

Policy

Title: Customer Complaint Handling Policy

Owner: ADCB India

Customer Complaint Handling Policy

DOCUMENT CONTROL SHEET

Document Authorization

Document Name	Department	Authorized By	Prepared By
Customer Complaint Handling Policy			

Review Activities

Last Review Date	Reviewed By
November 2014	Management Committee
December 2013	Management Committee
November 2012	Management Committee and Group Chief Compliance Officer & MLRO
November 2011	Management Committee and Head of Group Compliance & Group MLRO
December 2010	MRCC policy Committee Head Office

Policy

Title: Customer Complaint Handling Policy

Owner: ADCB India

Contents

1	Introduction	3
2	Process Risks	3
3	Identifying Complaints	4
4	Complaints handling procedure	5
5	Records Retention period	7

Policy

Title: Customer Complaint Handling Policy

Owner: ADCB India

1 Introduction

1.1 Objective of the Policy

The objective of the subject procedure is the establishment of general rules and procedures for the handling of Customer Complaints.

This Policy is designed to aid the employees and ADCBI to minimize its risk of regulatory breaches and to ensure that ADCBI's clients are treated fairly and consistently.

This Policy sets out the steps required to identify a potential client complaint for dealing; recording; and resolving that complaint.

1.2 ADCBI's Complaints Policy

ADCBI policy is that, all customers' complaints should be treated fairly and consistently and dealt with using due skill care and diligence and adheres to Circulars/Guidelines issued by the regulators from time to time.

The aim of dealing with complaints is to resolve the issue raised by the complainant and identify and resolve system and control weaknesses. Suitable records will be maintained to allow management to adequately monitor the level and types of Complaints that it is receiving. Complaints received during the month will be put up in the monthly Management committee.

2 Process Risks

- Failure to record complaints A register will be maintained to include a record of the number of complaints received.
- Complaints are not dealt with fairly Review of written correspondence with clients will be undertaken.

Policy

Title: Customer Complaint Handling Policy

Owner: ADCB India

-
- Complaints received from a client or eligible complainant not identified as such. Definition provided and employees trained.

3 Identifying Complaints

A complaint is defined as

- 1) “any expression of dissatisfaction, whether oral or written, and whether justified or not, about ADCBI’s provision of, or failure to provide, a financial service”; and
- 2) “must involve an allegation that the complainant has suffered, or may suffer, financial loss, material inconvenience or material distress”.

Proper handling of customer complaints is of paramount importance, since it safeguards the legitimate interests of customer and as a consequence:

- The Bank’s good reputation is protected;
- The Bank avoids possible civil actions by customers.

Accordingly, ADCBI may classify complaint

- That has financial implications and regulatory consequences;
- And complaints which do not have financial implications but emanate from dissatisfaction about the services/more of reaction to incident which emanate out of behavioral patterns involving staff or otherwise, about treatment or responses received from staff etc and has reputational consequences.

The complaints such as minor sevice matters mechanical, administrative or clerical errors must be dealt with immediately by the employee concerned, either in writing or by telephone.

Policy

Title: Customer Complaint Handling Policy

Owner: ADCB India

If the complaint involves financial implications or the problem persists or the complaint cannot be dealt with in a reasonable time (five working days), it should not be treated and should be processed as detailed below.

4 Complaints handling procedure

4.1 All complaints will be centrally monitored for which a Central Nodal authority will be designated. The Nodal officer will be responsible for monitoring and resolution of complaints as per the policy of the bank and regulatory norms prescribed for the purpose. Through the complaint resolution it will be ensured by such Nodal authority that the customer satisfaction is given paramount importance within the policy framework of ADCB India and regulatory framework.

4.2A A complaint register will be maintained in the branches to include a record of the number of complaints received and the records of complaint received by e-mail/letter/fax be maintained along with the relevant correspondence exchanged. The developments stages upto the stage of final resolution of the complaint be recorded in the register.

4.3 Any complaints will be received by the support desk /any department or by any official directly will be routed through the nodal officer and will be recorded in the register. An acknowledgement will issued to customer forthwith and the reply should intimate the customer the tentative period that will require for resolution of the complaint.

4.4 The nodal officer will seek comments/ feedback from the concerned department and will investigate the matter independently.

4.5 The complaint should be:

- investigated competently, diligently and impartially;
- assessed fairly, consistently and promptly considering:
 - (a) the subject matter of the complaint;
 - (b) what remedial action or redress (or both) may be appropriate; and
 - (c) if appropriate, whether it has reasonable grounds to be satisfied that another respondent may be solely or jointly responsible for the matter alleged in the complaint; taking into account all relevant factors;

Policy

Title: Customer Complaint Handling Policy

Owner: ADCB India

- 4.6** Upon investigation the complaints a solution acceptable within the framework will be worked out by the nodal officer in association with the concerned department and if necessary placed before Management committee for approval .
- 4.7** All correspondence received should be reviewed on the day on receipt and complaints should be identified.
- 4.8** If the correspondence relates to a previous complaint it should be reviewed in light of that correspondence and the previous records referred to.
- 4.9** If the complaint can be resolved by the close of day of receipt then it can as noted above provided a substantive response has been sent to the client.
- 4.10** A substantive response should be sent to the client within 7 business days of receipt, or in its absence a holding letter sent. The letters should explain to the complainant promptly and, in a way that is fair, clear and not misleading, its assessment of the complaint, its decision on it, and any offer of remedial action or redress. A copy of the correspondence must be maintained and the complaints register updated.
- 4.11** In event of any complaint which cannot be resolved amicably within 7 business days, the relevant Complaint Register is updated and the client be sent a final response or a response which explains the reasons of why it is not in a position to make a final response indicating when it is able to resolve informing the complainant.
- 4.12** All complaints register will be reviewed periodically by Customer service committee
- 4.13** A half year report of trend analysis of complaint will be put up by Nodal officer to the customer service committee and to the MANCOM . Management committee will take note of the same and suggest measure/s to reverse/improve the trend as the case may be which may include review of the departmental working and other disciplinary actions etc.
- 4.14** ADCB India branches and website will display the Name of Nodal officer appointed under Ombudsman scheme and Customer service officials all with contact details for proper and timely contact by the customer.

Policy

Title: Customer Complaint Handling Policy

Owner: ADCB India

4.15 The escalation matrix will be displayed on the website as well as in the branches and will be as follows:

a). Complaint which is not resolved within the specified period and resolved but the customer is not satisfied with the same can be escalated to :

Chief Executive Officer, ADCB (India)
(Contact details will be provided)

b) Customers can escalate the complaints further to Head office in UAE and the contact details will be displayed on the website/branches even after the intervention of CEO of ADCB India.

4.16 The complaint form will be made available on the website as well as the service desk of the ADCBI branches.

4.17 Records Retention period

When a complaint has been settled, the complaint record and associated correspondence must retain the records for at least five years from the date the complaint was received. The date on which the complaint was resolved must be recorded.

5 Disciplinary action

A breach of the rules contained in the policy may result in disciplinary action being taken by ADCBI against an employee. It is mandatory that all employees must read this policy and also follow any circulars/guidelines issued by the regulators.

Furthermore, a breach may need to be reported to the Regulator and may affect an individual's future employment prospects. Similarly, a significant and culpable involvement in a regulatory failure may result in disciplinary action.