	<b>Converse Bank CJSC</b> <b>Procedure for Review of and Response to</b> <b>Customer Complaints</b>	<b>PR 82-01</b>	<b>Classified</b>	
		<i>Date</i> 10.08.2020	<i>Edition</i> 9	1/ 12

## Subject

Converse Bank CJSC Procedure for Review of and Response to Customer Complaints /PR 82-01/ (the Procedure) establishes the process of collection and processing of, and responding to and monitoring of complaints, opinions and proposals delivered to the CSO and branches of Converse Bank CJSC (the Bank) by customers or third parties in person, by mail or email (including through social networks).

## Scope

Innovations and Quality Control Unit is in charge of the process regulated by the Procedure, and the Head of Innovations and Quality Control Unit is responsible for the process regulated by the Procedure. The Procedure is applied to the Retail Business Department, the Business Development Department, the Staff, the HR Management Division and other subdivisions directly or indirectly contacting the customers of the Bank.

## Related Documents

The RA Law of Financial System Mediator  
CBA Regulation 8/04 On Minimum Conditions and Principles for Internal Legal Acts Regulating Customer Complaint Handling Process  
Regulation 8/07 On Minimum Conditions and Principles for Internal Processes of Recording, Maintenance and Registration of Complaints Filed with Financial System Participants  
CBA Regulation 4 On Minimum Internal Control Requirements for Banks  
Converse Bank CJSC Procedure for Archiving /PR 42-03/  
Converse Bank CJSC Instruction on Workflow (IN 42-04)  
Converse Bank CJSC Procedure for Organization of Work with Mass Media (IN 72-49)  
"Converse Bank" CJSC Procedure on Backup copying and archiving in the Bank Software Systems IN 42-06  
CBA Board Resolution  
Bank Board Resolutions  
Executive Management Resolutions  
CEO Decrees

## Definitions

**Office of the Financial System Mediator (hereinafter referred to as the Office)** – is a non-profit organization, the key goal of which is to support the activities of the Financial System Mediator and to inform the consumers about the financial sphere.

**Complaint:** Based on the RA Law on Financial System Mediator, a written complaint filed with the Bank by the customer and the parties that provided assets to secure liabilities to the Bank referring to the services and collateral rendered by the Bank and containing a property claim. The complaint should at least include the customer's first and family names/title, contacts (address/location and phone number), signature and the description of the complaint. For the purpose of this Procedure, the non property claims and the opinions and proposals of the customer are not deemed a complaint.

**Customer** – an individual, sole proprietor or legal entity, including a party that has provided an asset to secure the liabilities to the Bank, who has made a claim related to the services provided by the Bank or the collateral.

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**Officer in charge:** An employee of the Innovations and Quality Control Unit, who is in charge of reviewing the customer Complaints in due order and arranging the response process.

**Employee in charge:** Customer Service officer (the latter's substitute) at branches, and Deputy CSO Manager and banking hall manager (substitute) at the Head Office, who are in charge of accepting Complaints and providing the customers with the required information.

## Abbreviations

**IQCU:** Innovations and Quality Control Unit

**CSO:** Customer Service Office

## Annexes

Statement	<b>Annex 1</b>
"What to do if you have complaint?" leaflet	<b>Annex 2</b>
Customer Complaint Form	<b>Annex 3</b>
Acknowledgement Letter to Customer Complaint	<b>Annex 4</b>
Acknowledgement Letter to Electronic Complaint	<b>Annex 5</b>
Complaint Database	<b>Annex 6</b>

## 1. Methods for collection of customer complaints

**1.1. Verbal Complaints** are filed by means of the Form specified in Annex 3 hereto or in a free form:

- 1.1.1. by dropping in the proposals and complaints box
- 1.1.2. by taking records in the proposals and complaints log
- 1.1.3. by the Bank's email [post@conversebank.am](mailto:post@conversebank.am)
- 1.1.4. by hand delivery to the Bank's employee in charge or by mail to the Head Office (26/1 Vazgen Sargsyan, Yerevan)
- 1.1.5. by posting on the Bank's official pages in social networks, except for complaints containing a property claim
- 1.1.6. by mass media

**1.2. Upon consent of the customer, a claim-demand to the Bank can also be delivered to the Office.**

**1.3. Verbal Complaints are accepted:**

- 1.3.1. by calls (+37410 511-211), furthermore the customer is notified in advance about recording of the conversation referring to the Complaint. The Remote Banking Unit employee records the Complaints received by call in the respective AS-Bank WST;
- 1.3.2. by filing the Complaint with the particular branch or the Head Office. Once the customer's verbal complaint is accepted the Bank employee informs the Employee in charge thereon.

