



PUBLIC

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Chairman of the  
Board  
S. Sukiasyan

**PROCEDURE  
FOR ADMISSION, CONSIDERATION AND MAKING DECISIONS ON APPLICATION-  
COMPLAINTS AND APPLICATIONS OF THE CLIENTS OF “ARMECONOMBANK” OJSC**

**YEREVAN 2022**

<b>HISTORY OF DOCUMENT AMENDMENTS</b>			
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3	19.02.2016	8/16-19.02.2016	R/K/0/050/19.02.2016/3
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## **1. GENERAL PROVISIONS**

- 1.1 Hereby, the procedure for accepting, considering and making decisions on complaints and appeals of the clients of "ARMENIAN BANK" OJSC (hereinafter referred to as the Bank) is defined (hereinafter referred to as the Procedure).
- 1.2 This Procedure has been developed in accordance with the RA legislation and the requirements of internal legal acts of the bank.
- 1.3 In terms of this Procedure:
  - 1.3.1 Customer (Applicant) people using or wishing to use the Bank's services.
  - 1.3.2 Application-complaint a nominal complaint, offer submitted to the Bank by the customer in accordance with this Procedure, which is not subject to examination of the Financial System Mediator in accordance with Points 5.2-5.9 of this Procedure.
  - 1.3.3 Complaint a subject of a physical entity microenterprise in accordance with the RA law "On Financial System Mediator" , as well as a nominal complaint-demand submitted to the Bank in writing by the client providing a security means for this obligations in accordance with this Regulation connected with the services provided by the Bank and including a property claim.
  - 1.3.4 Application an application-complaint or complaint submitted to the Bank by the client in compliance with this Procedure.
  - 1.3.5 Electronic information database- a unified database managed by the Bank, in which the application-complaints and data regarding the complaints having at least 3 years of validity period, the procedure and responsible people for its being filled are defined by the resolution of the Executive Board of the Bank.
  - 1.3.6 Responsible employee- an employee of the Head Office, branch appointed by the order of the CEO responsible for acceptance of applications, provision of necessary information to the client.
  - 1.3.7 Ombudsman – person responsible for the protection of rights of the Bank's clients.
  - 1.3.8 Financial System Mediator – a physical entity who examines the claims presented by clients against the Bank and makes decisions on them by exercising the powers conferred by the RA Law "On Financial Systems Mediator".

## **2. THE PROCEDURE OF ACCEPTANCE, CONSIDERING APPLICATIONS AND MAKING DECISIONS**

- 2.1 Any employee of the bank refers the client to the responsible employee by receiving the client's application, as well as provides details on the means of communication with the responsible employee(phone, electronic address, etc), furthermore:
  - 2.1.1. The client may submit the application by mail, electronic address of the Bank, by social network pages, by "AEB Mobile" and "AEB Online" systems, by "Viber", by "Whatsapp", "Messenger" and other means of communication with the Bank.
- 2.2. The Applications of clients are accepted at the head office and branches of the Bank by responsible employees, are registered in "WorkFlow" system (attaching the scanned Application or Application received electronically) the entry of Application-Complaint with "Request from Customer" type and Complaint entry with "Complaint from Customer" type.
- 2.3 The Applications accepted in branches are registered in the register and depending on the nature of the application:

- 2.3.1 are discussed and relevant measures shall be taken on the spot,
- 2.3.2 in case of being out of the jurisdiction of the branches the scanned versions of Applications are submitted to the responsible employee of the Head Office of the Bank with an accompanying note through the “WorkFlow” system or in person within one working day.
- 2.4 Applications submitted to the head office, after being registered at the Bank's Secretariat, are transferred to the deputy executive director coordinating the function that is the object of the application or to the head of an independent subdivision, according to the order in force in the Bank, on the instructions of the executive director.
- 2.5 The Deputy CEO (head of an individual subdivision) discusses the Applications together with the heads of the appropriate structural subdivisions (also with the heads of territorial subdivisions if necessary) and submit the answers in the form of a plan of a written response to the CEO of the Bank within the specified terms.
- 2.6 The CEO organizes the discussion of a written response of the Application together with the participation of the Deputy CEO (head of an individual subdivision) and makes necessary decisions according to the results of discussion regarding the measures to be taken, elimination of defects, holding guilty persons accountable.
- 2.7 The answer of the application is sent by mail or in person or is given to the client in the same way of receiving the application.
- 2.8 Documents may not be required from the Applicant during the examination of applications that are:
  - 2.8.1 not necessary for justifying the presence or absence of Applications or the circumstances underlying it or to identify a customer or
  - 2.8.2 are available to the Bank due to the services rendered to that Applicant and with his/her written confirmation the details defined in it have not been changed.

