

APPROVED
By the minutes No. DEC 11-19
of the Board of "Fast Bank" CJSC
dated 25.09.2024

CUSTOMER COMPLAINTS MANAGEMENT PROCEDURE



"FAST BANK" CJSC

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PURPOSE

The purpose of the "Customer Complaints Management Procedure" (hereinafter referred to as "the Procedure") is to define the procedure of acceptance, examination, decision-making and management of customer complaints, regulation of relations with customers who submitted complaints or claims, as well as collection, registration, recording, storage, periodic analysis of information on complaints and claims in "Fast Bank" CJSC (hereinafter referred to as "the Bank").

APPLICATION SCOPE

This Procedure is applied by all territorial and structural subdivisions of the Bank.

RELATED DOCUMENTS

RA Law "On Financial System Mediator"	
RA Central Bank Board Decree N 225-N "On Regulation 8/04 on Minimum Conditions and Principles for Internal Rules, Regulating the Procedure of Examination of Complaints/Claims of Customers", dated 28.07.2009	
RA Central Bank Board Decree N 200-N on approval of Regulation 8/07 "On Minimum conditions and principles for the internal process of accounting, storage and registration of complaints addressed to the participants of the financial system", dated 23.11.2018.	
Application for submission of a complaint-claim by an individual customer	eFO 64-05-01
Application for submission of a complaint-claim by a legal entity/individual entrepreneur	eFO 64-05-02
Template "What to do if you have an appeal?"	eFO 64-05-03
Receipt on submission of a complain-claim by the customer	eFO 64-05-04
Response to complaint-claim form	eFO 64-05-05
Database on received complaints and claims	eFO 64-05-06

DEFINITIONS AND CONCEPTS

Law – the RA law on "Financial System Mediator".

Financial System Mediator – an Individual who considers the requests of customers against the Bank and makes decisions on them by realizing the authorities within the bounds of the law and this procedure.

Customer – an individual or an individual entrepreneur or a legal entity, including a person who has provided the Bank with a collateral, who has submitted a claim related to the services provided by the Bank or the collateral.

Complaint-claim – a written claim submitted to the Bank by the Customer or a person acting on their behalf, as well as with the Customer's consent by the Office of the Financial System Mediator in accordance with the provisions of this procedure, which is related to the services provided by the Bank or a collateral and contains a property claim or a non-property claim in the case of claims regarding credit information, defined by the law of the Republic of Armenia "On Circulation of Loan Information and the Activity of Credit Bureaus", or claims, related to it.

Complaint – a complaint submitted by the Customer to the Bank **in writing** (Messenger, Telegram, Viber, Whatsapp, LinkedIn, etc.) **or verbally** via a phone call, a request for clarification of any situation or restoration (protection) of violated rights (which does not contain a property claim) or an observation of the Bank's activities, which implies the implementation of any action by the Bank and the provision of an answer to the Customer.

Responsible employee – managers of branches, who are responsible for receiving Complaints and Claims from customers in branches, providing necessary information to the latter.

Responsible subdivision – a structural subdivision that, on the basis of the letter received/signed by the Complaints coordinator, carries out the process of examining and preparing a response to

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Complaints and/or Claims in accordance with the order and sequence of actions defined in this Procedure.

Complaints coordinator – Head of Customer Experience Management Service, who is responsible for recording Complaints and Claims in the Bank, managing the process of their study, examination and providing answers, handling the Database on received complaints and claims [eFO 64-05-06](#) in a centralized manner and providing electronically to the Central Bank of the Republic of Armenia at the request of the latter within the period specified.

Database on received complaints and claims (hereinafter referred to as “the Database”) - a database managed by the Complaints Coordinator in the format defined by document [eFO 64-05-06](#), where complete information on all Complaints and Claims is entered to ensure their proper management, carry out periodical analyzes of complaints and claims, as well as to provide those to the Central Bank of the Republic of Armenia electronically within the period specified in the request by the latter. In addition, the Database is placed on a server domain that is accessible to the Responsible Subdivisions and the Compliance Service.

