**APPROVED**

Supervisory Board

VTB Bank (Azerbaijan) OJSC

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Chairman of the Supervisory Board

**\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ D.А. Bortnikov**

The Rules for Handling Customers’ Appeals of

VTB Bank (Azerbaijan) OJSC

**Baku – 2024**

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# 1. GENERAL PROVİSİONS

* 1. The Rules for Handling Customers’ Appeals of VTB Bank (Azerbaijan) OJSC (hereinafter referred to as the Rules) are an internal regulatory document of VTB Bank (Azerbaijan) OJSC (hereinafter referred to as the Bank), establishing the procedure for interaction between structural units and decision-making when considering appeals from customers and banking market regulators, as well as providing them with response information and, if necessary, compensation to customers of banking services.
  2. These Rules have been developed in accordance with the Legislation of Azerbaijan Republic of (hereinafter referred to as AR), the Law of AR “On Combating Money Legalization of Criminally Obtained Funds or Other Property and Counter-terrorism Financing”, current regulatory acts of Central Bank (hereinafter referred to as CB AR), the Charter of the Bank and other internal documents of the Bank, as well as international banking practice.
  3. Customers’ appeals may сoncern all spheres of activity of the Bank's structural units providing services to customers in accordance with the powers granted to the Bank on the basis of a license issued by Central Bank of AR.
  4. Bank employees are personally responsible for failure to comply or improper compliance with the procedure for performing actions established by the Rules.
  5. In the event of relations that are not concerned in the Rules, the Bank employees involved in the process of reviewing Customers’ Appeals must be guided by the current Legislation of AR and the internal documents of the Bank.
  6. The purpuses of the Rules are:
     1. organizing the reception and registration of Customers’ Appeals through all communication channels supported with them;
     2. investigation and reviewing of Сustomers' Appeals;
     3. investigation and reviewing of requests from regulators;
     4. special procedure for handling Customers’ complaints;
     5. compensation payment to Сustomers;
     6. regulation of the procedure for maintaining regular reporting on Customers’ Appeals and submitting reporting for consideration by the Bank's Management;
     7. procedure for providing information on Customer complaints;
     8. regulation of the procedure for interaction with Customers, as well as with the Bank's structural units in the process of receiving and reviewing Customer appeals.
  7. Actions under the clauses of the Rules that do not provide for deadlines for execution must be taken for execution without delay.
  8. The Bank's structural units, within the scope of their competence, must strive to reduce review period the Bank's Customers' appeals.
  9. Ignorance by the Bank employees of the requirements of the documents of Central Bank of AR and the Rules when reviewing Customer’s Appeals does not absolve them from responsibility in the event of any violations committed by them.
  10. In case of changes in formats or names of branches, the actions regulated by the Rules do not change. In case of any change in the Bank's regulatory documents, the Rules apply to the extend not inconsistent with the newly adopted documents.
  11. For the purposes of these Rules, the following terms and definitions are used:
  12. ABIS – Automated Banking Information System CFT IBSO;

1. ATM (Automatic Teller Machine) – an automatic device used to issue and receive cash without visiting a bank teller, as well as to perform other operations, including payment for goods and services. To perform operations using a Payment Card at an ATM, you must enter a PIN-code;
2. Dispute cycle – a set of measures carried out by the Bank for the purpose of settling a Disputed Transaction on a payment card and carried out within the framework of the Rules of international payment systems;
3. DOD – Director of OD;
4. DCBD – Department of Corporate Business Development of the Bank;
5. DRBD – Department of Retail Business Development of the Bank;
6. Complaint – an appeal from Customer, which provides for a requirement related to the restoration and protection of his rights and freedoms (including in relation to alleged violations) established by the contractual obligations of the Bank and/or the Legislation of AR, as well as an appeal of the Customer expressing dissatisfaction with the organization of the Bank's work, the quality of the services provided;
7. Requests from State Authorities of the AR/regulators – requests from CB of AR and other state authorities of AR regarding the Bank’s Customers;
8. Channel for receiving Customers’ Appeals (hereinafter referred to as the Channel) – a communication channel established by the Rules for receiving Customers’ Appeals. The Channels not provided for by the Rules are not channels for receiving appeals for the purpose of their reviewing within the framework of the Rules;
9. Customer/Consumer – an individual or legal entity, an individual entrepreneur (or a person acting by virtue of the power of attorney) (resident/non-resident), who has applied to the Bank for the purpose of performing a transaction to provide banking services and/or a person with whom a banking transaction has already been performed;
10. Supervisor – Member of the Board/Director of the Bank Department/Head of OD;
11. CC – Contact Center of DRBD;
12. IHE – in-house email of the Bank;
13. A Hall administrator – a DRBD employee whose responsibilities include the initial identification of the Customer's needs, coordination with the relevant employee, and conseling of bank Customers on issues of filling out questionnaires, order forms, and other documents;
14. An unfounded complaint – Customer’s appeal, the unfoundedness of which can be determined during the analysis of the complaint at the stage of the investigation and/or from the content of which, during processing, it is obvious that the Bank has not violated its contractual obligations;
15. CSQCD – the chief of SQCD;
16. CCCDPD – the chief of CCDPD;
17. COO – chief operating officer of OD;
18. SB – Supervisory Board of the Bank;
19. CSO – the chief security officer;
20. CDSNDCS – the chief of DSNDCS;
21. НCSC/BD – the head of the Customer Service Center/Branch Director;
22. Customer/Consumer Appeal (hereinafter referred to as Appeal) – an individual or collective appeal, including a Complaint, Request, Question, Application, Proposal, sent (submitted) in writing, including electronically or orally to the Bank, personally by the Customer or via his/her representative;
23. OD – Operation Department of the Bank;
24. SQCD – Service Quality Control Division of the Bank;
25. DTO – Division of Treasury Operation of Finance Department (hereinafter FD);
26. MCRMD – Methodology and Corporate Records Management Department of OD;
27. CAMU – Collateral assessment and monitoring unit of the Underwriting and Credit Risks Directorate of the Bank's Risk and Monitoring Department;
28. DSCS – Department of Sales and Customer Service for Retail Business/Department of Sales and Customer Service for Small and Medium Business of CSC/Department of Sales and Branch Customer Service;
29. AML/CTFandCD – Anti-Money Laundering and Counter-Terrorism Financing and Compliance Department of the Bank;
30. CCDPD – Claims and Customer Data Processing Department of OD;
31. OAD – Organizational and administrative document of the Bank;
32. AMSPD – Advertising, Marketing and Special Projects Department of the Bank;
33. DSSPO – Division of Support for Settlement and Payment Operations of OD;
34. OD – Operations Department of OD;
35. Re-applying – another appeal from the same applicant on the same issue, sent to the Bank, to which 3 (three) responses were given within a year[[1]](#footnote-1);
36. A systemic problem – a set of factors that cause the emergence and recurrence (potential recurrence) of controversial situations related to shortcomings in the information provided to customers about services/products, current processes, regulation/lack of regulation, lack of automation or deficiencies in the functionality of IT systems.
37. PS – payment system (SWIFT, ХÖHKS, Transit, Financial Message Transfer System and Multicard);
38. Explanatory note – a document containing explanations from a Bank employee regarding a controversial situation that has arisen;
39. Register is an information resource including a system of records in the established form, produced by CCDPD for the purpose of systematizing the recording of Customer appeals;
40. IAS – Internal Audit Service of the Bank;
41. CCE – employee of Contact Center;
42. SQCDE – employee of SQCD;
43. MCRMDE – employee of MCRMD of OD;
44. SCSDE – employee of SCSD of CSC/Branch;
45. CCDPDE – an employee of CCDPD responsible for conducting an investigation and preparing an responce to the Customer’s Appeal, as well as responsible for the correct assignment of the validity/unvalidity sign to complaints and for the general coordination of the activities of the Bank’s divisions within the framework of the requirements of the Rules;
46. ERA – a Bank employee responsible for receiving Customers’ Appeals in accordance with Table 1;
47. A disputed transaction – an operation using the Bank payment card, carried out in a third-party bank device (Not-On-Us), based on the fact of the reflection of the financial results with the respect of the card account the cardholder expresses his/her disagreement;
48. EDTS – electronic document transfer systems (Internet banking, Mobile Banking, App Store, Play Mark, etc.);
49. CSE – commersial service entities (shops, hotels, transport agencies, other service enterprises) those accept payment cards;
50. DS – the Bank Directorate of Security;
51. ARD – Accounting and Reporting Department of FD;
52. OIT – Bank’s Office of Information Technology;
53. BAE – an employee authorized to sign responses to Customers' appeals on behalf of the Bank;
54. PCD – Payment Card Department of OD;
55. Authorized employee (hereinafter referred to as AE) – within the framework of this Instruction is a Bank employee responsible for reviewing and preparing a response to a Customer’s Appeal based on the Competency Matrix (Table 2);
56. DSNDCS – Directorate of Sales, Network Development and Customer Service of DRBD;
57. DWDACB – Directorate on Work with Distressed Assets of Corporate Business DCBD;
58. DWDARB – Directorate on Work with Distressed Assets of Retail Business of DRBD;
59. DWCC – Directorate on Work with Corporate Customers of DCBD;
60. Branch – a separate unit of the Bank that is not a legal entity, located outside the location of the Bank, for whose obligations the Bank itself is responsible, capable of carrying out all or part of the banking activities permitted to the Bank;
61. CSC – Customer Service Center of DRBD;
62. LD – the Bank Legal Directorate.

