

## CLIENT COMPLAINT AND CLAIM HANDLING PROCEDURE

### *Definitions and Concepts*

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1. **SQA** means Service Quality Assurance service of Ameriabank CJSC (hereinafter - the Bank).
2. **Client** means an individual or legal entity or sole proprietor using or interested in the services provided by the Bank, or whom the Bank offers or intends to provide services, or who has provided means of security in favor of the Bank, and the authorized person acting on behalf of such individual or legal entity or sole proprietor.
3. **Business premises** means the head office and branches of the Bank.
4. **Employee in charge** means an employee responsible for collecting complaints/claims and/or providing the necessary information to Clients on the Bank's Business premises.
  - 4.1. **In the branches:**
    - 4.1.1. Branch Manager, Head of Operational Unit, Head of Customer Service Unit or a substituting employee
  - 4.2. **In the head office:**
    - 4.2.1. Heads of Premium Banking Direction or Corporate Customer Managers' Service or their substituting employees
    - 4.2.2. Responsible employee(s) assigned by the Head of the Contact Center
5. **Complaint** means a written or verbal expression of dissatisfaction filed by a Client with the Bank in relation to the Bank's activities and/or services and/or products provided by the Bank, as well as a grievance indirectly related to such, for which the Client expects to get solution and/or written response (only for a complaint submitted in writing), which does not contain any proprietary claim (is not qualified as a claim).
6. **Claim** means a written complaint filed by the Client with the Bank with relation to the services rendered by the Bank, containing a proprietary claim (in case of credit-related information or related claims, complaints may also be non-property). The claim should specify at least the client's name, surname (company name), contact details (e.g. place of residence (location), e-mail address, phone number), signature, and description of the claim.
7. **Incident** means a situation or case arising during provision of service and involving or related to the Client, which might lead to dissatisfaction of the Client. An incident should contain at least one of the following elements:
  - 7.1 Consideration regarding the services and/or products provided by the Bank, as a result of which the Client might turn down the Bank's services;
  - 7.2 An event/incident resulting from improper service and/or provision of services by a third-party partner providing services to the Bank, as a result of which the Bank might incur financial loss or reputational damage;
  - 7.3 Violation of the Bank's internal regulation by any employee of the Bank, which might cause harm to the Bank's reputation and/or standing;
  - 7.4 Inappropriate behavior on the part of the Client towards the Bank's employees, including during a phone conversation;

7.5 All cases where there is also a need for additional analysis of the situation/incident and involvement of interested subdivisions.

- 8. **Feedback** means written or verbal comments or satisfaction of the Client with respect to the activities of the Bank.
- 9. **Discontent message** means discontent expresses in the form of posts, comments or messages published in mass media, on social networks or websites.

## 1. SUBMISSION/ACCEPTANCE OF COMPLAINT/CLAIM BY THE CLIENT

1.1. When receiving/accepting a Complaint/Claim, the Bank can request the Client to provide additional documents required for consideration of the Complaint/Claim, but in no case can the Bank require documents which:

- 1.1.1 are not necessarily required for supporting or denying the Claim/Complaint or circumstances behind it or for identifying the Client;
- 1.1.2 the Bank has access to as a result of the services rendered to the Client, provided that the information and data specified therein have not changed which should be confirmed by the Client in writing.

1.2 A Complaint/Claim should be submitted by the Client in one of the manners specified below:

MANNER OF SUBMISSION	FORM OF SUBMISSION
In the business premises of the Bank, in person* or verbally	By submitting a letter or completing the Customer Complaint, Claim, Payment Card Chargeback, Feedback or Suggestion Form (4CEO.SQA FO 72-40-07)
	By presenting a written Complaint to any employee of the Bank
Remotely*	• office@ameriabank.am • info@ameriabank.am
	Internet/Mobile Bank
	To SQA's email crm@ameriabank.am or via the Bank's website /using the respective software/
Via phone call	From the Contact Center
	From an employee of another subdivision and/or a third person
To the Bank's postal address*	To the address of the Bank's head office
	To the address of any branch of the Bank
Via mass media, websites, or social networks	Via messages
Via Financial System Mediator	Via unified electronic system of the Financial System Mediator's office

## 2. MANNER OF PROVISION OF THE RESPONSE

2.1 The response to the Client's Complaint/Claim is provided as follows:

\* A claim can be submitted in the specified manner only.

