - 3					
Ground - 4					
Ground - 5					
Others					
Total					

Master list of grounds of complaints to be used for disclosure on the top five groundwise receipt of complaints by banks.

- 1. ATM/Debit Cards
- 2. Credit Cards
- 3. Internet/Mobile/Electronic Banking
- 4. Account opening/difficulty in operation of accounts
- 5. Mis-selling/Para-banking
- 6. Recovery Agents/Direct Sales Agents
- 7. Pension and facilities for senior citizens/differently abled
- 8. Loans and advances
- 9. Levy of charges without prior notice/excessive charges/foreclosure charges
- 10. Cheques/drafts/bills
- 11. Non-observance of Fair Practices Code
- 12. Exchange of coins, issuance/acceptance of small denomination notes and coins
- 13. Bank Guarantees/Letter of Credit and documentary credits
- 14. Staff behaviour
- 15. Facilities for customers visiting the branch/adherence to prescribed working hours by the branch, etc.
- 16. Others

Further bank shall place a detailed statement of complaints in the web-site for information of the general public at the end of each financial year.

Board of Directors

- \checkmark Shall drive the effective management of Grievance Redressal Policy.
- \checkmark Provide senior management with clear guidance and direction.
- ✓ Review the Grievance Redressal Policy annually and if necessary, revise them in tune with extant regulatory guidelines.
- ✓ Matters relating to customer service should be deliberated by the Board to ensure that the instructions are implemented meaningfully.

Commitment to hassle-free service to the customer at large and the Common Person in particular under the oversight of the Board should be the major responsibility of the Board.

Role of the Customer Service Committee

Customer Service Committee of the Board, illustratively, could address the following:

- ✓ Formulation of a Comprehensive Deposit Policy
 - \checkmark lssues such as the treatment of death of a depositor for operations of his account
 - ✓ Product approval process with a view to suitability and appropriateness
 - ✓ Annual survey of depositor satisfaction
 - ✓ Tri-enniel audit of such services.
 - ✓ Monitoring the implementation of awards under the Banking Ombudsman Scheme.
 - ✓ The Committee should also play a more pro-active role with regard to complaints/ grievances resolved by Banking Ombudsmen of the various States.
 - ✓ The Committee could also examine any other issues having a bearing on the quality of customer service rendered.

Further, with a view to enhance the effectiveness of the Customer Service Committee, banks should also:

- a) Place all the awards given by the Banking Ombudsman before the Customer Service Committee to enable them to address issues of systemic deficiencies existing in banks, if any, brought out by the awards; and
- b) Place all the awards remaining unimplemented for more than three months with the reasons therefore before the Customer Service Committee of the Board to enable the Customer Service Committee to report to the Board such delays in implementation without valid reasons and for initiating necessary remedial action.

Standing Committee on Customer Service

The Committee on Procedures and Performance Audit of Public Services (CPPAPS) constituted by RBI examined the issues relating to the continuance or otherwise of the Ad hoc Committees and observed that there should be a dedicated focal point for customer service in banks, which should have sufficient powers to evaluate the functioning in various departments. The CPPAPS therefore recommended that the Ad hoc Committees should be converted into Standing Committees on Customer Service. The constitution and functions of the Standing Committee may be on the lines indicated below:

- i. The Standing Committee may be chaired by the Chairman and include nonofficials as its members to enable an independent feedback on the quality of customer service rendered by the bank.
- ii. The Standing Committee may be entrusted not only with the task of ensuring timely and effective compliance of the RBI instructions on customer service, but also that of receiving the necessary feedback to determine that the action taken by various departments of the bank is in tune with the spirit and intent of such instructions.
- iii. The Standing Committee may review the practice and procedures prevalent in the bank and take necessary corrective action, on an ongoing basis as the intent is translated into action only through procedures and practices.
- iv. 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 may be submitted periodically to the Customer Service Committee of the Board.

