



Key Operating Document

Complaints Handling, Reporting and Controls – Corporate Bank Global

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

Template version: V5

Complaints Handling, Reporting and Controls – Corporate Bank Global

Key Data

Title	Complaints Handling, Reporting and Controls KOD – Corporate Bank Global		
Summary	This Document provides direction and structure on the end-to-end Complaint-handling data flow and reporting process in the Corporate Bank (CB). It describes how CB implements the Compliance policy " <u>Client Complaints Policy</u> " (the "Policy") and the procedure " <u>Client Complaints Procedure</u> " (the "Procedure").		
Category	☐ Policy	☐ Procedure	☒ Key Operating Document
Applicability	☐ All Units ☒ Restricted to: Corporate Bank Document contains requirements that apply to DWS ☒ No ☐ Yes DWS Employees refer to: ¹ N/A		
Parent document	<u>Client Complaints Policy</u> <u>Client Complaints Procedure</u>		
Responsible Unit (as per Business Allocation Plan)	Divisional Control Office		
Risk Type/Risk Type Number (if applicable)	R025 Duties to Customers - Handling of Customer Complaints		
Topic	Client focused Activities		
Addressees	All Client-facing Employees of the Corporate Bank		
MB Approval	Is approval of the Management Board required? ☒ No ☐ Yes		
Implementation date	Publication date		

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Field Names
Written or Verbal *
Name of DB employee who received Complaint*
Assigned owner/investigator of Complaint*
Date Received by Compliance *
Activity From *
Activity To *
Date Acknowledged *
Product Code (FINRA) *
Problem Code (FINRA) *
Description of Complaint *
DB Location (City / State) *
Registered Rep Name (Sales Practice Only)
Registered Rep Supervisor Name (Sales Practice Only)
Disputed Amount *
Complaint Status *
Client Category *
Escalation Indicator (Mandatory if Status of Complaint is marked as "Closed")
Resolution Details *

Annex 9: Local Requirements for DB India

A. This document should be read in conjunction with:

- RBI Master Circular on Customer Service in Banks – <https://rbidocs.rbi.org.in/rdocs/notification/PDFs/59FM04072F58B1DD44DFADD486B9B0A59E9D.PDF>.
- RBI Circular no. CEPD.CO.PRD. Cir. No.01/13.01.013/2020-21 dated January 27, 2021, on Strengthening of Grievance Redress Mechanism in Banks.
- SEBI Investor Charter for Custodians and DDP - SEBI/HO/FPIC/P/CIR/2021/691 dated 17 Dec 2021.
- PFRDA notification on Redressal of Subscriber Grievance, gazette notification dated 29th Jan 2015 no. PFRDA/12/RGL/139/1 including any amendments thereto.
- Master Direction – RBI (Internal Ombudsman for Regulated Entities) Directions, 2023 dated December 29, 2023.

B. Additional regulatory requirements in India

Reserve Bank of India

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

- Any complaint received through any channel will be recorded by the Bank.
- Acknowledgement of complaint along with Service Request number / Email acknowledgment should be provided to client on recording the complaint.
- Intimation for complaint closure should be mandatorily sent to the client, guiding the client as below:
-
"If you are not satisfied with our response, you may approach the Banking Ombudsman appointed by Reserve Bank of India. Kindly log on to our website for details of the Banking Ombudsman Scheme and procedure for lodging complaints."

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- Each Deutsche Bank AG (customer-facing) branch will display the complete contact details (Phone Number, Email ID and Fax Number) of the Branch Manager, Regional Manager, Principal Nodal Officer and Banking Ombudsman of the Area prominently on the notice board of the branch. The contact details are also available on the Bank's website
- A copy of the Banking Ombudsman Scheme (including Scheme for Digital Transaction) and BCSBI Codes of the Bank's commitment to customers is available with each branch manager and accessible to customer as the BO Scheme and BCSBI codes are also displayed on the website of the bank.
- Escalation matrix & Turnaround Time applicable to complaint received through normal channels will not be applicable to customer complaint received from RBI / Banking Ombudsman / Senior Management / BCSBI / Enforcement Directorate. The response on all customer complaint received through RBI / Banking Ombudsman / BCSBI will be highlighted to the Compliance Department. The response on the customer complaint received from Law Enforcement authorities like Police, court notices, CBI, TRAI etc., should be highlighted too Legal.
- Due care to be exercised to avoid incorrect closure of a complaint. If the information gathered from the customer is inadequate, the customer shall be contacted to ascertain all relevant details.
- Customer complaint leading to or likely to lead to payment of compensation and / or waiver of charges shall be intimated to CB BM and Business head prior to confirming the compensation amount to the customer.
- As required by the Reserve Bank of India and for better oversight & governance by EXCO, on Half Yearly basis, a Service Deck shall be submitted to EXCO (format given in Section E below). Such service deck should provide total no. of complaints, pending complaints, complaint from Banking Ombudsman with status and steps taken to avoid recurrence. The present teams responsible to place the Service Deck in the EXCO are IPB and CB.

