	QUALITY MANAGEMENT SYSTEM	ACBA 72 PR 34#6		
	“ACBA-CREDIT AGRICOLE BANK” CJSC PROCEDURE ON CONSIDERATION OF CUSTOMERS’ APPEALS	Approval date 23/08/19	Edition 12	Page 1 of 5

PURPOSE

The purpose of “ACBA-CREDIT AGRICOLE BANK” CJSC procedure on consideration of customers' appeals (hereinafter referred to as Procedure) is to define the process of consideration of the appeals regarding private legal relations presented by the “ACBA-CREDIT AGRICOLE BANK” CJSC's (hereinafter referred to as the Bank) customers against the Bank, protection of customers' rights and interests in the financial sector, prompt and effective discussion of their requests, as well as increasing the society's confidence about the Bank.

APPLICATION SCOPE

The present Procedure applies to the structural and territorial subdivisions of the Bank.

RELATED DOCUMENTS

RA Law “On Financial System Mediator”	
RA Central Bank Board Decree N 225-N “On Regulation 8/04 on Minimum Conditions and Principles for Internal Rules, Regulating the Procedure of Examination of Complaints/Claims of Customers”, dated 28.07.2009	
What to do, if you have an appeal	eFO 81-11
Application form of introducing appeals by the customers	eFO 81-07
Receipt of introduction of appeals by the customers	eFO 81-08
Receipt of introduction of appeals via internet by the customers	eFO 81-09

DEFINITIONS AND CONCEPTS

Law - the RA law on “Financial System Mediator”.

Financial System Mediator - an Individual who considers the requests of customers against the Bank and makes decisions on them by realization the authorities within the bounds of the law and this procedure:

Customer - an individual who uses the services of the Bank or applies for using them:

Appeal – According to the Republic of Armenia Law on “Financial System Mediator” written appeal-request presented by the customer to the Bank which is connected to the services provided by the Bank and consists of property:

Sides – the customer who presents a request to the Financial System Mediator for the consideration and the Bank against which the request is presented.

Responsible employee – in the Head Office of the Bank, the Head of Customer Experience Analysing Division, who is responsible for the process of appeal management process in the Bank, and in the branches – the branch managers of the Bank, who are responsible in the branches for receiving and examining the appeals of the customers and for providing them with the necessary information, for the collection of the documents and information requested by the Financial System Mediator and for the implementation of duties defined by the Law and the present Procedure.


DESCRIPTION OF THE PROCESS

CHAPTER 1. THE PROCESS OF PRESENTING THE APPEALS

1.1. The customer has right to apply to the Bank regardless of whether such right is envisaged by the contract signed between the Bank and the customer or not. The agreement or provision limiting the customer's right to apply to the Bank is null.

1.2. The Bank is obliged to consider the customers' appeals if it has been presented within one year starting from the moment, the customer knew or could know about the violation of his/her right.

1.3. No fee is being charged by the Bank from the customer for accepting, considering and making a decision on the request.

	QUALITY MANAGEMENT SYSTEM	ACBA 72 PR 34#6		
	“ACBA-CREDIT AGRICOLE BANK” CJSC PROCEDURE ON CONSIDERATION OF CUSTOMERS’ APPEALS	Approval date 23/08/19	Edition 12	Page 2 of 5

1.4. The appeal may be signed by the customer’s representative. In this case the copy assuring authorities of representative should be attached to the request.

1.5. The customers’ appeals are received both personally by the employees in the Bank’s Head office or in the branches and in an electronic form (via internet) by sending the appeal to the Bank’s e-mail address, which is acba@acba.am. Moreover, the function of receiving and discussing the customers’ requests can’t be made by the employee who has been directly involved in the process of providing services to the customers.

1.6. Each employee of the branch, who has received an appeals or has been informed by the customer about the customer’s wish to present an appeal, accompanies the customer to the Responsible employee as well as provides the customer with the information on communication means with the Responsible employee (phone, e-mail, etc.).

1.7. The Responsible employee orally informs the customer who wishes to present an appeal about the following:

- a) The customer may submit the Appel in a written form (in person, via post) or electronically, by sending it to the email acba@acba.am of the Bank.
- b) The customer can obtain the copy of the present Procedure.

1.8. The Responsible employee provides the customer wishing to present the appeal with the following materials:

- a) The document What to do, if you have an appeal [eFO 81-11](#), filled by the Bank,
- b) Application form of introducing appeal by the customer [eFO 81-07](#).

