

CUBE INVEST CJSC	Procedure for Submission and Consideration of Client Complaints	Effective from 15.02.2024 Version No. 2
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A P P R O V E D

by the decision No. 2024/15 of the General Meeting of

CUBE INVEST CJSC dated February 5, 2024.

Meeting Chairman:

Armen Ter-Hakobyan

[signature]

Cube Invest

Closed Joint-Stock Company

PROCEDURE FOR SUBMISSION AND CONSIDERATION OF
CLIENT COMPLAINTS

2024

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1. GENERAL PROVISIONS

1.1. CUBE INVEST CJSC (hereinafter referred to as the "Company") "Procedure for Submission and Consideration of Client Complaints" establishes the procedure for the Company to consider violations and/or complaints that have occurred or may occur during the provision of services to clients and to implement measures aimed at eliminating their consequences, as well as the powers, authorities, duties, and responsibilities of the Company's employees involved in that process.

The Procedure has been approved in accordance with the requirements of the RA Law "On Financial System Mediator" and Regulation 8/04 approved by the Central Bank of the Republic of Armenia.

1.2 Amendments and/or additions to the Procedure can be made only by the decision of the General Meeting of the Company at the suggestion of the shareholders or the Executive Director of the Company or by the requirement of the current legislation of the Republic of Armenia.

The Procedure shall be reviewed in parallel with the change in the Company's operating environment, but at least once every two years.

1.3. The Procedure shall enter into force ten calendar days after the approval by the General Meeting. From the date of entry into force of the Procedure, the "Procedure Regulating the Process of Consideration of Client Complaints" (Edition 1) approved by the Founding Meeting of the Company on 25.04.2022 shall be deemed invalid.

Within ten days following the approval of the Procedure, it shall be submitted to the Central Bank of the Republic of Armenia.

1.4. The Procedure is a document subject to publication and is available to the entire staff and clients of the Company. The Procedure is provided to the Company's clients at their request and posted in the Company's office and on the website. The Company publishes on its website, at the place of activity, as well as provides to each person upon request a telephone number, by which the client may contact the Company to receive information about his/her complaint.

2. TERMINOLOGY

2.1. Terms and concepts:

Company: CUBE INVEST CJSC.

Procedure: CUBE INVEST CJSC "Procedure for Submission and Consideration of Client Complaints."

General Meeting of the Company or General Meeting: Meeting of the Company's shareholders.

Executive Director of the Company or Executive Director: The sole executive body of the Company provided for by the Company's Articles of Association.

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Client: any natural person, legal entity, or individual entrepreneur who uses the Company's services or may apply to use them.

Representative Client: a natural person with secondary education, no financial and economic education or work experience, conscious, at least 30 years old.

Complaint: a written complaint demand submitted by the client to the Company in accordance with the Law "On the Financial System Mediator," which is related to the services provided by the Company and contains a property claim. Moreover, the complaint shall at least include the client's name, surname (name), his/her feedback means, and signature, as well as a description of the complaint.

Complaint Handling Process: a process that includes the submission of a complaint by the Client and the acceptance, study, and decision-making by the Company, including the disclosure of information to the Client related to the complaint during that period.

Responsible Employee: an employee of the Company appointed by the order of the Executive Director, on a part-time basis, whose duties include accepting client complaints and providing the necessary information to the client.

Interested Employee: an employee or employees of the Company whose activities are related to the received relevant complaint.

Law: RA Law "On Financial System Mediator."

Internal Legal Act of the Company: a document approved by the management bodies of the Company and having a mandatory nature in the Company.

Information System: the Company's internal local computer information system.

