

	<b>CLIENT COMPLAINTS AND CLAIMS HANDLING PROCEDURE</b>	Page: 1/5 PRO-0027-00
		Created: 10/09/2014
		Updated:

<b>Client complaints and claims handling procedure</b>	
Purpose	The client complaints and claims handling procedure (hereinafter-procedure) defines the actions for prompt and efficient investigation of clients complaints and claims. With this procedure, Amundi-ACBA regulates also the relationships between Amundi-ACBA and Financial system mediator.
Legal and regulatory framework	Amundi Group: PRO-070 - Client complaints handling procedure CBA: Regulation 8/04 "Minimum Conditions and Principles for Internal Rules, Regulating the Procedure of Examination of Complaints/Claims of Customers" Law of RA on Financial system mediator
General rule	Amundi-ACBA must quickly and fairly handle complaints and claims received from clients; ensure that the information provided in response to the complaint is correct and appropriate; keep a record of each complaint and the measures taken for its resolution.
Scope	The procedure applies to all Amundi-ACBA's activities.
Related processes	CFM-02 - Information, Advice, Prevention CFM-03 - Non-compliance risk controls CML-01 - Customer relationship management
Actors	All Amundi-ACBA's staff, risk and compliance officer, assistant of the CEO
Detailed procedure	
	<p><b>1. Definitions</b></p> <p>The notions used in this procedure have the following meaning:</p> <ul style="list-style-type: none"> <li>- "Law" - Law of RA on Financial system mediator,</li> <li>- "Financial system mediator" (FSM) – an individual person examining claims of clients against Amundi-ACBA, through exercising powers vested by the Law and taking decisions thereof,</li> <li>- "Client" – individual, who uses Amundi-ACBA's services or applies for using them, which can be proved with documentation given by authorized body,</li> <li>- "Complaint"- Expression of dissatisfaction made by a client either in written form or any other traceable means, whether founded or not,</li> <li>- "Claim" - Complaint with financial impact in case the client is compensated for an error, or in case a commercial gesture is made,</li> <li>- "Responsible employee" – assistant of the CEO, who is responsible for</li> </ul>

acceptance and registration of documents and have responsibilities, defined in this procedure,  
Other notions used in this document have meanings defined by RA law on Financial system mediator and other laws.

This procedure does not cover

- simple requests for information or error correction or expressions of expectations or solicitations of benefits, which are considered to be commercial negotiations and may give rise to reductions, rebates or exemptions,
- claims of a legal or judicial nature (lawyer's letter, official notice, writ of summons, notice or deed delivered by bailiff), which are dealt with the legal department as part of a more general procedure for dealing with pre-litigation and litigation cases,
- demands received from regulator.

## **2. Submission process of complaints and claims**

The client can express his dissatisfaction to Amundi-ACBA regardless whether such right is provided with the contract (if any) between the client and Amundi-ACBA, or not. Consent or condition, which limits the client's right to apply to Amundi-ACBA is not valid.

Amundi-ACBA will accept any client's complaints or claims, if the client applies to Amundi-ACBA within one year after identifying the issue or potential issue.

The complaint or claim can be signed by the representative person of the client. In this case, the authorization paper should be attached.

Acceptance, examination and decision making regarding the client's complaint or claim is free of charge.

Any employee of Amundi-ACBA, who receives complaint or claim from a client, or to whom a client told about the aim to apply a complaint or claim, should guide the client to the responsible employee. The employee should also inform the responsible employee and the risk and compliance officer about the potential complaint or claim.

If the client informs the responsible employee, that he wants to submit a claim, the responsible employee informs the client, that:

- Claim will be handled when received, if it is received in written, form, as a hard copy or by email (info-armenia@amundi.com) and with sufficient detailed information.

- He can obtain the copy of this procedure.

### **3. Determination of the claim**

After receiving a potential complaint, the responsible employee immediately submits it to the risk and compliance officer for first analysis. The risk and compliance officer analyses its content and determines, whether it can be understood as a complaint or as a claim, or not.

A receipt must be sent within one business day:

- If the complaint or claim was received as a hard copy, the responsible employee provides the client with a paper receipt (Annex 4).
- If the complaint or claim was received by email, in this case Amundi-ACBA sends to the email of the client an electronic receipt (Annex 5)

In cases of claims, the responsible employee provides the client with:

- Explanatory bulletin for resolving disputes (Annex 1),
- Procedure of examination of complaints/claims submitted by customers against Amundi-ACBA (Annex 2),
- Application form of client claim (Annex 3).