CHAPTER 1. GENERAL PROVISIONS

1.1. The purpose of organizing the process of receiving, examining, making decisions and managing the Bank's customers' Complaints and Claims is to contribute to the improvement of the quality of the services provided by the Bank and the protection of the Bank's customers' rights. For that purpose:

1.1.1. The following documents are published in the visible part of the Bank's branches and on the official website (www.fastbank.am):

1) "What to do if you have a complaint" form: [eFO 64-05-03](#),

2) Application form for submitting a complaint by the customer: [eFO 64-05-01](#) or [eFO 64-05-02](#).

1.1.2. During working hours in the Bank's branches, Responsible employees accept Complaints and Claims, answer Customer's questions related to Complaints and Claims.

1.1.3. An announcement is published in the Bank's branches about where the Customers can familiarize themselves with this procedure in detail. A copy of this procedure is provided upon the customer's request.

1.1.4. The Bank publishes on its official website (www.fastbank.am), at the place of operation, and also provides a telephone number to each person upon request, by which the Customers can contact the Bank to receive information on Complaints and Claims.

1.2. Any employee of the Bank who has received a Customer's Complaint and/or Claim, or to whom the Customer has expressed the desire to submit a Complaint, directs the customer to the Responsible Employee, as well as provides data on the means of communication with the Responsible Employee (phone number, e-mail address, etc.).

1.3. In the event that the clarification of the issues related to the Complaint and/or Claim is recorded, the Responsible employee shall inform the Customer in advance.

CHAPTER 2. SUBMISSION AND ACCEPTANCE OF COMPLAINTS - CLAIMS

2.1. The responsible employee verbally informs the customer who wants to file a complaint that:

1) The customer can submit the complaint in writing, in person, by post, or by e-mail to the Bank's e-mail address fastcare@fcc.am,

2) The customer may obtain an electronic or a paper copy of this Procedure.

2.2. The responsible employee provides the Customer who wishes to file a complaint with:

3) Template “What to do if you have an appeal?” [eFO 64-05-03](#),

4) Application for submission of a complaint-claim by a customer [eFO 64-05-01](#) or [eFO 64-05-02](#).

2.3. As necessary, the Responsible Employee helps the Customer to fill out the form [eFO 64-05-01](#) or [eFO 64-05-02](#), and then provides the receipt of the Customer's Complaint submission [eFO 64-05-04](#) in two copies (noting the serial number on the Complaint receipt), after which the Customer marks "Received and familiarized" on one copy of the Receipt, signs and returns it to the Responsible Employee, and keeps the other copy. In the event that the Responsible Employee is not in the branch at the moment, then the actions

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specified in this, as well as in clauses 2.1, 2.2 and 2.4 of the Procedure shall be carried out by any employee of the branch (in addition, the function of accepting the Application cannot be performed by the employee who has been directly involved in the provision of services to the given customer), after which they shall submit the Application to the manager.

2.4. The responsible employee informs the Customer that the information related to the submission of the Complaint is also available:

- 1) in the announcements available in the bank's branches,
- 2) in the "Customer Rights" section of the official website,
- 3) by e-mail or through the contact link of the official website, in a reply letter,
- 4) by phone call.

2.5. Complaints submitted by the Customers and persons acting on their behalf, as well as with the Customer's consent through the Financial System Mediator, submitted in writing, in person, by mail, electronically (fastcare@fcc.am) or written Complaints-claims submitted in a free form (irrespective of the document name or completion format), meeting the requirements of Clause 2.8 of this Procedure, are accepted by the Bank for examination (hereinafter referred to as "the Application") [eFO 64-05-01](#) or [eFO 64-05-02](#).

