	<i>Converse Bank CJSC</i>	PR 82-01	Classified	
	Procedure for Review of and Response to Customer Complaints,		<i>Date</i> 23.07.2025.	<i>Edition</i> 11
Annex 6				
Complaint Database				

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1. PURPOSE

Converse Bank CJSC Procedure for Review of and Response to Customer Complaints, Opinions and Proposals (PR 82-01), hereinafter the Procedure, establishes the process of collection, review, monitoring of and response to the complaints addressed to Converse Bank CJSC (the Bank), including the claims, opinions and proposals.

2. SCOPE OF APPLICATION

The process regulated by the Procedure is implemented by the Quality Control Unit, and the Head of Quality Control Unit is in charge of the process regulated by the Procedure.

The Retail Business Department, the Corporate Banking Department and other subdivisions directly or indirectly dealing with the customers of the Bank are guided by the Procedure when communicating with the customers.

3. RELATED DOCUMENTS

The RA Law on Financial System Mediator


The RA Law on Banks and Banking

CBA Regulation 8/04 on Minimum Terms and Principles for Internal Regulations of Customer Complaint Processing

CBA Regulation 8/07 on Minimum Terms and Principles for Internal Processes of Recording, Storing and Registering of Complaints Addressed to Financial System Participants

CBA Regulation 4 on Minimum Internal Control Requirements for Banks

Converse Bank CJSC Archiving Procedure (PR 42-03)

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Converse Bank CJSC Software Backup and Archiving Procedure (IN 42-06)

Converse Bank CJSC Procedure for Identification, Evaluation and Analysis of Operational Risk (IN 61-17)

Other internal regulations of the Bank

4. DEFINITIONS AND ABBREVIATIONS

Financial System Mediator Office (hereinafter the Office): a non-commercial organization, the core purpose of which is to support the operation of the Financial Mediator and to inform the consumers about the financial sector.

Customer: an individual or a sole proprietor or a legal entity, including a party providing collateral to secure the liabilities to the Bank, who has filed a claim, an opinion or a proposal relating to the services of the Bank or the collateral.

Complaint/request: a written or verbal complaint made by the customer with regard to the service of the Bank, which contains any disagreement with the service or transaction, does not imply a property claim, and the customer expects the correction of the situation should the problem be identified during the examination.

Complaint/claim: a written complaint of the customer filed with the Bank based on the RA Law on Financial System Mediator, which refers to the services of the Bank or the collateral and contains a property claim. The Complaint/claim should at least include the customer's name/trade name, contacts (residential address/location and phone numbers), signature and the description of the complaint. For the purpose of the Procedure, Complaint/claim is also deemed the non-property claim filed by the customers that refers to the information under the RA Law on Circulation of Credit Information and Operation of Credit Bureaus or a claim related thereto, which can be non-property as well.

Complaint: compliant/request and complaint/claim.

Opinion: expression of a stance, content or discontent of the customer about the services and/or the terms and conditions of services of the Bank, which the customer makes in a written manner and expects no written response from the Bank.

Proposal: the customer's proposal to revise the Bank's services and/or the terms and conditions of services, where the customer assumes that their revision will make the servicing process of the Bank more productive and competitive.

Quality Control Officer: the Head of QCU of the Bank, who is responsible for arranging the process of reviewing and replying to the customer Complaints, Complaint/claims and other feedbacks.

Employee in Charge: the banking hall manager (substitute) at branches and the CSO, who is responsible for accepting the customer Complaints and providing the relevant information to the customer. The Contact Center Manager and the Head of Marketing are the employees in charge.


