Grievance Redressal Policy

Division: Chennai

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1.0 Introduction

1.1 In the present scenario of competitive banking, excellence in customer service is the most important tool for sustained business growth. Customer complaints are part of the business life of any corporate entity. This is more so for banks because banks are service organizations. As a service organization, customer service and customer satisfaction should be the prime concern of any bank. We believe that providing prompt and efficient service is essential not only to attract new customers, but also to retain existing ones. Our bank has come up with a lot of initiatives that are oriented to providing a better customer service and a better complaints redressal mechanism and one such initiative is framing of this policy.

2.0 Objectives

2.1 This Grievance Redressal Policy is applicable to Bank of Ceylon, Chennai. It has been formulated with the following objectives.

2.1.1 Customers are treated fairly at all times

2.1.2 Complaints raised by customers are dealt with courtesy and on time

2.1.3 Customers are fully informed of avenues to escalate their complaints / grievances within the organization and their rights to alternative remedy, if they are not fully satisfied with the response of the bank to their complaints.

2.1.4 All complaints are dealt efficiently and fairly.

2.2 This policy document aims at minimizing instances of customer complaints and grievances through proper service delivery and review mechanism and to ensure prompt redressal of customer complaints and grievances. The review mechanism will help in identifying shortcomings in product features and service delivery.

3.0 Customer Complaints or Grievances

3.1 The customer complaint arises due to;

3.1.1. The attitudinal aspects in dealing with customers.

3.1.2 Inadequacy of the functions / arrangements made available to the customers or gaps in standards of services expected and actual services rendered.

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3.1.3 Improper understanding by customers about the products, services, bank's rules and regulations etc.

3.2 The customer has every right to register his / her complaint if he/she is not satisfied with the services provided by the bank. He / She can give his / her complaint in writing, orally or over telephone. If customer's complaint is not resolved within given time or if he/she is not satisfied with the solution provided by the bank, he / she can approach Banking Ombudsman with his/her complaint.

4.0 Internal Machinery to Handle Customer Complaints / Grievances

4.1 In order to make bank's redressal mechanism more meaningful and effective, a structured system has been built. This system would ensure that the redressal sought is just and fair and is permissible within the given frame-work of rules and regulation. All employees are aware about the complaint handling process.

4.2 Complaints/suggestions box has been provided at the bank. Further, a notice requesting the customers to meet the Country Manager / Deputy Manager has also been displayed at the bank regarding grievances, if the grievances are not redressed.

4.3 A complaint book, as designed by IBA, with perforated copies in each set has been introduced so that acknowledgement to the customers will be provided instantaneously.

4.4 Besides, a separate complaints register in the prescribed format is maintained for entering all the complaints/ grievances received by the bank directly or through RBI Integrated Banking Ombudsman. The register will be maintained irrespective of the fact whether a complaint is received or not in the past. The complaints registers maintained by the branch will be scrutinized by the Country Manager at periodical intervals.

4.5 The first point for redressal of complaints is the bank itself and that complainants may approach the Banking Ombudsman only if the complaint is not resolved at the bank level within a month. This information has been displayed in the notice boards of the bank.

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4.6 Customers who have any grievances / complaints, may approach the officer in charge of the concerned operational unit (head of the department) with whom the customer has raised the issue. The telephone numbers and e-mail id of the heads of the department are given below:

Functional Areas	Designation of the Head of the Department	Phone No. and E-mail id
Trade Finance	Assistant Vice President	91-44- 39519902/ 08/ 09 /10 tradechn@boc.lk
Loans and Advances	Senior Vice President	91-44-39519919/18/17 ramanujam@boc.lk
Deposits, funds transfers (RTGS/NEFT/ ECS etc), MICR clearing, safe deposit lockers etc.	Junior Executive Officer Grade-III	91-44-39519907/05/06 opschn@boc.lk

4.7 If the complaint is unresolved at the Heads of the Departments level, the customer may approach the Deputy Manager, whose contact details are given below:

Telephone No.	Mobile No.	Fax No.	E mail id
91-44-39519901	+91 91760 44644	91-44-39519900	dmchennai@boc.lk

4.8 In case the response received through the above channels are not satisfactory, they can approach the Country Manager.