2.6. In case of receipt of the complaint by e-mail (fastcare@fcc.am), by the order, defined by Clause 3.4 of this Procedure the Complaints Coordinator immediately after receiving the Complaint-Claim, but not later than the next working day, sends a letter electronically, confirming the fact of receipt (receipt) of Complaint-Claim [eFO 64-05-04](#) (noting the code (number) of the Complaint on the receipts) to the Head of Contact Center and the Responsible for Customer Group, indicating the date of receipt of the Complaint-Claim, as well as the form "What to do if you have a complaint" [eFO 64-05-03](#). The Head of Contact Center or the Responsible for Customer Group sends the receipt and the form to the Customer's e-mail address on the same day, through the same connection with which the Complaint-Claim request was received.

2.7. In case of receiving the complaint request through the Financial System Mediator and sending the answer electronically, the Complaints coordinator immediately after receiving the complaint request, but not later than the next working day, sends Receipt on submission of a complain-claim by the customer [eFO 64-05-04](#) to the e-mail address of the customer specified in the complaint request provided by the customer to the bank or received through the Financial System Mediator, which indicates the date of receipt of the Complaint, the code (number) of the Complaint.

2.8. The Complaint-Claim shall necessarily include:

- 1) customer's name, surname (company name),
- 2) the address of the customer's place of residence/location and their contact details (e.g. e-mail, phone number),
- 3) the amount of the property claim (if any);
- 4) the content of the complaint (circumstances on which the claim is based),
- 5) the date, month and year of submitting the complaint.
- 6) in the case of an individual entrepreneur or legal entity customer, a certificate issued by the tax authority at the time of applying to the Bank, according to the Tax Code of the Republic of Armenia, regarding his/her being considered a subject of micro-entrepreneurship;
- 7) the signature of the customer, and in the case of a legal entity customer, the signature of a person authorized to act on behalf of the company,
- 8) the customer, at his discretion, can also provide other additional information.

2.9. In case the complaint is submitted by the Customer's representative, the identity document of the authorized person and the power of attorney issued in accordance with RA legislation shall be submitted, copies of which shall be attached to the submitted Application.

2.10. Complaints that do not meet the requirements of Clause 2.8 of this procedure or RA legislation are not considered as Complaints and are examined by the Bank according to the procedure provided by Chapters 4 and 5 of this procedure, about which the Customer is informed by electronic communication (e-mail address: fastcare@fcc.am, Messenger, Telegram, Viber, Whatsapp, LinkedIn, etc.) via reply email or phone call.

2.11. In case of impossibility of proper identification of the Customer by the relevant procedures in the Bank, the Complaint submitted by the Customer is taken into account and may not be examined by the Bank.

2.12. The Bank considers the Complaint submitted by the Customer, if it was submitted within **one** year

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from the moment the Customer learned or could have learned about the violation of their rights.

2.13. The Customer has the right to apply to the Bank, regardless of whether such a right is stipulated in the contract concluded between the Customer and the Bank or not. Any agreement or condition limiting the Customer's right to apply to the Bank is null and void.

CHAPTER 3. EXAMINATION OF COMPLAINT-CLAIM AND PROVISION OF RESPONSE

3.1. In the Bank's branches, the responsible employee makes a photocopy of the application as soon as possible (within **one** working day at most) and sends it to the Complaints Coordinator through Doc Flow's Complaints Management workflow. Moreover, in addition to the Complaints Coordinator, the program automatically sends an electronic notice/notification to the Regional Manager, as well as the Application is simultaneously entered in the Staff register of incoming documents as a reference.

3.2. In the branches, the responsible employee sends the copies of the Receipt, identity document(s) of the applicant, the contract(s) concluded with the Customer (if the Complaint is submitted in the same branch where the contract was concluded) and, if available, other submitted documents, together with the Application. photocopies of documents.

3.3. Upon receiving the application or during the examination of the application, the Complaints Coordinator does not require from the Customer such documents that:

- 1) are not necessary to substantiate the Application or the presence or absence of the underlying circumstances or to identify the Customer,
- 2) are available to the Bank as a result of the services provided to the Customer, and upon the written confirmation of the Customer, the data specified in them have not been changed.

