

CAPITAL SMALL FINANCE BANK LIMITED

Internal Ombudsman Scheme, 2023
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CAPITAL SMALL FINANCE BANK LIMITED

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Internal Ombudsman Scheme, 2023

1. Preamble

With an attempt to strengthen the Grievance Redressal mechanism of the banks and to ensure that customer complaints are addressed at the bank level itself, earlier the Reserve Bank of India (RBI) in May 2015 had established the Internal Ombudsman (IO) mechanism who shall review customer complaints that are partly or fully rejected by the bank. The redressal would be through an authority placed at the highest level of the bank's grievance redressal mechanism.

On dated 29 December 2023, RBI has issued new directions with a view to further strengthen the Internal Grievance Redress mechanism within a Regulated Entity and ensure a proper and speedy resolution of customer complaints by enabling a review before their rejection, by an apex level authority within the Regulated Entity.

2. Definitions:

In these Directions, unless the context states otherwise, the terms herein shall bear the meanings assigned to them as below:

- a)** "Bank" means a 'banking company', a 'corresponding new bank' and 'State Bank of India' as defined in Section 5 of the Banking Regulation Act, 1949 (Act 10 of 1949) that are included in the Second Schedule of the Reserve Bank of India Act, 1934 (Act 2 of 1934), but does not include a bank in resolution or winding up or under directions or any other bank as specified by the Reserve Bank;
- b)** "Banking Outlet" is a fixed-point service delivery unit, manned by either bank's staff or its business correspondent where services of acceptance of deposits, encashment of cheques / cash withdrawal or lending of money are provided for a minimum of four hours per day for at least five days a week;
- c)** "Competent Authority" means Executive Director In-charge of customer service for banks, Executive Director / Managing Director / Chief Executive Officer for NonBanking Financial Companies, Managing Director / Chief Executive Officer for Non-bank System Participants, and Managing Director / Chief Executive Officer for Credit Information Companies;
- d)** "Complaint" means a representation in writing or through other modes alleging deficiency in service on the part of the regulated entity and seeking relief thereon;
- e)** "Credit Information Company (CIC)" means a company as defined in the Companies Act, 2013 (18 of 2013) and has been granted a certificate of registration under sub-section (2) of section 5 of the Credit Information Companies (Regulation) Act, 2005 (30 of 2005);
- f)** "Deficiency in service" means a shortcoming or an inadequacy in any service, which the regulated entity is required to provide statutorily or otherwise, which may or may not result in financial loss or damage to the customer;
- g)** "Deputy Internal Ombudsman" means any person appointed under these Directions
- h)** "Internal Ombudsman" means any person appointed under these Directions;

i) "Payment System" means a system that enables payment to be effected between a payer and a beneficiary, involving clearing, payment or settlement service or all of them, but does not include a stock exchange;

j) Regulated Entity (RE)" means a bank or an NBFC or an NBSP or a CIC as defined in these Directions, or any other entity as may be specified by the Reserve Bank from time to time;

k) "Related Party" shall include related party as defined in sub-clause 76 of section 2 of the Companies Act, 2013 and related party as per the applicable accounting standards

3. Scope:

To enhance the independence of the Internal Ombudsman and reinforce the oversight on the implementation of the IO scheme for further improving the quality of customer service, RBI has reviewed the present arrangements and have issued revised directions under section 35 A of the Banking Regulations Act, 1949 in the form of Internal Ombudsman Scheme, 2023. The scheme covers the appointment/ tenure, roles and responsibilities, procedural guidelines and oversight mechanism for the IO and Deputy IO.

All Scheduled Commercial Banks in India having more than 10 banking branches are required to appoint an independent Internal Ombudsman. The IO shall examine customer complaints which are in the nature of deficiency in service on the part of the bank. The complaints that are not fully redressed by the bank shall internally be escalated to the IO before conveying the final decision to the complainant. The implementation of the IO Scheme, 2023 shall be monitored by the bank's internal audit mechanism apart from regulatory oversight by RBI.