**1.4.** Any employee of the Bank, once being informed about the customer Complaint, directs the customer to the Employee in charge or provides the customer with the contacts of the Employee in charge (phone numbers, email, etc).

**1.5.** The Customer Complaints and Forms are accepted at the Head Office and branches by the Employee(s) in charge, who forward the Complaints to the Staff and Officer in charge through Outlook.

**1.6.** Once the customer's verbal Complaint is accepted at the Bank's business location and/or by phone, the Bank employee informs the Customer about the details listed in paragraph 2.2 below.

**1.7.** Once the Bank employees become aware of any feedback or opinion on the Bank and the latter's business in the mass media, they have to promptly inform the Bank's PR Officer and the Officer in Charge.

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## 2. Minimum conditions for acceptance of Complaints

- 2.1. The Bank has to consider the customer's Complaint if the latter has been filed in the course of 1 (one) year starting from the point when the customer has learnt or could have learnt about the abuse of their rights.
- 2.2. The Employee in charge has to verbally inform the customer having the intention to file a Complaint that:
  - 2.2.1. the Complaint is deemed made by the customer if filed in writing (delivered by hand, email or post);
  - 2.2.2. the customer can obtain the Complaint Handling Rules of the Bank.
- 2.3. The Employee in charge provides the customer intending to file a Complaint with the documents specified in Annexes 1, 2, 3 and 4 hereto.

## 3. Complaint acceptance process

- 3.1. At the end of the day the Employee in charge opens the complaints and proposals box and reviews the records made in the complaints and proposals log.
- 3.2. Based on the essence of Complaint, the Employee in charge:
  - 3.2.1. considers and takes the respective measures on the spot, or
  - 3.2.2. if beyond the competence of CSO/branches, forwards the scanned Complaint to the Staff and the Officer in charge.
- 3.3. The employee of the Staff in charge of emails accepts the Complaints sent by email, including those referring to the CSO and the branches.  
The aforementioned employee sends the letter(s) to the manager of the regional and/or structural subdivision whom the Complaint refers to and sends a copy to the Officer in charge in 1 business day. Immediately but no later than the following business day after receiving the Complaint, the employee in charge of emails sends an Acknowledgement Letter to Customer Complaint (Annex 5) and the information listed in paragraphs 2.2 and 2.3 above to the email address from where the Complaint was sent.
- 3.4. The Marketing Unit employee accepts the Complaints posted on the Bank's official pages in social networks.  
The Marketing Unit employee sends the letter(s) to the manager of the regional and/or structural subdivision whom the Complaint refers to and sends a copy to the Officer in charge in 1 business day. The Marketing Unit employee responds to the Complaint in 1 business day by making an attempt to clarify the essence of the problem. Depending on the latter, the Marketing Unit employee informs the customer about the requirement for filing of a written Complaint in compliance with paragraph 2.2.1 above, or presents a response. The latter has to be agreed with the Officer in charge.
- 3.5. The identification number is formed with the below components:
  - the subdivision's code,
  - the regular number of acceptance,
  - the date of acceptance.
- 3.6. The Complaints delivered in person to the CSO/branches are accepted by the Employee in charge, who issues the customers' Acknowledgement Letters (Annex 4) bearing the "Accepted" seal. The Acknowledgement Letters are copied and the customer signs the copy thus verifying the fact of receipt.

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The copies of Complaint(s) and Acknowledgement Letter(s) are forwarded to the Staff apart from the original Complaints provided to the Staff by the CSO.