3.4. Complaints submitted electronically to fastcare@fcc.am, shall be entered into the "Doc Flow" program and sent to the Complaints Coordinator for processing through the Complaints Management workflow by the employees of the Bank's contact center no later than the day of receipt (and in the case of Applications received after 18:00, on the next working day until 12:00). At the same time, the program automatically sends an electronic notice/notification to the Head of Contact Center, and the Application is entered into the Staff register of incoming documents for reference.

3.5. The Application submitted by mail is registered by the Staff Service into the "Doc Flow" program and within the same day (and in the case of Requests received after 18:00, by 12:00 of the next working day) it is sent to the Complaints Coordinator for processing through the Complaints Management workflow. Moreover, in addition to the Complaints Coordinator, the program automatically sends an electronic notice/notification to the Regional Manager and the Head of Staff.

3.6. Upon receiving the Application, the Complaints Coordinator examines it, immediately registers it in the Database [eFO 64-05-06](#) and, depending on the content, sends it to the Responsible Subdivision within the same day through the Complaints Management workflow of the "Doc Flow" Program for study and preparation of the draft response (hereinafter referred to as "the Response").

3.7. On the basis of the received documents and information, the Responsible Subdivision organizes the process of examining the complaint and preparing the response in the following order:

- 1) examines the Application, involving other subdivisions of the Bank as necessary, which are obliged to provide the information requested by them no later than within **three** working days of receiving the request.
- 2) develops the draft of the response to Complaint-Claim [eFO 64-05-05](#), mandatorily including in it the information defined by the legislation of the Republic of Armenia and agrees the content of the Response with the Legal Department and the Complaints Coordinator,
- 3) electronically sends the final draft of the response to the Complaints Coordinator, who, together with the Staff Service, ensures the signature of the Chief Executive Officer or a person with the appropriate authority and the signing off with the "Doc Flow" Program. In addition, the signing off shall be arranged during the day of receiving the Answer (and in the case of answers received after 18:00, by 12:00 on the next working day).

3.8. The Complaints Coordinator and the Staff Service supervise the observance of the deadline for the response to complaints.

3.9. In the case of delivering the Approved Response to the Customer in hand, in the case of Head Office, the Staff Service member first copies the Response and provides it to the Customer for signature. In the case of branches, the Staff Service ensures delivery of the Answer to the relevant branch as soon as

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possible, but not later than nine working days, and the Responsible employee ensures that the Answer is provided to the Customer.

3.10. The customer notes on the copy "I received the original", name and surname, date of receipt and signs.

3.11. After the customer makes the notes specified in Clause 3.10 of the Procedure, in the case of the Head Office, the employee of Staff Service provides the document with the note to the Complaints Coordinator on the same day, who keeps it in the folder for Complaints. In the case of branches, the Responsible Officer makes a photocopy and sends it to the Complaints Coordinator within the same day after receiving the document with the note, and keeps the original in the folder for Complaints in the branch.

3.12. In the case of providing the Approved Response to the Customer by mail, the Complaints Coordinator photocopies it in advance and stores it in the folder designated for Complaints, after which the Response is provided by the Staff Service to the address specified by the Customer to be sent as a registered letter with return notice. The Staff Service is obliged to send the received Answer to the Customer on the day of receiving the Answer, and if the deadlines stipulated by the Law have not expired, within **one** working day at most.

3.13. If the answer is sent by the e-mail address fastcare@fcc.am, the Complaints Coordinator makes a photocopy of the letter signed by the Chief Executive Officer or a person with the relevant authority and signed off by the Staff Service and immediately sends it electronically to the Head of Contact Center and the Responsible for Customer Group. The Head of Contact Center or the Responsible for the Customer Group sends the Response to the Customer's e-mail address on the same day. In addition, if the Customer's Complaint-Claim is received from an e-mail address not registered for them in the Bank's software system, the Complaints Coordinator contacts the Customer, specifies to which e-mail address the Customer wishes to receive the Response, after which the Response is sent to the e-mail address mentioned by the Customer.

