

Approved  
by the decision N 14/26 of MC  
of “Byblos Bank Armenia” cjsc dated 01.04.2026



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**BYBLOS BANK ARMENIA**

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**PROCEDURE ON CONSIDERATION OF  
CUSTOMERS' COMPLAINTS**

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## GENERAL PROVISIONS

**1.1.** This procedure (hereinafter referred to as the “Procedure”) regulates the process of handling customer complaints at “Byblos Bank Armenia” CJSC (hereinafter referred to as the “Bank”).

**1.2.** The terms used in this Procedure have the following meanings:

- 1) **Customer** – a physical or legal entity who uses the Bank’s services or applies to use them.
- 2) **Complaint** – in accordance with the Law of the Republic of Armenia “On the Financial System Mediator,” a written complaint-claim submitted to the Bank by a physical entity customer, related to services provided by the Bank and containing a property claim, as well as any property claim submitted by a legal entity customer. A complaint must include at least the customer’s name, surname or company name, contact details (place of residence/location and phone number), signature, and a description of the complaint.
- 3) **Place of activity** – the Bank’s head office or branch. If the Bank’s service is provided to the customer through a third party (intermediary), then the place of activity also includes the head office or branch of that intermediary where the service is provided.
- 4) **Employee responsible for complaint registration / Assistant to the Chief Executive Officer** – the employee responsible for receiving complaints and providing necessary information to customers.
- 5) **Complaint handling process** – the process that includes submission of a complaint by the customer, acceptance of the complaint by the Bank, review of the complaint and decision-making, including clarification of issues related to the complaint with the customer.

**1.3.** In a branch, the responsible employee is the branch manager, and at the head office – the Assistant to the Chief Executive Officer. In their absence, the duties defined by this Procedure are assigned to their substitutes.

**1.4.** The Bank must visibly display and always make available at the place of activity, on its website and via printed materials:

- 1) The “What to do if you have a complaint” form (Appendix 1),
- 2) The complaint submission application form (Appendix 2).

**1.5.** During working hours, a responsible employee must always be present at the place of activity to receive complaints and answer customer questions related to complaints.

**1.6.** A notice must be posted at the place of activity indicating where the customer can get familiar with this Procedure in detail. Upon request, the Bank provides the customer with a copy of this Procedure. The Procedure is also published on the Bank’s official website under the “Customer Rights” section.

**1.7.** The Bank publishes on its website and at places of activity, and provides upon request, a phone number through which customers can contact the Bank to obtain information regarding complaints.



**1.8.** Any Bank employee who receives a complaint or is informed of a customer's intention to submit a complaint must direct the customer to the responsible employee and provide contact details (phone, email, etc.). If conversations related to complaint clarification are recorded, the responsible employee must inform the customer in advance.

**1.9.** The Bank is obliged to review a complaint if it is submitted within one year from the moment the customer became aware or could have become aware of the violation of their rights.

**1.10.** The Assistant to the Chief Executive Officer presents semi-annual reports to the Bank's Executive Board on customer complaints received by the Bank.

**1.11.** The Bank must provide customers with information regarding complaints in a clear, understandable, and non-misleading manner. The information must be provided at least in Armenian, unless another language has been agreed upon with the customer. The information must be easily readable and accessible for customers.

## **PROCESS OF RECEIVING, REVIEWING COMPLAINTS AND MAKING DECISIONS**

**2.1.** Customer complaints may be submitted in writing on paper (in person or by mail), online (Online Banking), as well as electronically by sending an email to the Bank's designated email address.

**2.2.** Customer complaints may also be forwarded to the Bank by the Financial System Mediator and the Central Bank.

**2.3.** A customer wishing to submit a complaint directly to the Bank is verbally informed by the responsible employee that:

- 1) the complaint is accepted if submitted in writing (online via Online Banking, in person, or by mail), as well as electronically,
- 2) the customer may obtain the Bank's internal rules for complaint handling.

**2.4.** A physical entity customer wishing to submit a complaint is also provided by the responsible employee with:

- 1) the "What to do if you have a complaint" form (Appendix 1 of this Procedure),
- 2) the complaint submission application form (Appendix 2 of this Procedure).

Legal entity customers may submit complaints in a free format.

**2.5.** Complaints are addressed to the Chief Executive Officer of the Bank and/or the branch manager, indicating the customer's contact details (name, surname/company name, address, identification document details, phone numbers or other contact means), as well as a list of attached documents.



**2.6.** A complaint may be submitted by the customer's representative. In such cases, a copy of a duly issued power of attorney confirming the representative's authority must be attached.

**2.7.** A complaint is considered invalid and will not be reviewed by the Bank if:

- 1) it is not signed or is signed by a person without proper authority,
- 2) it does not include the customer's name and surname,
- 3) the provided information is insufficient to identify the customer.

**2.8.** Written complaints may be submitted by filling out the complaint form at a branch and placing it in the designated complaint box, via online channels (Online Banking), or by sending the complaint as a registered letter to the Bank's head office.

**2.9.** When receiving a complaint in person from a physical entity, the Bank provides a receipt confirming acceptance of the complaint, indicating the submission date, complaint identification number, the signature of the receiving employee and/or the Bank's seal (Appendix 2).

**2.10.** An employee of the Administrative Department collects complaints from the designated "Customer Complaints" box located in branches on a daily basis and transfers them to the relevant employee of the Administrative Department.