4. Objectives of the Scheme:

- To ensure that all complaints, which are rejected or partially accepted by the Bank, are examined by the Internal Ombudsman so that escalation of grievances to Banking Ombudsman are minimized.
- To enhance the customer confidence in the Bank's systems, for speedy grievance redressal mechanism and for a more transparent redressal process.
- The presence of IO/DIO at the apex level of Grievance Redressal Mechanism of the Bank would help enhancing the impartiality of the mechanism, as the grievance resolution would have an independent view point as a precursor to the Banking Ombudsman.

5. Appointment of Internal Ombudsman:

The Customer Service Committee of Board will appoint the Internal Ombudsman who should fulfil the following prerequisites:

- The Internal Ombudsman shall either be a retired or serving officer, in the rank equivalent to General Manager of another bank/ Financial Sector Regulatory body/NBSP/NBFC/CIC (viz, RBI, SEBI, IRDA etc.)
- The Internal Ombudsman should have necessary skills and experience of minimum seven years of working in areas such as banking, regulation, supervision, payment and settlement systems and / or consumer protection.
- The Internal Ombudsman shall not have worked/ be working in the same bank in which he/ she is appointed as Internal Ombudsman.
- The Internal Ombudsman shall not be over 70 years of age, before the completion of the tenure.
- The Bank may appoint more than one Internal Ombudsman depending on the volume of complaints

received by them to ensure continuity of operations during the absence of the Internal Ombudsman. While appointing additional Internal Ombudsman, the Bank shall consider the need for diversity of experience of the incumbents to deal with different types of cases. In such cases, the Bank may clearly define the jurisdiction of each Internal Ombudsman

6. Appointment of Deputy Internal Ombudsman:

The Customer Service Committee of Board will appoint the Deputy Internal Ombudsman, if required, who should fulfil the following prerequisites:

- a. The Bank may appoint one or more Deputy Internal Ombudsman depending on the volume of complaints received by them, who would assist the Internal Ombudsman in the quality disposal of the complaints.
- b. Deputy Internal Ombudsman shall either be a retired or serving officer, not below the rank of Deputy General Manager of another bank / Financial Sector Regulatory Body / NBSP / NBFC / CIC, having necessary skills and experience of minimum five years of working in areas such as banking, non-banking finance, regulation, supervision, payment and settlement systems, credit information or consumer protection.
- c. The Deputy Internal Ombudsman shall not be over 70 years of age before the completion of the tenure.
- d. The Deputy Internal Ombudsman shall functionally report to the Internal Ombudsman, who will be the final authority / decision-making authority while dealing with the complaints. In the temporary absence of the Internal Ombudsman, not exceeding a period of 15 working days, the Deputy Internal Ombudsman may function as the Internal Ombudsman for the limited purpose of reviewing the rejected complaints. Prior information shall be provided to Consumer Education and Protection Department, Central Office, Reserve Bank of India (iocepd@rbi.org.in) in case of temporary absence of the Internal Ombudsman exceeding 15 working days, advising inter-alia, details of alternate arrangements being put in place. However, such temporary absence should not exceed 30 days.

7. Tenure of Internal Ombudsman/Deputy Internal Ombudsman:

- a. The tenure of Internal Ombudsman shall be for a fixed term of not less than three years, but not exceeding five years and tenure of IO/DIO shall be indicated in the appointment letter.
- b. Internal Ombudsman shall not be eligible for reappointment or for extension of term in the same bank.
- c. The Internal Ombudsman/Deputy Internal Ombudsman cannot be removed before completion of his/her term without the explicit approval of the Reserve Bank. If there is any incumbency of Internal Ombudsman/Deputy Internal Ombudsman for any reason midway through the tenure, a report for the same shall be submitted by the bank within 10 working days from the date of such vacancy to the Reserve Bank indicating the reasons therefor. The Bank shall appoint a new Internal Ombudsman / Deputy Internal Ombudsman within three months from the date of vacancy and submit a report within 5 working days from the date of appointment of the new Internal Ombudsman / Deputy Internal Ombudsman.
- d. The Principal Nodal Officer or the Nodal Officer shall not act as Internal Ombudsman or vice versa, even during the temporary absence of either of them.
- e. The Bank shall ensure that the post of the Internal Ombudsman does not remain vacant at any point of time. The Bank shall undertake the process of fresh appointment well in advance to fill the vacancy before the expiry of the tenure of the incumbent Internal Ombudsman and ensure that there is a minimum overlap of at least one month between the time of demitting of office of the outgoing Internal Ombudsman and the incoming Internal Ombudsman. The Bank shall undertake the process