Securities and Exchange Board of India (SEBI)

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

- Clients may approach the Custodian at the designated Investor Grievance e-mail ID with complete details of complaints for redressal of investor grievances in a time bound manner. (grievance.redressal@db.com). In case the complaint is not redressed at Custodian level, the same may be lodged with SEBI on SCORES (a web based centralized investor grievance redressal mechanism at SEBI)
- Pursuant to SEBI circular on "Online Resolution of Disputes in the Indian Securities Market" dated 31 July 2023, SEBI has put in place an "Online Dispute Resolution" process which needs to be followed for any disputes arising in connection with the Indian Securities Market. This circular provides the Client with an option of choosing either of the below mechanism for resolution of a dispute, in case it arises.
 - a. By harnessing online conciliation and/or online arbitration as specified in the SEBI circular; or
 - b. By harnessing any independent institutional mediation, conciliation and/or online arbitration in India.
- Accordingly, the Client can opt for option (a) or option (b) and the parties executing these presents to record the dispute resolution option opted by the Client with respect to the issues/disputes arising out of the Agreement.
- SEBI expects attending to client queries with an acknowledgement or response within 48 hours and attending to Grievance Redressal with an acknowledgement within 48 hours and redress within 30 days. The SEBI Charter also directs the Custodian and DDP to display a report on the

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Organizations website providing details of Monthly, Yearly (Month wise) and 3 Yearly (Year wise) Grievance statistics on a monthly basis. (Annexure – B of the Charter).

Pension Fund Regulatory and Development (PFRDA)

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

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

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

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

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

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

C. Complaint received through other agencies

DB India may receive customer complaint through RBI, Banking ombudsman, TRAI, consumer forums or any other government, quasi-government or regulatory agency. Customer complaint received as mentioned above should be treated in line with process for **Increased Risk Complaint** by the respective Products.

Complaint received through NSDL / CSDL: Stock Exchanges and Depositories disseminate customer complaint to Brokers and Depository Participants respectively, through physical letter or e-mail. In case of any DP related complaint, NSDL / CDSL will send a letter or e-mail to custody. If the complaint pertains to GTB, custody will forward the letter / e-mail to respective GTB service team for action on the complaint. GTB Service Team will follow the internal procedure for complaint redressal (as

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mentioned above). GTB Service Team will directly update the complaint status to NSDL / CDSL (for them to further update the status in SCORES system). All stockbrokers and depository participants are directed to address / redress the complaint within 15 days from the receipt of the complaint. In case additional information is required from the complainant, the same shall be sought within 7 days from the receipt of the complaint. In such cases, the period of 15 days shall run from the receipt of additional information’.

In case of a complaint/grievance received related to accounts of National Pension System, the same will be received via Dedicated hotline, call / e-mail to service managers or Grievance Redressal Officer as mentioned in level 1 – PFRDA above. Such complaints should be closed within a period of 30 days. The closure will be on receipt of such communication and acceptance of the redressal from the complainant. If there is no communication received from the complainant within 45 days, the complaint shall be treated as closed.

D. Internal Ombudsman

Reference to the RBI circular dated December 29, 2023, on Internal Ombudsman for Regulated Entities.

- The appointment, reporting and governance of the Internal Ombudsman for the Bank is managed by International Private Bank (IPB).
- For CB, any complaint which is partly or wholly rejected by the Bank shall be escalated to the Internal Ombudsman (IO). Customers are not required to approach the IO directly. Details of rejected complaints shall be shared with the IPB Service Quality (SQ) team to be uploaded in Finacle CRM (refer template below). This will enable the complaint to be automatically escalated and accessed by the IO. Bank will internally escalate declined/rejected/ partially accepted grievance cases to IO for his / her consideration. The final communication to the complainant shall mention that the complaint has been examined by the IO and still if he / she is not satisfied, he / she can approach the RBI Ombudsman through the RBI’s portal for lodging online complaints : <https://cms.rbi.org.in/cms/indexpage.html#eng>
- For complaints that are fully or partly rejected even after examination by the Internal Ombudsman, the Bank shall advise the complainant that they can approach the RBI Ombudsman for redress (excluding complaints against regulated entities not covered under the RB-IOs, 2021) along with complete details of the complaint. The format of the response to the complainant is given below
“Please note that, the complaint was referred to the Internal Ombudsman (IO) of the bank for a fair review.

