Bandhan Bank Limited

Policy on Customer Service for Cross-Border Transactions

2026

TABLE OF CONTENTS

1. Objective of the Policy:

This policy is introduced in line with RBI Circular No D.O.FED.CO.PCD/S268/15.01 .004/2025-26 dated April 29, 2026, and FEDAI Email Ref:138/F-207/2026 Dated 29 April 2026.

This Policy establishes a comprehensive governance framework for handling all cross-border transactions of the Bank, ensuring:

- Documentation requirements for each type of transaction in view of Compliance with regulatory requirements (RBI, FEMA, FEDAI, DGFT)
- Standardization & Detailed process flows, including approving authorities of operational processes
- Schedule of charges applicable to different Cross Border transactions
- Enhanced Transparency with efficiency and customer service
- Timelines and accountability in transaction handling
- Escalation matrix and grievance redressal mechanism

2. Scope and coverage

This Policy applies to all cross-border transactions, including:

- Foreign Inward Remittances
- Foreign Outward Remittances
- Import Transactions (Goods & Services)
- Export Transactions (Goods & Services)

This policy applies across following functional units:

- All Branches (A, B & C category)
- Trade Processing Unit (TPU)
- Treasury
- Compliance/AML teams
- Respective Business Units

3. Regulatory Framework

All transactions shall be governed by Rules, Regulations; Guidelines etc. issued by various organizations from time to time.

- Foreign Exchange Management Act (FEMA), 1999

- RBI Master Directions
- Foreign Trade Policy (FTP)
- FEDAI Rules and Circulars
- AML / KYC Regulations issued by various Countries
- Banks internal SOPs and Guidelines

4. Definitions & functions

- Cross-border transactions: Transactions including flow of funds between residents and non-residents
- B Category Branch: Authorized branch handling forex/trade services
- C Category Branch: Customer servicing branch routing transactions through B Category Branch.
- Trade & Forex Processing Unit (TPU): A Central processing unit for processing trade & foreign exchange transactions.
- Treasury: Department facilitates Foreign Exchange Rates.

5. Policy Framework for Cross-Border Transactions

5.1 Documentation Requirements

The Bank shall ensure that all transactions are supported by complete and adequate documentation. The respective departments/units shall prepare and refer to the detailed operational guidelines (SOPs) outlining the requirements of documents based on event / life cycle / criticality of the transactions.

5.1.1 Common Documentation

The Bank shall keep on records following common documentation prior to undertaking any cross-border transactions

- Customer request/application (standard format)
- KYC/AML compliant account
- PAN, GSTIN, LEI, IEC etc. (as applicable)
- Customer onboarding/profile form covering Customer details & cross border exposures of the customer
- CA Certificate (wherever applicable)

5.1.2 Transaction-Specific Requirements

Branches shall refer to the list of documents for each type of transaction and obtain the necessary documents for processing transactions and adhere to the guidelines stated in latest Circulars issued by the RBI/ other authorities/Internal Guidelines. The list of documents is enclosed herewith in Annexure 1, 2, 3 and 4.

Also, Branches may obtain additional documentation based on:

- Risk profile of the customer
- Nature of transaction being undertaken
- Regulatory requirements specific to the transaction

5.2 Process Flow and Approvals

5.2.1 Standard Process Flow

1. Customer can submit requests at their Home Branch or any nearest Branch.
2. If the customer request is received at C-Category Branch (Non-Forex Branch), the Branch shall forward the full set of originial transaction documents to the nearest/Linked B-Category Branch (Forex Enabled Branch).
3. All the transactions shall be handled by B Category Branch as per the laid down operational guidelines and SOP.
4. Treasury shall facilitate the exchange rates wherever applicable as per the laid down operational guidelines.
5. TPU shall undertake processing of all transactions, compliance check as per laid down operational guidelines.
6. Regulatory reporting shall be handled as per respective SOPs/ Regulatory Guidelines.

5.2.2 Approving Authorities

All cross-border transactions shall be handled by respective stakeholders as given below:

Level	Nature of Activities	Authority
Level 1	Customer onboarding, Initial Set of Documents & sending to Centralized Processing Centre	Branch Head /ABH/ Assets Centre Head – (Foreign Exchange Enable Branch)
Level 2	Compliance Checking & Processing of transaction	Centralized Processing Centre
Level 3	Foreign Exchange Rates	Treasury
Level 4	Any Deviations/Exception - if applicable (Acceptable to Bank)	Competent Authority of Respective Functions as per Banks Internal Guidelines

5.3 Schedule of Charges

Bank has formulated a standardized Schedule of Charges in line with Service charge policy of the Bank and shall ensure levy charges which are commensurate with the services rendered. The cross-border services charges schedule is given in annexure 5.

Also, such Charges shall be Reviewed periodically and transparently disclosed to customers through communications.

5.4 Processing Timelines

Bank shall undertake transactions and ensure end to end delivery to customers subject to adherence of compliance as per extant Regulations and internal guidelines.

The below-mentioned timelines are considered post receipt of fully compliant documents within operating hours from the customers:

Activity	**Timeline**
Cutoff time for submission of customer Request	Within 3 PM
Intimation of Inward Remittance	Immediately on receipt of message from Nostro Bank (within operating hours)
Inward remittance processing	Within same Business Day
Outward Remittance	Within same Business Day
Import payment	Within same Business Day
Import Lodgment & other activities*	Within same Business Day

LC Issuance	Within same Business Day
Buyers Credit (Request for arrangement should be submitted 3 days prior to Import due date)	Within same Business Day
Export Pre Shipment	Within same Business Day
Export realization	Within same Business Day
Export Lodgment, Purchase, Discount, Negotiation & other activities*	Within same Business Day
*e.g. BOE knock off, EDF Waiver, Write off, Reduction, Extension etc.	

