

CLIENT COMPLAINT AND CLAIM HANDLING PROCEDURE

Definitions and Construction

- 1) **SQA** means Service Quality Assurance subdivision of the Bank.
- 2) **Client** means a physical or legal entity or sole proprietor using or interested in the services provided by the Bank, or to whom the Bank offers or intends to provide services, and the authorized person acting on behalf of such physical or legal entity or sole proprietor.
- 3) **Complainant** means an individual or legal entity or sole proprietor submitting environment or social-related complaint, grievance or concerns about entities and/or projects financed by the Bank.
- 4) **Business premises** means the head office and branches of the Bank. Where the Bank provides the service to the Client through a third party (intermediary), such intermediary's premises where the service is rendered to the client or where the Client/Complainant submits the complaint, including head office, any branch or any other premises (hereinafter referred to as the Office), are also considered Business premises.
- 5) **Employee in charge** means an employee responsible for collecting complaints/claims and/or providing the necessary information to Clients/Complainants on the Bank's Business premises.
 - 5.1. **In the Business premises:**
 - 5.1.1. Office Head, Branch Manager, acting Branch Manager, Head of Operational Unit, Head of Customer Service Unit or a substituting employee
 - 5.2. **In the head office:**
 - 5.2.1. SQA staff
 - 5.2.2. In absence of SQA staff: heads of Premium Banking Direction or Corporate Customer Service or their deputies
- 6) **Authorized person** means the Employee/s/ in charge appointed by the Retail Banking Director or Corporate and/or Investment Banking Director within the framework of authorities stipulated by this Procedure.
- 7) **Incident** means a situation or case arising during provision of service and involving or related to Client/Complainant, which has led or can lead to dissatisfaction of the Client/Complainant.
- 8) **Complaint** means a written or verbal, justified or unjustified expression of dissatisfaction filed by Client/Complainant with the Bank in relation to services/products provided by the Bank, or a grievance/concern related to environmental and social aspects of the activities of entities and/or projects financed by the Bank, including property owned by the Bank, for which the Client/Complainant explicitly or implicitly expects to get solution or response.
- 9) **Claim** means a **written** complaint filed by the Client with the Bank, claiming violation of obligations by the Bank in relation to rendered services and containing a proprietary claim.

- 10) Feedback** means comments, recommendations, satisfaction, etc. of Client/Complainant with respect to the activities of the Bank, which the Client/Complainant provides in writing without expecting written response.
- 11) Complaints and Feedback Box (hereinafter referred to as the Box)** means a box designed to collect Complaints/claims and feedback from Clients/Complainants on the Business premises of the Bank.

1. SUBMISSION OF COMPLAINT/CLAIM BY CLIENT/COMPLAINANT

- 1.1. Any Complaint/Claim, feedback, expression of dissatisfaction/concern, irrespective of its form, title and submission method, is accepted via any of the following means:
- 1.1.1. On the Bank business premises by submitting it in writing or filling in the “Customer Complaint, Claim, Payment Card Chargeback, Feedback or Suggestion Form”
 - 1.1.2. Distance channels: by email to crm@ameriabank.am, office@ameriabank.am, info@ameriabank.am or any other distance communication channel, including social networking sites and mass media
 - 1.1.3. By mailing it to the address of the Bank head office or any of its branches
 - 1.1.4. Through other people who either have or have had partnership and/or other relevant contractual relationships with the Bank
 - 1.1.5. Through any of the Bank employees, phone call or Contact Center.
- 1.2. The letter to the Bank is considered a Claim if it contains all information specified below:
- 1.2.1. First and last names of the Client
 - 1.2.2. Contacts (address, phone)
 - 1.2.3. Amount of proprietary claim
 - 1.2.4. Substance of claim
 - 1.2.5. Signature (except if filed electronically)
- 1.3. Complaints related to environmental and social issues must contain at least the following:
- 1.3.1. First and last names of the Client/Complainant
 - 1.3.2. Contacts (address, phone)
 - 1.3.3. Name of the project and/or entity to which the complaint relates
 - 1.3.4. Substance of the complaint
 - 1.3.5. Supporting documents or any other information related to the complaint (if any)
 - 1.3.6. Date of the happening or action behind the complaint
 - 1.3.7. Expected solution (if any)
- 1.4. The Bank can request the Client/Complainant to provide additional documents, but in no case can the Bank require documents which:
- 1.4.1. Are not necessarily required for supporting or denying the Claim/Complaint or circumstances behind it or for identifying the Client/Complainant