3. INFORMATION PROVIDED TO CLIENTS

3.1. The consideration of complaints submitted by clients, as well as the process of resolving possible disputes, is carried out in accordance with the procedure established by the legislation of the Republic of Armenia and the Procedure. Complaints submitted in the form established by the Procedure are subject to mandatory consideration. Employees involved in the processes established by the Procedure are periodically instructed on the implementation of measures aimed at eliminating violations and their consequences that have occurred or may occur during the provision of services to the client by the Company, as well as on the submission of required information in accordance with the legislation of the Republic of Armenia, the Procedure and other internal legal acts.

3.2. The Company publishes information on the submission, consideration, and response to complaints at least on its official website and in its office.

3.3. When disclosing the information established by the Procedure, the Company adheres to the following general principles:

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- The information is presented in a simple and accessible way for the representative client, does not contain confusing, obscure, or misleading words or expressions,
- The information is presented in at least Armenian language, and
- The information is presented in easily readable fonts and font sizes, and in the case of posting in the form of an announcement, it is signed by the Executive Director and placed in a visible place.

3.4. The following are published on the Company's website and presented in the service hall:

- "What to do if you have a complaint" form (Appendix 1),
- The form of the letter for submitting a complaint by the Client (Appendix 2).

3.5. All announcements and notifications posted in the Company's office shall be dated and signed. If the announcement or notification consists of several pages, it is necessary to put a signature in the lower right corner of all pages. On the desk of the Company's employees who directly deal with clients, in a visible place, there shall be a printed letter indicating the service provided by the given employee.

4. PROCEDURE FOR SUBMITTING COMPLAINTS

4.1. The Company is obliged to consider the client's complaint if it was submitted within one year from the moment when the client knew or could have known about the violation of his/her right. The client is also considered to have submitted a complaint to the Company in the case when, with the consent of the client, the client's complaint was submitted by the Office of the Financial System Mediator.

4.2. Clients may submit complaints in the following ways:

- Electronically,
- By mail or in person.

4.2.1. In the case of electronic submission, the client sends the complaint to the Company's e-mail address, which is subject to publication by means accessible to the public. Moreover, the complaint shall be submitted from the e-mail address specified in the contract concluded with the client.

4.2.2. Complaints submitted by mail or in person are submitted in the form of a written letter addressed to the Executive Director.

4.3 Regardless of the form of submission, the complaint shall clearly state:

- 1) Client data (name, surname, place of residence, in the case of a legal entity - full name, address) and phone number and/or address (e-mail address), to which the response to the complaint shall be reported or sent.
- 2) The nature of the complaint, information clarifying or confirming it (if possible, also attach documents).

A complaint containing the above information is considered a Properly Submitted Complaint.

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4.4 The acceptance and consideration of Properly Submitted Complaints cannot be rejected by the Company. In the case when the letter submitted by the client meets the requirements of proper submission established by the Procedure, the Company considers it as a complaint, regardless of the name of that letter (application, demand, complaint-demand, etc.) or the absence of a name and form, and gives a final answer in accordance with the procedure established by the Procedure.

Complaints not properly submitted by the client are not considered, about which the client is informed within one working day.

4.5. Any employee of the Company, upon receiving a verbal complaint from a client, directs him/her to the Responsible Employee, as well as provides information on the means of communication with the Responsible Employee (phone, e-mail, etc.).

4.6. The Company, represented by the relevant Interested Employee, has the right to provide verbal explanations to the client's verbal complaint and present the Company's position, which cannot in any way limit the client's right to properly submit his/her complaint to the Company.

4.7. In the case when a verbal inquiry submitted by a client to the Company is classified by the Responsible Employee as a complaint or implies additional clarifications, he/she is obliged to inform the client that the latter may submit his/her complaint in writing, as well as inform where the client can obtain detailed information on the submission and consideration of complaints.

4.8. The Responsible Employee verbally informs the client who wishes to submit a complaint that the complaint is considered submitted if it is properly presented, and that he/she may receive a copy of this Procedure. At the request of the client, the Responsible Employee also provides:

- "What to do if you have a complaint" form,
- A sample form of the letter for submitting a complaint by the Client.