All complaints and claims are registered by the responsible employee in the book for incoming documents, as well they are registered in the complaints and claims database by the risk and compliance officer. Each complaint or claim is identified by an id number in the database. Records of all received complaints and claims must be kept by Amundi-ACBA at least for 7 years after receiving.

### **4. Investigation**

The risk and compliance officer informs the CEO. He can discuss the content of the complaint or claim with all relevant persons (legal, managers...). After investigation of the claim, the risk and compliance officer issues a compliance opinion in order to send the response to the client within 10 business days.

Amundi-ACBA informs CBA about the complaint or claim, if it can cause a systemic impact.

### **5. Response to the client**

The response to the client should include:

- the precise decision of Amundi-ACBA (refusal, satisfaction or partially

satisfaction of the claim),

- Amundi-ACBA's argumentation for the decision,
- the name, position and contacts of the risk and compliance officer, responsible person for investigation of the claim,
- declaration, that if the client has any questions regarding the claim, he can contact the person mentioned above,
- declaration, that if the client is not satisfied with the written response of Amundi-ACBA, he can apply whether to the FSM, to the Central Bank of Armenia, to the arbitration court, or to the court,
- the deadlines for the client to apply for FSM, if he is not satisfied with response of Amundi-ACBA.

In case, Amundi-ACBA refuses or partially satisfies the claim, Amundi-ACBA should again provide the client the explanatory bulletin for resolving disputes (Annex 1).

#### **6. Relations with financial system mediator**

In case the client do not receive any response from Amundi-ACBA during 10 business days or is not satisfied with the final response, he has the right to submit a claim to the Financial system mediator within 6 months.

The FSM is allowed to investigate the claim, if the compensation claim does not exceed 10 million AMD, or equivalent amount denominated in foreign currency.

Amundi-ACBA must cooperate with FSM and during the period mentioned in the Law or, if none, during reasonable period provide explanations, all needed documents, even if they contain confidential information

When receiving a claim against Amundi-ACBA, FSM sends the copy of the claim to Amundi-ACBA. The risk and compliance officer informs the CEO about the claim and discusses the content of the claim with all relevant persons.

The FSM can arrange a meeting for receiving verbal explanations of the parties, if required by Amundi-ACBA or by the client.

After investigation of the documents transmitted by FSM, the risk and compliance officer issues a compliance opinion.

Based on the compliance opinion, the response to FSM must be sent within 14 business days after receiving the claim from FSM. The letter should contain the precise decision about the claim (refusal, satisfaction or

	<b>CLIENT COMPLAINTS AND CLAIMS HANDLING PROCEDURE</b>	Page: 5/5 PRO-0027-00
		Created: 10/09/2014
		Updated:

	<p>partially satisfaction of the claim). Written explanations, or objections, or any other documents asked by financial system mediator, can be attached to the response.</p> <p>If Amundi-ACBA needs more than 14 business days for investigation, it can apply to FSM to postpone the deadline for additional 7 business days.</p> <p>Amundi-ACBA has not abdicated the right to appeal Financial system mediator’s decisions. That means, that Amundi-ACBA in some cases can appeal Financial system mediator’s decisions in the court.</p>
Controls	<p>Quarterly controls are performed on received complaints and claims. The results of controls are reported to internal control committee and to Amundi compliance business line.</p>
Annexes	<p>Annex 1: Explanatory bulletin for resolving disputes  Annex 2: Procedure of examination of complaints/claims against Amundi-ACBA submitted by customers  Annex 3: Application form of client claim  Annex 4: Receipt of client complaint or claim  Annex 5: Electronic receipt of client complaint or claim</p>

	<b>CLIENT COMPLAINTS AND CLAIMS HANDLING PROCEDURE</b>	Page: 1/2 PRO-0027-00
		Created: 10/09/2014
		Updated:

## Annex 1

### Explanatory bulletin for resolving disputes

**Appendix 1**  
**to the Appendix to the Central Bank**  
**of the Republic of Armenia**  
**Board Resolution No. 225-N,**  
**dated July 28, 2009**

Attention: Dear customer, please be informed that your rights can be protected both judicially and through the Financial system mediator.