1.9. In case the appeal is received personally, in the branches – the Responsible Employee, and in the Head Office of the Bank – the employee of the administration of the Chief Executive Officer provides the customer with a receipt [eFO 81-08](#), whereas in case the appeal is received through an e-mail, the Bank sends a receipt [eFO 81-09](#) to the customer’s e-mail address. The latter two certify the fact that the appeal has been received.

1.10. The application form of introducing appeal by the customers [eFO 81-07](#) must be formed in written form on behalf of the Bank’s Chief Executive Officer (CEO) and must include:

- a) the name of customer,
- b) residence and contact addresses,
- c) the size of property demand,
- d) the content of the appeal (circumstances on which the request is based),
- e) the date of submitting the appeal,
- f) the signature of customer.

1.11. In case of receiving oral appeal of the customer in the Bank’s Head office, in the branches and/or by telephone, the employees orally present the information defined in section 1.7 of the present Procedure as well as provides the customer with the information on where the customer may acquire the information defined in section 1.8 of the present Procedure.


1.12. After receiving the appeal through an electronic form via acba@acba.am the staff of CEO forwards the email to the e-mail address (lawer@acba.am) of the Legal department not later than 1:00 PM the next working day. After receiving the e-mail, on the same day before 6:00 PM the Legal department sends the “Receipt of introduction of appeal via internet by the customers” [eFO 81-07](#) to the same e-mail address of the customer from which the appeal has been received.

1.13. If the Appeal has been received via another email of the Bank, receiving the email, the responsible for the given email shall immediately send it to acba@acba.am, after which the process is performed by the procedure, established under Clause 1.12 of this Procedure.

1.14. The verbal complaints, presented by the customers, are considered as comments and their discussion is performed according to “ACBA-CREDIT AGRICOLE BANK” CJSC procedure on examination and consideration of opinions, suggestions and comments of customers [ACBA 72 PR 21](#).

CHAPTER 2. THE PROCEDURE ON EXAMINING THE APPEALS

2.1. The appeals received in the branches, if they comply with the definition of “appeal” given in the present Procedure, are considered to be appeals despite the name of the letter (application, demand, appeal, etc.) or absence of the name. On the receiving day the appeals are registered in the register of incoming correspondence, after which they are scanned by the Responsible Persons and sent acba@acba.am e-mail address, to give relevant progress defined by the present Procedure, and the originals are kept in the given

	QUALITY MANAGEMENT SYSTEM	ACBA 72 PR 34#6		
	“ACBA-CREDIT AGRICOLE BANK” CJSC PROCEDURE ON CONSIDERATION OF CUSTOMERS’ APPEALS	<i>Approval date 23/08/19</i>	<i>Edition 12</i>	<i>Page 3 of 5</i>

branch together with the incoming correspondence. The exceptions are the appeals of the cardholders of the transactions, performed with their cards, the processing of which is regulated by the sequence of actions, specified by “ACBA-CREDIT AGRICOLE BANK” CJSC order on issue, provision and service of payment cards [ACBA 72 ORD 34](#).

2.2. The appeals presented to the Head office, including those, received via acba@acba.am, if they comply with the definition of “appeal” given in the present Procedure, are considered to be appeal despite the name of the letter (application, demand, appeal, etc.) or absence of the name, are registered by the Bank’s CEO’s staff and given to Bank’s CEO or his deputy. The exceptions are the appeals of the cardholders of the transactions, performed with their cards, the processing of which is regulated by the sequence of actions, specified by “ACBA-CREDIT AGRICOLE BANK” CJSC order on issue, provision and service of payment cards [ACBA 72 ORD 34](#).

2.3. After receiving the customer’s appeal, the Bank’s CEO or his deputy appoints it to the Head of Legal department. The complaints of the customers, regarding the card services, provided by the Bank, shall be addressed to the Head of Remote and Digital Bank Services Management Department.

The appointed appeal is addressed by the administration of the Chief Executive Officer of the Bank to the Head of Customer Experience Analysing Division for information.

Head of Legal Department is responsible for defending the rights of the Bank’s customers as well as for maintaining relations with the Financial System Mediator.

