

Approved by  
ARMECONOMBANK OJSC Board Resolution # \_\_\_\_ 23.12.2022

Effective from \_\_\_\_\_

Chairman of the Board

----- S. Sukiasyan

**PROCEDURE  
FOR ADMISSION, CONSIDERATION, AND RESOLUTION OF ARMECONOMBANK OJSC  
CUSTOMERS' APPLICATION-COMPLAINTS**

**YEREVAN 2022**

## 1. GENERAL PROVISIONS

- 1.1 This document sets forth the Procedure of receiving and discussion of complaints and/or claims of the Bank's customers, as well as resolutions made on them.
- 1.2 This Procedure has been developed in compliance with the requirements of Armenian legislation and the Bank's internal legal acts.
- 1.3 By this Procedure:
  - 1.3.1 Customer /Applicant/ - Persons using the Bank's services or persons who want to make use.
  - 1.3.2 Application-complaint – Nominal complaint, proposal submitted to the Bank in compliance with this Procedure which is not subject to be examined by the Mediator of the financial system in compliance with points 5.2-5.9 of this Procedure.
  - 1.3.3 Complaint – As provided by RA Law on Financial System Mediator, a nominal complaint, proposal submitted to the Bank in writing by customer representing an individual or a micro-enterprise, which has provided a security of liabilities in compliance with this Procedure, which is related to the services provided by the Bank to the customer and contains a financial claim.
  - 1.3.4 Application – Application-complaint, or complaint submitted to the Bank by customers in compliance with this Procedure
  - 1.3.5 Electronic database: a consolidated database administered by the Bank, where data on applications and complaints for at least 3 years are maintained; the manner of supplementing and personnel in charge to be determined by the Executive Board.
  - 1.3.6 Responsible employee – branch employee or employee in Head office nominated by CEO is responsible for receiving applications and providing necessary information to the customer.
  - 1.3.7 Ombudsman – Responsible person for protecting rights of customers, as well as for relations with the Mediator of the financial system.
  - 1.3.8 Mediator of the financial system – Individual who examines the demands presented against the Bank by customers and makes resolutions on them through the realization of authorities assigned by Armenian law on Mediator of the financial system.

## 2. PROCEDURE OF RECEIVING AND DISCUSSION, AS WELL AS DECISIONS TO BE MADE ON THEM

- 2.1 Upon receipt of the customer's application in person, any employee of the Bank shall refer the customer to the responsible employee, as well as provide information on the means of communication with the responsible employee (telephone, e-mail address, etc.), furthermore,
  - 2.1.1 Customers may submit the application by mail, email, AEB Mobile and AEB Online systems, Viber, Whatsapp, Messenger.
- 2.2 Applications of customers shall be accepted at the Head-office and branches of the Bank by responsible employees, registered in the "WorkFlow" system (by attaching the scanned or electronically received Application) to the Application-Complaint entry in the "Customer Application" type, and the Complaint entry in the "Customer Complaint" type..
- 2.3 In branches applications shall be accepted based on their nature:
  - 2.3.1 They shall be discussed and corresponding measures shall be taken on them.
  - 2.3.2 In case of being out of authorities of branches, the scanned versions of the applications through the "WorkFlow" program or within one working day on hand are submitted to the responsible employee of the Head-office.
- 2.4 Accepted application shall be registered in the Bank's secretariat, after which they shall be transferred to the Deputy CEO coordinating the function or to the Head of subdivision by CEO's instruction. Copy of the application shall be provided to the Ombudsman.
- 2.5 The CEO /Head of independent subdivision/, together with Heads of corresponding structural subdivisions of the Bank shall discuss the application and submit the plan of answer on results to the Bank's CEO, in a written form within the established periods.

- 2.6 The CEO /Head of independent subdivision/, with participation of the Ombudsman shall organize a discussion of the answer and shall make a decision on measures to be taken, elimination of underperformances, and calling the guilty persons to responsibility.
- 2.7 Answer of application shall be delivered to the Customer by mail or in the same way as received.
- 2.8 During the examination of the applications documents can not be required from the Applicant which:
  - 2.8.1 are not necessary for applications and for grounding their existence or absence as well as for identification the customer or,
  - 2.8.2 are available to the Bank in case of services provided to the Applicant and based on his written approval, the data determined in is not changed.