Details for contact:

Telephone No.	Mobile No.	Fax No.	E mail id
91-44-39519913	+91 94440 47483	91-44-39519900	agmcb@boc.lk

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5.0 Board Approved Policies on Customer Service

5.1 The bank has the Board approved Comprehensive Deposit Policy incorporating the issues such as premature withdrawal / renewal of term deposit, renewal of overdue term deposits, advances against deposits, settlement of dues in deceased deposit account etc.

6.0 Branch Level Customer Service Committees

6.1 In order to encourage a formal channel of communication between the customers and the bank at the branch level, the Bank should take necessary steps for strengthening the branch level committees with greater involvement of customers. The Branch Level Customer Service Committee will be chaired by the Deputy Manager of the Branch. The members comprise of Head of Department of Operations, Credit and Trade Finance. Head of Treasury, Risk and Compliance Heads may participate as Special Invitees. It is desirable that branch level committees include their customers too. Further, as senior citizens usually form an important constituent in banks, a senior citizen may preferably be included therein. The Branch Level Customer Service Committee may meet at least once a month to study complaints/ suggestions, cases of delay, difficulties faced / reported by customers / members of the Committee and evolve ways and means of improving customer service.

6.2 The Branch Level Committee may also submit quarterly reports giving inputs / suggestions to the Standing Committee on Customer Service thus enabling the Standing Committee to examine them and provide relevant feedback to the Management Committee of Chennai Branch for necessary policy / procedural action.

7.0 Standing Committee on Customer Service

7.1 The Standing Committee on Customer Service will be chaired by the Deputy Manager (Nodal Officer) of the bank. Besides three senior executives of the bank (in the cadre of Senior Vice President, Vice President or Assistant Vice President), the committee would also have one or two non-executives drawn from the public as members. The committee would have the following functions.

7.2 Evaluate feed-back on quality of customer service received from various quarters. The committee would also review comments / feed-back on customer service.

7.3 The Committee would be responsible to ensure that all regulatory instructions regarding customer service are followed by the bank.

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7.4 The Committee also would consider unresolved complaints/grievances referred to it by functional heads responsible for redressal and offer their advice.

7.5 The Committee would meet at least once in a quarter and submit report on its performance to the Country Manager. The quorum for the meeting will be two Officers of the Bank.

8.0 Nodal Officer to Handle Complaints and Grievances

8.1 The Deputy Manager of the Chennai Branch is the Nodal Officer for handling complaints and grievances. He is responsible for the implementation of customer service and complaint handling for the bank. The name of the Deputy Manager / Nodal Officer will be notified to the customers through display on bank's notice board and website, from time to time.

9.0 Mandatory Display Requirements

9.1 Our bank has the following requirements

9.1.1 Appropriate arrangement for receiving complaints and suggestions.

9.1.2 The name, address and contact number of Nodal Officer(s)

9.1.3 Contact details of Banking Ombudsman of the area

9.1.4 Fair practice code

10.0 Resolution of Grievances

10.1 The customers can highlight their complaints/ issues with our bank vide the channels mentioned earlier in the policy. The officer in charge of the concerned operational unit (Head of the Department) with whom the customer has raised the issue is responsible for the resolution of complaints / grievances.

10.2 The Head of the Department is responsible for the resolution of complaints/ grievances in respect of customer's service by the department/ unit, subject to the compliance of internal policy guide lines. He would be responsible for ensuring closure of all complaints received at his department / unit. It is his foremost duty to see that the complaint should be resolved completely to the customer's satisfaction subject to adherence to the bank's internal policy guidelines. If the customer is not satisfied, then he should be provided with alternate avenues to escalate the issue. If the Head of the Department feels that it is not possible at his level to solve the problem, he can refer the case to Deputy Manager (Nodal

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Officer) / Standing Committee on Customer Service for guidance. Similarly, if the Deputy Manager finds that he is not able to solve the problem such cases may be referred to the Standing Committee on Customer Service/Country Manager.