- 3.7. The Staff records the Complaints in compliance with the internal regulations of the Bank and forwards them to the subdivision whom the Complaint refers to and provides the copies to the Officer in charge.
- 3.8. The Office carries out examination of customer complaints-claims submitted to the Bank in accordance with Chapter 4 of the Procedure.

#### 4. Review of and response to Complaints

- 4.1. The Officer in charge jointly with the concerned subdivision reviews the customer Complaints and makes the response to the latter based on the task sent by the Staff.
- 4.2. If required, the response to the customer can be given by another subdivision jointly with the Officer in charge.
- 4.3. The employee drafting the response can make written and verbal inquiries and receive clarifications from other employees of the Bank within the scope of the task.
- 4.4. The manager of the regional/structural subdivision takes the respective actions for correction of omissions highlighted in the Complaint, and sends written comments and proposals to the Officer in charge as needed.
- 4.5. The manager of the regional/structural subdivision submits an explanation to the Officer in charge referring to the Complaint within at most 2 business days from receipt of the Complaint.
- 4.6. The Officer in charge coordinates the response to the Complaint with the Legal Division within at most 2 business days and submits the response to the CEO for approval.
- 4.7. Once the approval of the CEO is received, the Officer in charge forwards the letter to the Staff for signature and passing the letter to the customer.
- Where the response is sent by post, the letter is sent by registered mail.
  - The response to the Complaint if posted on social networks is sent by the Marketing Unit employee.
  - Where the Customer prefers to get the response by hand delivery, the response is provided by the subdivision to which it has been addressed. **Furthermore, upon hand delivery the customer has to sign the copy of the letter, put “Received the original” in handwriting and the date**, and the copy is held with the branch and the scan is sent to the Officer in charge to be maintained in the Customer Complaint response database.
  - Where the customer Complaints refer to the same issue or the same Complaint repeats, the Employee in charge has to inform the direct supervisor thereon.
- 4.8. Where the Complaint refers to the service quality or the conduct of a concrete employee, then the Officer in charge informs the HR Management Division thereon.
- 4.9. The HR employee makes joint efforts with the respective subdivision manager to reveal the reasons for the Complaint and to make recommendation(s) on the further measures (e.g. training, etc).
- 4.10. In the presence of a second and each subsequent Complaint referring to the same employee, a disciplinary action can be applied to the latter. At the same time, the Complaints referring to any employee can be taken into consideration for his/her annual and interim performance evaluation. Similarly, the positive responses recorded in the complaints and proposals log can serve a ground for the employee’s motivation.
- 4.11. The Officer in charge maintains an electronic database containing information about the customers, the essence of customer Complaints and the responses to the latter. The information is collected and maintained at least based on the components listed in Annex 6

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hereto, and is stored electronically in the protected files according to the requirements of "Converse Bank" CJSC on Backup copying and archiving in the Bank Software Systems (IN 42-06). The report is disclosed to the Central Bank of Armenia on the latter's demand based on the template illustrated in Annex 6.

**4.12.** The deadline for responding to the customer Complaints is set 10 (ten) business days.

## 5. Finalization and archiving of documents

- 5.1.** The Complaints extracted from the complaints and proposal box or copied from the complaints and proposals log, and the findings of analysis are scanned by the Officer in charge on a monthly basis, by the 5<sup>th</sup> business day of the following month and sent to the IQCU and the Branch Support and Customer Acquisition Division, and to other concerned subdivisions as needed.
- 5.2.** The customer Complaints, the responses thereto and the documents referring to the particular Complaint are held and archived in compliance with the Bank's Instruction on Workflow (IN 42-04) and Converse Bank CJSC Archiving Procedure /PR 4203/.