➤ In case of applying to the court the dispute between “Amundi-ACBA asset management” CJSC (hereinafter- Amundi-ACBA) and you is solved by the court. You can apply to the court at each stage of the examination of your claim. Court decision cannot be reviewed by the Financial system mediator.

➤ In case of applying to the Financial system mediator, the dispute between Amundi-ACBA and you is solved by the Mediator, as stipulated in the Law of the Republic of Armenia “On Financial system mediator”. Financial system mediator’s services are FREE OF CHARGE. If you have any complain, first of all you have to apply to Amundi-ACBA. Amundi-ACBA has to response to your complain within 10 business days. After receiving the response of Amundi-ACBA or without it in case you did not receive any response, you can apply to the Financial system mediator.

Financial system mediator cannot examine your claim, if:

1. 10 business days have not yet passed after the claim was submitted to Amundi-ACBA,
2. You do not claim a monetary or property compensation, Your compensation claim exceeds 10 million Armenian drams (or adequate amount denominated in foreign currency),
3. More than six months have passed after you received response from Amundi-ACBA,
4. The activity or inactivity, which is the subject of your claim, has taken place before August 2, 2008.

Warning: Financial system mediator cannot examine your claim, if it is being examined by the court (or arbitration court) or there is already available court (or arbitration court) decision on that claim.

**Financial system mediator office****Ombudsman:** Piruz Sargsyan**Address:** 15, M. Khorenatsi Str.,  
0010 Yerevan, Armenia**Tel.:** +(37410) 58-23-22, 58-23-21**Fax:** + (37410) 58-24-21**Website :** www.fsm.am

Dear customer, please be informed, that Amundi-ACBA has not abdicated the right to appeal Financial system mediator's decisions against Amundi-ACBA.

That means, that Amundi-ACBA in some cases can appeal Financial system mediator's decisions made against Amundi-ACBA in the court.

➤ You may also submit a claim to the Central Bank. Please be informed that the Central Bank is not entitled to solve the disputes between Amundi-ACBA and you, but may apply sanctions towards Amundi-ACBA, if it finds out that Amundi-ACBA has violated requirements of the law.

**Central Bank of the Republic of Armenia****Address:** 6, V. Sargsyan Str.,  
0010 Yerevan, Armenia**Tel.:** +(37410) 592-698**E-mail:** mcba@cba.am**Fax:** +(37410) 523-852**Website:** www.cba.am

Dear customer, please be aware, that if an arbitration agreement has been signed between Amundi-ACBA and you, that means that disputes arisen from the contract signed with Amundi-ACBA, are to be solved by arbitration court. You are deprived from the right to go to court with the disputes arisen from the contract, signed between Amundi-ACBA and you. Decisions made by arbitration court, as a rule, are not reconsidered by the court.

	<b>CLIENT COMPLAINTS AND CLAIMS HANDLING PROCEDURE</b>	Page: 1/2 PRO-0027-00
		Created: 10/09/2014
		Updated:

## Annex 2

### “Amundi-ACBA asset management” CJSC

#### Procedure of examination of complaints/claims against Amundi-ACBA submitted by customers

**Appendix 2  
to the Appendix to the Central Bank  
of the Republic of Armenia  
Board Resolution No. 225-N,  
dated July 28, 2009**

- This procedure relates to complaint/claim, submitted by the customer, relating to the services, provided by the company, and contains claim of ownership.
- The procedure of examination of complaint/claim includes provision of information on complaint/claim to the customer, submission of complaint/claim by the customer, acceptance and examination of complaint/claim, as well as taking decision thereon by Amundi-ACBA.

**STEP 1.** Become familiar with your rights and client complaints and claims handling procedure.

- Any employee of Amundi-ACBA must refer You to the responsible employee in that headquarter for acceptance of claim and disclosure of necessary information, as well as must provide to you contact details for approaching the responsible employee (telephone number, electronic address, etc.).
- The responsible employee of the company shall:
  - ✓ inform you about your rights, the client complaints and claims handling procedure in Amundi-ACBA (submission and examination of, as well as taking decision on claim).
  - ✓ provides the explanatory bulletin for resolving dispute, booklets provided by the financial system mediator’s office (if any), also upon Your request provides the internal rules of examination of complaint/claim by the company and the form of application for submission of claim by the customers.
  - ✓ helps to complete the application of complain/claim, if you wish.