### **3 THE PROCEDURE AND TERMS OF DISCUSSING THE APPLICATION-COMPLAINTS**

- 3.1. The application-complaints are discussed in accordance with the procedure defined by point 2 of this Procedure and the answers shall be sent to the customer within 15 days' after the Application-Complaints have been entered to the Bank.
  - 3.1.1 In order to process the application-complaint, if it is necessary to carry out an additional study or request materials, as well as take other measures (making inquiries, receiving clarifications, comments, etc.), the executive director of the Bank (in his absence, the deputy executive director), the branch manager can extend the period for discussing the Application-complaint until the end of the period for receiving the requested additional materials or for taking other measures, but not more than 15 days after the specified period, notifying the Applicant about the prolongation.
- 3.2 In case the inquiries posed in the application-complaints shall be out of justification the Applicant is notified about it no later than within 5 days.
- 3.3 In case of not agreeing with the decision made regarding the application-complaint, the Applicant has the right to appeal it to the Board of the Bank (which is subject to discussion

within 30 days).

#### **4. MINIMUM REQUIREMENTS FOR ACCEPTING A COMPLAINT**

- 4.1 The responsible employee notifies verbally to the client having a desire to submit a complaint:
- 4.1.1. that the complaint is considered to be given by customer in case of submitting in writing, personally, by e-mail of the Bank, by social network pages of the Bank, through “AEB Mobile” and “AEB Online” systems, by “Viber”, “Whatsapp”, “Messenger” and other means of communication with the Bank,
  - 4.1.2. that the customer may acquire the internal rules of the Bank for handling complaints.
- 4.2 The responsible employee also provides to the client having a desire to submit a complaint:
- 4.2.1. The “What to do if you have a complaint?” form filled by the bank (Appendix 1). The bank cannot change the design of the form and the information in it. The Bank puts its official trademark in “Trademark (logo) of the organization” part, fills in the Bank’s name, the electronic and postal addresses of the responsible employee in the space under “Apply to” line and fills in the name, address, telephone number and e-mail address of the Bank in the line marked "Contact in case of questions" at the bottom of the form.
  - 4.2.2 form of submitting an application of complaint by the client(Appendix 2).

#### **5. PROCEDURE FOR CONSIDERING COMPLAINTS**

- 5.1 The Head of the Legal Department is responsible for the relations with the Financial System Mediator.
- 5.2 The Financial System Mediator undertakes to handle the complaints that are submitted by a physical entity customer against the Bank, are connected with the services provided by the Bank and contain a property claim not exceeding AMD ten million or foreign currency equivalent to it.
- 5.3 Complaints to be examined by the Financial System Mediator, before being submitted to the Financial System Mediator, must be submitted to the discussion of the Bank by an individual customer in accordance with the provisions of this Order by filling out the application form for submitting a complaint (Appendix 2) and submitting it to the responsible person.
- 5.4 In case of receiving the complaint in person the Responsible employee provides a document confirming the fact of receiving the complaint- receipt (Appendix 3), in which the date of submitting the complaint, the identification number of complaint (note), the signature of the person accepting the complaint and (or) the seal of the Bank are specified.
- 5.5. In case of the complaint being received via the e-mail of the Bank, social network pages of the Bank, “AEB Mobile” and “AEB Online” systems, “Viber”, “Whatsapp”, “Messenger”, through other electronic means of communication with the Bank or through Financial System Mediator immediately after receiving the complaint by the Secretariat of Bank, but no later than the next working day, in the same way as the complaint was received (to the client's e-mail address, social network page, "AEB Mobile" and "AEB Online" systems, "Viber", "Whatsapp", "Messenger", etc.), a completed letter is sent confirming the receipt of the complaint (the receipt specified in Appendix 3) and the attached forms.