of fresh appointment at least three months before the expiry of the term of the incumbent Internal Ombudsman.

8. Administrative Oversight:

The Internal Ombudsman shall report to the Executive Director, as defined under the Directions, of the Bank administratively, and to the Board entity functionally.

9. Staffing and Cost of Internal Ombudsman Office:

- a. In view of low volume of customer complaints and limited area of operation of the bank, the bank shall initially appoint only one Internal Ombudsman. However, decision on appointment of additional Internal Ombudsman(s) shall depend upon future volume of complaints received by the bank.
- b. **The Internal Ombudsman shall report to the Executive Director of the bank who is handling customer grievances.**
- c. The emoluments/ facilities/ benefits of the Internal Ombudsman/Deputy Internal Ombudsman shall be fixed by the Customer Service Committee of the bank's board.
- d. The office of the Internal Ombudsman shall be placed in Head/ Corporate Office or at any of the bank's Regional Offices.
- e. Requisite infrastructure (i.e. information technology/ human resource, etc.) shall be provided by the bank for the smooth functioning of the office of Internal Ombudsman/DIO.

10. Roles and Responsibilities of Internal Ombudsman

- i. The Internal Ombudsman shall deal only with those customer complaints that have already been examined by the bank's internal grievance redressal mechanism and have remained partly or wholly un-redressed.
- ii. The Internal Ombudsman shall consider/examine all customer grievances including complaints of deficiency in service on the part of the bank, including those listed under **Clause 8 of the Banking Ombudsman Scheme** given by the Reserve Bank of India (**Refer Annexure I**).
- iii. The Internal Ombudsman shall not examine the complaints/ references on aspects relating to the following:
 - a. Complaints related to frauds, misappropriation etc., except in respect of deficiency of service, if any, on the part of the bank;
 - b. Complaints / references relating to a) internal administration, b) human resources, c) pay and emoluments of staff;
 - c. References in the nature of suggestions, requests for concessions in rate of interest charged, rejection of loan proposal, modification in sanction terms and conditions, enhancement in credit limit, waiver/write-off of loans, etc which are primarily in the nature of commercial decisions, However the service deficiency in cases falling under commercial decisions will be valid complaints for the Internal Ombudsman.
 - d. Complaints which have been decided by or are already pending in other forums such as Consumer forum/Consumer Disputes Redressal Commission, Courts, Debt Recovery Tribunals, etc.
 - e. Disputes for which remedy has been provided under Section 18 of the Credit Information

companies (Regulation) Act,2005.

- iv Internal Ombudsman shall suggest means for taking actions to address the root cause of complaints of different nature by analyzing the pattern of complaints such as product/category wise / consumer groups wise, based on geographical location, etc.
- v The Internal Ombudsman shall have the right to access the Bank's records relating to the complaints received, seek detailed comments from the Bank with regard to the complaints, can hold meetings with the functionaries/ departments concerned and can also meet the complainants, if required, while examining the complaint for redressal. The Bank shall furnish all records/ documents sought by the I.O. to enable him/ her to discharge his/ her duties effectively and redress/ resolve customer grievances expeditiously.
- Vi To ensure peaceful resolution of customer complaints through conciliation i.e. negotiations, the Internal Ombudsman may seek direct feedback/ clarifications from the complainant.
- Vii In cases of conciliation where the decision of the Internal Ombudsman is accepted by the complainant, the Internal Ombudsman shall obtain and keep on record a statement showing the terms of the agreement duly signed by the complainant.
- Viii The Internal Ombudsman shall not represent the bank in legal cases arising out of complaints examined by the bank or the Internal Ombudsman.
- ix Complaints received by Internal Ombudsman which are outside the purview of the scheme, should immediately be referred back to the bank.