11.0 Time Frame

11.1 To register complaints, customer can use any of the channels mentioned above (refer point 4 on Internal Machinery to handle customer complaints). If the complaint has been received in writing, the bank will endeavor to send an acknowledgement/ response within a week. After the matter is examined a final response will be sent to the customer or information that more time is required and the bank will endeavor to do so within 30 days of receipt of complaint.

11.2 In case the customer is not satisfied with the response received, then he/she can write to the Deputy Manager (nodal officer) or the Country Manager.

11.3 The Complaint will be responded within 5 working days. In case the customer is still not satisfied with the response or has not received a response from the bank within a month, then the customer can file a complaint before the Banking Ombudsman at RBI.

(11.3.1) The RBI has newly implemented a single window for registering complaints against regulated entities under the Integrated Ombudsman Scheme in 2021.The complaint may be lodged online through the portal designed for the purpose (https://cms.rbi.org.in) or forwarded to the Centralised Receipt and Processing Centre, RBI, Chandigarh (Email: crpc@rbi.org.in).

(11.3.2) The complaint may also be submitted through electronic or physical mode to the Centralised Receipt and Processing Centre as notified by the Reserve Bank. The complaint, if submitted in physical form, shall be duly signed by the complainant or by the authorised representative.

11.4 The Communication of bank's stand on any issue will be provided to the customers. Complaints received which would require some time for examination of issues involved will be acknowledged promptly.

12.0 Interaction with Customers

11.1 The bank recognizes that customer's expectation/ requirement/ grievances can be better appreciated through personal interaction with customers by bank's staff. Structured customer meets, say once in a month will give a message to the customers that the bank cares for them and values their feedback/suggestions for improvement in customer service. Many of the complaints arise on account of lack of awareness among

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customers about bank services and such interactions will help the customers appreciate banking services better. As for the bank the feedback from customers would be valuable input for revising its product and services to meet customer requirements.

13.0 Sensitizing Operating Staff on Handling Complaints

All the members of staff of the bank are educated on the Complaints Redressal Mechanism. We are dealing with people and hence difference of opinion and areas of friction can arise. With an open mind and a smile on the face we would be able to win the customer's confidence. It would be the responsibility of the Nodal Officer to ensure that internal machinery for handling complaints/grievances operates smoothly and efficiently at all levels. He would give feedback on training needs of staff at various levels to the Country Manager.

14.0 Review of the Policy

The Policy will be reviewed by Chennai Branch on an annual basis in tune with the regulatory guidelines issued from time to time or internal requirements or as and when considered necessary.

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Annexure – I

1.0 Internal Ombudsman Framework

1.1 Introduction

The framework is introduced with a view to strengthen the internal grievance redressal mechanism within the Bank and ensure a proper and speedy resolution of customer complaints by enabling a review before their rejection, by an apex level authority within the Bank.

1.2 Definitions

a. "Bank" means Bank of Ceylon
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 CEO/Country Manager of the Bank.
d. "Complaint" means a representation in writing or through other modes alleging deficiency in service on the part of the bank and seeking relief thereon.
e. "Deficiency in service" means a shortcoming or an inadequacy in any service, which the bank is required to provide statutorily or otherwise, which may or may not result in financial loss or damage to the customer
f. "Deputy Internal Ombudsman" means any person appointed under clause 6 of this policy
g. "Financial Sector Regulatory Body" means regulatory body for financial sector entities and includes:

(i) The Reserve Bank of India established under the Reserve Bank of India Act, 1934;
(ii) The Securities and Exchange Board of India established under the Securities and Exchange Board of India Act, 1992;
(iii) The Insurance Regulatory and Development Authority of India established under the Insurance Regulatory and Development Authority of India Act, 1999;
(iv)The Pension Fund Regulatory and Development Authority established under the Pension Fund Regulatory and Development Authority Act, 2013;

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1.3 Appointment of Internal Ombudsman

i. Bank has decided to appoint the Chief Compliance Officer as the Internal Ombudsman of the Bank considering the size of branch and the volume of operation in the branch.
ii. The Internal Ombudsman shall not be over 70 years of age before the completion of the tenure.
iii. Bank may appoint more than one Internal Ombudsman depending on the volume of complaints received by the Bank to ensure continuity of operations during the absence of the Internal Ombudsman. Considering the size and volume in the Branch, Chennai Branch has decided to appoint one Internal Ombudsman to address customer complaints at present.
iv. 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.