C.<u>REPORTING STRUCTURE/ REQUIREMENTS:</u>

2.1.4 Grievance Escalation System:

- a. Customers can lodge their complaints directly to Branch-in-charge and it will be the responsibility of the Branch-in-charge to resolve the complaint within 7 days from the date of receipt.
- b. All complaints received by the Bank through other mode/ channels outside to online grievance portals/packages are to be captured in the PGRS portal, on the same day of receipt of the complaint and complaint id/ reference to be communicated to the complainant for online tracking of status.
- c. The Branch-in-charge will analyze the complaint and if need be he/she will contact the complainant personally and resolve the complaint.
- d. A complaint redressal letter will be sent to complainant.
- e. If the Branch-in-charge is not able to resolve the complaint within 7 days, the complaint will get auto escalated to the concerned Regional Office.
- f. The Complaints referred to Regional Office will be analyzed by customer service section and based on the explanation received from the Branch, RO will send a suitable reply to complainant.
- g. If Regional Office cannot resolve the complaint within 5 days from the date of auto-escalation of complaints or upto 12th day from the date of receipt of complaint, the same will be auto escalated to Customer Service Section/SP&D Wing, Head Office.
- h. Customer Service Section, Head Office will analyze the complaint and the replies received from Branch/ Regional Office. On placing the matter before appropriate authorities, a decision is taken on the complaint.
- i. A complaint redressal communication will be sent to the complainant from Head Office and suitable instructions are passed on to Branch/ Regional Office for taking action in the deficient areas. Whenever the decision is taken to reject the claim or partial relief is proposed, it shall be escalated to Head Office, SP& D Wing.
- j. Compliant redressal/ closure intimation with complaint status & tracking link will be communicated to the complainant through SMS/email/letter/any other mode of communication approved by the Bank.
- k. Bank shall critically examine on an on-going basis as to how grievances redressal

machinery is working and whether the same has been found to be effective in achieving improvement in customer service in different areas.

1. Bank shall constitute special squads conduct Root Cause Analysis for those areas in which the number of complaints is repetitive in nature or on the increase. Bank shall arrange to include one or two sessions on customer service, public relations etc., in training programmes conducted.

3. Online Grievance Redressal System: PGRS (Public Grievance Redressal System):

Based on the Recommendations of the Damodaran Committee, IBA and also as per the instructions of the Ministry of Finance, the bank has developed an in-house package for the online grievance redressal system namely PGRS (Public Grievance Redressal System). The same is made available in the Banks Website. This package enables the customers to register their complaints online through our corporate website. This package records a complaint and provides the customer the complaint status tracking and receiving response from the bank.

Through the website of the bank customers can register the complaints. A unique reference number is generated by the system for the reference to the customer. Customers can track their complaint, check the resolution provided and if any customer feels dissatisfied with the resolution provided by the bank, customer can reopen the complaint.

Customer can also register their complaints through Toll Free number, Mobile Banking and Internet Banking which will be auto recorded in PGRS package and customer will be provided with Complaint tracking Reference number which will be attended by the Bank as per the procedure below.

AT BRANCH LEVEL:

- a. Branches to follow up PGRS complaint under Banksoft module on day-to-day basis for close monitoring of redressal of grievances.
- b. Branches have to invariably enter redressal within the prescribed time norms (i.e. within the 7th day of lodging of the complaint).
- c. After entering the redressal by the branch, the complaint would automatically flow to the respective Regional Office for review of redressal entered by the branch and closure of the same at their end.
- d. Wherever branches do not attend the complaints within the prescribed time lines, the complaint itself would flow to the next higher authority (i.e. RO) for the redressal and closure. Branches would be having only view rights of auto-escalated complaints.

AT REGIONAL OFFICE LEVEL:

- a. Regional Offices are requested to monitor the grievance redressal of complaints at their branches within the prescribed time norms (i.e. within the 7th day of lodging of the complaint).
- b. After the branch enters the redressal of complaint, it automatically flows to the respective Regional Office for review of redressal entered by the branch and closure of the same.

- c. If the complaint remains unattended at branch level, on 7th day of lodging of the complaint, the complaint itself flows to RO for necessary redressal and closure. Branches would be having only view rights of such complaints. RO has to close such complaint.
- d. If the complaint still remains unattended on the 5th day of the complaint landing at RO, it would flow to the next higher authority (i.e. HO) for necessary redressal and closure. ROs will be having only view rights of such complaints.

AT HEAD OFFICE LEVEL:

- a. If the complaint remains unattended at RO level, on 12th day of lodging of the complaint, the complaint itself would flow to HO for necessary redressal and closure. ROs would be having only view rights of such complaints. HO has to close such complaint.
- b. HO follows up on each case and redresses the issue to the satisfaction of the customer.

4. INTEGRATED OMBUDSMAN SCHEME 2021

For general complaints submitted to Bank and if customer does not get a satisfactory response from us and if customer wishes to pursue other avenues for redressal of grievances, customer may approach Banking Ombudsman appointed by Reserve Bank of India under Integrated Ombudsman Scheme, 2021.

