

Door Step Banking Policy

History of Revisions

Version	Summary of Revisions	Date of Approval
7.0	Changes by Management	29-Sep-23
6.0	Regulatory Changes	28-Jan-22
5.0	Annual Review	17-Jun-21
4.0	Regulatory Changes	14-May-20
3.0	Annual Review	21-Jun-19
2.0	Annual Review	26-Jul-18
1.0	Policy Formulation	21-Jul-17

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1. Preamble

1.1 Objective of the Policy

The objective of this Policy is to provide a framework, to enable Equitas Small Finance Bank (ESFB) to provide Doorstep Banking services to its customers. Doorstep Banking will be provided as an additional service to the customers and enable the Bank to facilitate transactions of the customers without them visiting the branch.

1.2 Scope of the Policy

- a. This policy will cover the role, rights and responsibilities of Equitas Small Finance Bank ("ESFB" or "the Bank") as a service provider of Doorstep Banking Services.
- b. This policy also enumerates the rights and obligations of the customers who opt for receiving Doorstep banking services provided by the Bank.

2. Regulatory Framework - Applicable Regulations

RBI has laid down the following general principles and broad parameters to be followed by Banks while offering "Doorstep Banking" services to its customers.

2.1 RBI Circular on Doorstep Banking based on Section 23 of Banking Regulation Act, 1949 dated February 21, 2007

- a. Bank to formulate a scheme with the approval of their Board, for providing services at the premises of a customer.
- b. Bank to take suitable steps to educate their "Agents" to enable them to detect forged and mutilated notes while providing Doorstep banking to avoid frauds and disputes with the customers.
- c. Bank to take into account the various risks that might arise on account of offering Doorstep banking services to customers directly or through agents and take effective steps to manage the same. Bank's Board of Directors to review the operation of the Doorstep banking scheme on half yearly basis during the first year of its operation and subsequently on an annual basis.

2.2 Banking Facility for Senior Citizens and Differently abled Persons dated November 9, 2017

In view of the difficulties faced by senior citizens of more than 70 years of age and Differently abled or infirm persons (having medically certified chronic illness or disability),including those who are visually impaired, banks have been advised to:

- a. make concerted effort to provide basic banking facilities, such as pick-up of cash and instruments against receipt, delivery of cash against withdrawal from account, delivery of demand drafts, submission of Know Your Customer (KYC) documents and Life Certificate at the premises/ residence of such customers;
- b. Give due publicity in the bank branches and website about the Doorstep Banking facilities.

2.3 RBI notification on Doorstep Banking dated March 31, 2020

a. Bank should offer the Doorstep Banking services on pan India basis. Banks should develop a Board approved framework for determining the nature of branches/centres where these services will be provided mandatorily and those where it will be provided on a best effort basis and make the policy public. The list of branches offering such doorstep banking services shall be displayed/updated on the bank's website regularly.

- b. Bank should give adequate publicity to the availability of these services in their public awareness campaigns. The charges, in this regard, should also be prominently indicated in brochures and published in their websites.
- c. Bank should report the progress made in this regard to the Customer Service Committee of the Board every quarter.

2.4 <u>RBI Circular on Review of incentive and other measures to enhance distribution of coins dated August</u> <u>27, 2021</u>

2.4.1 Banks to provide coins to bulk customers-

Further, in terms of Paragraph 2, SI. No. (iii) (iii) of circular <u>Master Direction DCM (CC) No.G-2/03.41.01/2021-</u> <u>22 dated April 01, 2021</u>, banks were instructed to put in place a system of checks and balances so as to ensure that coins are distributed to retail customers in small lots and not to bulk customers.

On a review, with a view to meet the coin requirements of bulk customers (requirement of more than 1 bag in a single transaction) banks are advised to provide coins to such customers purely for business transactions. The banks may also endeavour to provide such services as part of their Board approved policy on 'Door Step Banking' services. Such customers should be KYC compliant constituents of the bank and the record of coins supplied should be maintained. Banks are advised to exercise due diligence to ensure that such facility is not misused (Clause 2b).

3. ESFB Policy framework

Bank is proposing the following Framework for offering Doorstep Banking services to its customers:

3.1 Services Offered under the Doorstep Banking Scheme

3.1.1 Bank will be providing Doorstep Banking Services in compliance with the regulatory guidelines. As listed out below:

- a. Doorstep Banking services will be offered at best effort basis by the bank.
- b. Doorstep Banking services will be offered only to customers of ESFB, based on the product offerings.
- c. The services can be offered either at the residence or at the office of the customer, the address of which has been clearly and explicitly mentioned in the account. Additionally, for non-cash related pick-up services the customer can choose to avail these services at branch offices or vendor premise.
- d. Doorstep banking service is not restricted to any particular client/customer or class of customers.

3.1.2 The Bank offers the following services under Doorstep Banking services -

- a. Pick-up of Cash from customer's residence/office.
- b. Pick-up of Cheques and other instruments from customer's residence/office.
- c. Delivery of Cash / Drafts at the doorstep of individual/Corporate/Government Customers either against Cheques received at the counter or requests received through any secure convenient channels such as phone banking / internet banking/email.
- d. All electronic transactions are subject to adopting technology and security standards and procedures.