# CHANNELS FOR RECEIVING CUSTOMERS’ APPEALS

1. In order to ensure conditions for the functioning of the feedback system with Customer, providing Customers with the opportunity to send Appeals to the Bank at a time convenient for the Customer and in a convenient form, the following channels for receiving Customers’ Appeals to the Bank are organized and supported (Appendix 1) are:
   * 1. Personal appeal to the Bank's unit - the Customer fills out a written Application form (Appendix 2, 3) at the Bank CCSC/Branch.
        1. The “Customer Appeal” form (Appendix 2) is filled out at any insistence, demand or in a controversial situation, except for the case when the Customer disputes a transaction made with a payment card or without its at an ATM or CSE;
        2. The “Customer Appeal” form (Appendix 3) is filled out in the event of a dispute regarding transactions carried out at the Bank’s ATMs (including those with the cash deposits function);
        3. The application on a disputed transaction is filled out in free form in English (in Azerbaijani for disputed transactions in the territory of Azerbaijan Republic) only if the Customer disputes a transaction made via a payment card issued by the Bank at an ATM and cash points of a third-party bank, as well as when disputing a transaction made at a CSE.
     2. Complaints and Suggestions Box – a specially equipped Complaints Box in the CSC/branches of the Bank, into which the Customer places his/her Appeal (Appendix 2,3);
     3. Postal/courier service;
     4. Public email address, Bank website, Internet forums, official Bank pages in social networks, official contact numbers of messengers for communication with the Bank, as well as online Platforms (such as “Google Play”);
     5. Telephone communication channels (СС);
     6. Electronic channels of remote access (hereinafter referred to as ECRA).
     7. PS.

# RECEIVING AND REGISTRATION OF APPEALS

* 1. The receiving and registration of Appeals received through the channels provided for in Chapter 2 of the Rules is carried out by BAE of the divisions specified in Table 1.
  2. The transfer of the Appeal from the unit that received the Appeal to the unit responsible for its processing is carried out no later than the next working day after the Appeal is received.

**Table 1**

|  |  |  |
| --- | --- | --- |
| **The channels for receiving appeal** | **Division responsible for receiving Customer Appeal** | **Division responsible for registering the Customer’s Appeal** |
| Personal appeal to the Bank's unit | DSCS | DSCS |
| Complaints and suggestions box | SQCD | MCRMD |
| Postal/courier service | MCRMD/Hall administrators/DSCS of CSC/Branch | MCRMD |
| Public email address, Bank website, Internet forums, official Bank pages in social networks, official contact numbers of messengers for communication with the Bank, as well as online Platforms | MCRMD/CC/AMSPD | CC  MCRMD  AMSPD |
| Telephone communication channels (CC) | CC | MCRMD, CC |
| PS | DSSPO | MCRMD |
| ECRA | Department of Information Security Support of the Directorate of Operational Activity of OD (hereinafter referred to as DISS) | DISS |

* 1. **The processing the Appeals when the Customer personally applies to the Bank.** 
     1. Customer’s appeal received by the Bank are accepted for reviewing only if they contain mandatory details sufficient for the unambiguous identification of the Customer;
        1. Name of the organization[[2]](#footnote-2) and address of the legal entity. When a representative applies on behalf of the organization, the last name, first name, patronymic and address of the representative - for customers-legal entities;
        2. Surname, first name, patronymic (hereinafter referred to as Full Name), indicating the address of registration or place of work - for customer-individuals;
        3. Customer's signature indicated in the signature samples[[3]](#footnote-3);
        4. At least one contact detail of the Customer (postal address, contact phone numbers, email address).
     2. Customers' Appeals, with the exception of Appeals specified in paragraphs 2.1.1, 2.1.1.3 and 2.1.3, are drawn up in a free format, provided that they contain the mandatory details sufficient for the unambiguous identification of the Customer, listed in paragraph 3.3.1 of the Rules.
     3. If the Customer does not wish to provide his/her data (at least one of the mandatory details listed in paragraph 3.3.1 of these Rules), he/she is notified by the BAE that his/her Appeal will be taken into account by the Bank, but the implementation of measures on the merits of this Appeal will be carried out at the discretion of the Bank, while the Bank does not assume any obligation to the Customer to respond to the Appeal.
     4. Upon receipt of an oral appeal from a Customer located in a Bank unit, BAE is obliged to offer the Customer to present the Appeal in writing, with the obligatory indication of the details specified in paragraph 3.3.1. of the Rules.
     5. After the Customer's Appeal has been processed, BAE has to:
        1. puts a stamp on the Customer's Appeal about its receipt, indicating the date and time of receipt, signs with initials, and then provides the Customer with a copy of the Appeal;
        2. informs the Customer orally about the standard period for consideration of the Application, as provided for in Chapter 8 of the Rules;
        3. Further steps for preparing a responce to the Customer's Appeal are described in Chapter 6 of the Rules.
     6. When a Customer contacts the Bank to drawn up a complaint, BAE and the head (НCSC/BD) of the relevant division are obliged to take all possible actions within their competence in order to resolve the controversial situation.
     7. Only if it is impossible to resolve the problem without the processing an appeal, BAE:
        1. provides the Customer with the appropriate form to process appeal (in accordance with Appendix 2 or 3);
        2. accepts the processed Appeal from the Customer;
        3. identifies the person submitting the Application in accordance with paragraph 3.3.1. of the Rules;
        4. checks the completeness of the information provided in the Appeal (including filling in mandatory fields), the presence of attached documents confirming the controversial situation;
        5. puts a stamp of reciept, date, position, full name and signature on the Appeal in the appropriate columns. Separates the tear-off part (marked with a dotted line) with a mark of reciept of the Appeal from the original and hands it over to the Customer (Appendix 3);
        6. informs about possible deallines for its consideration and methods for obtaining results;
        7. forwards the Customer's Appeal to MCRMD.
        8. further steps for preparing an responce to the Customer's Appeal are described in Chapter 6 of the Rules.
     8. If the Customer does not have documents at the time of the appeal confirming the controversial situation, the fact of the transaction (receipts, cheques, statements of accounts of third-party banks, etc.), CCDPDE accepts the appeal and informs BAE via IHE about the need to submit documents, in any way convenient for the Customer (if available), for making a decision.
  2. **Drawing up the Appeals accepted by MCRMD.** 
     1. Upon receipt of an Appeal by MCRMD, the MCRMDE distributes the appeals, scans them and sends them via IHE to the Bank's units no later than the working day following the day of receipt of the Customer's Appeal, and files the original Appeal in the appropriate folder in accordance with the Bank's internal document regulating the procedure for Records Management.
     2. Timely reflects the date and stage of processing of the complaint in the relevant portal to ensure that the Customer tracks the status of the complaint.
     3. Further steps for preparing an responce to the Customer's Appeal are described in Chapter 6 of the Rules.
  3. **Acceptance Customers’ Appeals via telephone communication channels.**
     1. When receiving the Customer's Appeal during communication with the Customer, CC employee:
        1. provides the greatest possible detail of the Customer's Appeal (name of the Bank's Sales Office where the service was provided, name of the banking service or product, full name of the Bank employee who worked with the Customer, date and approximate time of service, etc.);
        2. clarifies all mandatory details of the Customer in accordance with clause 3.3.1. of the Rules;
        3. informs the Customer of the standard terms for consideration of the Customer's Appeal, as provided for in Chapter 8 of the Rules;
        4. prepares a brief description of the Customer's Appeal.
     2. All Customer Appeals of the CSC/branch are sent to MCRMD for registration via IHE with the indication in the copy of HOD, CCSC/BD, CSQCD and the management of the CC;
     3. Further steps for preparing a responce to the Customer's Appeal are described in Chapter 6 of the Rules;
     4. Further negotiations with the Customer are conducted by telephone, unless the Customer is offered/selected another method at the stage of receiving the Appeal.
  4. **Acceptance Customers’ Appeals via Electronic channels of remote access.**
     1. Upon receipt of a message from the Client via the electronic channel of remote access (ECRA) BAE:
        1. takes all possible actions within its competence in order to resolve the controversial situation;
        2. only if it is impossible to resolve the problem without drawing up an appeal, the BAE informs the Customer of the standard period for reviewing the Appeal, stipulated by Chapter 8 of the Rules, by sending a response message to the Customer through EDTS and forwards the Customer's Appeal to the MCRMD for registration and further review by CCDPD;
     2. Further steps for preparing an responce to the Customer's Appeal are described in Chapter 6 of the Rules.
     3. Further negotiations with the Customer are conducted by telephone, unless the Customer is offered/selected another method at the stage of receiving the Appeal.
  5. **Acceptance of Appeals received via payment systems.**
     1. The procedure for receiving and further processing of Appeals received via the Bank's PS is determined and implemented in accordance with the current Rules for receiving and sending correspondence via the Bank's PS.
  6. **Acceptance of Customers' Appeals received via the Bank's Complaints and Suggestions Box.** 
     1. Every week in the branches located in Baku city of and Absheron, and twice a month in the regional branches, the SQCDE opens the Complaints and Suggestions Boxes located in the CSC/branches of the Bank, after that:
        1. Checks the Appeals for the presence of the mandatory details specified in paragraph 3.3.1. of the Rules. In the absence of the necessary details, the Appeal is not accepted for further execution. Anonymous Appeals of Customers will not be accepted for consideration by the Bank.
        2. Submits correctly drawn up Appeals to MCRMD;
        3. Further steps for reviewing Appeals received via the Complaints and Suggestions Box are carried out identically to the procedure for receiving Customers’ Appeals via MCRMD.
        4. Further steps for preparing an responce to the Customer's Appeal are described in Chapter 6 of the Rules.
  7. **Acceptance Customers’ Appeals to the Bank's corporate email address and the Bank's official pages on social networks and using a special form on the Bank's website.** 
     1. Monitoring of Customers’ Appeals received at the address of the CEP or submitted using a special form on the Bank's website, on the Bank's official pages on social networks, on the official contact numbers of messengers, as well as online platforms is carried out by responsible employees of the MCRMD/CC/AMSPD, respectively.
  8. Acceptance Customer' Appeals to the address of the Bank's official page on social networks, official contact numbers of messengers for communication with the bank, as well as online platforms.
     1. Monitoring of Customers’ Appeals is carried out daily. During the working day, CC employees check the e-mail/website/pages of the Bank, etc. in social networks for the receipt of Appeals, after that:
        1. When receiving Appeals via the Bank's website/pages on social networks, CC employees check the Appeal for the presence of the mandatory details specified in paragraph 3.3.1. of the Rules.
           1. In the absence of mandatory details, the Customer is asked to provide data sufficient to uniquely identify the Customer.
     2. On the day of the monitoring, as provided for in paragraph 3.10.1. of the Rules, all correctly completed Customers’ Appeals are forwarded to MCRMD employee via IHE, indicating COD, CCSC/BD, DSNDCS, CSQCD and the head of CC in the recipients' copy.
     3. In the absence of the necessary details, CC employee sends the sender of the Appeal a request to provide the missing details with a notification that anonymous Appeals from Customers are not considered by the Bank.
     4. On the day of registration of the Customer's Appeal, CC employee informs the Customer of the standard period for reviewing of the Customer's Appeal, stipulated by Chapter 8 of the Rules, via his e-mail address, unless the Customer has proposed another form of sending a response at the stage of acceptance the Appeal.
     5. Further correspondence with the Customer is conducted via e-mail, unless the Customer is offered/selected another method at the stage of acceptance the Appeal.
  9. The acceptance of Appeals received at the Bank's corporate e-mail address is carried out by the employees of the MCRMD in the same manner as the procedure for accepting Customers’ Appeals via MCRMD.
  10. **Acceptance Customers' Appeals related to challenging transactions on payment cards within the framework of the PS is carried out in accordance with the Rules of the payment system, the processing center in effect at the time of drawing up the appeal.**
  11. **Acceptance Customers' Appeals related to transactions with valuables at Cash Desks of the CSC/Branches:** 
      1. Appeals regarding the discrepancy between valuables (which are assets of the Bank or security for the Customer's obligations to the Bank) received from the cash desk of the CSC/Branches are accepted for consideration only if the recipient checked them at the time of receipt, without leaving the operating cash desk in the presence of an employee of the CAMU in accordance with the current internal document regulating the procedure for carrying out cash transactions.
      2. In the event of detection of surpluses/shortages or in the presence of other complaints related to the received valuables (which are assets of the Bank or security for the Customer's obligations to the Bank), CAMU employee notifies CDS of the need to appoint a responsible employee to be present when drawing up the Act (Appendix 6) in connection with the current situation.
      3. Appeals regarding discrepancies in valuables (after opening Individual Bank Safes, hereinafter referred to as IBS) received from the cash desk of the CSC/Branches are accepted for reviewing only in the event of the presence of the BD/CCSC with an attachment in the form of an inventory report of valuables opened by the IBS.
      4. The Customer's appeal drawn up in accordance with paragraph 3.2 of the Rules with an appendix in the form of an Act (Appendix 6), which reflects a detailed description of the values ​​and discrepancies. The Appeal and the Act are drawn up in the presence of the Customer, DSCSE, CCSC/BD, CAMU and the responsible employee of DS.