3.14. When sending the answer in the way specified in Clause 3.13 of the Procedure, if there is a technical possibility, the settings confirming the receipt of the answer (delivery and read receipt) are set and upon receiving the letter confirming the receipt, the Complaints Coordinator takes a screenshot and files in the Complaints folder together with a photocopy of the answer letter.

3.15. In case of rejection or partial satisfaction of the complaint request, the Bank provides "What to do if you have a complaint" form [eFO 64-05-03](#) attached to the written response, and if the Complaint request was submitted by e-mail, then sends the form attached to the written response.

3.16. The Bank shall provide the Customer with the response to the submitted Complaint through the communication means specified by the latter within **ten** working days following the receipt of the Application.

3.17. The Staff is responsible for the delivery of Responses to Complaints-Claims.

3.18. All employees involved in the process of examining a complaint and providing a response are obliged to follow the deadlines set by this procedure.

CHAPTER 4. SUBMISSION AND ACCEPTANCE OF COMPLAINTS

4.1. Complaints that do not contain property claims can be submitted by customers:

- 1) **in person**, handing it over to the relevant responsible employee,
- 2) through the information kiosk available in branches,
- 3) **through the postal service**, by sending a letter to the head office of the Bank,
- 4) **by any means of electronic communication**: by e-mail (fastcare@fcc.am), by submitting a complaint via the Bank's website (www.fasbank.am), Messenger, Telegram, Viber, Whatsapp, LinkedIn, etc.,
- 5) **by phone call**, calling the 24/7 phone number (+37410) 510 000, and if the phone call is recorded, the Customer shall be informed about it before the phone conversation.

CHAPTER 5. EXAMINATION OF COMPLAINTS AND PROVISION OF RESPONSE

5.1. In case of receipt of Complaints through the channels specified in Clause 4.1 of this Procedure, the employee receiving the Complaint as soon as possible after receiving the Complaint (within **one** working day at most), enters it into Doc Flow program and sends it to the Complaints Coordinator through the Complaints Management workflow. Moreover, in addition to the Complaints Coordinator, the program automatically sends an electronic notice/notification to the Regional Manager and the Head of Staff. In this case, the Customer is not provided/sent the receipt of the Customer's Complaint [eFO 64-05-04](#). The entry, registration

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and examination of the complaint is carried out in accordance with the process defined in Chapter 3 of the Procedure. Providing a response to the Complaint to the Customer is carried out by the Complaints Coordinator using the contact information provided by the Customer.

5.2. After receiving the Complaints through the official electronic communication systems of the Bank (Messenger, Telegram, Viber, Whatsapp, Linkedin, etc.) by the employees of the Contact Center, they are entered into the Doc Flow program and forwarded through the Complaints Management workflow to the Complaints Coordinator for processing. Moreover, in addition to the Complaints Coordinator, the program automatically sends an electronic notice/notification to the Head of Contact Center and the Regional Manager. After receiving the letter, the Complaints Coordinator immediately registers it in the Database [eFO 64-05-06](#), then performs the same actions as in the case of Complaints and sends the response from their email to the Complaint to the Head of Contact Center and Responsible for the Customer Group within **ten** working days. The Head of Contact Center or Responsible for the Customer Group, on the same day through the same contact, as the Complaint was received, sends the Response to the Complaint to the Customer.

5.3. The Complaints Coordinator is considered to be responsible for the deadlines for providing the Response to Complaints.

5.4. All employees involved in the process of examining a Complaint and providing a response are obliged to follow the deadlines and requirements set by this Procedure.

CHAPTER 6. EXAMINATION OF COMPLAINTS SUBMITTED BY THE FINANCIAL SYSTEM MEDIATOR AND PROVISION OF RESPONSE

6.1. Within the scope of cooperation with the Financial System Mediator, the Bank has given up the right to dispute the decisions of the Financial System Mediator with claims not exceeding **100,000 AMD**.