### **3. PERIODS AND PROCEDURE FOR DISCUSSING THE APPLICATION-COMPLAINTS**

- 3.1 Application-complaints are discussed in compliance with Paragraphs 2 of this Procedure and answers shall be sent to customers within 15 days from the date application-complaints are submitted to the Bank. Applications requiring additional examination shall be discussed and sent to customers within one month.
  - 3.1.1 In case it is need to check the application-complaint, carrying out additional analyses or demand additional materials as well as take other measures (inquiring, receiving explanations, interpretations, etc. ), the Bank's CEO /Deputy CEO if he/she is absent/, branch manager may prolong the periods for discussing the application-complaint until receiving required additional materials or the end of term taking other measures not later than for 15 days, informing the Applicant about the prolongation.
- 3.2 If the inquiries mentioned in application-complaint are out of the Bank's authorization, the Applicant shall be informed about it not later than within 5 days.
- 3.3 If Applicant doesn't agree with resolution made on his/her application, the Applicant has right to file an appeal against the decision to the Board /which shall be discussed within 30 days/.

### **4. THE MINIMAL CONDITIONS OF RECEIVING COMPLAINTS**

- 4.1 Customer wishing to submit complaints, is verbally informed by the responsible employee that:
  - 4.1.1 The complaint is deemed duly received if delivered by the customer in writing, personally, by mail, or by Bank's E-mail, AEB Mobile and AEB Online systems, Viber, Whatsapp, Messenger.
  - 4.1.2 The customer can obtain the Bank's internal rules of processing application-complaints.
- 4.2 Customer wishing to submit a complaint is also provided with:
  - 4.2.1 Form "How to proceed with your complaint" completed by the Bank (Appendix 1). The bank may not change the layout of or the information contained in the form. The Bank shall place its logo in the "Organization trade mark" field, enter the Bank's name, responsible officer's electronic and postal addresses in the space provided under "Apply to" field, and complete the Bank's name, address, telephone number, and email address in "With any questions contact" line in the bottom of the form.
  - 4.2.2 The form of complaint by customer. (Appendix 2).

### **5. PROCEDURE OF THE DISCUSSION OF COMPLAINS**

- 5.1 Responsible person for relations with the financial system mediator is the Head of Law Department.
- 5.2 Mediator of the financial system has right to examine other complaints which are submitted by an individual customer against the Bank, are connected with services offered by the Bank and contain a property claim not exceeding AMD ten million or foreign currency equivalent to it.
- 5.3 Customer shall submit complaints subject to be examined by the Mediator in compliance with the provisions of this Procedure before submitting them to the discussion of the Mediator of the financial

- system filling in the form of application-complaints (Appendix 3) and presenting it to the responsible employee.
- 5.4 In case of receiving the complaints the officer in charge provides the fact proving document receipt (Appendix 4) in which the date, number of application-complaints pointed and the receiver's signature and (or) seal of the Bank.
  - 5.5 In case of receiving the complaint by e-mail, AEB Mobile and AEB Online systems, Viber, Whatsapp, Messenger or through the Financial System Mediator, the Bank Secretariat shall immediately, but not later than the next business day, send a completed letter confirming the receipt of the complaint (receipt defined in Annex 3) in the same way as received (to the e-mail address of the customer mentioned in the complaint, AEB Mobile and AEB Online systems, Viber, Whatsapp, Messenger) and attached forms.
  - 5.6 In case of receiving the oral complaints in Head Office and in branches or by telephone the Bank submits the information established in compliance with paragraph 4.1 of this Procedure as well as informs how to get the information established in compliance 4.2 paragraph of this procedure. The bank can also provide this information by means of special record.
  - 5.7 Complaints noted in 5.3 point shall be discussed in compliance with point 2 of this Procedure and the replies shall be provided to individual customers within 10 days after the date they are submitted to the Bank including mandatory:
    - 5.7.1 The distinct position: deny, satisfy partly or satisfy completely the complaint-claims.
    - 5.7.2 The bank's decision.
    - 5.7.3 For examination of the complaints, the details of the responsible division or person (division name or person's name, surname, position) and means of communication (telephone, E-mail. etc).
    - 5.7.4 information that, in case of having any question concerning the results of complaints examination the customer can apply to the division (person) indicated in the 5.6.3 sub point.
    - 5.7.5 information that, if not satisfied by the written answer to the complaint, for defending his/her rights the customer can apply to the court or Mediator of the financial system or Central Bank of RA or arbitral court if there is arbitral agreement.
    - 5.7.6 information that in case of not being satisfied by the written reply to the complaint, the customer has right to apply to Mediator of the financial system within six months after receiving the reply.
  - 5.8 In case of denying or partly satisfying the complaint, the Bank shall provide, together with the written answer, a "How to proceed with your complaint"Form (Appendix 1) completed by the Bank.
  - 5.9 In case the customer doesn't receive any answer within the period mentioned in point 5.6 of this Procedure, the customer has right to submit a complaint to the Mediator of the financial system.
  - 5.10 If the Bank had been obligated to settle the customer's complaint, but has failed to do so, the customer can submit a claim to the Mediator of the financial system.
  - 5.11 The Bank is obliged to submit written explanations and/or objections, as well as other documents and information required by the Mediator of the financial system on the complaint, within 14 working days after receiving the copy of the complaint by the Bank.
  - 5.12 The Bank may apply to the Mediator of the financial system for the purpose to extend the period established by point 5.10 of this Procedure for 7 days.
  - 5.13 After receiving the notification on resolution by the Mediator of the financial system with regard to the complaint, the CEO shall organize a discussion on the resolution with participation of the Deputy CEO and the Ombudsman on disputing the resolution of the Mediator of the financial system in the Court according to the established order.