2.4. The Head of Legal Department and Remote and Digital Banking Services Management Department if necessary by involving the corresponding employees of interested subdivisions (in case the appeal is directed to the branch then also the branch manager), examines the submitted appeal in short terms, gathers and receives necessary interpretations, clarifications as well as documents and information on it. During the discussion process of an appeal the customer may not be asked to present the documents, that:

- a) are not necessary for examining the appeal or the presence or absence of related circumstances or for the identification of the customer,
- b) are available to the Bank due to the provision of services to the customer, and by the written confirmation of the customer the data defined in them have not been changed.


2.5. After examining the questions related to the appeal presented to the Bank and gathering the documents and information concerning the operation, the Legal Department submits them to the CEO of the Bank or to the Deputy CEO and explains the drawbacks and/or violations (in case of their existence) committed by the employees of the Bank related to the given appeal or in case of their absence gives profound objections on not satisfying the appeal.

In case of card related appeals, the Remote and Digital Banking Services Management Department, examining the issues, related to the Appeal, and collecting the relevant documents and information, related to the transaction, submits them to the Legal Department.

2.6. By the instruction of the Chief Executive Officer of the Bank or his/her deputy, the Legal Department or Remote and Digital Banking Services Management Department shall prepare a written response-letter in the name of the Chief Executive Officer within ten working days upon receipt of the Appeal, addressed to the Customer. The letter includes the following:

- a) the bank’s exact position on rejecting, satisfying or partially satisfying the customers’ appeal,
- b) the explanation of the Bank’s decision,
- c) the details of the subdivision or person responsible for the examination of appeals (the subdivision’s name or person’s full name and position) and communication means (phone number, e-mail address),
- d) information on the fact that the customer may apply to the subdivision (person) mentioned in the “c” subsection of the present section in case of having any questions with respect to the examination results of his/her appeal,
- e) information on the fact that the customer may go to court or apply to the Financial System Mediator or to the Central Bank or to arbitration tribunal to defend his/her rights in case of not being satisfied by the written answer to the appeal,
- f) Information on in which terms the customer may apply to the Financial System Mediator, if he/she has not been satisfied with the written answer of the appeal.

In case of **rejection** or **partial** satisfaction of the customer’s appeal, within ten working days upon receipt of the Appeal, the Bank shall mandatorily send a reply to the Customer by the way the Appeal was received; in case of **satisfaction** of the Appeal, the Bank may send no reply to the Customer. In case of not providing

	QUALITY MANAGEMENT SYSTEM	ACBA 72 PR 34#6		
	“ACBA-CREDIT AGRICOLE BANK” CJSC PROCEDURE ON CONSIDERATION OF CUSTOMERS’ APPEALS	<i>Approval date 23/08/19</i>	<i>Edition 12</i>	<i>Page 4 of 5</i>

a written reply, the Legal Department or Remote and Digital Banking Services Management Department respectively shall inform the Customer of the satisfaction of the Appeal at least on the phone within ten working days upon receipt of the Appeal.

The appeal response drafts, prepared by the Remote and Digital Banking Services Management Department, are submitted to the Bank’s Legal Department, and only in case of a positive opinion, they are signed by the Chief Executive Officer/Deputy CEO of the Bank and sent to the customer.

In addition, the copy of the answer-letter is being provided to the Head of Customer Experience Analysing Division who is responsible for the activities directed to the quality and customers’ satisfaction enhancement.

2.7. In case of rejecting or partially satisfying the appeal, the Bank along with the written answer provides, if appeal is presented via email, the Legal Department along with the written answer from the lawer@acba.am e-mail address sends the document What to do, if you have an appeal [eFO 81-11](#), filled by the Bank.

2.8. After receiving the final answer of the Bank or in case of not receiving it on the date defined in the section 2.6 of the present Procedure, the customer gets the right to present his/her appeal to the Financial System Mediator, in case the property demand doesn’t exceed 10 million AMD or its equivalent foreign currency.

CHAPTER 3. THE EXAMINATION OF THE APPEALS PRESENTED TO THE BANK BY THE FINANCIAL SYSTEM MEDIATOR

3.1. The Financial System Mediator sends the copy of appeal received from the customer to the Bank.

3.2. After receiving the letter from the Financial System Mediator, the CEO of the Bank or his deputy appoints it to the Head of the Legal Department. The letter received from the Financial System Mediator for information is addressed to the Head of Customer Experience Analysing Division. The Head of Legal Department, if necessary by involving the corresponding employees of interested subdivisions (in case the appeal is directed to the branch then also the branch manager), examines the submitted appeal in short terms, gathers and receives necessary interpretations, clarifications as well as documents and information required by the Financial System Mediator.