The aforementioned services are made available currently in select branches. Service provider or the Branch Banking staff of respective branches will cover rest of the branches on a best effort basis. The list of branches and services under Doorstep Banking will be made available in the Bank's website and the list will be updated periodically.

3.1.3 The Bank may offer distribution of coins through 'Door Step Banking' services in line with RBI guidelines.

3.2 Eligible Customers

The following are class of customers who are eligible to avail the Doorstep Banking Services:

- Individual Customers/Natural persons
- Corporate Customers
- o Government Departments
- Public Sector Undertakings
- o Business firms and
- o Such other establishments, who opt for availing the above services.

3.3 Delivery Channel

- a. Delivery of the services will be done either through our employees or by engaging Business Facilitators/Service Providers.
- b. Bank's own employees will normally be used for Non-Cash related doorstep services and Business Facilitators/Service Providers will be engaged for pick-up and delivery of cash/ cheques and other instruments.
- c. Where the services of Business Facilitators/ Service Providers are availed, it will be ensured that the selection of the Business Facilitators/Service Providers will be fair and also be considering the experience, security and servicing capability.
- d. The Regional Head Operations/Business of the respective region or above will approve the Business Facilitators/Service Providers only after personal interaction with them to verify the credentials and market reputation. The head of operations will be the authority for empanelment of the vendor on the recommendation of the Regional Head Operations/Business of the respective region.
- e. Bank may appoint single or multiple Service Providers for providing Doorstep Banking services.
- f. Business correspondents of the banks too may act as Doorstep Banking providers in areas where they are appointed.

3.4 Service Charges

All the services rendered under the 'Doorstep Banking' are subject to payment of charges, based on the type of customer, type of service and the quantum/frequency of the service requirement. These charges will be clearly specified in the Doorstep Banking application form and in the agreement with the customer. The charges will vary based on the type of customer and the transactional volumes for such customers but not limited to:

- a) High relationship account holders
- b) Senior Citizens above 70 years of age
- c) Differently abled customers
- d) Corporate customers
- e) Government Bodies
- f) High transaction volume customers

Such charges may be approved by MD & CEO or by any other Bank official to whom it may be delegated by MD & CEO.

All charges will form part of the agreement and prominently displayed on brochures offering Doorstep Banking services and on the Bank's website.

3.5 Operational Procedure

Detailed operational procedure will be put in place with the approval of the Managing Director. It will be ensured that before operationalizing 'Doorstep Banking service' a confirmation will be obtained from the

service provider on the capability and any additional condition/cost for servicing the request and suitable agreement in this regard with indemnity clause will be executed.

The service will be offered based on the feasibility and financial viability and it is solely at the discretion of the Bank either to accept or reject a request of the customer for extending Doorstep Banking services. All necessary precautions, to safe guard against AML violations and counterfeit notes etc. will be taken while extending cash related services.

3.6 Role of Operations

The Operations Department will examine the availability of infrastructure at the branch concerned for extending the service/s requested so that customer complaints shall not arise on this count. The services will be considered post confirmation of service provider on feasibility of such services.

3.7. Minimizing Risks

The process to ensure smooth pick-up and delivery of cash and cheques is put in place, ensuring that the process is followed up while also minimizing the risk. The scope of work for the service provider will be matched with the process and adherence to the same will be mandatory for the service provider. Insurance coverage will be maintained as per the volumes of the doorstep banking and the service provider also needs to maintain the same to ensure coverage of any unforeseen losses. The agreement/Terms and conditions signed by the customer/service provider shall indemnify the bank against any losses arising out of negligence of the customer/service provider.

3.8. Grievance Redressal Mechanism

The Bank's customer grievance Redressal mechanism will involve handling of Doorstep Banking related grievances / service request also.

The customer queries and Redressal Mechanism is handled through Call Centre and unresolved complaints through the Principal Nodal Officer at Bank. The Customers can escalate unresolved complaints to RBI Ombudsman and the Bank will comply with Banking Ombudsman Scheme 2006

The Bank will be sensitive towards providing doorstep banking facilities to senior citizens above 70 years of age and differently abled or infirm persons (having medically certified chronic illness or disability) including those who are visually impaired.

Bank will report the progress made with respect to Doorstep Banking services for Senior Citizens and Differently abled persons to the Customer Service Committee of the Board every quarter. The operation of the Doorstep Banking Scheme will be reviewed by the Board of Directors of the Bank on an annual basis.

4. Provisions in policy over and above but in consonance with RBI guide lines

None

5. Changes to the Policy

Inclusion in para 3.8

6. Periodicity of Review of the Policy

The Board will review this policy at annual intervals and at such intervals as will be required on the regulatory and business exigencies.

Author of the Policy	Branch Banking	
Reviewer of the Policy	Compliance	
Name of Committee which recommended to the	Executive Policy Formulation Committee	
Board		
Date of Board Approval	29-Sep-23	
Date of Next Review	18-24 months from the date of board approval /	
	previous review	