**2.11.** All complaints received by mail, at branches, online, or electronically are registered on the day of receipt in the Bank's Administrative Department logbook and are forwarded within one day to the Assistant to the Chief Executive Officer.

**2.12.** Upon receiving a complaint electronically or online, the Bank immediately, but no later than the next business day, sends the physical entity customer a confirmation (receipt) to the email address from which the complaint was received. This confirmation includes the date of receipt, the complaint identification number, as well as the information defined in clauses 2.3 and 2.4(1) of this Procedure (Appendix 3).

**2.13.** Complaints in electronic form are submitted by sending a message to the Bank's email address: **info@byblosbank.am**.

**2.14.** The password for the above-mentioned email address is accessible only to the Assistant to the Chief Executive Officer and their substitute.

**2.15.** If a verbal complaint from a physical entity customer is received at the place of activity and/or via telephone, the Bank provides verbally the information defined in clause 2.3 of this Procedure and informs the customer where they can obtain that information. The Bank may also provide this information through a pre-recorded message.

**2.16.** The Assistant to the Chief Executive Officer submits the received complaints to the Chief Executive Officer, who decides which Bank employee(s) will review the substance of the complaint and prepare a



draft written response. The review of the complaint may not be assigned to the person whose actions are being appealed.

**2.17.** The Assistant to the Chief Executive Officer sends the complaint electronically to the employee assigned to prepare the response, indicating the deadline for providing the response to the customer.

**2.18.** Every complaint accepted in accordance with the established procedure must be forwarded to the Risk Management Department for assessment from an operational risk perspective.

**2.19.** The employee(s) assigned to prepare the draft written response must submit it to the Legal Department within a maximum of five working days.

**2.20.** The Assistant to the Chief Executive Officer is responsible for monitoring the process to ensure that deadlines for providing responses are not missed.

**2.21.** Once the written response to the complaint is ready, it is sent to the Assistant to the Chief Executive Officer. After obtaining the necessary approvals (signatures) from the relevant responsible employees, the Assistant submits it to the Chief Executive Officer for signing.

**2.22.** After reviewing the submitted written response, the Chief Executive Officer of the Bank may, if necessary, organize additional discussions regarding the response and make a final decision.

**2.23.** The Assistant to the Chief Executive Officer registers the customer complaint in the Complaints Database, indicating the customer's details, the date of receipt, the subject, the names of responsible employees, the Bank's incurred expenses (if any), and the date the response is provided/sent to the customer.

**2.24.** If the complaint is submitted by a physical entity customer and contains a property claim related to a breach of the Bank's obligations regarding services provided, the final response is sent by mail or delivered in person within ten working days from the date of receipt of the complaint.

**2.25.** When providing the response to the customer electronically or in person, the "What to do if you have a complaint" form (Appendix 1 of this Procedure) must be attached.

**2.26.** Correspondence related to claims/applications submitted by customers through the Financial System Mediator is received by the Bank via the Mediator's online platform, where the Assistant to the Chief Executive Officer is registered as a user. Responses to such claims are prepared by the Legal Department.

**2.27.** Complaints submitted by customers to the Central Bank are received by the Assistant to the Chief Executive Officer via the CBA/Net system, by mail, or electronically.

**2.28.** The Bank is obliged to respond to each complaint/application submitted to it within ten working days, unless shorter deadlines are established as an exception.



**2.29.** In cases where forming a final position on the complaint requires long-term review or collection of information from third parties, the employee assigned to prepare the response must, within three working days, prepare an interim response. This response must indicate the need for additional review or inquiries and, where possible, the timeframe for providing the final response. This clause does not apply to cases defined in clause 2.21.

**2.30.** In accordance with an internal decision of the Chief Executive Officer, responsible employees must submit the response letter for the CEO's signature at least one working day prior to the legally established deadlines.

**2.31.** The Assistant to the Chief Executive Officer provides the Central Bank, on a semi-annual basis, with the information database on complaints received from consumers, in accordance with Regulation 8/07 approved by Decision No. 200-N of the Central Bank of the Republic of Armenia dated November 23, 2018 (Appendix 4).

**2.32.** When receiving or reviewing a complaint, the Bank may not require the customer to provide documents:

- 1) that are not necessary to substantiate the complaint, the circumstances underlying it, or to identify the customer, or
- 2) that are already available to the Bank in connection with services provided to the customer, provided that the customer confirms in writing that the information contained therein has not changed.

### **3. REQUIREMENTS FOR THE BANK'S DECISION**

**3.1.** The final response provided by the Bank to the customer must include at least:

- 1) The Bank's clear position – to reject, partially satisfy, or fully satisfy the complaint,
- 2) The reasoning behind the Bank's decision,
- 3) Information about the unit or person responsible for handling the complaint (name of the unit or the person's name, surname, position), as well as contact details (phone, email, etc.),
- 4) Information that, in case of questions regarding the outcome of the complaint review, the customer may contact the unit (person) specified in subpoint 3 of this clause,
- 5) If the complaint is submitted by a physical entity customer and includes a property claim related to services provided by the Bank, must also include information that if the customer is not satisfied with the written response, they may protect their rights by applying to the court, the Central Bank, or the Financial System Mediator, including the applicable deadlines for submission.

**3.2.** If the complaint meets the criteria defined in clause 3.1(5), then in cases where the complaint is rejected or partially satisfied, the Bank provides (or, if submitted electronically, sends) a completed "What to do if you have a complaint" form in accordance with Appendix 1, attached to the written response.