We have displayed in our website and in all our Branches a notice explaining that we are covered by the new Integrated Ombudsman Scheme, 2021 of Reserve Bank of India along with the scheme guidelines. The copy of the scheme is made available at all the branches. Salient features of the Integrated Ombudsman Scheme, 2021 are displayed in the branch premises/ notice boards and our corporate website www.karnatakagrameenabank.com If customers face any difficulty, our Staff will explain the procedure in this regard.

As per the new scheme, reply will be issued to customers within 15 days of lodging a complaint with Bank. If Bank, needs more time to resolve the complaint, a written request may be given to the Ombudsman for further extension of initial period of 15 days.

- a. Where the complaints are not redressed within 15 days, the concerned Nodal Executive of the Regional Office shall take up with the respective Customer Service Section Head office for further extension of time within the initial time of 15 days. Branch/ Controlling Office shall forward a copy of the same to the Principal Nodal Officer at Head Office and keep him updated regarding the status of the complaint. This would enable the Principal Nodal Officer to deal effectively with the Banking Ombudsman. Further, it is also necessary that the customer is made aware of his rights to approach the Ombudsman in case he is not satisfied with the Bank's response on a complaint raised by him.
- b. Bank shall appoint Principal Nodal Officer of sufficiently senior level, not below the

rank of a General Manager Customer Service Section, Planning and Development Division is appointed as Principal Nodal Officer of the Bank.

c. It is necessary that the customer is made aware of his rights to approach the concerned Banking Ombudsman in case he is not satisfied with Bank's response. As such, in the final intimation sent on Redressal of any complaint, bank indicates that complainant can also approach the Banking Ombudsman. The details of complaint lodging portal of the Ombudsman (https://cms.rbi.org.in).

D.STRATEGIES FOR MEETING OBJECTIVES:

5. Standing Committee Meeting on Customer Service

In order to benchmark the current level of service, review the progress periodically, enhance the timeliness and quality, rationalize the processes taking into account technological developments and suggest appropriate incentives to facilitate change on an ongoing basis the Standing Committee on Customer Service is functioning.

The Standing Committee on Customer Service will be chaired by the Chairman and the Committee would also constitute one or two General Manager/s of the Bank, asits members.

The Committee is having the following functions:

- i. To convene meeting every quarter.
- ii. The committee would submit report on the deliberations of the meeting to the customer service committee of the board at quarterly intervals.
- iii. Evaluate feedback on quality of customer service received from various quarters. The committee would also review comments/ feedback on customer service, implementation of commitments in the Code of Bank's Commitments to customers received from BCSBI.
- iv. The committee would be responsible to ensure that all regulatory instructions regarding customer service are followed by the Bank. Towards this, the committee would obtain necessary feedback from Regional Managers/ Functional heads.
- v. The committee would consider unresolved complaints/ grievances referred to it by functional heads responsible for redressal and offer its advice.

6. Customer Service Committee of the Board

This sub-committee of the Board would be responsible for formulation of a Comprehensive Deposit Policy incorporating the issues such as the treatment of death of a depositor for operations of his account, the product approval process and annual survey of depositor satisfaction. The committee would also examine any other issues having a bearing on the quality of customer service rendered. This committee would also review the functioning of the Standing Committee on Customer Service.

7. <u>Nodal Officer and other designated officials to handle complaints and</u> <u>Grievances</u>

7.1 At Head Office:

Principal Nodal Officer:

The Bank has nominated General Manager, Strategic Planning and Development Wing as PRINCIPAL NODAL OFFICER, who is monitoring the implementation of Customer Service and complaint handling process for the entire Bank.

7.2 At Regional Office:

Regional Managers of Operations/Customer Service Section at Regional Offices is handling the complaints received directly from customers of that region. Customer Service Committees are in place in all the Regional Offices to look into implementation of customer service.

8. <u>Mandatory display requirements</u>

The Bank has made it mandatory to display the following at Branches and at our corporate website <u>www.karnatakagrameenabank.com</u> for the benefit of our customers:

- 1. Details on appropriate arrangements made for receiving complaints and suggestions.
- 2. The name, address and contact number, email address etc, of Nodal Officer(s) who can redress the complaints.
- 3. Website details of Ombudsman (<u>https://cms.rbi.org.in</u>) where customer can file complaint online.
- 4. Details of Code of Bank's commitments to customers/ Fair practice code.
- 5. Prominently display at the branches, the names of the Officials who can be contacted for redressal of complaints, together with their direct Telephone No., complete address (not Post Box No.) and e-mail address, etc., for proper and timely contact by the customers and for enhancing effectiveness of the redressal machinery.
- 6. The names of the Officials displayed at the branches who can be contacted for redressal of complaints shall also include the name and other details of concerned Nodal Officer appointed under the new Integrated Ombudsman Scheme, 2021, in the Circle.
- 7. Bank shall display on its website, the names and other details of Officials at their Head Office who can be contacted for redressal of complaints including the names of the Nodal Officers/ Principal Nodal Officer.
- 8. Banks shall give wide publicity to the grievance redressal machinery through advertisements and also by placing them on its website.
- 9. The details including name, complete address, telephone number, e-mail address, etc., of the Principal Nodal Officer shall be displayed in the portal of the bank preferably on the website so that the aggrieved customer can approach the Bank with a sense of satisfaction that he/ she has been attended at a senior level.