1.4 Tenure of Internal Ombudsman

i. The tenure of the Internal Ombudsman in the Bank shall be a fixed term of not less than three years. The Chief Compliance Officer will continue to operate as the Internal Ombudsman after three-year period. The Internal Ombudsman shall continue after five-year period considering the size and volume of operations of the Branch.
ii. The Internal Ombudsman cannot be removed before the completion of his / her contracted term without the explicit approval of the Reserve Bank of India. In case the vacancy arises on account of reasons beyond the control of the Bank (such as death, resignation, incapacitation, terminal illness, etc.), the Bank shall inform Reserve Bank of India within 10 working days from the date of such vacancy. The Bank shall appoint a new Internal Ombudsman as per eligibility criteria specified under clause 5 of this policy, 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 as per clause 15 of this policy.
iii. The Principal Nodal Officer or the Nodal Officer, liaising with the offices of the RBI Ombudsman, shall not act as Internal Ombudsman or vice versa, even during the temporary absence of either.

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iv. 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.

1.5 Administrative Oversight

The Internal Ombudsman shall report to the MD & CEO of the Bank and to the Local Advisory Board (LAB).

1.6 Secretariat and Cost of the office of Internal Ombudsman

i. Banks shall depute such number of its officers or other staff to the office of the Internal Ombudsman as is considered necessary for the smooth functioning of the offices of the Internal Ombudsman.

1.7 Internal Audit

i. The Bank shall conduct an internal audit of the implementation of the Internal Ombudsman Framework formulated in this policy, on annual basis. The Internal Audit of the Bank shall cover the implementation and compliance with this policy, including:
   a. The adequacy of the infrastructure (space, IT infrastructure, human resources, etc.) provided to the office of Internal Ombudsman and whether it is in line with the volume of complaints and the stated position of the Internal Ombudsman at the apex of the grievance redress mechanism;
   b. Implementation of auto-escalation of the partly or wholly rejected complaints to the Internal Ombudsman within 20 days and adherence with various timelines indicated in this policy;
   c. Actions by the Internal Ombudsman with regard to analysis of complaints, reports submitted to RBI and the Bank, efforts made by Internal Ombudsman for review and quality disposal of the rejected complaints, support provided by the Bank towards raising awareness about types of grievances, and developing

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uniformity of approach in handling of complaints across the Bank as also the support provided to the Internal Ombudsman for redress of the complaints;

d. Adherence with various timelines indicated in this framework.

ii. The scope of the Internal Audit shall exclude any assessment of the correctness of decisions taken by the Internal Ombudsman.

1.8 Role and Responsibilities of Internal Ombudsman

i. The Internal Ombudsman shall not handle complaints received directly from the complainants or members of the public but deal with the complaints that have already been examined by the bank but have been partly or wholly rejected by the bank.

ii. The following types of complaints shall be outside the purview of this framework and shall not be handled by the Internal Ombudsman:

a) Complaints related to corporate frauds, misappropriation etc., except those resulting from deficiency in service, if any, on the part of the bank;

b) References in the nature of suggestions and commercial decisions of bank. However, service deficiencies in cases falling under 'commercial decisions' will be valid complaints for the Internal Ombudsman;

c) Complaints / references relating to (i) internal administration, (ii) human resources, or (iii) pay and emoluments of staff in the bank;

d) Complaints which have been decided by or are already pending in other fora such as the Consumer Disputes Redressal Commission, courts, etc.;

e) Disputes for which remedy has been provided under Section 18 of the Credit Information Companies (Regulation) Act, 2005.

iii. Complaints that are outside the purview of the framework shall be immediately referred back to the bank by the Internal Ombudsman.

iv. The Internal Ombudsman shall examine the complaints on the basis of records/ documents available with the bank and comments/ clarifications furnished by the bank to specific queries of the Internal Ombudsman.

v. The Internal Ombudsman may hold meetings with the concerned functionaries of the bank and seek any record / document available with the bank that are necessary for examining the complaint and reviewing the decision. The bank shall furnish all records and documents sought by the Internal Ombudsman to enable expeditious resolution of the complaints without any undue delay.