## Features of acceptance and reviewing Complaints depending on the channel for receiving Appeals.

* + 1. A complaint received via the channels specified in paragraphs 2.1.4 – 2.1.7 may be considered only if there is sufficient data provided by the Customer to carry out identification (in accordance with paragraph 3.3.1 of the Rules).
  1. **Criteria for refusal to accept and reviewing Customer' Appeals.**
     1. All Customers’ Appeals received by the Bank require a qualified response, with the exception of:
        1. Appeals that contain obscene or offensive expressions that discredit the business reputation of the Bank and/or the honor and dignity of its employees, messages containing information of a provocative nature;
        2. The name of the company/Customer's full name is written illegibly, the content of the Appeal does not allow for the unambiguous identification of the person who submitted the Appeal;
        3. Appeals of an advertising nature or other nature not related to the Bank's activity;
        4. Appeals received at the email addresses of Bank employees, with the exception of addresses declared as channels for receiving Customers’ Appeals to the Bank (Appendix 1)[[4]](#footnote-4);
     2. Appeals containing positive feedback on the work of a specific Bank employee do not require a mandatory response and are forwarded to SQCD for reviewing.
     3. After providing three responces to identical appeals to the Customer within a year, the preparation of responces and reviewing of appeals by the Bank ceases. In this case, a meeting may be arranged with the Customer in advance by a group of AE appointed by OAD with the provision of proposals for settling the appeal.

# the LIST OF UNITS INVOLVED IN THE PROCESS OF CONSIDERING CUSTOMERS’ APPEALS AND DISTRIBUTION OF RESPONSIBILITIES AMONG THEM

4.1. Depending on the nature of the Customer's Appeal, as well as the work required to prepare a response, the Bank distinguishes several areas of responsibility for working with Customers’ Appeals (Table 2 - Competency Matrix).