**STEP 2.** Complete the complaint/claim and save the receipt.

- Procedure of filling and submission of claim.

Please fill the application of claim and submit it to the responsible employee or to the following postal address (Piazza Grande business center, 10 Vazgen Sargsyan Str., 0010 Yerevan, Armenia, premises 100-101). When filling the application, get the receipt from the company and save it.



	<b>CLIENT COMPLAINTS AND CLAIMS HANDLING PROCEDURE</b>	Page: 2/2 PRO-0027-00
		Created: 10/09/2014
		Updated:

- Client complaints and claims handling procedure and taking decision thereon

The company shall examine complaint/claim and take decision (to satisfy, partially satisfy or refuse) within 10 business days.

- About returning a response to complaint/claim

In any case within 10 business days Amundi-ACBA shall submit a written response of complaint/claim to You.

The written response shall reflect the explicit position of Amundi-ACBA (to satisfy, partially satisfy or refuse), the facts, on which the result of the examination of complaint/claim is grounded, information on the department and (or) person responsible for procedure of examination of complaint/claim (name of the department or name, surname and post of the person) and contact details (telephone number, electronic address, etc.), whom You can approach also in case of having questions on the result of examination of complaint/claim, as well as which measures can be taken by the customer in order to defend his/her rights in case of being dissatisfied with the written response to complaint/claim (to bring an action before the court, apply to the Financial system mediator, to the Central Bank).

The written response will be presented via address or communication facilities, mentioned by You.

**STEP 3.** Acquaint yourself with the written response, submitted to You by Amundi-ACBA. Make sure that it includes all necessary information.

If any questions arise, approach the person, mentioned in the Response.

**STEP 4.** If you are not satisfied with final response to the complaint/claim.

In case You did not receive any response from Amundi-ACBA during 10 business days or you are not satisfied with the final response to the complaint/claim, You have the right to submit a claim to the Financial system mediator.

#### **Financial system mediator office**

**Ombudsman:** Piruz Sargsyan  
**Address:** 15, M. Khorenatsi Str, 0010 Yerevan,  
Armenia  
**Tel.:** +(37410) 58-23-22, 58-23-21  
**Fax:** + (37410) 58-24-21  
**Website :** www.fsm.am

	<b>CLIENT COMPLAINTS AND CLAIMS HANDLING PROCEDURE</b>	Page: 1/1 PRO-0027-00
		Created: 10/09/2014
		Updated:

### Annex 3

#### Application form of client claim

“Amundi-ACBA asset management” CJSC  
to the attention of Chief Executive Officer  
10 V. Sargsyan Str., premises 100-101,  
0010 Yerevan, Armenia

from

\_\_\_\_\_

Clients name, surname

\_\_\_\_\_

\_\_\_\_\_

Registration and post addresses

\_\_\_\_\_

Phone number

\_\_\_\_\_

Email address

#### Description of the claim

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Client \_\_\_\_\_

first name, surname

signature

date

	<b>CLIENT COMPLAINTS AND CLAIMS HANDLING PROCEDURE</b>	Page: 1 / 1 PRO-0027-00
		Created: 10/09/2014
		Updated:

**Annex 4**

**Receipt of client complaint or claim**

Dear \_\_\_\_\_.

We received your complaint (claim) on the \_\_\_\_\_.

Our response will be sent within 10 business days. We may contact you before this delay, if necessary.

The person, responsible for investigation of your complaint(claim) is our risk and compliance officer \_\_\_\_\_.

Responsible employee \_\_\_\_\_

first name, surname signature

Date \_\_\_\_\_

	<b>CLIENT COMPLAINTS AND CLAIMS HANDLING PROCEDURE</b>	Page: 1 / 1 PRO-0027-00
		Created: 10/09/2014
		Updated:

**Annex 5**

**Electronic receipt of client complaint or claim**

Dear \_\_\_\_\_

We received your complaint (claim) on the \_\_\_\_\_.

Our response will be sent within 10 business days. We may contact you before this delay, if necessary.

The person, responsible for investigation of your complaint(claim) is our risk and compliance officer \_\_\_\_\_.

Responsible employee \_\_\_\_\_

first name, surname

Date \_\_\_\_\_