



EXTERNAL COMMUNICATION MECHANISM

July 2020

1. INTRODUCTION

This section defines the external communication mechanism (ECM) of TDB through which it will receive, record, process & assess and address external inquiries and complaints from the public and other stakeholders regarding their operations.

2. OBJECTIVES OF ECM

The objective of the ECM is to provide an opportunity to the public, project affected community and other stakeholders of the Bank to seek clarification and raise concerns about the Bank's operations. For the Bank, it provides a structured mechanism for handling enquires and complaints in a fair and transparent manner.

3. SCOPE OF ECM

Any person who has an interest in the Bank's operations and has an existing relationship with TDB or any of its projects can use this mechanism to seek clarification and make suggestions & complaints.

It is important to note that TDB's ECM can be accessed by the project affected families of projects & companies financed by TDB. However, the complainants are encouraged to first use the project/ company level grievance mechanism before escalating the complaint to TDB. Such persons will have to demonstrate that they are affected by the activities or impacts of operations financed by TDB.

The ECM covers only the financing operations of the Bank. All information covered by confidentiality agreements, related to staff safety & security, about adequacy of TDB's policies & procedures, non-operational matters, and internal deliberations are excluded from the purview of this ECM.

4. PROCESS FOR EXTERNAL COMMUNICATION

The key steps involved in the ECM are:

- **Receiving and recording:** The inquiries and complaints can be submitted in any language used in TDB member countries by letter, e-mail, phone and/or web form. The address, email address and phone numbers for receiving inquiries and complaints is provided on the TDB's website.
- **Acknowledgment of enquiry/ complaint:** Upon recording the inquiry or complaint, an acknowledgment mail or SMS will be sent to the person seeking clarification/ raising a complaint. The communication will include a possible timeframe within which the issue will be addressed.

- **Process and assess:** All enquiries and complaints received through the ECM will be forwarded to the Banks Head of Enterprise wide Risk Management (ERM). Depending on the nature of the complaint, the Head ERM will assign a dedicated officer. To this extent, all enquiries and complaints related to E&S performance of the Bank or its clients will be forwarded to the E&S Specialist. The E&S Specialist will assess or organize for the assessment of the request or complaint for validity and relevance.

The project affected people/ community of projects/ companies financed by TDB can use ECM to report their grievances related to E&S performance of TDB's sub-borrowers. For assessing these complaints, TDB will first determine if the complaint pertains to the project/ company operations financed by TDB and that the complainant is a community member. The E&S Specialist will also try to ascertain whether the complaint used the project/ company grievance mechanism to seek resolution to her grievance. The E&S Specialist will coordinate with the client's (TDB's borrowers and their subprojects) ESMS officer, where needed, to investigate the complaint and identify measures to resolve the issue as appropriate. As part of assessment of complaint and its resolution, TDB will evaluate the complaint handling by its sub-borrowers and review the resolution proposed by them, if any.

It is possible that some issues and complaints may not be resolved at the level of E&S Specialist. Such issues should be escalated to the Bank-wide Integrated Risk Management Committee (BIRMC) for resolution.

- **Resolution:** Communicate the outcome of the assessment and resolution to the enquirer or complainant and record the issue as closed in internal records.

ECM process with timeframe



5. INSTITUTIONAL ROLES AND RESPONSIBILITIES

Staff	Roles & responsibilities
Banks Head of Enterprise wide Risk Management (ERM)	<ul style="list-style-type: none"> • Receive complaints and undertake first level assessment to determine who to refer the complaints to • Record all enquires & complaints in the database • Refer the complaints to appropriate managers and departments for assessment and resolution
E&S specialist	<ul style="list-style-type: none"> • Respond to enquiries and complaints over the phone/ email that seek specific information and clarifications • Follow up with concerned departments and managers on complaint resolution • Liase with ESMS officers of subprojects where needed • Prepare internal monitoring reports for presentation to senior management • Communicate status and resolution to the complainant • Close the complaint and keep updated records
Concerned departments/ managers	<ul style="list-style-type: none"> • Assess and resolve complaints when a compliant is referred to them as per the timeframe described in ECM • Inform the E&S specialist if a delay is expected in assessment and resolution • Attend ECM review meetings, as & when held, to inform the management especially on those complaints that are escalated
Bank-wide Integrated Risk Management Committee	<ul style="list-style-type: none"> • Complaints that remain unresolved will be escalated to the BIRMC • BIRMC will assess & review the complaints • Meet with the complainants and subprojects (if the complaint concerns subprojects financed by TDB), if required

	<ul style="list-style-type: none"> • Form sub-committees with domain knowledge experts to resolve pending complaints • Inform senior management of status of all complaints escalated to BIRMC
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6. MONITORING AND REPORTING

All communication received through ECM should be documented and periodically reported to the top management. Internal report on ECM should provide information on the following:

- Number of communications received (as per source and type of issue such as E&S, commercial, etc.)
- Number of open enquiries and complaints
- Number of closed enquiries and complaints
- Number of enquiries and complaints which exceeded the defined timeline
- Number of enquiries and complaints which were escalated to BIRMC