vi. The Internal Ombudsman shall, on a quarterly basis, analyse the pattern of all complaints received against the bank, such as entity-wise (for CICs), product-

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wise, category-wise, consumer group-wise, geographical location-wise, etc., and may provide inputs to the bank for policy intervention, if so warranted.

vii. The Internal Ombudsman shall not represent the bank in legal cases before any court or fora or authority.

viii. In cases of conciliation, where the decision of the Internal Ombudsman is accepted by the complainant, a statement showing the terms of agreement duly signed by the complainant, shall be kept on record.

1.9 Procedure for Complaint Redress by Internal Ombudsman

i. The bank shall ensure that all complaints that are partly or wholly rejected by the bank's internal grievance redress mechanism are escalated to the Internal Ombudsman within 20 days of receipt, for a final decision.

ii. The Internal Ombudsman and bank shall ensure that the final decision is communicated to the complainant within a period of 30 days from the date of receipt of complaint by the bank.

iii. The Bank shall furnish all records / documents sought by the Internal Ombudsman to enable him / her to redress / resolve customer grievances expeditiously.

iv. The decision of Internal Ombudsman shall be binding on the bank, except in cases where the bank has obtained approval for disagreeing with such decision.

v. In cases where the complainant has approached the RBI Ombudsman before the Internal Ombudsman has examined the complaint, the bank should obtain the views of Internal Ombudsman and include the Internal Ombudsman's views in its submissions to the RBI Ombudsman.

vi. The bank shall use the analysis of complaints handled by Internal Ombudsman in their training programmes / conferences to raise awareness about the pattern of complaints including the root causes, remedial measures, etc., among the frontline staff, in order to evolve consistency in handling of complaints. The Internal Ombudsman may also be involved for such trainings, where necessary.

vii. While assessing the performance of the Internal Ombudsman, in addition to the level of pendency and work done by the Internal Ombudsman towards developing uniformity across the bank in the redress of complaints, the bank shall also analyse the number of cases where there is substantive difference between the decisions of the Internal Ombudsman vis-à-vis those given by the RBI Ombudsman subsequently.

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viii. The bank shall widely disseminate the guidelines / instructions regarding the framework among their staff while communicating the appointment of Internal Ombudsman in the organization (all branches and administrative offices).

ix. The bank shall not provide the contact details of the Internal Ombudsman in the public domain as the Internal Ombudsman shall not handle complaints received directly from the customers.

1.10 Board Oversight

The Internal Ombudsman shall furnish periodical reports on his / her to the Customer Service Committee of the bank's Local Advisory Board(LAB), preferably at quarterly intervals, but not less than bi-annually. Banks shall put in place a system for discussion of cases by the Customer Service Committee of the bank's, which is to be done with approval of CEO/Country Manager of the Bank.

1.11 Supervisory Oversight

i. Areas regarding customer service and implementing of the Scheme would be a part of the risk assessment and supervisory review by Department of Banking Supervision of the Reserve Bank.

ii. The Reserve Bank shall review the cases where decisions of the Internal Ombudsman are not accepted by the bank and the aggrieved customer appeals to the Banking Ombudsman. If in such cases, the original decisions of the Internal Ombudsman are reiterated by the Banking Ombudsman frequently, then the bank be subjected to appropriate enforcement action.

1.12 Reporting to Reserve Bank

1.	Name of the 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)	

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Annexure

Report to Consumer Education and Protection Department, Reserve Bank of India Office of Internal Ombudsman (IO), Name of the Bank: _____ Report for quarter ended _____

Part A: Quarterly Reporting (For all banks)

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

Number of Complaints received by the Bank during the quarter	**Number of Complaints processed by the Bank 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 Bank to the IO**
(A)	**(B)**	**(C)**	**(D)**	**(E)**

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

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 bank 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

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), product-wise, category-wise, consumer group-wise, geographical location-wise, any other.

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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

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

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Table – II

Number of complaints that should have been referred by the bank to the IO during the year (as per the framework)	Number of complaints under (A) referred by the bank 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.

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