11. Escalation of Grievances to Internal Ombudsman

The Standard Operating Procedure for grievance handling and escalation matrix of the Bank will be as per the Customer Grievance Policy of the Bank, as amended from time to time. All the customer grievances received through mail, website, telephone, from the Banking Ombudsman, through post or any other medium shall be dealt with accordingly.

12. Procedural guidelines for Bank:

Procedure for Complaint Redressal by Internal Ombudsman:

- i. The complaints that have not been addressed to or are partly or wholly rejected by the bank's internal grievance redressal mechanism shall be auto escalated to the Internal Ombudsman within 20 days of receipt of complaint, for a final decision through PULSE software for a final decision.
- ii. The escalation of all such complaints to Internal Ombudsman shall be made within 20 days of receipt of the complaint and the final decision shall be conveyed by the bank to the complainant within a period of 30 days from the receipt of the complaint by the bank.
- iii. In view of low volume of customer complaints and limited area of operation of the bank, the bank shall initially appoint only one Internal Ombudsman. However, decision on appointment of additional Internal Ombudsman(s) shall depend upon future volume of complaints received by the bank.
- iv. All the complaints shall be accessible to the Internal Ombudsman through a "read only" access to the Complaint Management module of PULSE software who shall follow up the cases of delayed escalation

with the concerned department. Internal Ombudsman shall also have access to add his/ her decision on the complaints escalated to him/ her through the said module.

- v. "Read only" access to the Complaint Management system of the Reserve Bank of India shall also be provided to the Internal Ombudsman to keep a track of the cases/ complaints forwarded by the Offices of Banking Ombudsman and the decisions on complaints escalated to the Banking Ombudsman, including the decision of the Appellate Authority, where applicable. The Bank shall seek read only access for the Internal Ombudsman from Consumer Education and Protection Department of Reserve Bank.
- vi. For speedy redressal of customer grievance, the bank shall furnish all the records/ documents, clarification on queries raised by the Internal Ombudsman.
- vii. The cases where the final decision on the complaint is taken after examination of the same by the bank's Internal Ombudsman, the bank's final reply to the complainant shall explicitly mention the same.
- viii. The cases where a resolution to the complaint has been made by conciliation/ agreement, Internal Ombudsman shall obtain the resolution duly signed by the complainant and furnish the same to the bank for records. In all such cases, the final reply to the complainant is issued by the Internal Ombudsman with an endorsement to the bank.
- ix. The decision of Internal Ombudsman shall be binding on the bank. However, in case of disagreement with the Internal Ombudsman's decision, the bank may approach and obtain a necessary approval from the Executive Director in charge of customer service of the bank and reject the said decision given by the Internal Ombudsman. A final reply to the complainant shall be submitted by the bank which shall mention that the decision of the bank has the approval of the Executive Director, **such decision must be communicated to the complainant with in 7 days of communication of the decision of Internal Ombudsman on the case to the Bank.** Further, all such cases shall be subsequently reviewed by the Customer Service Committee of the bank's board.
- x. The complaints falling under Clause 8 of the Banking Ombudsman Scheme, 2006 (Refer Annexure I) which have been partly or wholly rejected by the Bank's internal grievance redressal mechanism and have further also not been resolved to the satisfaction of the complainant (either partly or wholly) after examination by the Internal Ombudsman, the bank in all such cases shall necessarily advise the complainant that he/ she can approach the Banking Ombudsman for redressal. The complete details and address of the concerned Banking Ombudsman as well as the link to the Reserve Bank's portal for online filing of customer complaints shall also be shared with the complainant.
- xi. In cases where the grievance, even after being examined by the Internal Ombudsman, is not resolved to the satisfaction of the complainant and the same is escalated to the Banking Ombudsman, the bank shall have to mandatorily include the decision of the Internal Ombudsman while furnishing the documents related to the complaints received in the office of Banking Ombudsman.
- xii. In cases where the complainant has directly approached the Banking Ombudsman before the Internal Ombudsman has examined the complaint, bank should obtain and include the views of the Internal Ombudsman in its submissions to the Banking Ombudsman.
- xiii. The analysis of complaints done by the Internal Ombudsman (Refer Clause 7.4) shall be used by the bank in various training programmes/ conferences to raise awareness about the patterns of complaints among the frontline staff and shall also facilitate them with handling of similar complaints. The Internal Ombudsman shall also be associated for such training programs where he/ she can share an in-depth