## **6. OTHER PROVISIONS**

- 6.1 Ombudsman is nominated by the Board.
- 6.2 Ombudsman submits brief information with quarterly comparative analyses to the Board once in a quarter based on the submitted results of the applications monitoring.
- 6.3 Once in a quarter by the third day of the month following the accounting quarter, the branches provide Branch Management Department with information on application-complaints. Branch Management Department consolidates the received information and submits it to the Executive Board and Board by the fifth day of the month following the accounting quarter.

- 6.4 6.4 Upon the request of the Central Bank of the Republic of Armenia and within the period specified thereby, the Ombudsman shall compose the required information out of the electronic database and submit it to the Central Bank electronically in the format specified by Regulation 8/07 "Minimum Terms and Principles for Internal Procedure for Recording, Maintenance and Registration of Claims to Financial System Participants".
- 6.5 The Bank is obliged to discuss customer's complaints if they are submitted within one year from the moment the customer knew or could know about the deviation of his/her right.
- 6.6 It is prohibited to send the applications for discussion to persons whose actions are appealed.
- 6.7 The information concerning communication (telephone number, e-mail and so on) with Ombudsman is placed in the web site of the Bank, posted at Head Office and branches as well as is provided for any person gating information about complaints.
- 6.8 Revealing the information established in compliance with this Procedure by the Bank the following principles are kept:
- 6.8.1 The information is formed simple and clear for the customer, does not contain confused, difficult or words and word combinations.
- 6.8.2 The information is formed at least in Armenian, with the exception when the other language is selected between the customer and company.
- 6.8.3 The information is formed with easy reading letters for the customer and in case of posting as a announcement is placed in a visible place.
- 6.9 In the Web site of the Bank and in the Head Office and branches are always visible and posted:
- 6.9.1 "How to proceed with your complaint" Form (Appendix 1).
- 6.9.2 The brief description examination operation of application-complaints.
- 6.9.3 The form of complaints by customer (Appendix 2).
- 6.10 An announcement is posted in the Head Office and in the branches where the customer can get any information about the internal Bank's rules of application – complaints. The Bank provides Bank's internal rules of receiving complaints.
- 6.11 Applications shall be addressed to CEO (branch manager) from the applicant's name (written applications delivered by mail or in person must be signed), mentioning the Applicant's data /name of customer, residence address, phone numbers or other means of communication/.
- 6.12 Anonymous applications or those with false data shall be considered as invalid and shall be kept in the Premises Management Department with corresponding signature.
- 6.13 In case of recording the questions concerning complaints the responsible employee informs about it before.
- 6.14 Officials breaching the provisions of this Procedure shall bear responsibility in compliance with Armenian legislation and the Bank's internal Procedures.

## 7. APPENDIXES

<b>№</b>	<b>APPENDIXES</b>	<b>IDENTIFIER</b>
1	"How to proceed with your complaint" Form	R/DZ/0/K050.1/27.02.2018/6
2	Application for compliant by customer	R/DZ/0/K050.2/27.02.2018/6
3	Receipt of complaint from customer	R/DZ/0/K050.3/27.02.2018/6