9. <u>Resolution of Grievances</u>

Branch Manager is responsible for the resolution of complaints/ grievances in respect of customer service at the branch. He would be responsible for ensuring closure of all complaints received at the branches. It is his foremost duty to see that the complaint should be resolved completely to the customer's satisfaction and if the customer is not satisfied, then he should be provided with alternate avenues to escalate the issue. If the branch manager feels that it is not possible at his level to solve the problem, he can refer the case to Regional Office for guidance. Similarly, if Regional Office finds that they are not able to solve the problem such cases may be referred to the Principal Nodal Officer, Customer Service Section, SP&D Wing Head Office of the Bank.

10. <u>Time Frame</u>

Complaints received will be seen in right perspective and will be analyzed from all possible angles. Specific time schedule is set up for handling complaints and disposing them at all levels including Branches/ Regional Offices and Head Office. The Branch Manager will try to resolve the complaint within specified time frames decided by the Bank.

	Stipulated by Ministry of Finance	Adopted by Bank
General Complaints	30 days	21 days
Complaints forwarded by MOF MPs/VVIPs	21 days	15 days
Complaints forwarded by RBI	15 Days	15 days
Complaints from PMs office	15 days	7 days

Time Schedule for Redressal of Complaints:

All the complaints received will be acknowledged immediately. In cases where complaints received would require some time for examination, the same will be informed to customer through an interim reply.

E. LIMIT STRUCTURE/ TRIGGER MECHANISM:

11.1 DISPUTE REDRESSAL MECHANISM: TECHNOLOGICAL PRODUCTS:

(Monitored by Information Technology Division, HO)

Lodging of ATM related Complaints

The following information should be displayed prominently at the ATM locations: -

i. ATM ID may be displayed clearly in the premises to make use of it while making a complaint/ suggestion.

- ii. Information that complaints should be lodged at the branches where customers maintain accounts to which ATM card is linked.
- iii. Telephone numbers of help desk/ contact persons of the ATM owning bank to lodge complaint/ seek assistance.

To improve the customer service through enhancement of efficiency in ATM operations, banks are advised to initiate following action:

(i) Message regarding non-availability of cash in ATMs should be displayed before the transaction is initiated by customer

(ii) Make available forms for lodging the complaints with name and phone number of the officials with whom they have to be lodged

(iii) Toll-free numbers for lodging complaints / reporting and blocking lost cards etc., to be displayed and attend the requests on priority

(iv) Mobile numbers/ e-mail IDs of the customers may be registered to send alerts.

In case of complaints pertaining to failed ATM transaction at other bank ATMs, the customer should lodge a complaint with the card issuing bank even if the transaction was carried out at another bank's ATM.

Transactions at ATM-Procedural Amendment - Pin Validation for Every Successive Transaction.

The process flow followed for ATM transactions varies from bank to bank. The type of card readers installed by each ATM vendor also contributes to the variation in the process flow. Security concerns arise in the case of certain type of card readers which facilitate multiple transactions without the need for pin validation for every successive transaction. The possibility of frauds/ misuse of cards are very high in a scenario where the card is inserted in such reader slots, the card holder fails to collect the card after the transaction is completed and the card is misused. This risk can be eliminated to a great extent if, for every transaction, the process flow demands pin validation. Hence each bank may ensure that the process flow is modified to provide the pin validation for every transaction, including balance enquiry facilitated through ATM. Further, as an additional safety measure, banks are advised that the time-out of sessions should be enabled for all screens/ stages of ATM transaction keeping in view the time required for such functions in normal course.

Non-adherence to the above provisions shall attract penalty as prescribed under the Payment and Settlement Systems Act 2007 (Act 51 of 2007).

Security Issues and Risk mitigation measures - Online alerts to the cardholder for usage of credit/ debit cards.