**Table 2**

|  |  |  |
| --- | --- | --- |
| **№** | **Name of the structural division** | **Functions of the structural unit arising in connection with participation in the consideration of Customers' Appeals** |
| 1 | ARD | Providing expert conclusions at the requests of units responsible for reviewing Customers’ Appeals related to taxation and accounting issues. |
| 2 | DTO | * + - 1. Making business decisions on complaints from Customers, including unfounded appeals, the unfoundedness of which is revealed as a result of investigations;       2. Making decisions on Customers’ Appeals related to changes in the parameters of an approved interbank transaction;       3. Reviewing and preparation of responses to requests from Customers-banks related to the provision of preferential terms for Bank products. |
| 3 | CC | 1. Submission of Appeals to the responsible unit for registration no later than one working day following the day of registration of the Appeal;  2. Providing responses from the Bank via telephone. |
| 4 | CCDPD | * + - 1. Provision of documents in operational storage upon request;       2. Consideration of Customers’ Appeals and enqueries from authorized government bodies (including supervisory authorities) related to the client base and consideration of Customers’ Appeals;       3. Conducting investigations, preparing responses to Customers' Appeals (including Disputed Transactions resulting from fraud);       4. Preparation of draft decisions and responses to Customers’ Complaints;       5. Preparing responses to Customers’ Appeals;       6. Preparing responses to enqueries from authorized government bodies (including supervisory authorities) related to the client base and consideration of Customers’ Appeals;       7. Consideration of Complaints and Unreasonable Appeals from Customers;       8. Preparation of responses to responses from authorized government bodies (including supervisory authorities) related to the consideration of unreasonable appeals and complaints from Customers, payments for which were made earlier on the basis of decisions of the units responsible for consideration;       9. Involvement of responsible/necessary units in official meetings on appeals.   \* With the exception of Appeals that are within the competence of other divisions specified in Chapter 6 of the Rules. |
| 5 | ОD[[5]](#footnote-5) | 1. Calculation of the amounts of funds subject to reimbursement based on Customers’ complaints for active and passive transactions, with the exception of transactions using payment cards and transactions specified in the functionality of PCD; 2. Execution of decisions of departments responsible for reviewing Appeals on active and passive transactions, with the exception of payments on payment cards and transactions specified in the functionality of PCD; 3. Refund of wrongfully withheld commissions to Customers' current accounts; 4. Implementation of decisions of units responsible for reviewing Customers’ Appeals; 5. Provision of necessary information/documents, expert conclusionson controversial situations within the competence of the responsible Unit; 6. Provision of necessary information/documents, expert conclusions on controversial situations related to the Bank's cash activities; 7. Consideration of complaints from Customers regarding transactions carried out at the Bank's ATMs, including those with the cash acceptance function (except for complaints from Customers regarding disputed transactions) and settlement of consequences caused by incorrect operation of the Bank's ATMs; 8. Consideration of Customers' Appeals related to the examination of banknotes. |
| 6 | MCRMD | 1. Distribution of Appeals to the units responsible for consideration no later than one working day following the day of registration of the Appeal;  2. Forwarding the Bank's responses to Customers' appeals and enquires related to Customers' appeals. |
| 7 | DS | Conducting an investigation and providing an expert conclusion at the request of the Department responsible for reviewing Appeals on issues within the competence of the DS. |
| 8 | OIT | 1. Providing expert conclusions on issues of technical support of banking products and processes at the request of the unit responsible for reviewing Appeals; 2. Technical settlement of causes/consequences, controversial situations in the Bank's systems, subject to technical feasibility and compliance with the current architecture of the Bank's IT systems used. |
| 9 | CSC/Branches | 1. Provision of documents, explanatory notes on the occurrence of controversial situations at the requests of units responsible for reviewing Customers' appeals;  2. Implementation of decisions of units responsible for reviewing Customers’ appeals;  3. Providing responses to Customers’ Appeals accepted directly by the CSC/Branch, specifically:   * 1. Customer account statements;   2. certificates of the Customer's account status for submission to government and other authorities;   3. certificates of purchase and sale of cash by the Customer for submission to customs authorities;   4. certificates of absence of the Customer's loan debt;   5. work with Customer’s Appeals related to enqueries for clarification of information, payments received/sent, accepted/sent through urgent money transfer systems;   4. Notifying Customers of the decision made based on the results of reviewing the Appeal. |
| 10 | PCD | 1. Participation in conducting investigations of Disputed Transactions within the framework of the dispute cycle established by the PS Rules (including making a decision on the advisability/impossibility of initiating a dispute cycle, conducting all its stages and completion); 2. Conducting investigations related to incorrect operation of ATMs; 3. Crediting of funds based on the results of the dispute cycle; 4. Providing the results of the investigation into Disputed Transactions to CCDPD (based on the results of the dispute cycle, including information on the inappropriateness of its initiation, indicating the reasons); 5. Providing expert opinions and documents at the request of units responsible for consideration Customers’ complaints related to card servicing; 6. Implementation of decisions of units responsible for reviewing complaints regarding crediting/reimbursement of funds to payment cards, including for fraudulent transactions; 7. Closing complaints with a positive decision, as a result of which the review was successful in challenging transactions with subsequent crediting of funds to the main card account, unblocking of holds or receipt of reversal and no reimbursement of interest, penalties and other debts to the Bank is required and a written response is provided; 8. Calculation of amounts of money subject to reimbursement for complaints from Customers on payment cards. |
| 11 | DSNDCS | * 1. Conducting an investigation and providing an expert conclusion at the request of the unit responsible for reviewing Appeals on issues within the competence of the DSNDCS, specifically in terms of:  1. Customer service standards and monitoring their implementation; 2. office maintenance standards and monitoring their implementation; 3. product knowledge among employees DSCS; 4. proposals to improve the quality of services provided by the Bank, to increase service standards. 5. Making Business Decisions on Complaints from Corporate Business Customers (with the status of PB), including unfounded requests, the unfoundedness of which is revealed as a result of investigations; 6. Making decisions on Customers’ Appeals related to changes in the parameters of an approved credit transaction for retail business products, in accordance with the relevant decision of the authorized body of the Bank; 7. Reviewing and preparation of responses to Customers’ appeals related to the provision of preferential terms for Bank products in accordance with the relevant decision of the authorized body of the Bank. |
| 12 | DWCC | 1. Making Business decisions on complaints from corporate business Customers (except for the status of PD), including unfounded requests, the groundlessness of which is revealed as a result of investigations; 2. Making decisions on Customers’ Appeals related to changes in the parameters of an approved credit transaction/individual tariffs for settlement and cash services for corporate business products, in accordance with the relevant decision of the authorized body/authorized persons of the Bank for making credit decisions; 3. Reviewing and preparation of responses to Customers’ Appeals related to the provision of conditions, including preferential ones, as well as those related to individual tariffs for settlement and cash services for Bank products in accordance with the relevant decision of the authorized body/authorized persons of the Bank. |
| 13 | DWDARB | 1. Making Business Decisions on Complaints from Retail Business Customers with PD, including unfounded appeals, the unfoundedness of which is revealed as a result of investigations; 2. Making decisions on Appeals from Retail Business Customers with PD related to changes in the parameters of an approved credit transaction for retail business products, in accordance with the relevant decision of the authorized body/authorized persons of the Bank for making credit decisions; 3. Reviewing and preparation of responses to enqueries from retail business Customers who have a PD in accordance with the relevant decision of the authorized body/authorized persons of the Bank for making credit decisions. |
| 14 | DWDACB | 1. Making Business Decisions on Complaints from Corporate Business Customers (with the status of PB), including unfounded appeals, the unfoundedness of which is revealed as a result of investigations; 2. Making decisions on Corporate Business Customers’ Appeals (with the status of PD) related to changes in the parameters of an approved credit transaction for corporate business products, in accordance with the relevant decision of the authorized body/authorized persons of the Bank for making credit decisions; 3. Reviewing and preparation of responses to enqueries from corporate business Customers (with the status of PD) in accordance with the relevant decision of the authorized body/authorized persons of the Bank for making credit decisions. |
| 15 | LD | 1. Providing expert conslusions (in any form) regarding the legality of the requirements set out in Customers’ Appeals, conslusions (in any form) on issues of interpreting the terms of contracts, the Legislation of AR and emerging legal risks; 2. Coordination of decisions and responses to Customers’ complaints in cases provided for the Rules; 3. Participation in the development of additional agreements and other documents for the purpose of resolving and preventing controversial situations. |
| 16 | SQCD | Providing an expert conclusion at the enquiry of the division responsible for reviewing Appeals on issues within the competence of SQCD in terms of:   * 1. Customer service standards and monitoring of their implementation;   2. office maintenance standards and monitoring their implementation;   3. product knowledge among employees DSCS;   4. proposals to improve the quality of services provided by the Bank, to increase service standards. |

4.2. In order to prepare a response to the Customer's Appeal, AE may request and receive from the employees of CSC/Branch and employees of other structural divisions the necessary information in essence of the Appeal under consideration.

4.3. The person responsible for organizing the work on processing Customers’ Appeals sent for consideration to the Bank's structural division, as well as interaction with other structural units in accordance with Table 2, is the head of the structural unit responsible for considering the Appeal in accordance with Table 2.