QCU: the Quality Control Unit

CSO: the Customer Service Office

HRMD: the HR Management Department

5. ANNEXES

Statement	Annex 1
What to do if you have a complaint?	Annex 2
Customer Complaint Form	Annex 3
Receipt Confirmation Form	Annex 4
Electronic Complaint Receipt Form	Annex 5
Complaint Database	Annex 6


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6. METHODS OF COLLECTION OF CUSTOMER COMPLAINTS, OPINIONS AND PROPOSALS

- 6.1. Written complaints, opinions and proposals** are filed in a free format in one of the below-listed manners, except the Complaint/claim, in which case the customer is recommended to file the latter in the manner set in paragraphs 7.1.2-7.1.5 or 7.2 and 7.3:
- 6.1.1.** in the book of complaints and proposals,
 - 6.1.2.** by the Bank's email post@conversebank.am,
 - 6.1.3.** in person, by handing over to the Employee in charge,
 - 6.1.4.** by mail, to the Head Office at 26/1 Vazgen Sargsyan, Yerevan, Armenia,
 - 6.1.5.** through other electronic communication channels applied by the Bank (Internet-Bank, mobile app, Viber, WhatsApp, Messenger, etc.).
- 6.2.** The complaints can also be filed based on the template outlined in [Annex 3](#).
- 6.3.** Upon the customer's consent, the Complaint/claim may be filed with the Bank by the Office based on the RA Law on Financial System Mediator, or the CBA, and the examination is carried out in accordance with Section 10 below.
- 6.4. The verbal complaints are received:**
- 6.4.1. By phone;** the customer is informed in advance that the call is recorded. The Contact Center employee informs the Head of the Unit about the complaints by phone and fills in the details of the complaint in Oktell;
 - 6.4.2. By making the complaint to the branch or the Head Office:** Once being aware of the customer's verbal complaint, the Bank employee informs the respective employee in charge and directs the customer to the latter. In the absence of the employee in charge at that point, the employee provides his/her contacts (phone number, email, etc.) to the customer and directs the customer to the branch manager. The employee in charge informs the Quality Control Officer about the customer's verbal complaint and the actions taken for its solution and as well provides the customer's contacts to the latter. Unless the issue is settled by the branch, the QCU examines the issue in 2-day period and reports the results to the customer.
- 6.5.** The written and verbal complaints of the customer are not accepted and examined by the employee, who has been directly involved in the process relating to servicing and specifically the complaint.
- 6.6.** The customer complaints, opinions and proposals are accepted by the employee in charge at the Head Office or the branches. The complaints are sent electronically directly to the Staff to be forwarded to the Quality Control Officer, and the opinions and proposals are sent to the latter for information. The opinions and proposals sent to the QCU are examined in 2-day period and the results are reported to the customer as appropriate.
- 6.7.** Once the employees of the Bank become aware of any negative feedback or opinion on the activities of the Bank in the mass media, they should promptly inform the Quality Control Officer thereon, and after receiving and analyzing the information, the Quality Control Officer informs the PR Unit and the Chief Compliance Officer. The decision on replying to the feedback or the opinion, as well as the content of the response is taken jointly by the Quality Control Officer, the PR Officer and the Chief Compliance Officer.

7. MINIMUM CONDITIONS FOR ACCEPTANCE OF COMPLAINTS

- 7.1.** The Bank should consider the customer's complaint should the latter be filed in 1 (one) year, starting from the point when the customer has learnt or could have learnt about the violation of their rights.
- 7.2.** The officer in charge informs the customer willing to file a complaint in a verbal or electronic manner that:
- 7.2.1.** The complaint/request can be accepted both verbally or in writing, and the complaint/claim is deemed filed by the customer, if made in writing – by email, mail or through other electronic communication channels applied by the Bank (Internet-Bank, mobile app, Viber, WhatsApp, Messenger, etc.);
 - 7.2.2.** The customer may obtain the Bank's internal rules for examination of complaints.

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7.3. The employee in charge provides the documents set in [Annex 2](#) and [Annex 3](#) to the customer willing to file a complaint/claim.