The Internal Ombudsman (IO) of the bank has examined the complaint, and she has concurred with the bank’s stand. However, in case if you are not satisfied with the resolution of your complaint by our bank, you may escalate to RBI Ombudsman by posting it to “The Centralized Receipt and Processing Centre (CRPC), Reserve Bank of India, Central Vista, Sector 17, Chandigarh-160017” or click on the following link <https://cms.rbi.org.in> to lodge it online.”

- For rejected complaints that are overruled by the Internal Ombudsman, the Bank can disagree with the decision with the approval of the Competent Authority. In such cases, the reply to the complainant shall explicitly state the fact that the complaint was examined by the Internal Ombudsman and the decision of the regulated entity was overruled by the Internal Ombudsman in favor of the complainant; however, the Bank, with the approval of the Competent Authority, has disagreed with the decision of the Internal Ombudsman. Such decision shall be communicated to the complainant within 7 days of communication of

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the decision of the Internal Ombudsman. All such cases shall be subsequently reviewed on a quarterly basis by the Customer Service Committee of the Board. The Competent Authority for the Bank is the COO for IPB.

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

IO referral template

Customer Profile	Gist of the case	Case details						
Company name:	Customer claim:	<u>RCA:</u>						
Cust ID:	Previous channel approached: Nodal							
Account number:	<table border="1"><tr><td>Date</td><td>Request type</td><td>SR number</td></tr><tr><td></td><td></td><td></td></tr></table>		Date	Request type	SR number			
Date	Request type		SR number					
Account opening date:								
Account closed dated:								
Account type:								
Branch:								

E. Roles and responsibilities

- To aid centralisation within CB, the service deck will be compiled by CCM service team. MIS on complaint must be provided to CCM service team by respective CB Product service teams as defined / agreed frequency. Since the reporting is currently half-yearly, respective CB Product service teams can share the data to the CCM service team by 5th Oct & 5th April every year (format given in the next section below). In case of changes the same shall be agreed mutually. To clarify, the responsibility of ensuring correctness and completeness of the data being provided to the CCM Service team shall lie with the respective CB Product service teams. CCM Service team is only responsible for consolidating the data received from the various divisions and shall not verify its correctness or completeness.
- The CCM Service team shall send the compiled Service Deck to Service Quality team of IPB for onward submission to the Exco.
- In case the complaint data is not received by the agreed date, then it will be presumed that there are no complaint to report for that period. CCM Service team will not track nor follow up for the data from the respective CB Product service teams.
- Respective CB Product service teams should ensure the MIS includes complaint handled by their business operations.
- Respective CB Product service teams should ensure that the complaint data should be reconciled and tallied with the MIS sent to their regional / global product lines.

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- The respective CB Product service teams shall also ensure that they are in compliance with all the regulations, policies and guidelines on Complaint, including the process laid down in this document.
- The respective product service teams are also responsible to share quarterly report of all complaints to the Service Quality team of IPB for Internal Ombudsman reporting (format given in the next section below).
- Any Product-line reporting will be managed by the respective CB Product service teams
- All complaints not closed within 30 days of receipt of the complaint shall be raised to the Principal Nodal Officer of the Bank for review. This is the responsibility of the respective CB Product service teams.

Following is the summary of the roles and responsibilities: -

Accepting complaints	Respective CB Product service team
Resolution of complaints	Respective CB Product service team
Communication with customer	Respective CB Product service team
Closure communication to customer	Respective CB Product service team
Reporting of complaints to central team	Respective CB Product service team
Responsibility for correctness and completeness in reporting	Respective CB Product service team
CB-wise consolidation	CCM Service team
Preparation of the CB Service Deck	CCM Service team
Sending CB Service Deck to IPB for consolidation	CCM Service team
Division / product-line reporting	Respective CB Product service team
Escalation to Nodal officer (> 1 month)	Respective CB Product service team
Escalation of rejected complaints to the IO	Respective CB product service team
Quarterly complaint data to IPB for IO reporting	Respective CB product service team
Monthly complaint data reporting to IPB	Respective CB product service team

F. Reporting

- Format of reporting to EXCO as mandated by the RBI

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

1. **Complaints from Customers** – Data for the reporting period **<current reporting period>**

Product	CCM	SeS	TF	TAS	CMFI
No. of Complaints pending at beginning of the period					

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

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

2. Top 5 grounds of complaints received from Customers (Separate for every Product)

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

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

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

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

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

- Format of quarterly reporting to IO

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

- Format of monthly reporting to IPB

Details of the complaints received during the month to be provided.