**HOW TO COMPLAIN ABOUT A PROJECT FUNDED BY COMMERCIAL BANKS?**

# A Guide to Complaint Offices at Commercial Banks

If commercial banks have funded or supported the project that is causing you harm, we, and our partners at BankTrack, can help you to investigate whether those banks have a complaint office you can use.

## Understanding commercial banks and their complaint offices

### WHICH COMMERCIAL BANKS HAVE COMPLAINT OFFICES?

Commercial banks are for-profit financial institutions that accept deposits, provide loans, and offer other financial services to individuals and businesses to earn a profit.

Our partners at BankTrack have identified eight large commercial banks that have either developed their own complaint office, or opted to participate in a shared complaint office, which are able to consider complaints from communities about the environmental and human impacts of the bank's finance. This includes five banks that have developed their own complaint offices:

- ABN AMRO: headquartered in Amsterdam, ABN AMRO is the third-largest bank in the Netherlands. While the bank's primary business is focused in the Netherlands, it also finances companies abroad, including power generation, oil and gas upstream, shipping, construction and agriculture.
- ANZ Banking Group: headquartered in Melbourne, Australia and New Zealand Banking Group (ANZ) is the fourth-largest commercial bank in Australia. The bank operates primarily in Australia and New Zealand but also has operations in Asia, North America, and Europe. It provides financing for large-scale projects, including in the mining, steel and oil and gas industries.
- Commonwealth Bank: headquartered in Sydney, Australia, the Commonwealth Bank of Australia (CBA) is the largest of Australia's "Big Four" banks. It operates primarily in Australia and New Zealand, but also has a presence in Europe, the US and across Asia. The CBA also provides financing for large-scale projects and industries including oil and gas, mining, and infrastructure.
- Deutsche Bank: headquartered in Frankfurt, Germany, Deutsche Bank is one of Europe's largest financial institutions. The bank operates in over 50 countries across the globe and is one of the world's leading asset managers. It finances large-scale projects, including in the energy and mining sectors.
- National Australia Bank: headquartered in Melbourne, National Australia Bank (NAB) is another one of Australia's four largest banks. It operates in Australia and New Zealand, with other business in Asia, the UK, and the US. It finances projects in the renewable section, but also in industries like infrastructure, oil and gas and mining.

In addition, Japan's "big three" banks, Mitsubishi UFJ Financial Group (MUFG), Sumitomo Mitsui Banking Corporation (SMBC) and Mizuho Financial Group (Mizuho) have opted to participate in a shared complaint office, the Japan Center for Engagement and Remedy on Business and Human Rights (JaCER), which has a separate page in this Guide (coming soon).

It is also worth investigating whether the commercial bank that is funding the project that is causing (or threatening) you harm is an Accredited Entity of the Green Climate Fund (GCF): if it is, it should have a grievance mechanism, as this is a requirement for GCF Accreditation. We are currently compiling a list of GCF Accredited Entities with grievance mechanisms and will add these to the Pathfinder soon. In the meantime, if the bank funding the project causing you harm is listed as a GCF Accredited Entity, you're welcome to reach out to us via the AC Helpdesk to learn more about these mechanisms.

## WHAT ARE THE COMPLAINT OFFICES?

The five banks identified by BankTrack each have their own complaint offices which are able to receive complaints from communities about the environmental and human rights impacts of the projects they fund. Those offices are:

- **ABN AMRO:** ABN AMRO established its "Human Rights Remedy Mechanism" in October 2024. Complaints can be filed by affected individuals and their legitimate representatives. The complaint must relate to a current ABN AMRO
  relationship with a client that is registered in the Netherlands, and has a relationship manager at the bank who is also based in the Netherlands. Forieng companies, subsidiaries, and branches fall outside this scope.
- **ANZ**: ANZ introduced its "Human Rights Grievance Mechanism" in 2021, following a complaint by 681 Cambodian families about the impacts of its lending to a sugar plantation and refinery project in Cambodia. Affected people and their “nominated legitimate representatives” anywhere in the world can bring a complaint to this mechanism concerning any of the bank’s past or current large business clients (lending customers of ANZ’s Institutional Business).
- **CBA**: CBA created a “Human Rights of First Nations Stakeholders Grievance Process” in 2023, allowing Australia's First Nations stakeholders and their legitimate representatives to raise complaints. This means CBA’s grievance mechanism is not accessible to all individuals or communities who might be affected by the bank’s financing activities, but rather only to Australian Indigenous Peoples.
- **Deutsche Bank**: Deutsche Bank established its “Complaints procedure under the German Supply Chain Due Diligence Act” in 2023. Deutsche Bank’s complaint office is available to “anyone who has indications of human-rights-related risks or incidents that have arisen as a result of Deutsche Bank economic actions”, according to its website.
- **NAB**: NAB was among the first banks to introduce a complaint office, with its “Human Rights Grievance Process” in place since at least 2019. Complaints can be filed about human rights impacts associated with the bank's business relationships, including its customers and suppliers.

As mentioned above, the shared mechanism to which Japan's MUFG, SMBC, and Mizuho banks all subscribe — the Japan Center for Engagement and Remedy on Business and Human Rights (JaCER) — has a separate page in this Guide (coming soon).

Some of these complaint offices are stronger than others. BankTrack's Users' Guide contains an evaluation of their strengths and weaknesses.

## How to file a complaint

# CAN YOU COMPLAIN TO A COMMERCIAL BANK COMPLAINT OFFICE?

For detailed guidance on how to use each of these complaint offices, see BankTrack's Users' Guide.

**SAMPLE COMPLAINT LETTER**

Some banks provide sample complaint letters ...

# STRENGTHEN YOUR COMPLAINT BY REFERENCING COMMERCIAL BANK POLICIES

When filing your complaint to a bank complaint office, you may want to reference bank policies that were violated. Environmental and social safeguard policies play an important role in your complaint. These safeguards are rules and policies designed to identify and mitigate risks associated with bank activities, with an overarching goal of preventing environmental and social harms. Understanding these safeguards is essential for anyone seeking to hold banks accountable for harms associated with their investments.

## What happens after you file a complaint?

**Stage 1: Intake & Eligibility**

> ...

**Stage 2: Assessment**

> ...

**Stage 3: Substantive Phase**

> ...

**Stage 4: Monitoring / follow-up**

> ...

## Real stories of communities who have filed complaints

## Assessing their performance

**COMPARISON TO BEST PRACTICE**

**A LOOK AT THE DATA**

**POLICY RECOMMENDATIONS TO IMPROVE COMMERCIAL BANK COMPLAINT OFFICES**

## Contact a commercial bank complaint office

Date Last Updated: Jan. 15, 2026

Downloaded from https://accountabilityconsole.com/pathfinder/commercial-banks/ on 25 November 2026. Visit the website for the latest version.