8. PROCESS OF ACCEPTANCE OF COMPLAINTS, PROPOSALS AND OPINIONS

- 8.1. At the end of every day, the employees in charge at the CSO and the branch examine the records made in the book of complaints and proposals.
- 8.2. Based on the essence of the records, the employee in charge:
- 8.2.1. Discusses with the branch manager and takes the respective measures to settle the current/technical issues related to the current activities of the branch, and informs the Quality Control Officer about the results;
 - 8.2.2. Forwards the scanned complaints to the Staff and the Quality Control Officer if the issue is beyond the authorization of the CSO/branch.
- 8.3. The employee of the Staff in charge of emails receives the complaints referring to the CSO and branches. He/she sends the letters in 1 business day to the Head of Staff and forwards the copy to the Quality Control Officer. In 1 business day from receiving the complaints, the employee in charge of emails sends the receipt confirmation to the customer having sent the complaint to the latter's email address from where the complaint was received ([Annex 5](#)).
- 8.4. The customer complaints sent through the Messenger of social networks (Facebook, Instagram, etc.) are accepted by the Contact Center employees and forwarded to the employee in charge, who further sends the complaint to the Quality Control Officer.
- 8.5. The communication of public notes (comment, review, post on the wall) made by the social network users is provided by the respective Marketing specialist. Once the notes implying complaint are received from the aforementioned systems, the respective employee in charge forwards the same to the Quality Control Officer. The Marketing specialist also sends the opinions and proposals of social network users to the Quality Control Officer on a weekly basis.
- 8.6. The complaints that have been filed in person with the CSO/branches are accepted by the employee in charge, who issues a receipt confirmation to the customer ([Annex 4](#)) bearing the "Accepted" stamp. The receipt bears an identification number as well, which contains the name of the branch accepting the complaint, the sequential number and the date of acceptance of the complaint.
- 8.7. The employee in charge sends the copies of complaints and receipts to the Staff on the same day.
- 8.8. The Staff enters the complaints based on the internal regulations of the Bank and electronically sends to the Quality Control Officer as a task in 1-day period.
- 8.9. The Office and the CBA examine the customer complaints made to the Bank based on Section 10 below.

9. COMPLAINT PROCESSING AND RESPONDING PROCESS

- 9.1. The QCU examines the customer complaints and prepares the reply based on the task received from the Staff.
- 9.2. The Quality Control Officer and the QCU employees can make written or verbal inquiries and receive explanations from the managers and employees of territorial and structural subdivisions of the Bank while examining the complaint.
- 9.3. Once the manager of the territorial/structural subdivision receives the inquiry specified in paragraph 10.2 above, he/she submits a written reply to the Quality Control Officer or the QCU employee in 1 business day.
- 9.4. The QCU prepares the reply in 2-day period, agrees the same with the head of the respective department and other interested subdivisions based on the essence of the complaint in 3 business days at most. The final reply is agreed with the Legal Division as well.
- 9.5. The agreed reply is signed by the Quality Control Officer based on the CEO's POA and submitted to the Staff.

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- 9.6. The Staff sends the reply to the customer in the same manner the complaint was received, unless otherwise stated by the customer. If sent by mail, the reply is sent as a registered mail, based on the internal regulations of the Bank. Should the customer prefer hand delivery, the reply is delivered by the branch, where the complaint was filed. Furthermore, should the reply be delivered to the customer in person, the customer signs the copy and writes "I received the original copy" and puts the date. The scanned copy of the letter is sent to the QCU.
- 9.7. Should the complaint refer to the service quality or the conduct of a concrete employee, the employee in charge also communicates the results of examination to the HRMD and the direct manager of the employee in 1-day period.
- 9.8. The QCU maintains a database, containing information about the customers, the essence of their complaints/notes and the related replies. The information is collected and stored at least based on the components of the report set in [Annex 6](#). The data are stored electronically in protected files for at least 3 years in compliance with Converse Bank CJSC Software Backup and Archiving Procedure (IN 42-06). The report developed based on [Annex 6](#) is sent electronically to the Central Bank at the latter's request.
- 9.9. The deadline for replying to the customer complaints is 10 (ten) business days.
- 9.10. The customer opinions and proposals are examined by the QCU and recorded in the database. Should the QCU find sufficient grounds for improvement of the Bank's services and servicing terms due to examination, the latter are submitted to the interested subdivisions for consideration.
- 9.11. When examining and analyzing the complaints, the QCU makes recommendations on the solution and prevention of the problem. The QCU regularly follows up the implementation of recommendations, and presents the results in the reports specified in Section 12 below.
- 9.12. Based on the Procedure for Identification, Evaluation and Analysis of Operational Risk (IN 61-17), the QCU discloses the information about the complaints involving operational risk to the Operational Risk Management Unit, which are also recorded in the Help Desk.

