

Approved
by decision No 391-L of the Management Board
of "IDBank" CJSC dated December 15, 2022

PROCEDURE ON EXAMINATION OF COMPLAINTS AND CLAIMS SUBMITTED BY CLIENTS

Responsible subdivision	Quality management unit
Effective date	17.01.2023
Scope	All subdivisions of "IDBank" CJSC
Other provisions	From the moment hits procedure enters into force repell the procedure on "Examination of complaints and claims submitted by clients" approved by Decision No 404-L of the Management Board of "IDBank" CJSC dated 04.11.2021
Related documents	RA law "On Financial System Mediator" Regulation 8/04 on "Minimum requirements and principles of internal legal acts regulating the process of examination of complaint-claims of clients" adopted by the Council of the RA Central Bank, Regulation 4 on "Minimum conditions for implementation of internal control of banks" Procedure "On activity of the Quality Management Unit" Procedure "On management of flows of client applications" Procedure "On document management and organization of internal document circulation"

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PROCEDURE ON EXAMINATION OF COMPLAINTS AND CLAIMS SUBMITTED BY CLIENTS	Application date 17.01.2023	Edition 2	pg 3/7	

CHAPTER 1. PURPOSE

1. The purpose of this procedure is to define the main principles of examination of complaints and claims arising from private legal relations submitted to "IDBank" CJSC by clients and ensuring the relationship with the Financial System Mediator, as well as other legal relations related to protection of consumers' rights.

CHAPTER 2. DEFINITIONS AND ABBREVIATIONS

2. The definitions and abbreviations used in this procedure have the following meaning:
 - 1) **Bank** – "IDBank" CJSC
 - 2) **Complaint-claim** – a written complaint-claim submitted by the Client to the Bank which is related to a breach of obligations in terms of services rendered by the Bank and contains a property claim, or pertains to credit information defined by or related to the law "On circulation of credit information and activities of credit bureaus" and contains a property and/or non-property claim.
 - 3) **Client** – a physical entity or private entrepreneur or legal entity, including an entity who has provided a means of security for obligations to the Bank, who has submitted a claim related to the services rendered by the Bank or the means of security in accordance with the RA law on "Financial system mediator".
 - 4) **The process of examination of the complaint-claim** – A process which includes the submission of the complaint-claim to the Bank by the client, the acceptance, examination of the complaint-claim and submission of the response by the Bank including the disclosure of information related to the complaint-claim to the client throughout the mentioned period.
 - 5) **Package of documents** – contracts, agreements, concluded with the Client related to the subject of the complaint-claim, consents, applications, documents provided to the client, including statements, notices etc.
 - 6) **Financial system mediator** – A physical entity examining the complaints-claims submitted by clients against the Bank and making decisions on the latter in accordance with the authorities provided by the RA law "On financial system mediator".
 - 7) **Responsible employee** – employee who carries out the function of accepting the complaint-claim and providing the required information, as well as the response letter in person, particularly a branch Consultant or Head of Customer Service Unit and Coordinator, Specialist or Head of Premium banking division.

CHAPTER 3. GENERAL PROVISIONS

3. The process of examination of a client's Complaint-claims as well as the minimum requirements to the internal legal act describing the mentioned process, the general rules and principles are defined by the RA law on "Financial System Mediator", Regulation 8/04 on "Minimum requirements and principles of internal legal acts regulating the process of examination of complaint-claims of clients" adopted by the Council of the RA Central Bank, internal legal acts adopted by the Bank's competent management bodies and this procedure.
4. The transactions concluded between the Bank and the Client must contain a note on that the Client may submit the claims arising from the transaction to the Financial System Mediator in accordance with the RA law on "Financial System Mediator".



5. While disclosing the information defined by this procedure by the Bank the general principles mentioned below shall be observed:
 - 1) The information shall be written in a simple and accessible manner, shall not contain confusing, hard-to-understand, incomprehensible or misleading words and expressions,
 - 2) The information shall be written at least in Armenian unless another language is selected according to the mutual consent of the Client and the Bank,
 - 3) The information shall be written in a font size and font which is easily readable for the Client and shall be placed in visible locations in case of being posted in a form of announcement .
6. The Bank shall always assure the availability of the following documents on the Bank's website, electronic information panels installed in the branches of the Bank and in a form of separate leaflets in the place of operation in a visible form in the customer service areas:
 - 1) Sample form of submission of a complaint-claim by the Client (Appendix 1)
 - 2) "What to do if you have a complaint?" template (Appendix 2),
 - 3) This procedure.
7. An announcement should be placed (installed) in a visible location in the customer service area informing that the Client can learn more about the Bank's internal legal acts on examination of complaints-claims of clients from the Responsible employee, and upon the Client's request the Bank shall provide the former with a copy of this procedure.
8. The Bank shall provide the telephone number of the Quality Management Unit in the announcement placed on the Bank's website and place of operation, as well as per each person's request, by which the Client can apply to the Bank to receive information about his/her complaint-claim submitted to the Bank.
9. The Responsible employee shall inform the Client who wants to submit a complaint-claim about the conditions and requirements of submitting Complaint-claims defined by this procedure.
10. Each employee of any subdivision of the Bank who received the Client's complaint-claim or whom the Client has told about his/her intention to submit a complaint-claim, shall provide the Client with the contact information of the Responsible employee or the Quality Management Unit (work phone number and e-mail address).
11. In case if the clarification on issues related to the complaint-claim, the Quality Management Unit employee shall inform the Client about that beforehand.
12. The main subdivision responsible for ensuring the requirements and coordination of the process defined by this procedure is the Quality Management Unit.
13. The process of acceptance, examination, further decision-making on clients' complaint-claims, responding to complaint-claims, monitoring of the mentioned process are defined by this procedure and other internal legal acts adopted by the Bank's competent management bodies.