Banks were mandated to send online alerts to the cardholders for all Card Not Present (CNP) transactions for the value of ₹5000/- and above. In view of the incidents of unauthorized / fraudulent withdrawals at ATMs that came to the notice of RBI, Banks were advised to put in place, a system of online alerts for all types of transactions irrespective of the amount, involving usage of cards at various channels and hence the same was implemented by the Bank. This measure encourages further usage of cards at various delivery channels. Banks provides easier methods (like SMS) for the customer to block his card and get a confirmation to that effect after blocking the card.

Security Issues and Risk mitigation measures related to Card Not Present (CNP) transactions

Banks have been mandated to necessarily put in place additional factor of authentication/validation based on information not visible on the cards for all on-line Card not Present (CNP) transactions in a phased manner, starting with online transactions followed by Interactive Voice Response (IVR), Mail Order Telephone Order (MOTO) and Standing Instructions (SI). In the case of MOTO and SI transactions, it has been stated that in case of customer complaint regarding issues, if any, arising out of transactions effected without the additional factor of authentication after the stipulated date, the issuer bank has to reimburse the loss to the customer further without demur.

11.2 FAILED TRANSACTIONS:

Harmonization of Turn Around Time (TAT) and customer compensation for failed transactions using authorized Payment Systems

SI.	Description of the	Framework for auto-reversal and compensation		
no.	Description of the incident	Timeline for auto- reversal	Compensation payable	
Ι	II	III	IV	
1	Automated Teller Machines (ATMs) including Micro-ATMs	5	
А	Customer's account debited but cash not dispensed.	Pro-active reversal (R) of failed transaction within a maximum of T + 5 days	₹ 100/- per day of delay beyond T + 5 days, to the credit of the account holder.	
2	Card Transaction			
А	Card to card transfer Card account debited but the beneficiary card account not credited.	Transaction to be reversed (R) latest within T + 1 day, if credit is not effected to the beneficiary account.	₹ 100/- per day of delay beyond T + 1 day.	

	Point of Sale (PoS) (Card Present) including Cash at PoS		
В	Account debited but confirmation not received at merchant location i.e., charge-slip not generated.	Auto-reversal within	₹ 100/- per day of delay beyond
	<u>Card Not Present</u> (CNP) (e- commerce)	T + 5 days.	T + 5 days.
C	Account debited but confirmation not received at merchant's system.		
3	Immediate Payment System (IMPS)	
A	Account debited but the beneficiary account is not credited.	If unable to credit to beneficiary account, auto reversal (R) by the Beneficiary bank latest on T + 1 day.	₹100/- per day if delay is beyond T + 1 day.
4	Unified Payments Interface (I	JPI)	
A	Account debited but the beneficiary account is not credited (transfer of funds).	If unable to credit the beneficiary account, auto reversal (R) by the Beneficiary bank latest on T + 1 day.	₹100/- per day if delay is beyond T + 1 day.
В	Account debited but transaction confirmation not received at merchant location (payment to merchant).	Auto-reversal within T + 5 days.	₹100/- per day if delay is beyond T + 5 days.
5	Aadhar Enabled Payment System		
Α		Acquirer to initiate "Credit Adjustment" within T + 5 days.	₹100/- per day if delay is beyond T + 5 days(where "T" is
	Account debited but beneficiary account not credited.	and the states.	the date of transaction).

All disputes regarding ATM failed transactions to be settled within 120 days from the date of transaction shall be settled by the issuing bank and the acquiring bank through National Payment Corporation of India only. No bilateral settlement arrangement

outside the dispute resolution mechanism available with the system provider is permissible.

However, ATM failed transactions beyond 120 days from the date of transaction be settled by issuing bank and acquiring bank through bilateral arrangement on good faith claim basis.

The number of free transactions permitted per month at other bank ATMs to Saving Bank account holders shall be **inclusive** of all types of transactions, financial or non-financial.

All disputes regarding ATM failed transactions shall be settled by the issuing bank and the acquiring bank through the ATM System Provider only. No bilateral settlement arrangement outside the dispute resolution mechanism available with the system provider is permissible. This measure is intended to bring down the instances of disputes in payment of compensation between the issuing and acquiring banks.

11.3 Exception Handling:

Exception transactions are those that cannot be reconciled or reported as erroneous by a card holder. Members should collaboratively endeavour to settle discrepancies in settlement, if raised by other member banks, and all such discrepancies should be resolved amicably as per settlement procedure document, by Department of Information Technology Division, HO.

11.4 Charge Backs:

Chargeback can be raised within 60 days from the next day of the transaction. Charge back should be accepted or represented by acquirer bank within 5 days of raising the chargeback. Good faith chargeback can be raised within 61 to 120 days from the date of transaction. Good faith charge back should be accepted or represented by acquirer Bank within 15 days of raising the good faith chargeback.