- 2.1.1 If the Complaint/Claim has been submitted by a person authorized by the Client and the power of attorney presented is acceptable for the Bank, the response is given to the authorized person, using the contact details provided by the latter, unless there is a preferable manner specified for receiving the response. If the power of attorney presented is not acceptable for the Bank, the response is given to the Client, according to Table 1.
- 2.1.2 The Client, in advance, specifies the preferred manner of receiving the response letter in the Customer Complaint, Claim, Payment Card Chargeback, Feedback or Suggestion Form (4CEO.SQA FO 72-40-07).
  - 2.1.2.1 Regular post;
  - 2.1.2.2 Email Regular post;
  - 2.1.2.3 In person.
- 2.1.3 Any instruction issued by the Client with regard to the manner/channel of receiving of the response to the Client's Complaint/Claim shall be performed by the Bank (e.g. the Client has sent the Complaint/Claim from a recorded email address and wishes to get the response by post, having specified the address; or the Client has sent the Complaint/Claim by regular mail and wishes to get the response by Internet Bank).
- 2.2 In the event if the requirements specified in clauses 2.1.2 and 2.1.3 are not observed, namely if the Complaint/Claim is submitted using a channel not recorded with the Bank or a channel recorded with the Bank is used but the preferable manner for receiving the response is not specified, the response letter to the Complaint/Claim is provided in accordance with Table 1 hereof.
- 2.3 If the Client's written Complaint/Claim is not subject to examination, the Client is informed accordingly in writing within 10 (ten) business days following the date of submission of the Complaint/Claim.
- 2.4 The verbal Complaint presented by the Client shall be examined within 10 (ten) business days, and if the nature and content of the Complaint implies contacting the Client to provide feedback or response, such response is provided within the period specified in this clause.
- 2.5 The response to the Complaint or Claim submitted by the Client in writing shall be provided no later than within 10 (ten) business days following receipt of the Complaint/Claim, except:
  - 2.5.1 Responses to Complaints related to environmental and social issues shall be provided within 21 (twenty one) business day.
  - 2.5.2 Responses to requests for chargeback of card transactions, provided in accordance with the timeframes specified in the Payment Cards Terms and Conditions.
- 2.6 The response letter to the Client's Claim should contain at least the following information:
  - 2.6.1 The Bank's explicit position: **to decline the Claim, satisfy it in full or in part**; to note that if the Bank declines or satisfies the Client's Claim partially, apart from the response letter, the Client shall be provided with the "What to do if you have a complaint" form;
  - 2.6.2 Reasons for the Bank's decision;

- 2.6.3 Contact details of the unit (SQA) or person (name of the unit, or name, position and signature of the person) in charge for Claim handling;
- 2.6.4 Information that if the Client has any questions concerning the outcome of the Complaint, the Client may contact the SQA, specifying the contact details (phone number, email, etc.);
- 2.6.5 Information that if unhappy with the written response to the Claim, the Client may apply to the court or the Financial System Ombudsman or the Central Bank of RA or arbitration court (if an arbitration agreement is in place) to protect his/her rights;
- 2.6.6 Information on the timing for applying to the Financial System Ombudsman if the Client is not happy with the written response to the Claim.

### **3. REVIEW OF COMPLAINTS/CLAIMS IN EMERGENCIES**

- 3.1 If Clients submit Complaints/Claims in emergencies, the Complaint/Claim shall be accepted, reviewed and response to it shall be provided in the manner and within the term specified by this Procedure, unless other regulations apply depending on the emergency, as required by the Armenian laws and regulations, the Central Bank's resolution, decision of the Bank's authorized body specified by the internal regulations of the Bank related to management of business continuity at the Bank in emergencies and/or other internal regulations of the Bank.