10. ACCEPTING AND ARCHIVING OF DOCUMENTS

- 10.1. The employee in charge sends the complaints, proposals and opinions photocopied from the book of complaints and proposals, as well as the related explanations to the QCU on a monthly basis, by the 5th business day of the following month.
- 10.2. The customer complaints, their replies and other documents are stored and archived based on Converse Bank CJSC Archiving Procedure (PR 42-03) and other internal regulations of the Bank.

11. REPORTING

- 11.1. The QCU summarizes and monitors the books of complaints and proposals, and the complaints, proposals and opinions made to the CSO and the branches by email, mail, phone calls, through social networks and in person, on a quarterly basis, by the 15th business day of the month following the quarter, and reports the results to the CEO, the Compliance Unit and the managers of the interested subdivisions.
- 11.2. Within the first 5 business days of every month, the information about the written complaints received by the QCU in the previous month is disclosed to the Compliance Unit in the form of the database maintained by the QCU.
- 11.3. Based on Regulation 8/07 on Minimum Terms and Principles for Internal Processes of Recording, Storing and Registering of Complaints Addressed to Financial System Participants, the QCU maintains the complaint database in compliance with [Annex 6](#).
- 11.4. The report on the customer service quality of the Bank employees is submitted to the HRMD as well.

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12. TOOLS NEEDED FOR FILING COMPLAINTS AND PROPOSALS

- 12.1.** The Bank provides the following in a visible and accessible location at the Head Office and branches of the Bank:
- 12.1.1.** The book of complaints and proposals,
 - 12.1.2.** What to do if you have a complaint? ([Annex 2](#)),
 - 12.1.3.** Customer Complaint Form ([Annex 3](#)),
 - 12.1.4.** The place where the customer can review the Internal Rules of Complaint Examination, which the Bank will provide to the customer at the latter's request ([Annex 1](#)),
 - 12.1.5.** The contacts of the employee in charge (name, position, phone number, email).
- 12.2.** The Bank makes the phone number available on its website (www.conversebank.am) and at the CSO/branches, as well as provides the phone number to the customers at their request by which they can contact the Bank to receive information about the complaints.

13. MINIMUM REQUIREMENTS FOR REPLY TO COMPLAINT

- 13.1.** The Bank's final reply to the customer complaint should at least include the following information:
- 13.1.1.** The Bank's clear stance – decline, partially satisfy or fully satisfy the complaint,
 - 13.1.2.** The justification of the Bank's decision,
 - 13.1.3.** The information about the subdivision or employee in charge of examining the complaint (the name of the subdivision or the name and position of the employee) and the contacts (phone number, email, etc.),
 - 13.1.4.** Information that the customer may contact the Quality Control Officer should they have questions about the result of examination of the complaint or the complaint/claim,
 - 13.1.5.** Information that the customer can apply to the court or the Financial System Mediator or the Central Bank or the arbitration (in the presence of the respective agreement), unless the customer is satisfied with the written reply to the complaint,
 - 13.1.6.** Information about the dates when the customer can apply to the Financial System Mediator, unless satisfied with the written reply to the complaint.
- 13.2.** Should the complaint be declined or satisfied partially, the Bank attaches the "What to do if you have a complaint?" form ([Annex 2](#)) to the written reply. The form is not provided for the complaints that contain no property claim or imply disagreement of general nature and/or work improvement proposals.

14. MISCELLANEOUS

- 14.1.** In cases, when the customer's note submitted to the Bank meets the requirements of the Procedure for the Complaint/claim, the Bank considers the latter as it is, notwithstanding the title of the note (request, claim, complaint, etc.) or the absence and form of the title, and provides the final reply based on the RA Law on Financial System Mediator.
- 14.2.** When receiving and examining the complaint, the Bank does not require any documents from the customer,
- 14.2.1.** unless needed to substantiate the presence or absence of circumstances being the ground for the complaint or to identify the customer, **or**
 - 14.2.2.** if they are made accessible to the Bank due to the services rendered to the customer, and according to the customer, their data have not been changed.