11.5 Credit/ Debit Adjustments:

All credit adjustments are to be raised within T+5 days. All Debit adjustments are to be raised within T+10 days.

12. <u>Net Banking</u>:

(Monitored by DBS Wing, HO)

Grievances related to the following shall be redressed by the concerned branch:

- 1. For availing Net Banking facility (User creation).
- 2. Reset of Login password (In case the customer is not able to reset the login password online using the option available in Net Banking home page) Now customers can unlock login password.
- 3. Unlock (In case the customer is not able to reset the login password online using the option available in Net Banking home page).

- 4. Reset of Login (other than online) and Transaction password.
- 5. Modification of details like address, Mobile number and e-mail Id.
- 6. Activation of Net Banking facility.

Now, the Bank has enabled user creation, creation of login password, Transaction Password, Unlock/ resetting of password and regenerate OTP by the customers themselves by using internet facility.

Other grievances such as non-receipt of password PIN mailer and any Net Banking issues which could not be resolved at the Branch level shall be handled by Internet and Mobile Banking Section of Digital Banking Service Wing, HO.

If grievances are technology related, Internet and Mobile Banking Section has to take up the matter with the concerned group of Technology Operations section, DIT, HO for resolving the issues and communicating the same to the customer.

Grievances related to Net Banking facility and non-receipt/ delayed receipt of OTP shall be handled by Payment Systems and Alternate Delivery Channels Group of DBS Wing, HO. (DBS Wing, HO).

13. Mobile Banking:

(Monitored by DBS Wing, HO)

Grievances related to the following shall be redressed by the concerned branch:

A. Registration for Mobile Banking facility

B. Activation of Mobile Banking facility after MPIN change by the customer Grievances which could not be resolved at the Branch level shall be handled by Internet and Mobile Banking Section of DBS Wing, HO.

If grievances are technology related, Internet and Mobile Banking Section has to take up the matter with the Mobile Banking group of DIT/DBS Wing for resolving the issues and communicating the same to the customer.

14. Interaction with Customers

(Monitored by SP&D Wing, HO)

Customer's expectation/ requirement/ grievances can be better understood through personal interaction with customers by Bank's staff. Structured 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 to appreciate the banking services better. The feedback from customers would be a valuable input for revising our product and services to meet customer requirements.

15. Sensitizing the operating staff on handling complaints:

Our staff will be properly trained for handling complaints. During all the Training Sessions at our Staff Training College, the importance of handling complaints is explained to all the participants and they are trained to deal with customer complaints. Principle Nodal Officer for the Bank will ensure that internal machinery for handling complaints/grievances operates smoothly and efficiently at all levels and he will be giving feedback on training needs of staff at various levels to the Human Resources Department.

Redressal of complaints emanating from rural areas and those relating to financial assistance to Priority Sector and Governments Poverty Alleviation Programme also form part of the above process.

The existing grievance policy adopted, approved by the Board and published in our website is applicable to the complaints emanating from rural areas also.

Toll Free Number **1800 102 5250** has been introduced as a part of One bank, One number concept. This satisfies the requirements of all Customers. Customers can register their grievances by using this Toll Free number.

16. Home Loans-Levy of fore-closure charges/ pre-payment penalty:

(Monitored by Credit Wing)

- a. The removal of fore closure charges/ prepayment penalty on home loans will lead to reduction in the discrimination between existing and new borrowers and competition among banks will result in finer pricing of the floating rate home loans. Though many banks have in the recent past voluntarily abolished prepayment penalties on floating rate home loans, there is a need to ensure uniformity across the banking system. It has, therefore, been decided that bank shall not charge foreclosure charges/ pre-payment penalties on home loans on floating rate basis.
- b. As per extant guidelines a fixed rate loan is one where the rate is fixed for a certain period with reset clause option. Hence, Dual rate/Special rate home loans sanctioned by the bank cannot be treated as fixed rate loans. In case of Dual rate/Special rate home loans, the provisions of lower interest rate will be applicable from the date the rate of interest on the loan becomes floating.
- c. Bank shall not charge foreclosure charges/pre-payment penalties on all floating term loans sanctioned to individual borrowers.

17. Uniformity in Intersol Charges:

With the introduction of Core Banking Solution (CBS), it is expected that customers of the bank would be treated uniformly at any sales or service delivery point. It is,

therefore, bank is not discriminating against the customers on the basis of one branch Being designated as 'home' or 'base' branch where charges are not levied for products/ services and other branches of the same bank being referred to as 'non- home' branch. As such, if a particular service is provided free at 'home' branch, the same shall be available free at 'non home' branches also. There shall not be any discrimination as regards intersol charges between similar transactions done by customers at 'home branch' and 'non home' branches. (Page 33-point no. 6.6 of RBI Master Circular on Customer Service 2015 dated 01.07.2015.)