CHAPTER 4. MINIMUM REQUIREMENTS OF ACCEPTANCE OF COMPLAINTS AND CLAIMS ADDRESSED TO THE BANK AND THE ORDER OF THEIR SUBMISSION

14. The complaint-claim addressed to the Bank shall be submitted by the Client in a written form.
15. In case of receiving the Client's oral complaint in the Bank and/or over a phone call the Bank's Responsible employee shall provide the Client with the required information on submission and the procedure of acceptance of a complaint-claim defined in this chapter.
16. The Client may submit his/her written complaint-claim in person, through a representative as well as through the Financial System Mediator.

17. The written complaint-claim can be submitted by the Client to the Bank:
- 1) In person,
 - 2) By mail,
 - 3) By e-mail.
18. The Responsible employee shall orally provide the Client who wants to submit a complaint-claim with the following information:
- 1) A complaint-claim shall be considered as submitted upon its submission to the Bank in a written form in one of the abovementioned forms,
 - 2) The Client may obtain this procedure from the Bank's official website or by applying to the Bank.
19. The Responsible employee shall provide the Client who wants to submit a complaint-claim with the following:
- 1) Sample form of submission of a complaint-claim by the Client (Appendix 1)
 - 2) "What to do if you have a complaint?" template (Appendix 2).
20. In case of receiving the complaint-claim through the Financial System Mediator and sending the response in an electronic form the Quality Management Unit employee shall send a letter confirming the receipt of the complaint-claim (receipt) to the client's e-mail address known to the Bank or mentioned in the complaint-claim received through the Financial System Mediator immediately after receiving of the complaint-claim but not later than the following business day by mentioning the date of the receipt of the complaint-claim, the ID number (note) of the complaint-claim, as well as the information provided by paragraphs 18 and 19 of this procedure if possible.
21. In case of receiving the complaint-claim by e-mail, the Quality Management Unit shall send a letter confirming the receipt of the complaint-claim (receipt) in the same way of receiving the complaint-claim immediately after receiving of the complaint-claim but not later than the following business day by mentioning the date of the receipt of the complaint-claim, the ID number (note) of the complaint-claim, as well as the information provided by paragraphs 18 and 19 of this procedure if possible.
22. In case of receiving the complaint-claim in person the Quality Management Unit shall provide the client with the document confirming the receipt of the complaint-claim (receipt) with indication of the date of submission of the complaint-claim, the ID number (note) of the complaint-claim, the signature of the receiver of the complaint-claim and (or) the Bank's seal.
23. The complaint-claim submitted to the Bank by the Client must be prepared in a written form and contain the following:
- 1) Client's first name, last name (name),
 - 2) Client's contact information for feedback (place of residence (actual address) and registration, telephone number, e-mail address if applicable),
 - 3) The amount of the property claim (if applicable),
 - 4) The content of the complaint-claim (description of circumstances on which he claims is based),
 - 5) The date, month and year of submission of the claim,
 - 6) The signature of the Client or the person authorized to act on behalf of the company in case of legal entity clients,
 - 7) Copy of the identity document of the physical entity client, or the copy of private entrepreneur's or legal entity client's state registration document or identification number in case of private entrepreneurs or legal entity clients,
 - 8) The power of attorney provided in the order defined by RA legislation verifying the authorities of the representative in case if the complaint-claim is submitted by the Client's representative, as well as the copy of the identity document of the client's representative.