## 6. Reporting

- 6.1.** The Innovations and Quality Control Unit conducts regular monitoring of the complaints and proposals logs and boxes, and the complaints and proposals sent by email or by post, made by calls or in social networks or delivered in person to the CSO and branches, by the 15<sup>th</sup> business day of the month following each quarter, and reports the findings to the CEO.
- 6.2.** The report on service quality of employees is submitted to the Head of HR Management Division as well, furthermore, based on the latter's recommendation and subject to the CEO approval, the customer feedbacks on the actions of the Bank employee can be posted on the Bank's intranet.
- 6.3.** The PR Officer of the Bank conducts monitoring of the publications in the mass media referring to the Bank and provides responses/denials to the respective information in compliance with the Procedure for Organization of Work with Mass Media (IN 72-49).
- 6.4.** Based on Regulation 8/07 On Minimum Conditions and Principles for Internal Processes of Recording, Maintenance and Registration of Complaints Filed with Financial System Participants, the IQCU prepares and submits the Complaints Report (Annex 6) to the Reports Unit in compliance with the Procedure for Comprehensive Information on Financial Operations (IN 61-10).

## 7. Information disclosed at Head Office and branches and other tools for filing Complaints

- 7.1.** The Bank places in a visible, assessable and suitable place at the Head Office and the branches:
  - 7.1.1. The complaints and proposals box, either closed or sealed; the pens and papers should be placed near the boxes,
  - 7.1.2. The complaints and proposals log,
  - 7.1.3. "What to do if you have complaint?" leaflet (Annex 2),
  - 7.1.4. The Customer Complaint Form (Annex 3),
  - 7.1.5. A statement about the accessibility of the complaint handling rules of the Bank and the provision of the latter by the Bank to the customer on the latter's demand (Annex 1),
  - 7.1.6. Information about the Employee in charge (full name, position, phone number, email).
- 7.2.** The Bank publishes on its website ([www.conversebank.am](http://www.conversebank.am)) and at the CSO/branches and provides the customer on the latter's demand with the phone number for contacting the Bank to get information about Complaints.


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## 8. Minimum requirements for response to Complaints

- 8.1.** The Bank’s final response to the customer Complaint should at least include:
- 8.1.1. The Bank’s clear position – decline, satisfy partially or satisfy entirely the Complaint,
  - 8.1.2. Justifications for the Bank’s decision,
  - 8.1.3. Information about the subdivision or employee responsible for review of the Complaint (name of the subdivision or the full name and position of the employee) and contacts (phone, email, etc),
  - 8.1.4. Notification of the customer that the latter can address the subdivision (employee) defined in paragraph 8.1.3 above for further questions about the results of review of the Complaint,
  - 8.1.5. Notification of the customer that the latter can apply to the court or the Financial System Mediator or the Central Bank of Armenia or the Arbitration (in the presence of an arbitration agreement) to protect their rights unless the customer is satisfied with the written response to the Complaint,
  - 8.1.6. Information about the deadlines for applying to the Financial System Mediator unless the customer is satisfied with the written response to the Complaint.
- 8.2.** Upon rejection or partial satisfaction of the Complaint, the Bank attaches the “What to do if you have complaint?” sheet (Annex 2) to the written response, or emails the latter to the customer if the Complaint has been made electronically. The sheet is not provided for the complaints not containing a property claim or referring to discontent of a general essence and/or containing proposals for improvement of services.
- 8.3.** In the event the Bank has undertaken to satisfy but has not satisfied the customer’s Complaint, the customer can file a claim with the Financial System Mediator in due order.

## 9. Other provisions

- 9.1.** If the customer’s letter filed with the Bank meets the requirements set for the Complaint in the Definitions above, the Bank considers the letter as a Complaint irrespective of its title (application, request, complaint and the like) or the absence or the form of the title, and provides a final response in compliance with the RA Law on Financial System Mediator.
- 9.2.** For the review of the Complaint the Bank cannot demand the customer the disclosure of documents that:
- 9.2.1. are not required for justification of the Complaint or the availability or absence of grounds for the Complaint or for identification of the customer; or
  - 9.2.2. are made accessible for the services rendered by the Bank to the particular customer, and their details are not revised as assured by the customer in writing.


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	<b>Annex 1 Statement</b>	<i>25.12.2017</i>	<i>Edition 7</i>	<i>1/ 12</i>

**Dear Customer,**

Any employee of the Bank has to forward you to the employee in charge of the complaint handling process at the Head Office or the particular branch who can provide you with the Bank's internal rules and the Customer Complaint Form.