18. Charges for sending SMS alerts:

With a view to ensuring reasonableness and equity in the charges levied by the bank for sending SMS alerts to customers, bank is leveraging the technology available and the telecom service providers to ensure that such charges can be levied on all customers on actual usage basis.

These charges shall not be applicable to Jan Dhan accounts, Basic Saving Bank deposit accounts and other financial inclusion SB accounts and any other category exempted by the bank.

19. Grievance Redressal on complaints against outsourced agencies/employees:

Bank outsources few activities which are customer facing like Business Correspondent, Call Centre employees, Operators at Aadhar Seva Kendra, Direct Selling Agents etc., who are monitored by respective Divisions. The Bank shall take adequate steps for redressal of grievances against its outsourced Vendor/ Employees within TAT and keep the Authority informed about the number, nature and other particulars of the complaints received.

If the complaint is received through any other mode other than PGRS or any other online complaint portal like Call Centre, letter, email, telephone etc., the same should be recorded/ registered in respective grievance Redressal portal/package PGRS, immediately after receipt of customer complaint and complaint id/ reference to be provided to the complainant for further tracking the status online.

19.1 Recovery Agents (Monitored by R&L Wing)

a) The Borrower having any grievance/complaint against any Recovery Agent / Agency may bring the same to the notice of the in-charge of the Branch at the first instance. If the grievance/ complaint is not redressed to the satisfaction of the Borrower, he can file a written complaint to the Grievance Redressal Cells at Regional Office within whose jurisdiction the Branch or the Office of the Bank is located not later than 21 days from the date of cause of action.

b) On receipt of the written complaint, the in-charge of the Grievance Redressal Cell at Regional Office shall as expeditiously as possible, and in any case not later than 21 days from the date of receipt of the complaint, initiate appropriate steps for redressal of the complaint unless the nature of complaint is such that it requires verification of voluminous facts and figures. If complaint is not resolved within the TAT, interim reply shall be given to the customer.

c) The head of the Grievance Redressal Cells of the Bank for Recovery Agents are:

Grievances Received at	In-charge/Head of the Cell	To be handled by
Regional Office	CM/AGM of the Region	R & L Section

d) The decision taken by the in-charge of the Grievance Redressal Cell/s shall be final and shall be informed to the complainant in writing.

19.2 Call Center Service (Monitored by DIT/DBS Wing)

Concerned Branch/Section/official from Bank has to ensure that any complaint pertaining to call center vendor/outsourced agency, received directly from customer through any mode, is to be sent to DBS/DIT Wing for follow up and redressal.

The complaints pertaining to Call Centre will be analyzed and resolved by customer care Section by carrying out the Root Cause Analysis and obtaining observations/inputs from the concerned Wing.

A suitable reply regarding resolution/action taken will be sent by Customer Service section, SP&D Wing, HO to the complainant directly or through proper channel within 21 working days of receipt of complaint.

19.3 Business Correspondents (Monitored by Financial Inclusion Wing) :

Whenever complaints are received on conduct/activities of Business Correspondents(BCs), the BCs Terminal ID will be blocked immediately and Business Correspondent Section, Financial Inclusion Wing, HO will advise Regional Office to investigate and submit the report along with recommendation. Based on the facts and recommendation received from Regional Office, BC Section will instruct Corporate BC to replace the BC Agent or release the blocked Terminal IDs as the case may be.

The complaint has to be looked into from fraudulent angle also by Regional Office. It has to arrive at a logical conclusion on whether to lodge a complaint against Business Correspondent Agent with police authority or otherwise based on the nature of the complaint. Before lodging such police complaint, Regional Office shall take up the matter with Head Office - Legal Section for proper guidance.

While submitting Investigation Report along with RO Recommendation, Regional Office shall confirm that complaint has been analyzed from under fraudulent angle also.