analysis of complaints received and ways to handle customer grievances, if any, at the branch level itself.

- xiv. Performance assessment of the Internal Ombudsman shall include level of pendency, work done by the Internal Ombudsman towards developing uniformity in redressal of complaints across the bank, number of cases where there is substantive differences between the decision of the Internal Ombudsman vis-a-vis that given by the Banking Ombudsman subsequently.
- xv. All the branches and the administrative offices of the bank should be suitably informed about the guidelines/ instructions regarding the Scheme and the appointment of the Internal Ombudsman.
- xvi. Since the customers cannot directly approach the Internal Ombudsman for their complaints, the contact details of the Internal Ombudsman shall not be displayed in the public domain.

13. Reporting to Reserve Bank of India

Periodic reporting of information to the Reserve Bank of India:

- On quarterly basis, the total number of complaints received, number of partly or wholly rejected complaints and number of complaints escalated to the Internal Ombudsman;
- On quarterly basis, the number of times Banking Ombudsman / Appellate Authority sought IO comments and number of cases not refer to IO earlier but refer to IO after information sought by BO.
- On quarterly basis, Root Cause Analysis to be conducted by IO of the Bank . Major findings from RCA and details of suggestions made by IO and accepted by the Board.
- On quarterly basis subjective assessment and detail analysis of complaints in terms of Top three complaints with respect to Products, Consumer groups, Geographical locations category.

- On annual basis, the number of cases where the decision of the Internal Ombudsman has been rejected with the approval of Executive Director of the bank, to be submitted in April every year; and

- On annual basis, the number of cases closed by the Internal Ombudsman and age-wise number of cases where the bank was yet to implement the decision of the Internal Ombudsman, to be submitted in April every year;
- On annual basis, the number of complaints not referred to IO with in twenty days and number of complaints where the complainants were not responded to within one month of the date of filing of the complaint.

- the reporting format is as given in Annexure II

14. The Bank shall, within five working days of appointment of the Internal Ombudsman or Deputy Internal Ombudsman, furnish the details of the official so appointed to the Consumer Education and Protection Department, Central Office, Reserve Bank of India (iocepd@rbi.org.in) in the following format:

1.	Name of the Internal Ombudsman / Deputy Internal Ombudsman	
2.	Details of the last positions held/ organization names	
3.	Date of Appointment	

4.	Term (in years)	
5.	Brief professional profile, including previous exposure to financial services highlighting those that make them eligible for appointment	
6.	Contact details (telephone, email, address)	