4.4. BAE are responsible for ensuring the identification of Customers submitting Appeals to the Bank.

# PRINCIPLES FOR CONSIDERING APPEALS

* 1. During the review of the Appeal, AE collects a dossier. The dossier is collected in the form of electronic copies and/or original documents. The exception is Appeals that do not require additional review and are within the competence of CSC/branches according to Table 2.
  2. The results of the consideration of the Appeal are placed by CCDPD in the Register of Accounts (Appendix 5), with a mandatory note on the measures taken on complaints (justified and unjustified) and other justified Appeals from Customers.
  3. The period for accepting an Appeal for work by AE may not exceed 1 (one) working day from the moment of registration of the Appeal.
  4. During the processing of the Appeal, AE is obliged to check the compliance of the Appeal with the requirements stipulated in Chapter 3 of the Rules. In case of detection of discrepancies, AE returns the incorrectly executed Appeal to BAE in accordance with Table 1, to eliminate the identified deficiencies and monitors its repeated receipt with the necessary corrections of the violations committed.
  5. BAE that has accepted the Appeal in violation of the requirements of the Rules must, no later than the working day following the day of receipt of the relevant information from the AE, take measures to correct the violations committed.
  6. If no information is received on the elimination of the identified deficiencies within 2 working days, AE informs its immediate supervisor, who may raise the issue of the advisability of closing the Appeal without consideration with its supervisor and supervisor’s BAE.
  7. Information on closed Appeals due to incorrect execution is provided by AE to SQCD on a monthly basis.
  8. After the written registration of the Appeal, communication with Customers on issues related to the consideration of Appeals is carried out only by employees of the CCDPD or at meetings with the mandatory presence of CCDPDE and SQCDE. The presence of direct contacts between employees of the departments accepting Appeals and Customers, as well as the discussion of issues related to the Appeal without the participation of CCDPD employees is prohibited.
  9. **Features of complaint handling.** 
     1. The investigation and the stages of work with the Complaint must be recorded by CCDPD employee by changing the status of the Appeal review in the Registration register (Appendix 5).
     2. Persons whose actions or inactions have been appealed on the basis of received Complaints shall not participate in the investigation.
     3. The purpose of the investigation is to establish indisputable documentary evidence of the fact of violation or absence of the fact of violation by the Bank of contractual obligations and/or the Legislation of AR, as well as the presence/absence of guilt of the Bank's employees in the violation of contractual obligations by the Customer.
     4. The establish the fact of violation or absence of violation by the Bank of contractual obligations and/or the Legislation of AR, as well as the establish the presence/absence of guilt of the Bank employees in the violation of contractual obligations by the Customer is carried out as a result of the investigation conducted on the Appeal, and must be documented (i.e. confirmed by explanatory notes, expert opinions, extracts, etc.).
     5. When considering a Customer's complaint that arose due to the fault of the Bank employee, CCDPDE requires an explanatory note signed by the employee guilty of creating the controversial situation, with a resolution from a head not lower than the level of the Head of Division (if any), and prepares a draft decision on the controversial situation (Appendix 4).
     6. If during the investigation facts are established that indicate the occurrence of an operational/regulatory (compliance) risk, CCDPDE acts in accordance with the Instruction on the procedure for collecting information on operational/regulatory (compliance) risk events. Additionally, if during the investigation facts are revealed that indicate a violation of the requirements of the Legislation of AR and regulatory acts of CB of AR, CCDPDE notifies IAS and DOD of the identified violations via IHE, and in the event of revealing facts that indicate fraudulent actions, also the heads of DS, OD, DSNDCS, AML/CTFandCD, SQCD.
     7. Responses to Customers' appeals related to incidents that pose a regulatory risk, in accordance with the algorithm for classifying regulatory risk events (Appendix 7), are sent for approval to AML/CTFandCD via IHR. AML/CTFandCD is obliged to provide approval via IHR within 2 (two) working days. In the absence of approval within the specified period, the response is considered approved by AML/CTFandCD. If there are comments, the total period for consideration of the request by AML/CTFandCD should not exceed 2 (two) working days.
     8. If, during the consideration of the complaint and the investigation, facts are established that indicate possible fraudulent actions, AE must notify of these facts via the Bank's e-mail box "qaynarxett@vtb.az", in which the following units of the Bank are registered: DS, RD, IAS, OD, DSNDCS, AML/CTFandCD, SQCD) and DOD.
     9. In order to conduct an objective analysis of the disputed situation, CDPDE, if necessary, requests expert conclusion, documents, as well as data from the ABIS, confirming the fact and circumstances of the disputed situation. The request can be issued in the form of a service note with a visa of the HOD, as well as in the form of a message in IHE indicating in the copy the recipients of the message HOD, HSQCD.
     10. The structural unit that received the Request, within the scope of its competence, is obliged to provide the necessary information no later than the next working day after receiving the Request[[6]](#footnote-6).
     11. If it is necessary to contact external organizations, the period for providing information on the Request may be extended taking into account the period required to receive a response from the external organization. The basis for making a decision are responses sent to CCDPD, drawn up in the form of a service note, as well as in the form of a message in IHE.
     12. The wording of the expert conclusion and the response of the unit providing information at the request of CCDPD should not contain double interpretations, ambiguous and vague phrases and expressions. The conclusion should directly answer the question posed and contain references to facts, norms of the Legislation of AR, regulatory documents of the Bank.
     13. The head of the unit providing the expert conclusion is responsible for:
         1. reliability of expert conclusion;
         2. the completeness and timeliness of its provision.
     14. The employees of CCDPD are responsible for the completeness of the collected data and the availability of the necessary expert conclusions for making decisions on the Appeal.
  10. **Features of consideration of complaints related to incorrect operation of ATM.**
      1. The decision to pay out funds is made on the basis of collection documents, logs, journal and photo materials (if necessary) from the ATM, as well as on the basis of the following data from the ATM on cash deposit and withdrawal transactions:
         1. In the processing system, the Customer's operation (deposit) is reflected with the status (Posting Status) – Rejected, the operation permission type (Is Auth) with the status fin, i.e. the operation was completed unsuccessfully;
         2. In the processing system, the response to the authorization request for the Customer's transaction (withdrawal) is reflected as successful;
         3. A technical failure of the device was recorded at the time of the Customer's transaction with the message ATM Time out passed.

# PREPARING A RESPONSE TO A Customer'S APPEAL

* 1. Responses to Customers on the results of consideration of Appeals are signed by BAE.
  2. The response to the Customer on the results of the consideration of his/her Appeal must contain a reasoned statement for each argument presented by the Customer. When confirming the facts presented in the Customer's Appeal, the response must indicate what measures have been taken on them.
  3. Response quality criteria:
     1. the response must be reasoned and explain the Bank's position;
     2. the response should be aimed at preventing/resolving the conflict situation;
     3. the answer must be positive;
     4. the response must contain constructive proposals from the Bank to resolve the situation;
     5. the response should be short and logical.
  4. In case of disagreement of the Customer with the Bank's response to the Appeal, he/she is informed in writing of his/her rights, including the right to appeal to the CB of AR and to the courts.
  5. The Customer is clearly and distinctly informed in writing of the steps that will be taken to compensate for the damage caused to the Customer by the Bank, the amount of compensation offered, the term, the method of calculation, as well as the acceptance or refusal of compensation by the Customer.
  6. The Customer has the right to make a decision regarding acceptance/rejection of the offered compensation within 10 (ten) business days.
  7. In the event that the Bank refuses to provide comments on the request or issue compensation, including if the amount of compensation is lower than the amount requested by the Customer, the Customer must be informed of the reasons for the refusal in writing, including of his/her rights.
  8. Upon receipt of the Customer's Appeal, AE:

6.8.1. puts a stamp and signature on the Customer's Appeal to indicate acceptance for execution;

6.8.2. if the preparation of a response to the Customer's Appeal is within its competence according to Table 2 and does not require contacting other structural units of the Bank, AE takes all necessary measures to resolve the situation and/or prepares a response, after that:

6.8.2.1. if it is necessary to prepare a response on paper, it transfers the document for signature to the head of the structural unit and ensures further sending of the document in accordance with paragraph 7.1 of the Rules;

6.8.2.2. if it is necessary to send a response in the format of an electronic message, it forwards the response via IHE with the recipients of the head of the structural unit indicated in the copy;

6.8.2.3. if it is necessary to notify the Customer by telephone, forwards the response to CC via IHE with a copy indicating the recipients of the head of the structural unit for further notification of the Customer in accordance with paragraph 7.1 of the Rules;

6.8.3. If the preparation of a response to the Customer's Appeal is within its competence according to Table 2, however requires contacting other structural units of the Bank, AE takes all necessary measures to resolve the situation, after which, upon receipt of the required information, prepares a response;

6.8.4. further steps for sending a response to the Customer are described in Chapter 7 of the Rules;

6.8.5. if the preparation of a response to the Customer's Appeal is outside its competence in accordance with Table 2 of the Rules, AE ensures the transfer of the Appeal to the relevant structural unit of the Bank in accordance with Table 2.

6.9. Upon receipt of the Customer's Appeal, an employee of the relevant structural unit:

6.9.1. puts a stamp (if avaliable), date, and signature on the Customer's Appeal to confirm acceptance for execution;

6.9.2. conducts the necessary investigation to prepare a response to the Customer's Appeal and/or, if necessary, takes all necessary measures to resolve the situation, prepares a response, after that:

* + - 1. if necessary to prepare a response on paper, it transfers the document for signature to BAE and ensures further sending of the document in accordance with paragraph 7.1 of the Rules;
      2. if necessary to send a response in the form of an electronic message, forwards the response by electronic mail with a copy indicating the recipients of BAE;
      3. if necessary to notify the Customer by telephone, forwards the response of ERA via IHE with the indication in the copy of the recipients of CCCDPD and HOD for further notification of the Customer in accordance with paragraph 7.1 of the Rules;
      4. if necessary to make payments/refund funds, write off fines to the Customer to restore his rights/contractual obligations, prepares a draft decision/conclusion (Appendix 4) and, after receiving the visa of the head and supervisor of the structural unit, sends it for consideration to the authorized person/body of the Bank in accordance with Table 3.