19.4 Formation of Women SHG & Facilitation in crediting of SHG/JLG. (Monitored by Credit Wing)

Borrower having any grievance/complaint against any Agency under Tie Up arrangement for formation of Women SHG & facilitation in credit to SHGs under Core Agriculture:

- 1. May bring the same to the notice of the in-charge of the Branch at the first instance.
- 2. If the grievance/ complaint are not redressed to the satisfaction of the Borrower, he can file a written complaint to the Grievance Redressal Cells at Regional Office within whose jurisdiction the Branch or the Office of the Bank is located not later than 21 days from the date of cause of action.
- 3. On receipt of the written complaint, the in-charge of the Grievance Redressal Cell/s shall, as expeditiously as possible, and in any case not later than 21 days from the date of receipt of the complaint, initiate appropriate steps for redressal of the complaint unless the nature of complaint is such that it requires verification of voluminous facts and figures.
- 4. The head of the Grievance Redressal Cells of the Bank at the Regional office for is as follows:

Grievances Received at	In-charge/Head of the Cell	To be handled by
Regional Office	Overseeing Executive	Credit Wing

5. The decision taken by the in-charge of the Grievance Redressal Cell/s shall be final and shall be informed to the customer in writing.

20. Strengthening of Grievance Redress Mechanism in Banks.

In the Statement on Developmental and Regulatory Policies dated January 27, 2021 Reserve bank of India (RBI) putting in place a comprehensive framework comprising of enhanced disclosures by banks on customer complaints, recovery of cost of redress from banks for the maintainable complaints received against them in OBOs (Office of the banking Ombudsman) in excess of the peer group average, and undertaking intensive review of the grievance redress mechanism and supervisory action against banks that fail to improve their redress mechanism in a time bound manner.

21. Handling of Complaints related to vigilance, bribery & corruption: (Vigilance Wing)

All Complaints which involve vigilance angle to be referred to Vigilance Wing like bribery, corruption, fraud by employee etc., and received through any mode like PGRS /email/letter (hard copy) will be handled by Vigilance Wing. Such Complaints received in PGRS portal will flow automatically to Vigilance Wing. As per CVC guidelines, anonymous complaints will be lodged with no action.

If complainant basis details and contact number is available, the Wing will analyse and refer the case to HO Vigilance Officer for preliminary investigation. Upon receipt of the same, Vigilance Officer can decide on further detailed investigation or to advise HO,RMCA for placing it to SASC (Staff Accountability Screening Committee) for analysis

and provide a feasible reply to the complainant and initiate any corrective Action. An interim reply will be sent to customer in case of delay in concluding the complaint.

In case of further detailed investigation is ordered by VO, a detailed investigation will be conducted through **HO Inspection Wing** and the above referred procedure will follow. If lapses are crystalized against the staff, IAC will be placed before VO for determination of Vigilance Angle. If there is no staff lapse identified, the matter will be closed with the approval of VO.

22. Complaints related to Credit Information Companies (CIC): (Monitored by Credit Wing)

The Reserve Bank of India directs Credit Information Companies and Credit institutions to implement the compensation framework for delayed updation/ rectification of credit information by CIs (Credit Institutions) and CICs as detailed below

Complainants shall be entitled for a compensation of $\gtrless100$ per calendar day in case their complaint is not resolved within a period of thirty (30) calendar days from the date of the initial filing of the complaint by the complainant with a CI/ CIC.

CI would get twenty-one (21) days and CICs would effectively get the remainder of nine (9) days for complete resolution of the complaint.

Penalty needs to be paid by the Bank/CIC in case there is a delay.

A CI shall pay compensation to the complainant if the CI has failed to send updated credit information to the CICs by making an appropriate correction or addition or otherwise within twenty-one (21) calendar days of being informed by the complainant or a CIC.

Publicity of the Policies

Wide publicity is given to the above policies formulated by Bank by placing them prominently on the Web-site and copy of policy is available with Branches.

F.COMPLIANCE/ MONITORING OF IMPLEMENTATION OF THE POLICIES

Implementation of policy at Branches will be checked by Inspection Wing during RBIA & Concurrent inspection and deviations will be reported to Regional Offices / Customer Service Section, Operations Wing, HO & to Audit committee of the Board.

Overseeing Executive of Operations/Customer Service Section in Head Office to ensure that all Regional offices are adhering to the Policy guidelines.

Overseeing Executive of Operations/ Customer Service Section in Regional Office to ensure that all Branches are adhering to the policy guidelines.

Disclaimer:

Review of the **Customer Grievance Redressal Policy 2025-26** of the Bank Policy for the Financial Year 2025-26:

Any mandated additions as per guidelines from NABARD, RBI, DFS, Sponsor Bank, or any other regulatory bodies, as well as subsequent amendments or modifications communicated post- adoption, seamlessly integrate into this Policy. The Bank is committed to complying with all additional policy requirements as they arise.

Validity of the Policy:

This policy comes in to effect immediately and shall be valid until the next review and adoption of policy by the by the Board of Directors.