15. Board Oversight

- At quarterly intervals, the Internal Banking Ombudsman shall furnish reports on his/ her activities to the Customer Service Committee of the bank's board. These reports shall also include the analysis done by I.O. on the complaints (Refer Clause 7.4).
- The Customer Service Committee of the bank's board shall discuss all the cases where the decision of the Internal Ombudsman was rejected by the bank with an approval of Executive Director of the bank (Refer Clause 9.1.9).
- The Audit Committee of the board can refer to the Internal Ombudsman in respect of cases mentioned in Clause 7.3.1 of the Scheme.
- The Internal Ombudsman shall be designated as an ex-officio member or a permanent invitee to the meetings of the Committee of the Board of Bank handling customer service and protection.
- The bank shall conduct an internal audit of the directions of the scheme on yearly basis.
- To check the effective implementation of the Scheme, an internal audit shall be conducted which shall cover aspects relating to the infrastructure (space, information technology, human resource etc.) provided to the Internal Ombudsman.
- The internal audit shall further check the implementation of auto escalation of partly or wholly rejected complaints to the Internal Ombudsman within the time frame of 20 days as indicated in Clause 9.1.1.
- The scope of the audit shall also cover actions taken by the Internal Ombudsman with regard to analysis of complaints, efforts made towards raising awareness about type of grievances and developing a uniform approach in handling complaints of similar nature across the bank as indicated in Clause 9.1.15 and 9.1.16. The support provided by the bank to the Internal Ombudsman for an effective implementation of the above actions shall also be reviewed.
- The internal audit shall exclude the decisions taken by the Internal Ombudsman from its scope.

16. Supervisory Oversight

- Implementation of the Scheme and the areas regarding customer service would be a part of the risk assessment and supervisory review by the Department of Banking Supervision of the Reserve Bank of India.
- All such cases where the decision of the Internal Ombudsman are not accepted by the bank and the complainant appeals to the Banking Ombudsman, shall be reviewed by the Reserve Bank. Further, if in such cases, the original decisions of the Internal Ombudsman are reiterated by the Banking Ombudsman frequently, then the bank may be subjected to enforcement actions.

Clause 8 of the Banking Ombudsman Scheme, 2006**Grounds of Complaint**

1. Any person may file a complaint with the Banking Ombudsman having jurisdiction on any one of the following grounds alleging deficiency in banking including internet banking or other services.
 - (a) non-payment or inordinate delay in the payment or collection of cheques, drafts, bills etc.;
 - (b) non-acceptance, without sufficient cause, of small denomination notes tendered for any purpose, and for charging of commission in respect thereof;
 - (c) non-acceptance, without sufficient cause, of coins tendered and for charging of commission in respect thereof;
 - (d) non-payment or delay in payment of inward remittances;
 - (e) failure to issue or delay in issue of drafts, pay orders or bankers' cheques;
 - (f) non-adherence to prescribed working hours;
 - (g) failure to provide or delay in providing a banking facility (other than loans and advances) promised in writing by a bank or its direct selling agents;
 - (h) delays, non-credit of proceeds to parties' accounts, non-payment of deposit or non-observance of the Reserve Bank directives, if any, applicable to rate of interest on deposits in any savings, current or other account maintained with a bank;
 - (i) complaints from Non-Resident Indians having accounts in India in relation to their remittances from abroad, deposits and other bank related matters;
 - (j) refusal to open deposit accounts without any valid reason for refusal;
 - (k) levying of charges without adequate prior notice to the customer;
 - (l) non-adherence by the bank or its subsidiaries to the instructions of Reserve Bank on ATM/Debit card operations or credit card operations;
 - (m) non-disbursement or delay in disbursement of pension (to the extent the grievance can be attributed to the action on the part of the bank concerned, but not with regard to its employees);
 - (n) refusal to accept or delay in accepting payment towards taxes, as required by Reserve Bank/Government;
 - (o) refusal to issue or delay in issuing, or failure to service or delay in servicing or redemption of Government securities;
 - (p) forced closure of deposit accounts without due notice or without sufficient reason;
 - (q) refusal to close or delay in closing the accounts;
 - (r) non-adherence to the fair practices code as adopted by the bank;

(s) non-adherence to the provisions of the Code of Bank's Commitments to Customers issued by Banking Codes and Standards Board of India and as adopted by the bank;

(t) non-observance of Reserve Bank guidelines on engagement of recovery agents by banks; and

(u) any other matter relating to the violation of the directives issued by the Reserve Bank in relation to banking or other services.