# INFORMING CUSTOMERS ABOUT THE RESULTS OF CONSIDERATION OF APPEALS

* 1. The responses to Customers are sent via the channels for receiving Customer’s Appeal. Accordingly, if:
     1. Customers' Appeals were received by the Bank by postal means, courier service, response letters are sent to the Customer by postal communication in accordance with the Bank's internal document regulating the procedure for conducting record management;
     2. The Customers' Appeals were received by personal contact with the Bank, the response may be read to the Customer by CC employee, if the Appeal does not contain a requirement for a written response. The Customer may also receive an oral response when contacting CSC/Branch of the Bank. If the response contains confidential information, only a notification of the fact that the Bank is considering the Appeal and the methods for receiving the response by the Customer is communicated by telephone;
     3. Customers' Appeals were received at the Bank's e-mail address, via the Bank's website and forums, response letters are sent to the Customer to his e-mail address by AE, unless the Customer has proposed another form of sending a response at the time of receiving the Appeal (by post or telephone). If the response contains confidential information, only a notification of the fact that the Bank is considering the Appeal and the methods of receiving the response by the Customer is sent to the Customer's e-mail address;
     4. Customers' Appeals were received by CC by telephone, the responses are read out by CC employee by telephone, unless the Customer has suggested another form of sending a response (by post or to his/her e-mail address). If the response contains confidential information, only a notification of the fact that the Bank is considering the Appeal and the methods of receiving the response by the Customer is communicated by telephone;
     5. Customers' Appeals were received by the Bank by fax, response letters are sent to the Customer by post in accordance with the Bank's internal document regulating the procedure for conducting record management. In the event that the response contains confidential information, only a notification of the fact that the Bank is considering the Appeal and the methods of receiving the response by the Customer is communicated by telephone;
     6. Customers' Appeals were received by the Bank via PS - responses are sent in accordance with the Bank's internal document regulating the procedure for receiving and sending correspondence via the Bank's PS;
     7. Customers' Appeals were received through the Complaints and Suggestions Box - responses are sent in accordance with the Customer's choice specified in the Appeal, unless the response contains confidential information;
  2. Sending a written response to the Customer’s Appeal is carried out via MCRMD in accordance with the current Instructions for record management, and only to the address specified in the Bank's ABIS or to the address specified in the Appeal or other document (for example, an agreement), certified by the personal signature of the Customer.
  3. If there are several addresses for sending and there is no written request from the Customer to send a response to a specific address, the response is sent to the address specified in the Customer's Appeal. If the Appeal does not specify an address, the Appeal is sent to the registration address specified in the Bank's ABIS.
  4. At the Customer's Appeal, a written response may be forwarded to him/her at the CSC/branch of the Bank. In this case, CSC/branch employee is obliged to obtain a receipt from the Customer for the response. The receipt (mark of receipt) may be made on a copy of the response.
  5. Upon receipt of notifications regarding responses sent to Customers, MCRMD[[7]](#footnote-7) attaches these notifications to outgoing letters.

# DEADLINES FOR REVIEWING CUSTOMERS’ APPEALS

* 1. The deadlines for providing a response to the Customer are calculated from the date of receipt of the Appeal to AE.
  2. Exceptions are Customers’ Appeals received through the Complaint and Suggestions Box, the deadline for providing a response, which is calculated from the date of opening the Complaint and Suggestion Box (but not more than 20 (twenty) working days), as well as Appeals related to protesting card transactions, the deadlines for which are regulated by the IPS Rules.
  3. If necessary to obtain additional information and send requests to external organizations, the period for considering the Appeal may be extended to a maximum of 30 (thirty) working days[[8]](#footnote-8), taking into account the period required to receive a response from the external organization (the structural unit of the Bank that sent the request monitors its receipt by the external organization). If no response to the request is received within 10 (ten) working days, a repeat request is sent. A repeat request is sent no more than 2 (two) times. If no response is received to the second repeat request, the Appeal is considered on the basis of the information available to the Bank.
  4. Individual deadlines for providing a response to the Customer may be established by resolution of the Supervisor of BAE (no more than 20 (twenty) working days).
  5. In cases where Supervisor of BAE resolution does not set an individual deadline for execution, the following deadlines for preparing a response to Customs’ Appeals are established:
     1. for Appeals from Customers that do not require any further investigation:
        1. for legal entities and banks – no more than 10 (ten) working days;
        2. for individuals – no more than 5 (five) working days;
        3. for complaints and appeals of military personnel and their families – no more than 15 (fifteen) working days;
        4. Appeals on the facts of corruption offenses – no more than 20 (twenty) working days;
     2. For Appeals from Customers that require any further investigation:
        1. for legal entities and banks – up to 20 (twenty) working days;
        2. for individuals – up to 10 (ten) working days;
        3. for complaints – up to 30 (thirty) working days.
  6. If for the Customer is requires a longer period to prepare a response than that established in accordance with paragraph 8.5. of the Rules, AE, no later than 2 (two) days before the expiration of the period, must contact its manager via IHE with a reasoned request to extend the period, after which AE agrees on the extension of the period with the Supervisor.
  7. If the Supervisor decides to extend the deadline, the fact of changing the deadline for responding to the Customer's Appeal is documented by entering the new deadline, the date of change and the signature of the Supervisor. AE ensures mandatory notification of the Customer about the extension of the deadline for considering the Appeal via CC.
  8. The requests from CB of AR related to Customers’ Appeals are considered within 7 (seven) working days, unless otherwise provided in the regulator's request. CB of AR has the right to demand that Appeals be considered within other timeframes. If CB of AR requires a response to the Customer, the consideration and provision of responses to Appeals must be carried out within the timeframes specified in paragraphs 8.5. of the Rules.
  9. The requests from government bodies are considered within the timeframes established by the Legislation of AR.

# MAKING DECISIONS ON CUSTOMERS’ COMPLAINTS

* 1. Decisions are made on the basis of primary documents, Bank’s ABIS data, explanatory notes from employees, expert conclusions from structural units obtained during the investigation and conclusions on the admission of guilt of the Bank employee.
  2. The basis for making a positive decision on the Complaint (indicated in the decision on the Complaint) may be:
     1. Established fact of violation of contractual obligations by the Bank;
     2. Established fact of violation of AR legislation by the Bank;
     3. Established fact of the Bank's guilt in the Customer's violation of contractual obligations/or in losses incurred by the Customer, or in the creation of other controversial situations, which are confirmed by documents or an explanatory note from the Bank employee acknowledging the error made with the resolution of the immediate supervisor, the consequence of which was the Customer's failure to fulfill contractual obligations;
     4. Established fact of fraud by third persons.
  3. Decisions on Disputed Transactions on payment cards are made based on the results of the transaction protest in accordance with the rules of the payment systems in force in the Bank at the time of consideration of the complaint.
  4. A decision to uphold a complaint regarding a Disputed Transaction on payment cards, determined during an investigation conducted within the framework of the PS Rules as fraud (e.g. skimming), is made before the end of the Dispute Cycle.
  5. If necessary to correct the Customer's credit history, the Bank's unit implementing the decision taken is obliged to simultaneously send a notification to the relevant structural units and/or CB of AR about the corrections to the Customer's credit history. The need to correct the credit history must be indicated in the order from the unit responsible for considering the Complaint.

# EXECUTION OF DECISIONS ON CUSTOMERs’ COMPLAINTS

1. Upon receipt of the draft decision and establishment of facts of illegal actions of the Bank, the employee possessing the relevant powers in accordance with the Competency Matrix specified in Table 3:
2. Makes a decision on the Customer's Complaint based on all available documents on the given situation (extracts, explanatory notes, references to the terms of agreements and tariffs) no later than the next working day following the adoption of the draft decision, with the corresponding resolution placed on the draft decision;
3. On the day of the decision, forwards the draft decision with the resolution to CCDPD.
4. The decision on the Complaint is subject to execution within a period not exceeding 3 (three) working days from the date of receipt of the decision, unless otherwise provided by the agreement with the Customer.
5. The decision on reimbursement of funds for Complaints (except for unfounded appeals) is made in accordance with Table 3. The decision is drawn up in accordance with Appendix 4 to the Rules.