For information about your Complaint filed with the Bank you can contact the employee in charge of the customer complaint process (tel. 010 511 211, ext. 1263).

**Converse Bank**

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	<b>Annex 2</b> <b>What to do if you have complaint?</b>	<i>Date</i> 25.12.2017	<i>Edition</i> 7	1/ 12



## ԻՆՉ ԱՆԵԼ, ԵՅԵ ԲՈՂՈՔ ՈՒՆԵՔ



Կազմակերպության աշխատակից պարտավոր է յուրաքանչյուր

Պատասխանատու աշխատակիցը պարտավոր է:

- Ձեզ ուղղորդել բողոքների հարցերով վբաղվող աշխատակցի մոտ.
- Տրամադրել հարողրակցման համար անհրաժեշտ տվյալներ (հեռախոսահամար, էլեկտրոնային հասցե):

- **Տեղեկացնել** Ձեր իրավունքների և բողոքների քննության գործընթացի մասին.
- **Տրամադրել** կազմակերպությունում գործող համապատասխան կանոնները և Հայտի ձևը:

*կազմակերպության անվանումը*  
 Գրավոր բողոքը ներկայացրեք պատասխանատու աշխատակցին կամ ուղարկեք հետևյալ հասցեներով՝

- **Նշեք** Ձեր տվյալները՝ պատասխանը ստանալու համար:
- Անպայման **վերցրեք** ստացականը և պահպանեք մինչև հարցի վերջնական լուծումը:



Կազմակերպությունը բողոքի վերաբերյալ որոշում է կայացնում (բավարարել, մասնակի բավարարել, մերժել) 10 աշխատանքային օրվա ընթացքում:

Հարցեր ունենալու դեպքում կապվեք պատասխանատուի հետ

### ՖԻՆԱՆՍԱԿԱՆ ՀԱՄԱԿԱՐԳԻ ՀԱՇՏԱՐԱՐԻՆ, ԵՅԵ.

### ԱՐԲԻՏՐԱԺԱՅԻՆ ՏՐԻԲՈՒՆԱԼ

- ֆիզիկական անձ եք,
- բողոքը վերաբերում է մատուցվող ծառայությանը և ունեք գումարային պահանջ (մինչև 10 մլն դրամ), կամ բողոքը առնչվում է վարկային վեկուցում ներառված տեղեկատվությանը,
- 10 աշխատանքային օրվա ընթացքում պատասխան չեք ստացել կամ պատասխանը Ձեզ չի բավարարում,
- բողոքը չի քննվում դատարանում կամ արբիտրաժային տրիբունալում,
- պատասխանից հետո չի անցել 6 ամիս,
- բողոքարկվող գործողությունը կամ անգործությունը տեղի է ունեցել 2008 թ. օգոստոսի 2-ից հետո:

- Եթե Ձեր և կազմակերպության միջև կնքվել է արբիտրաժային համաձայնություն, ապա ձեր միջև ծագող վեճերը ենթակա են լուծման արբիտրաժային տրիբունալի կողմից:
- Պայմանագիր կնքելիս Դուք իրավունք ունեք հրաժարվելու արբիտրաժային համաձայնագրից. կազմակերպությունը պարտավոր է Ձեզ ծառայություն մատուցել:
- Հիշեք. նույնիսկ արբիտրաժային համաձայնության առկայության դեպքում Դուք կարող եք դիմել Ֆինանսական համակարգի հաշտարարին, քանի դեռ բողոքը չի քննվել տրիբունալում:
- Հաշտարարը իրավասու չէ ընդունել բողոքը, եթե այն արդեն քննվում է տրիբունալում:

**ԾԱՌԱՅՈՒԹՅՈՒՆՆԵՐՆ ԱՆՎՃԱՐ ԵՆ**  
 (Երևան 0010, Ա. Խորենացի փողոց 15, էլետրոնային փոստ՝ info@fsm.am)

### ԿԵՆՏՐՈՆԱԿԱՆ ԲԱՆԿ


### ԴԱՏԱՐԱՆ

- Դուք կարող եք նաև դիմել Կենտրոնական բանկ, և Ձեր բողոքին կպատասխանեն 15 աշխատանքային օրվա ընթացքում: (Երևան 0010, Վ. Սարգսյան 6, +374 10 592 697, consumerinfo@cba.am)
- Եթե Ձեր բողոքը այլ կառույցների իրավասության դաշտում է, ապա Կենտրոնական բանկը Ձեր հարցը կուղղորդի նրանց տիրույթ:
- Կենտրոնական բանկը խորհուրդ է տալիս Ձեր խնդրով նախևառաջ դիմել ֆինանսական կազմակերպությանը (քայլ 2):

- Դուք միշտ կարող եք դիմել դատարան.
- Դատարանի վճիռը ենթակա չէ վերանայման Ֆինանսական համակարգի հաշտարարի կողմից:

### Հարցերի դեպքում դիմեք



	<b>Converse Bank CJSC</b> <b>Procedure for Review of and Response to</b> <b>Customer Complaints</b>	<b>PR 82-01</b>	<b>Classified</b>	
	<b>Annex 3</b> <b>Customer Complaint</b> <b>FORM</b>	<i>Date</i> 25.12.2017	<i>Edition</i> 7	1/ 12


**FORM \_\_\_\_\_**  
Customer Complaint

**CUSTOMER INFORMATION**

Full name			
ID details			
Actual place of residence			
Email			
Phone numbers			
Status	Individual	Legal entity	
Property claim amount (AMD) (if any)			
Description of complaint			

Enclosed (--- ) pages

Customer signature ----- (date)

	<b>Converse Bank CJSC</b> <b>Procedure for Review of and Response to</b> <b>Customer Complaints</b>	<b>PR 82-01</b>	<b>Classified</b>	
	<b>Annex 4</b> Acknowledgement Letter To Customer Complaint	<i>Date</i> 25.12.2017	<i>Edition</i> 7	1/ 12

## ACKNOWLEDGEMENT LETTER

To Customer Complaint

I herewith confirm that I accepted Complaint # \_\_\_\_\_ on \_\_\_\_\_ from

-----.

Customer's full name

Enclosed ----- pages

----- Branch


**EMPLOYEE IN CHARGE**

signature

SEAL

\_\_\_\_\_ 20\_\_

For complaint handling details please follow the link <https://conversebank.am/hy/customer-rights/>

	<b>Converse Bank CJSC</b> <b>Procedure for Review of and Response to</b> <b>Customer Complaints</b>	<b>PR 82-01</b>	<b>Classified</b>	
	<b>Annex 5</b> Acknowledgement Letter to Electronic Complaint	<i>Date</i> 25.12.2017	<i>Edition</i> 7	1/ 12

## ACKNOWLEDGEMENT LETTER

-----  
 (Complaint identification number)

-----  
 (Date of receipt)


Dear Customer,

We acknowledge the receipt of your complaint.

Please be advised that your complaint will be reviewed and responded to in compliance with the internal regulations of the Bank.

For complaint handling details please follow the link <https://conversebank.am/hy/customer-rights/>

Best regards,  
 Converse Bank

	<b>Converse Bank CJSC Procedure for Review of and Response to Customer Complaints</b>		<b>PR 82-01</b>	<b>Classified</b>	
	<b>Annex 6 Complaint Database</b>		<i>Date</i> 25.12.2017	<i>Edition</i> 7	1/12

### Complaint Database

1	2	3	4	5	6	7	8	9	10	11	12	13	14
<i>Service</i>	<i>Subject</i>	<i>Marz, Yerevan</i>	<i>Property/ non property</i>	<i>Total number of complaints</i>	<i>Number of satisfied complaints</i>	<i>Number of partially satisfied complaints</i>	<i>Number of rejected complaints</i>	<i>Number of complaints in process</i>	<i>Recovery of customer loss</i>	<i>Number of complaints declined by the Bank but satisfied by Financial Mediator, court of Arbitration</i>	<i>Number of fines (AMD 300,000) for violation of customer rights</i>	<i>Number of paid claims for cases accommodated by Financial Mediator</i>	<i>Total sum paid for cases accommodated by Financial Mediator</i>