2. A complaint on any one of the following grounds alleging deficiency in banking service in respect of loans and advances may be filed with the Banking Ombudsman having jurisdiction:

(a) non-observance of Reserve Bank Directives on interest rates;

(b) delays in sanction, disbursement or non-observance of prescribed time schedule for disposal of loan applications;

(c) non-acceptance of application for loans without furnishing valid reasons to the applicant; and

(d) non-adherence to the provisions of the fair practices code for lenders as adopted by the bank or Code of Bank's Commitment to Customers, as the case may be;

(e) non-observance of Reserve Bank guidelines on engagement of recovery agents by banks; and

(f) non-observance of any other direction or instruction of the Reserve Bank as may be specified by the Reserve Bank for this purpose from time to time.

3. The Internal Ombudsman may also deal with such other matter as may be specified by the Reserve Bank from time to time in this behalf.

**Report to Consumer Education and Protection Department, Reserve Bank of India
Office of Internal Ombudsman (IO), Name of the Regulated Entity (RE):**

Report for quarter ended _____

Part A: Quarterly Reporting (For all regulated entities including Credit Information Companies)

I. Table I - Information pertaining to Internal Grievance Redress (IGR)

Number of Complaints received by the Regulated Entity during the quarter	Number of Complaints processed by the Regulated Entity during the quarter	Number of complaints under (B) that are rejected (Partly or Wholly) by RE	Number of complaints falling under the domain of IO under (C)	Number of complaints referred by the RE to the IO
(A)	(B)	(C)	(D)	(E)

Reasons for difference between (D) and (E) – case-wise

II. Table II - Information pertaining to Alternate Grievance Redress (AGR)

Number of times RBIO / AA@ sought IO comments	Number of Cases not referred to IO earlier but referred to IO after information sought by RBIO / AA	Number of times AA had advised the regulated entity to refer the decision of the AA to the Board / IO	Number of Root Cause Analysis /(RCA) put up by the office of the IO to the Board	Number of suggestions of the IO accepted by the Board

@ RBIO – Reserve Bank of India Ombudsman and AA – Appellate Authority as per Reserve Bank – Integrated Ombudsman Scheme, 2021

a. Major findings from the RCA

b. Details of suggestions made by the IO and accepted by the Board

III. Table III - Subjective assessment

Details of analysis and inputs on the pattern of:

- (i) Complaints received against the RE, such as entity wise (for CICs), productwise, category-wise, consumer group-wise, geographical location-wise, any other.

Top 3 Products against complaints were received:

Product Name (eg. Credit cards)	Number of complaints received	RCA done (Yes / No)

Top 3 Consumer groups from where complaints were received:

Consumer group Name (eg. Pensioners, Proprietary firms)	Number of complaints received	RCA done (Yes / No)

Top 3 Geographical locations from where complaints were received:

Geographical locations (eg. - State name – Kerala, Odisha or West Bengal)	Number of complaints received	RCA done (Yes / No)

Part-B: Annual Reporting (For all regulated entities)

Report for year ended _____

Table – I

Number of complaints referred by the RE to the IO during the year	Number of complaints Closed by IO	Number of complaints where decision of the RE was not upheld by the IO	Number of complaints wherein the decision of the IO was rejected*	Number of decisions of the IO implemented by the RE	Number of IO decisions yet to be implemented by bank			
					1 Month	2 Months	3 Months	More than 3 Months

*To be rejected only with prior approval of the Competent Authority

Table – II

Number of complaints that should have been referred by the regulated entity to the IO during the year (as per the Directions)	Number of complaints under (A) referred by the regulated entity to the IO during the year	Out of Number of complaints under A, Number of complaints not referred to IO within twenty days	Number of complaints where the complainants were not responded to within one month of the date of filing the complaint
(A)	(B)	(C)	(D)

Major reasons that complaints are not referred to the IO:

- 1.
- 2.