**Authority to make decisions on Customers’ Appeals.**

**Table 3**

|  |  |
| --- | --- |
| **Amount of payment under the Appeal** | **Right of decision making** |
| Up to 100 AZN (inclusive) | Head of DWCC/DSNDCS/DTO/DWDARB/DWDACB |
| Over 101 to 500 AZN[[9]](#footnote-9) (inclusive) | Director of Department of Corporate Business Development/ Department of Retail Business Development/Finance Department |
| Of 501 AZN and above | Chair of Executive Board of the Bank |

1. The right to make a Decision on crediting the Customer's funds, unlawfully retained by the Bank's ATMs (including those with the cash acceptance function), to the Customer's accounts or the accounts of the Bank's partners involved in the execution of the relevant transactions and reimbursement of funds to the Customer for the consequences arising in the event of the Customer's funds being unlawfully retained by the ATMs (including those with the cash acceptance function), is within the competence of DOD.
2. The authority to make a Decision to refuse to reimburse funds in the absence of grounds for payment, as provided for in paragraph 9.2 of the Rules, belongs to persons, in accordance with Table 3, with the entry of a resolution to refuse to reimburse funds in the appropriate column of the draft Decision.
3. The right to make a Decision on crediting funds for Disputed Transactions on payment cards, as well as transactions carried out in CSE that are Customers of the Bank (an acquiring agreement has been concluded), is within the competence of DOD (except for cases of fraud). The decision is drawn up in accordance with Appendix 4 to the Rules.
4. The right to make a Decision on satisfying Complaints on Disputed Transactions identified as fraud during the investigation is within the competence of the Bank's Executive Board, subject to mandatory approval of this decision by the heads of PCD and DS. The decision is drawn up in accordance with Appendix 4 to the Rules.
5. The decision taken is communicated to the head of the ERA by sending the original/scanned copy of the decision to the email address of the Head of ERA within 2 (two) working days from the date of the decision.

# the WORK WITH UNREASONABLE APPEALS

1. Work with unfounded Appeals is carried out in accordance with the requirements of the Rules, taking into account the features defined in this Section.
2. The right to make a decision on satisfying Appeals determined during the investigation as unfounded is within the competence of the Bank's Executive Board.
3. Upon receipt of a draft decision on an Unreasonable Appeal from CCDPD, the Bank's Executive Board makes a Business decision on the Customer's appeal based on all available documents on this situation (statements, explanatory notes, references to the terms of contracts and tariffs) no later than the next working day following the adoption of the draft decision, with the corresponding resolution placed on the draft Business decision, provided that, upon consideration of the appeal, the presence of the following indirect signs confirming the Customer's rightness is revealed:
4. the employee whose explanations are necessary for making an objective decision on the appeal is not currently employed of the Bank or cannot provide an explanation regarding the fact of the disputed situation (due to the time of the events, etc.);
5. the video recording/audio recording, viewing/listening to which is necessary to make an objective decision on the Customer's complaint, is missing or does not provide a complete picture of what happened;
6. other circumstances and facts that indirectly indicate the Customer's rightness.
7. If necessary to make a Business decision, the period for consideration of the Customer's Appeal is extended by the period for making the Business decision.
8. The period for making a Business Decision and submitting it to the unit responsible for consideration the Appeal shall not exceed 3 (three) working days.
9. In the event that a Business decision is made to satisfy the Customer's requirements by the unit responsible for reviewing the Appeal, measures are taken to resolve the controversial situation and prepare a response to the Customer in accordance with the requirements of the Rules.
10. The Bank's unit implementing the decision taken is obliged to simultaneously send to the unit that conducted the investigation a confirmation indicating the date, amount of payment and the fact of restoration of the credit history (if necessary). The need to correct the credit history must be indicated in the order from the unit responsible for considering the Appeal.

# ANALYTICAL WORK ON CUSTPMERS’ APPEALS

1. CCDPDE maintains a register of Appeals (Appendix 5), summarizes the data in the register according to the date of receipt and nature, correctly assigns the validity/unvalidity sign to the appeals, having previously agreed on the status with CCDPDE. The information in the register is stored in the Bank for at least 5 (five) years.
2. All telephone conversations related to Customers' Appeals are conducted by CCDPD using special telephones with a conversation recording function.

12.2.1 CCDPDE monitors the receipt of new and/or changes in the status of consideration of current Appeals in the Bank. If necessary, CCDPDE sends information about the appeals via IHE to MCRMD for translation into the required language;

12.2.2. Every 6 (six) months, CCDPD sends data on complaints to AMSPD via IHE for subsequent posting on the Bank’s official website;

* + 1. CCDPDE employees ppace information about complaints on the Bank's official website in a specially designated section “Appeals” at least 2 (two) times a year. The information is stored on the Bank's official website for at least 3 (three) years from the date of publication.

1. CCCDPD, no later than the 3rd (third) working day of each month, submits to COD and CSQCD analytical reference/reports compiled based on the results of the investigation of controversial situations.
2. CCCDPD, via IHE, provides data on appeals to CB of AR, according to the Reporting Form at the request of the regulator.
3. CCCDPD together with CSQCD analyzes mass similar Customers’ Appeals, establishes their causes and identifies problem areas in Customer service. Based on the results of the analysis:
   * 1. SQCD (if necessary) informs the responsible units of the Bank, initiates changes to the internal documents of the Bank, and carries out other activities within the competence of SQCD to eliminate these reasons;
     2. In the event of detection of cases of violation of the rights and legitimate interests of Customers, CCDPD, together with DSNDCS, develops relevant proposals to eliminate deficiencies and coordinates them with COD, CSQCD, AML/CTFandCD and DOD for their submission to the Bank's Executive Board.
     3. When cases of violation of the rules of ethical conduct of employees are identified, CCDPD, together with DSNDCS, develops appropriate proposals to eliminate deficiencies and coordinates them with the COD, DHR, AML/CTFandCD and DOD for their submission to Executive Board.
4. CCCDPD provides SB with a report on Appeals in PowerPoint format on a quarterly basis.
5. The above report should reflect a comparative analysis with previous periods (month/quarter/year).

12.8. The activities of CCDPD are audited by IAS at least once a year, and the report on the audit results is discussed at a meeting of Audit Committee and the Bank's SB.

12.9. In case of changes to the contact details of CCDPD, COD shall submit them to CB of AR within 2 (two) working days for posting on the website of CB of AR. The contact details shall include the telephone number, e-mail address, postal address and full names of CCDPD employees, including the head of this structural unit.

# WORK WITH SYSTEMIC PROBLEMS

1. Based on the register of appeals filled in by CCDPD (Appendix 5), SQCD monthly analyzes the set of factors causing the emergence and recurrence (potential possibility of recurrence) of controversial situations in order to identify systemic problems.
2. In the event of a systemic problem being identified, SQCD records the Systemic Problem, determines the priority status of the problem and the department responsible for its elimination.
3. CCDPD assigns a problem the status of “priority” only if the Systemic problem meets one/more of the following criteria:
4. contributes to the growth of mass Appeals from Customers;
5. contributes to the growth of payments for Customers’ complaints;
6. accompanied by an increase in labor costs for reviewing and satisfying requests;
7. is the result of a discrepancy between current processes, software settings and the terms of agreements concluded with the customer.
8. SQCD informs the unit responsible for eliminating the problem about the identified Systemic Problem, about the status of the problem in order to determine and carry out measures to eliminate it.
9. The unit responsible for eliminating the problem provides information about the decision made and the timing of the planned activities to SQCD within 10 (ten) working days.
10. The unit responsible for eliminating the problem shall inform SQCD about the planned activities no later than 3 (three) days from the date of the activities.
11. The Systemic problem is considered resolved:

13.7.1. after the Units responsible for eliminating the problem have carried out the planned activities;

13.7.2. in the event of absence of Customers’ Appeals for 3 (three) months regarding controversial situations that arose after the resolution of a systemic problem.

13.8. The decision to resolve a systemic problem is made by CSQCD, together with the immediate head of the unit responsible for eliminating the systemic problem.

* 1. Control over the implementation of measures planned by structural units responsible for eliminating systemic problems is carried out by SQCD.

# FINAL PROVISIONS

* 1. The Rules shall enter into force on the date of approval by the Bank's SB.
  2. Changes and additions to the Rules are approved by the Bank's SB and are formalized by presenting them in a new version. The adoption of a new version of the Rules automatically leads to the termination of the previous document.
  3. In case of inconsistency of any part of the Rules with the current Legislation of AR, including regulatory acts of CB of AR, as well as in connection with the adoption of new legislative acts of AR, or regulatory acts of CB of AR, the Rules will be valid only in that part that does not contradict the current Legislation of AR and regulatory acts of CB of AR.