- 1.4.2. The Bank has access to due to the services rendered to the Client, provided that the information and data have not changed which should be confirmed by the Client in writing
- 1.5. Response to written or verbal complaints and written claims of the Client/Complainant should be provided within no longer than 10 business days after receipt of Complaint/Claim except:
 - 1.5.1. Responses to chargeback applications concerning transactions with international payment cards, in which case the response is provided within 60 (sixty) calendar days,
 - 1.5.2. Responses to environment and social-related complaints in which case the response time is 21 (twenty one) business days.
- 1.6. In case of Complaints/Claims the response period can vary depending on the nature of the problem. This being the case, the SQA employee must give written notice to the Client not later than expiry of the term defined in clause 1.5 above.
- 1.7. The Client's/Complainant's feedback may be submitted by filling out the "Customer Complaint, Claim, Payment Card Chargeback, Feedback or Suggestion Form" or preparing a written statement in advance.

2. RESPONSE

While filling in the "Customer Complaint/Claim, Payment Card Chargeback, Feedback or Suggestion Form", the Client should specify the manner she/he would like to receive the response.

- 2.2.1. By email, in which case the SQA employee or the Contact Center sends the message
 - 2.2.2. In person, at the branch or other Business premises at the Client's convenience. The response is handed over to the Client/Complainant together with a duplicate, on which the recipient of the response indicates "Original received" and the date.
 - 2.2.3. By regular mail: postal delivery of the response letter is organized by the Document Flow Management Division maximum within 1 (one) business day after it is signed and finalized, and the letter is sent either to the address specified by the Client/Complainant or the address available in the Bank's records.
- 2.3. If the Client does not submit his/her Complaint/Claim, grievance, concern, or feedback using the "Customer Complaint/Claim, Payment Card Chargeback, Feedback or Suggestion Form" approved by the Client, but uses a free wording instead:
 - 2.3.1. The original of the response letter is provided or sent in the manner and to the address specified in the Client's/Complainant's application, if any
 - 2.3.2. if no preferable manner or address is specified in the Client's/Complainant's application, then the response letter is provided in the manner of notification agreed with the Client/Complainant during a recorded phone conversation with the latter

- 2.3.3. If the Bank does not manage to reach the Client/Complainant, it is entitled to provide the response letter to the Client/Complainant by means of sending it to the email or postal address available in the Bank's records.
- 2.4. The Client/Complainant is considered properly notified upon sending of the response letter by the Bank in any manner stated in clause 2.2 above.
- 2.5. The response letter to the Complaint/Claim should contain at least the following information:
 - 2.5.1. The Bank's explicit position to decline the Complaint/Claim, satisfy it in full or in part
 - 2.5.1.1. If the Bank declines or satisfies the Client's/Complainant's Complaint/Claim partially, apart from the response letter the SQA employee should provide "What to do if you have a complaint" form to the Client/Complainant by means chosen by the latter.
 - 2.5.2. Reasons for the Bank's decision
 - 2.5.3. Contact details of the unit/person (name of the unit, or name and position of the person; phone number, email, etc.) in charge for complaint/claim handling
 - 2.5.4. Information that if the Client has any questions concerning the outcome of the Complaint the Client may contact the Service Quality Assurance
 - 2.5.5. Information that if unhappy with the written response to the Complaint/Claim the Client may apply to the court or the Financial Ombudsman or the Central Bank of RA or arbitration court (if an arbitration agreement is in place) to protect his/her rights
 - 2.5.6. Information on the timing for applying to the Financial Ombudsman if the Client is not happy with the written response to the Complaint/Claim.
- 2.6. Where the Complaint does not require written response, the SQA employee informs the Client/Complainant about the Bank's position over the phone (call to be recorded) or on the Bank's Business premises within the term/s/ specified in clause **Error! Reference source not found..**
 - 2.6.1. If the Client/Complainant is satisfied with the response they get, the process is considered finished.
 - 2.6.2. If the Client/Complainant is not satisfied with verbal response and demands a written one, the process resumes in accordance with clauses 1.1.1, 1.1.2 and 1.1.3.
- 2.7. As soon as the SQA employee provides the response letter to the Client/Complainant or, in the event of a verbal Complaint, informs the Client/Complainant about the Bank's position and finalizes the relevant record in the Incidents section of the System, the process ends.

3. COLLECTION AND REVIEW OF CLIENT/COMPLAINANT SUGGESTIONS AND APPRECIATION LETTERS

- 3.1. Written suggestions or appreciation letters of the Clients are forwarded to the SQA in the same manner and within the same terms as written Complaints/Claims as described in this Procedure.