6.2. Within **14** working days after receiving the letter and application-request submitted by the Financial System Conciliator, the Legal Department, on behalf of the Bank, submits written explanations, clarifications and/or objections to the Financial System Mediator, as well as other documents and information requested by the Financial System Mediator.

6.3. The Bank cooperates with the Financial System Mediator upon the latter's request within the time limit set by law, and in the absence of such a time limit, by submitting documents within a reasonable time, giving explanations and clarifications, providing the Financial System Mediator with the existing materials related to the claim, even if they contain banking, insurance or trade secret.

6.4. The processes of examination of applications and demands submitted by the Financial System Mediator, preparation of the answer, and provision of the complaints to the coordinator are carried out by the Legal Department of the Bank, guided by the sequence of actions defined by this Procedure, as well as by the law of the Republic of Armenia "On the Financial System Mediator".

CHAPTER 7. STORAGE OF COMPLAINTS AND CLAIMS

7.1. The originals of Complaints/Claims and their Receipts submitted in person in the Bank's branches are stored in the branches in the folder for Complaints for a period of **five** years, and the Complaints/Claims and their Receipts submitted by mail or by any means of electronic communication are stored with the Complaints Coordinator for a period of **five** years.

7.2. For the purposes of complaint analysis and/or reporting, available information is stored in the Database [eFO 64-05-06](#). The Database is managed by the Complaints Coordinator by recording the information required by it from the moment of acceptance of the Complaint-Claims examination to the moment of providing the Answer. In addition, in the Database [eFO 64-05-06](#), accounting is carried out at least in accordance with the filling rules defined by Regulation 8/07 of the Central Bank of the Republic of Armenia.

7.3. The Complaints Coordinator fills all the information regarding the given Complaint/Claim in the Database within **ten** working days after receiving it, and also creates a separate electronic folder for each Customer, in which electronic copies/photocopies of all documents related to the given Complaint/Claim are stored.

7.4. After completing each year, a new Database [eFO 64-05-06](#) is created for the following year.

7.5. The Complaints Coordinator ensures that information on Complaints/Claims that are at least **five** years old are stored in the Database and in the electronic files created by the latter.

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CHAPTER 8. REGULAR ANALYSIS AND REPORTING ON COMPLAINTS AND CLAIMS

8.1. The Complaints Coordinator conducts at least a quarterly analysis of received Complaints/Claims in order to evaluate the effectiveness of their management and form recommendations for improving the Bank's processes. The results of the analysis are submitted to the Bank's management and board for consideration in the form of reports in accordance with the requirements of the internal legal acts defining the procedure for providing the Bank's internal accountability.

8.2. The Bank's Compliance Service monitors the received Complaints/Claims in order to identify the Compliance risks in them and manage them in accordance with the Bank's internal legal acts.

CHAPTER 9. RESPONSIBILITY

9.1. Each employee involved in the process is personally responsible for observing and performing the actions of this Procedure.

9.2. If violations of the provisions of this Procedure were allowed by the employees involved in the process, then by the decision of the Chief Executive Officer, measures of responsibility provided by the RA legislation and internal legal acts of the Bank may be applied.

CHAPTER 10. TRANSITIONAL PROVISIONS

10.1. At the written or verbal request of the RA Central Bank, the Complaints Coordinator submits the information in the format defined by the Database [eFO 64-05-06](#).

10.2. The Customer experience Management Service is the owner of this Procedure.

10.3. This Procedure enters into force from 7 October, 2024.

10.4. From the day of enforcement of this Procedure, "Customer Complaints Management Procedure" [PRC 64-05#1](#), approved by Board minutes No. DEC 11-08, dated 26 March 2024, shall be repealed.

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SUBMITTED	APPROVED
Chief Executive Officer	President of the Board
Garegin Darbinyan	25.09.2024
	Vahe Badalyan

OWNER
Head of Customer Experience Management Service
Elen Khachatryan