# 

**APPENDİX 1** **to**

“The Rules for Handling Customers’ Appeals of VTB Bank (Azerbaijan) OJSC”

**CONTACT INFORMATION FOR RECEIVING CUSTOMERS’ APPEALS**

1. Email address:

[**info@vtb.az**](mailto:info@vtb.az)

[**OPROKD@vtb.az**](mailto:OPROKD@vtb.az)

1. Bank telephone numbers:

**(012) 492-00-80**

**(077) 274 09 86 – WhatsApp (вотсап) канал**

**(012) 986**

1. Telephone number of CCDPD:

**(012) 492-00-80 (внутр. – 5130, 5136, 1519)**

1. Postal address:

Baku, Khatai Ave. 38 AZ1008

1. Official pages of the Bank in social networks:

**facebook – VTB (Azerbaijan)**

**Instagram – bank\_vtb\_azerbaijan**

**Telegram – Bank VTB (Azerbaijan)**

**LinkedIn – Bank VTB (Azerbaijan)**

**YouTube – Bank VTB (Azərbaycan)**

1. Numbers of CC:

**(012) 986**

**(012) 492-00-80**

1. Internet resource for receiving Customers’ Appeals

[**www.vtb.az**](http://www.vtb.az)

1. **Bank Swift code:**

**VTBAAZ22XXX**

**APPENDİX 2** **to**

“The Rules for Handling Customers’ Appeals of VTB Bank (Azerbaijan) OJSC”

**CUSTOMER’S APPEAL**

*Fields marked with an asterisk are mandatory. If the required fields are left blank, the Bank may refuse to accept the appeal and investigate it****.***

**\*❑ Bank’s Customer** \*❑ **Not the Bank’s Customer**

**\***The customer's full name/name \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

\*Address with Post code/TIN \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

\*Passport details (or details of another identity document)

series\_\_\_\_\_\_\_\_ №\_\_\_\_\_\_\_\_\_\_\_\_ date of issue\_\_\_\_\_\_\_\_\_\_\_\_ by whom to be issued \_\_\_\_\_\_\_\_\_\_\_

\*Теlephone/Fax\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

E-mail \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

**\*Place of origin of the appeal**

**❑ Branch**

**❑ Customer Service Center**

**❑ Other\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**

\*Address or name \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

**\*TYPE OF APPEAL**

**❑ Offer**

**❑ Request**

**❑ Application**

**❑ Complaint**

**Description:** \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

**❑ Channel for providing a response to the Appeal**

**❑ Mailing address \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**

**❑ Email address \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**

**❑ Facsimile \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**

**❑ Telephone \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**

**❑ Personal appeal to CSC/Bank Branches**

(To be filled in unreservedly and signed by the Client personally)

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ Customer's signature\*

*Anonymous Customers’ Appeals are not considered by the Bank.*

# 

**APPENDIX 3 to**

“The Rules for Handling Customers’ Appeals of VTB Bank (Azerbaijan) OJSC”

**CUSTOMER’S APPEAL**

**regarding transactions carried out at the Bank's ATMs (including the cash acceptance function)**

|  |  |
| --- | --- |
| Appeal number |  |

*Fields marked with an asterisk are mandatory. If the required fields are left blank, the Bank may refuse to accept the appeal and investigate it.*

\* ❑ Bank’s customer \* ❑ Not the Bank’s customer

**\***Full name/Name\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

\*Address with Post code/TIN \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

\* Passport details (or details of another identity document)

series\_\_\_\_\_\_\_\_ №\_\_\_\_\_\_\_\_\_\_\_\_ date of issue\_\_\_\_\_\_\_\_\_\_\_\_ by whom to be issued\_\_\_\_\_\_\_\_

**\***Теlephone/Fax\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ E-mail \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

**Place of occurrence of the controversial situation**

**\***Device address\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ Device No \_\_\_\_\_\_\_\_\_\_\_\_\_\_

**\***Card No.\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ Card type\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

**\*** Card issuing bank **❑ VTB Bank (Azerbaijan) OJSC ❑ Other** \_\_\_\_\_\_\_\_(specify which one)

**\***Date and time of the transaction\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

**\***Transaction type: **❑ Cash withdrawal ❑ Cash deposit**

**❑ Transfer ❑ Opening a deposit**

**❑ Payment for mobile phone services (indicate phone number) \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**

**❑ Other (name of the payment recipient - payment code) \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**

**\***Amount and currency of the transaction\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ Banknotes \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

|  |  |  |
| --- | --- | --- |
|  |  |  |

(number and denomination of banknotes)

\*Transaction identification code

(a 3-digit combination entered when performing a currency exchange transaction)

**\*Description of the problem:**

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

**\*Customer’s requirement:**

❑ transfer funds to account/card\* No. \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ in the amount \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ \_\_\_\_\_\_\_\_\_\_\_\_

❑ complete the transaction of replenishing the phone account No. \_\_\_\_\_\_\_\_\_\_\_\_\_ in the amount of \_\_\_\_\_\_\_\_\_\_\_\_\_

❑ issue cash in the amount of \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Method of providing response:

**❑ In writing ❑ E-mail**

**❑ Теlephone**

**❑ Other\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**

**\*Customers full name** \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_Signature\_\_\_\_\_\_\_\_\_\_\_\_\_\_Date

(To be filled in unreservedly and signed by the Customer personally)

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ **To be filled by Bank’s employee**

LS

Received by: Full name of the Bank employee \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ Signature\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_Date\_\_\_\_\_\_\_\_\_\_\_\_\_

✂

**Tear-off coupon for issue to the Customer**

Accepted by: Full name of the Bank employee\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_Signature\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_Date\_\_\_\_\_\_\_\_\_\_\_\_\_

You can clarify the status of the consideration of the Appeal in the Claims and Client Data Processing Department of VTB Bank (Azerbaijan) OJSC: 994 12 492-0080

М.П.

**APPENDIX 4 to**

# “The Rules for Handling Customers’ Appeals of VTB Bank (Azerbaijan) OJSC”

**Decision**

*On Customer's complaint \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_*

***Full name***

*of \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_No\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_*

Customer's account/card number \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

**The following facts have been established:**

1.

2.

3.

*(the nature and period of the transaction are specified)*

Justification for the decision (indicating the violated clause of the agreement, article of the law)

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

1. Based on the results of the investigation, the fact of the Bank’s guilt in the emergence of the controversial situation has been established and documented.
2. Based on the results of the investigation, the fact of the Bank’s guilt in the emergence of the controversial situation has been established, but is not documented.
3. Based on the results of the investigation, the fact of the Bank's guilt in the emergence of the controversial situation has not been established.

**Proposed solution:**

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Executor: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Deadline for execution: \_\_\_\_ working days from the date of adoption of this decision.

***Bank employee position \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_***

***Full name\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_***

**RESOLVED:**

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

**AGREED**

|  |  |  |  |
| --- | --- | --- | --- |
| **Position** | **Full name** | **Signature** | **Date** |
|  |  |  |  |
|  |  |  |  |

Executor: Full name, Теl.

**APPENDIX 5 to**

**“The Rules for Handling Customers’ Appeals of VTB Bank (Azerbaijan) OJSC”**

Register of accounting



# APPENDIX 6 to

# “The Rules for Handling Customers’ Appeals of VTB Bank (Azerbaijan) OJSC”

**The Act on the description of values ​​and identified discrepancies**

**VTB Bank (Azerbaijan) OJSC**

|  |  |
| --- | --- |
| «\_\_\_\_» \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ 20\_\_\_ | No. \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ |

|  |
| --- |
| This Act was drawn up in the branch \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ /CSC VTB Bank (Azerbaijan) OJSC  due to the fact that on the specified date, when opening the package with values received at the cash desk of branch \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_/CSC VTB Bank (Azerbaijan) OJSC  from the part of \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ (full name of Customer)  in the presence of \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_,  *(full name of the Bank employee)*  had been discovered \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_    *\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ (names of values)*  It was revealed that \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_  \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_  \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ *(description of discrepancies)*  Full name, signatures of persons who drew up the Act  \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_  Full name, signatures of persons present when the Act was drawn up  \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ |

Bank employee ………………………..

Bank employee ………………………..

Bank employee ………………………..

Bank employee ………………………..

Bank employee ………………………..

Bank employee ………………………..

Customer ………………………..

# APPENDIX 7 to

# “The Rules for Handling Customers’ Appeals of VTB Bank (Azerbaijan) OJSC”

Algorithm for classification of regulatory (compliance) risk events by categories



1. The period is calculated from the moment the first response is provided. [↑](#footnote-ref-1)
2. The exception is cases when sending an appeal on the letterhead of a legal entity, on which the details are indicated. [↑](#footnote-ref-2)
3. If a written appeal is submitted through a representative, a copy of the document confirming the representative’s authority must be attached to the appeal. [↑](#footnote-ref-3)
4. Appeals received at the corporate email addresses of employees are accepted for reviewing only if they were forwarded by them to the Bank's public email address declared as the channel for receiving Appeals. [↑](#footnote-ref-4)
5. Except for CCDPD. [↑](#footnote-ref-5)
6. Unless otherwise provided in the internal rules of units. [↑](#footnote-ref-6)
7. Via the office manager – if the response is sent via a branch. [↑](#footnote-ref-7)
8. With the exception of Appeals from military personnel and their families, as well as Appeals regarding offenses related to corruption. [↑](#footnote-ref-8)
9. Being that DWDACB is directly subordinate to Chair of Executive Board of the Bank, decisions on appeals of 101 to 500 AZN (inclusive) are made on his part. [↑](#footnote-ref-9)