3.3. After examining the questions related to the appeal presented to the Bank and gathering the required documents and information, the Legal Department submits them to the CEO or to the Deputy CEO of the Bank and explains the drawbacks and/or violations (in case of their existence) committed by the employees of the Bank related to the given appeal or in case of their absence gives profound objections on not satisfying the appeal.


3.4. After receiving the appeal from the Financial System Mediator, the Head of the Legal Department by the instruction of the Bank’s CEO or his Deputy within 14 working days prepares an answer-letter directed to the Financial System Mediator. In the letter the bank’s exact position on rejecting, satisfying or partially satisfying the customer appeal is expressed. Explanations, clarifications and/or objections in a written form as well as other documents and information required from the Financial System Mediator related to the appeal are being attached to the answer letter. In addition, the copy of the answer-letter provided to the Financial System Mediator is being provided to the Head of Customer Experience Analysing Division and the Head of Compliance Department.

3.5. The Financial System Mediator examines the appeal and makes a decision after receiving the explanations of the Bank or within fourteen working days after the completion of the term mentioned in the section 3.4 of the present Procedure. In case of difficulty of the deal, the Financial System Mediator may extend the fourteen day period with additional fourteen days.

3.6. At the instance of the sides or one of the sides or by its own initiative, the Financial System Mediator may invite the sides in order to get their oral explanations and clarifications.

3.7. Upon the request of the Financial System Mediator the Bank must cooperate with the latter in the terms defined by the law. In case of absence of such terms, the Bank must present documents, give explanations and clarifications, provide the Financial System Mediator with the materials at its disposal that are related to the appeal, even if the latter include banking, insurance or trade secrecy.

3.8. The decision making order and the sequence of activities on satisfying, partially satisfying or rejecting the customer’s appeal by the Financial System Mediator is defined by the law.

	QUALITY MANAGEMENT SYSTEM	ACBA 72 PR 34#6		
	“ACBA-CREDIT AGRICOLE BANK” CJSC PROCEDURE ON CONSIDERATION OF CUSTOMERS’ APPEALS	<i>Approval date 23/08/19</i>	<i>Edition 12</i>	<i>Page 5 of 5</i>

CHAPTER 4. THE PROCEDURE ON RECEIVING, DISCUSSING APPEALS, MAKING DECISIONS, ANSWERING THE APPEALS, MAKING MONITORING OVER THAT PROCESS

4.1. For the establishment of a control over the process of accepting, examining, making decision and answering the appeals of the customers the Head of Compliance Department makes monitoring on the monthly basis and presents the results to the management of the Bank.

4.2. For exploring the information mentioned in the section 4.1 of the present Procedure and for making monitoring the Bank may also involve independent organizations with respective experience.

CHAPTER 5. THE RISKS RELATED TO THE PROCESS OF CONSIDERATION OF THE CUSTOMERS’ APPEALS

5.1. The risks promoting the emergence of customers’ appeals, as well as the risks related to the discussion of appeals may appear while implementing those operations of the Bank such as examination of customers’ proposals and opinions, adoption of new products and services in the Bank, elaboration of new internal legal acts, and examination of the appeals.

5.2. To prevent and manage the possible risks that may appear in the operations mentioned in section 5.1 of the present procedure, actions like sheets of “Examination of customers’ opinions, proposals and remarks”, the evaluation of possible risks during the adoption of new products and services and elaboration of new internal legal acts, the training arrangement for employees as well as the regular control upon the terms and quality of customers’ appeals’ consideration are taken in the Bank.

5.3. To evaluate the reputation risk responsible employee of the Legal Department presents to the Risk Management Department the periodic reports of the reputation risk intervals and classes determined by the Risk Management Department.

CHAPTER 6. TRANSITIONAL PROVISIONS

6.1. The present Procedure enters into force from 13 September 2019.

6.2. After the present Procedure enters into force, the “ACBA-CREDIT AGRICOLE BANK” CJSC procedure on consideration of customers' appeals approved by the Board of the Bank on 24 September 2018 is to be declared void.

6.3. The Bank makes the present procedure available to the society also by posting it in the Bank’s website.