6. Grievance Redressal Mechanism

The Bank has established a multi-level escalation framework, beginning with resolution at the first point of contact i.e. Level 1 channels such as Contact Centre, email (customercare@bandhanbank.com) or Branch. Further, customers have the option to escalate to various levels as per the defined hierarchy. Defined turnaround times shall be adhered to at each level, and customers shall be informed of progress and delays, wherever applicable.

The mechanism is supported by robust monitoring and MIS framework, with periodic review by senior management to ensure effectiveness, identify systemic issues, and drive continuous improvement in customer service standards.

All complaints shall be registered in the complaint management application of the Bank and tracked till closure. An acknowledgement will be provided to customers for all the complaints lodged through any channels/Banking Outlets.

7. Escalation Matrix

If the customer is not satisfied with the resolution provided, they prefer to escalate the complaint as per GRIEVANCE REDRESSAL POLICY of the Bank to the following officers:

Level	Authority	Email ID	TAT
Level 2	Grievance Redressal Manager	grievanceredressalmanager@bandhanbank.com	8 Days
Level 3	Principal Nodal Officer	pno@bandhanbank.com	15 Days

These details are already available on Bank Website and same link may be shared with FEDAI as per the RBI instructions.

8. Disclosure and Customer Awareness

Bank shall display the below-mentioned information prominently on the website and at Foreign Exchange enabled branches (B Cat Branch) handling such transactions to ensure transparency and ease of access for customers

- Documentation requirements for each type of transaction
- Detailed process flows, including approving authorities
- Schedule of charges applicable to different transactions
- Defined timelines for processing remittances
- Escalation matrix and grievance redressal mechanism

Also, Bank shall send communication to customers via email alerts / SMS etc. for Credit advice, Transaction status updates to ensure transparency and ease of access for customers.

9. Customer Fairness

Bank shall ensure that all dealings with customers are always conducted in an ethical manner and all customers shall be treated equally. All employees shall ensure that any grievance of customers is treated in an unbiased and just manner. Accordingly, following points shall be adhered to

a) Bank shall ensure that Customers shall not be charged due to:
   - Internal processing inefficiencies
   - Regulatory delays or violations by the customer

b) Bank shall ensure that Compensation shall be provided as per Bank Compensation Policy on the on the following
   - Interest for delayed inward/Export credit
   - Interest for delayed Remittance of proceeds to the lodger's bank for Import Bills
   - Compensation for FX loss (if applicable)

c) Bank shall also ensure that the charges levied are reasonable & proportionate to the services rendered.

10. Internal Oversight and Governance

a) Bank shall ensure periodic review of all processes / transactions by the Concurrent/ Internal Auditors as per internal guidelines.

b) Aside respective departments shall ensure to review the internal Process / Policy / Guidelines at periodic intervals to ensure that customer dealings are at per with the Regulatory guidelines.

10.1 Control Framework

Bank shall ensure the following control measures while undertaking any cross-border transactions

- Maker-checker mechanism during processing of transactions in accordance with respective guidelines.
- Necessary AML & Sanction screening
- Trade-Based Money Laundering (TBML) monitoring

10.2 Training and Capacity Building

a) Officials handling Cross Border Transactions (Foreign Exchange) at Branches and processing centers shall mandatorily attend/undergo training/workshops related to the domain at least once every year. The Focus areas shall be Regulatory compliance, Cross Border products, AML and sanctions etc.

b) Also, officials should be encouraged to complete other professional courses related to trade and foreign exchange services.

10.3 Succession Planning

Bank shall ensure a succession plan for key dealing officials at intervals as follows

a) Identification of critical roles at

   - B Category Branches
   - Trade and Foreign Exchange Processing Centers
   - Treasury

b) Also, respective department should ensure backup resources are adequately created and cross-training are provided.

11. Feedback Mechanism

a. Bank shall ensure that communications are sent to customers to provide feedback on Quarterly basis over email / digital channels as per the prescribed Digital feedback forms set out by Bank.

b. Customer Experience department of the Bank shall review the feedback received from the customer on quarterly basis and submit actionable insights to senior management.

12. FEDAI Portal Linkages

Bank shall share relevant website links with FEDAI on the following disclosures to facilitate hosting such information on the FEDAI portal

- Documentation requirements for each type of transaction
- Detailed process flows, including approving authorities
- Schedule of charges applicable to different transactions
- Defined timelines for processing remittances
- Escalation matrix and grievance redressal mechanism

13. Compliance and Deviations

Any deviation from this policy shall require Approval from MD & CEO.

14. Review of Policy

This Policy shall be reviewed on Annually basis or upon regulatory changes and amendments (if any) shall be approved by Board / designated committee.

15. Annexures

The list of annexures is enclosed herewith which will be hosted in displayed at Branches handling such cross-border transactions and Banks website as well as same link will be shared with FEDAI as guided in this Policy.

- Annexure I: Documentation Checklist – Inward Remittance
- Annexure II: Documentation Checklist – Outward Remittance
- Annexure III: Documentation Checklist – Export transactions
- Annexure IV: Documentation Checklist – Import transactions
- Annexure V: Schedule of Charges
- Annexure VI: Customer Escalation Matrix & Grievance mechanism
- Annexure VII: Timelines & Approval Matrix