- 5.6 In case of receiving the oral complaint of the client at the Head Office and branches and (or) by phone the Bank submits the information specified in point 4.1 of this Procedure, and also informs about where the client can obtain the information specified in point 4.2 of this procedure. The bank may also provide the information defined by this point through a specially recorded message.
- 5.7 The complaints specified in point 5.3 of this Procedure shall be discussed in accordance with the procedure set by point 2 of this Regulation and the answers shall be provided to a physical entity customer within 10 business days from the date of entry into the Bank necessarily including:
- 5.7.1 The exact position of the bank to reject, partially satisfy or fully satisfy the complaint,
  - 5.7.2 The reasoning of the Bank's decision,
  - 5.7.3 The details of the responsible subdivision or person (name of the subdivision or name, surname, position of the person) and means of communication (phone, electronic address, other),
  - 5.7.4 Information that in case of having questions regarding the result of examination of complaint the customer may apply to the subdivision (person) specified in sub-point 5.7.3 of this regulation.
  - 5.7.5 Information that in case of not being satisfied with the written response of the complaint the client may apply to the court or the Financial System Mediator to protect his/her rights or to the Central Bank of RA or arbitral tribunal if there is an arbitration agreement.
  - 5.7.6 Information that in case of not being satisfied with the written reply to the complaint, the client has the right to apply to the Financial System Mediator within six months period after receiving the response.
- 5.8 In case of rejecting the complaint or partially satisfying it the Bank provides the client with "What to do if you have a complaint?" form (Appendix 1) filled by the Bank.
- 5.9 From the moment of receiving the Bank's response or in case of not receiving it in accordance with the period set by point 5.7 of this Regulation the physical entity client has a right to submit a claim to the Financial System Mediator in accordance with the law.
- 5.10 In case when the Bank has been committed to satisfy the client's complaint, but has not satisfied it, the client may submit a complaint to the Financial System Mediator in accordance with the law.
- 5.11 The Bank is obliged to submit written explanations, clarifications and/or objections regarding the complaint to the Financial System Mediator, as well as other documents and information required by the Financial System Mediator within 14 working days after receiving a copy of the complaint submitted by an individual client to the Financial System Mediator.
- 5.12 The bank may apply to the Financial System Mediator to prolong the term specified in point 5.11 of this Regulation for another seven working days.
- 5.13 After receiving the notice on the decision made on the basis of the complaint from the

Financial System Mediator the CEO of the Bank organizes the discussion of that decision together with the Deputy CEO (the head of the individual subdivision) and makes a decision according to the results of discussion on disputing the decision of the Financial System Mediator to a competent court in accordance with the law.

## 6 OTHER PROVISIONS

- 6.1 The ombudsman is appointed by the Board of the Bank.
- 6.2 The branches submit information regarding the application-complaints to the Branch Management Department once in a trimester, by the third business day of the month following each quarter. The Branch Management Department summarizes the information received from branches and reports to the Bank's Board and the Ombudsman on the fifth working day of the month following each quarter.
- 6.3 The ombudsman submits summarizing information to the Executive Board of the Bank and Board according to the information received by subdivisions once in a quarter with a quarterly comparative analysis.
- 6.4 At the RA Central Bank's request and within the terms indicated thereon the Ombudsman composes out of the electronic database and provides the required information to the Central Bank electronically in accordance with the format defined by regulation 8/07 "Minimum conditions and principles to be submitted to the internal process of recording, maintenance and registration of complaints addressed to the participants of the financial system"
- 6.5 The bank undertakes to handle customer complaints if they have been submitted within a year starting from the moment when the physical entity customer knew or may have known about the violation of his/her rights.
- 6.6 It is prohibited to send the Applications to the discussion of the people whose actions are appealed,
- 6.7 The information regarding the means of communicating with the Ombudsman (phone number, e-mail and so on) is posted on the Bank's website, attached in the Head Office of the Bank and all branches, as well as is provided at each person's request to receive information about complaints.
- 6.8 When disclosing the information defined by the Bank by this procedure the following general principles are kept:
  - 6.8.1 the information is composed in a simple and accessible way for the customer, does not contain confusing, tricky or misleading words, expressions,
  - 6.8.2 the information is written at least in the Armenian language, except when another language is chosen by mutual agreement of the client and the company,
  - 6.8.3 the information is composed in easy-to-read font sizes and fonts, and when posted in the form of an announcement, is placed in visible places.
- 6.9 The following are attached in a visible way on the Bank's website and Head Office and branches and are permanently available:
  - 6.9.1 The "How to proceed with your complaint?" form filled by the bank(Appendix 1),
  - 6.9.2 the application form for filing a complaint by the customer (Appendix 2).
- 6.10 An announcement is attached in the Head Office and branches about where the client can get detailed information about the Bank's internal rules for handling complaints. At the Client's request the Bank provides him/her with the internal rules for handling and examining complaints.

6.11 The applications are submitted on the behalf of the CEO of the Bank (branch manager), nominal (in writing, applications submitted by mail or by hand must be signed), indicating the contact information with the Applicant (name of the customer, residential address, phone numbers or other means of communication).

6.12 The applications with anonymous or false data are considered invalid and are kept in the Secretariat with a corresponding inscription.

6.13 In case when the clarification of questions connected with the complaint is recorded, the responsible employee notifies about it in advance to the client.

6.14 Officials breaching the provisions of this order shall be held accountable in accordance with RA legislation and the internal regulations of the Bank.

## 7 APPENDIXES

<b>Nº</b>	<b>NAME OF APPENDIX</b>	<b>IDENTIFIER</b>
1	“How to proceed with your complaint?” form	R/DZ/0/K050.1/24.12.2021/11
2	Application “On filing a complaint by the customer”	R/DZ/0/K050.2/24.12.2021/11
3	Receipt “On submitting a complaint by the customer”	R/DZ/0/K050.3/24.12.2021/11