24. The Bank is obliged to respond to the Client within 10 business days after receiving the complaint-claim submitted by the Client which shall contain the following:
- 1) The Bank's clear position on rejecting, satisfying or partially satisfying the Client's claim, as well as the reasoning for the decision made.
 - 2) Details (name of the subdivision or first name, last name and position of the subdivision employee) and contact information (telephone number, e-mail address, etc.) of the Quality Management Unit and (or) subdivision employee as well as information stating that the Client may apply to the subdivision or employee mentioned in this provision in case of questions about the results of the examination of the complaint-claim.
 - 3) A note stating that in case of dissatisfaction with the written response to the complaint-claim the Client may apply to the court or the Financial System Mediator or the Central Bank or the arbitral tribunal to defend his/her rights if an arbitral agreement is available, as well as within what term the Client can apply to the Financial System Mediator in case if the former is dissatisfied with the written response to the complaint-claim.
25. In case of rejecting or partially satisfying the complaint-claim together with the written response the Client shall be provided with the "What to do if you have a complaint?" template (Appendix 2).
26. The Bank shall discuss the Client's complaint-claim if the latter has been submitted within one year starting from the moment when the Client learned or could learn about violation of his/her right.

CHAPTER 5. SUBMISSION OF COMPLAINTS AND CLAIMS TO THE BANK

27. The Client or the latter's representative shall submit the Complaint-claim together with the identity document of the person submitting the complaint-claim to the Responsible employee who in its turn shall accept the complaint-claim by identifying the person submitting the complaint-claim and checking the correctness and compliance of the completion of the complaint-claim application with the requirements of this procedure and process the complaint-claim in accordance with the internal legal acts regulating the processes of processing applications and letters accepted from the Bank's clients. Moreover, the Responsible employee is responsible for proper identification of the Client, correctness of completion of the accepted complaint-claim application (including availability of contact details and address) and compliance with the requirements of this procedure and registration in due order.
28. The Responsible employee copies the complaint-claim and the identity document of the person who submits the complaint-claim, puts his/her signature on the copy of the complaint-claim, writes down the date of acceptance of the complaint-claim on the copy of the latter and provides the copy of the complaint-claim to the Client as a document confirming the fact of receipt of the complaint-claim, receipt, then immediately sends the Complaint-claim with the copy of the identity document of the person submitting the complaint-claim to the Quality Management Unit.
29. The Quality Management Unit endures the provision of the response-letter to the Complaint-claim to the Client in a sealed envelope by registered mail, or by giving it to the Responsible employee in case if the Client wants to receive the response in the branch. Moreover, in case if the response-letter is provided to the Client in person the latter shall make the corresponding note on receiving the mentioned document on the response-letter by stating the date of receipt and signing, and the Responsible employee shall send the copy of the response-letter signed by the Client to the Quality Management Unit before the end of the same working day in an electronic form.

30. The complaint-claim shall be considered as accepted by the Bank by mail or e-mail if the information required for identification of the client, particularly the copy of the identity document, is attached to the letter.
31. In case of agreement with the Bank's response an agreement shall be signed between the Bank and the Client on full or partial satisfaction of the claim.
32. In case of disagreement with the Bank's response the Client may apply to the Financial System Mediator in the order defined by RA law "On Financial System Mediator" within 6 months starting from the day when the Client received the Bank's final response or within the period defined by paragraph 24 of this procedure if the Client has not received any response.
33. In case if the Bank undertook to satisfy the Client's complaint-claim but did not do so, the Client may submit a claim to the Financial System Mediator in the order defined by RA law "On Financial System Mediator".

CHAPTER 6. SUBMISSION OF A CLIENT'S COMPLAINTS AND CLAIMS TO THE BANK BY THE FINANCIAL SYSTEM MEDIATOR

34. After receiving the letter from the Financial System Mediator on submission of a complaint-claim against the Bank to the Financial System Mediator by the Client the Bank undertakes to submit a written explanations, clarifications and (or) objections within 14 business days, as well as other documents and information required by the Financial System Mediator.
35. After receiving the decision on satisfying or partially satisfying or rejecting the claim of the Financial System Mediator by the Bank the Financial System Mediator examines the client's claim and makes a decision on satisfying or partially satisfying or rejecting the claim within the term defined by RA law "On Financial System Mediator" and hands in or sends my mail an example of the decision to each party.
36. In case if the Client agrees with the decision unconditionally and in a written form within 30 business days from the moment of notification about the decision of the Financial System Mediator, the latter becomes mandatory for the parties. Within one business day after receiving a letter from the Client on agreement with the decision or after 30 business days in case of disagreement the Financial System mediator is obliged to notify the Bank about the presence or absence of the Client's written agreement and thus on whether the decision has become or has not become mandatory for the parties.
37. Termination of the examination of the Client's claim by the Financial System Mediator, compulsory enforcement of the decision, challenging of the decision of the Financial System Mediator and the process of cancellation are regulated by the RA law "On Financial System Mediator"
38. The examination of the claim by the Financial System Mediator is terminated if during the examination the Bank and the Client come to an agreement or the Client submits an application on reaching an agreement. In this case, a reconciliation agreement may be concluded between the parties.