If the clarification of issues related to the complaint is recorded, the Responsible Employee informs the client thereabout in advance.

5. PROCEDURE FOR ACCEPTING AND REGISTERING COMPLAINTS

5.1. Client complaints are accepted during the working day. All complaints submitted by clients to the Company are subject to mandatory registration in the Electronic Complaint Registers (Appendix 4) within the day of receipt of the complaint or the next working day.

5.2. Complaints received electronically are accepted and registered only by the Responsible Employee. After receiving the complaint, until the next working day, the Responsible Employee sends the client, to the e-mail address, from which he/she received the complaint, a letter confirming the fact of receiving the complaint - a receipt (Appendix 3), which indicates the date of receipt of the complaint and the number of the line of its registration in the Electronic Register. The information provided to the client established by the Procedure is attached to the letter.

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Complaints received electronically are considered accepted from the day of their actual receipt (reading).

5.3. Complaints submitted in person are accepted by the Responsible Employee, who indicates the date of receipt, the number of the line of its registration in the register, and his/her surname in the lower left part of the first page of the complaint and signs it. A copy of the accepted and signed complaint is given to the submitter.

Complaints received in person are considered accepted from the date indicated by the Responsible Employee.

5.4. Complaints submitted by mail are submitted in the form of a written letter addressed to the Executive Director. The letter is accepted and registered, and a copy thereof is transferred to the Responsible Employee for registration in the register and further processing.

Complaints received by mail are considered accepted on the day they are entered into the Company.

5.5. The response shall be submitted to the client no later than the 10th working day after receiving the complaint. The day of providing the response is considered the day the Company sends it to the client.

6. COMPLAINT REVIEW PROCEDURE

6.1. The complaint is studied and the response is submitted in the following sequence of steps:

Step I - Summarizing Received Complaints

At the end of each working day, the Responsible Employee summarizes the complaints received and registered by him/her, prepares their electronic versions, and submits them to the Interested Employee and the Executive Director with an accompanying letter.

Step II - Studying the Complaint

The Interested Employee studies the submitted complaint and within three, and in the case of need for additional information, within five working days, submits his/her explanations and the draft decision to the Executive Director (copy to the Responsible Employee). If the available information is not sufficient for considering the complaint, the Interested Employee requests in writing from the client additional information directly related to the complaint, indicating the deadline for submission thereof. In the case the client does not provide the necessary additional information (documents) to the Company, the client's complaint is studied based on the available information (documents).

Step III - Preparing the Response to Complaints

Based on the submitted complaint and the responses of the Interested Employee, the Executive Director approves the response to be submitted to the client. If necessary, the Executive Director convenes additional discussions. The approved written response provided to the client

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shall comply with the sample form established by the Procedure (Appendix 5) and contain at least:

- 1) A justified and complete answer to each question raised by the Client and express the Company's clear position on rejecting, satisfying, or partially satisfying the client's demand.
- 2) Justification of the Company's decision.
- 3) Information about the Interested Employee responsible for the complaint review (name, surname, position) and means of communication (phone and e-mail) and the client's ability to contact him/her for clarifications.
- 4) Information that if the client is not satisfied with the written response to the complaint, he/she may apply to the court or the Financial System Mediator within the established period to protect his/her rights, and the "What to do if you have a complaint" form is attached to the response.

Step IV - Providing the Response

The response to the complaint is signed by the Executive Director. The Responsible Employee registers the signed response in the register and provides it to the client. The response is provided to the client in the same way the complaint was received unless another method of transmission is specified by the client.

Step V - Taking Corrective and Preventive Measures

After signing the response to the complaint, the Executive Director gives a separate order to take actions aimed at correcting the consequences arising from the response to the complaint or (if any) compensating for the damage and preventing such problems in the future. As a result, the interested employee may be subject to disciplinary action, material liability, or other liability.

Step VI - Complaint Monitoring

In the case of complaints, the Responsible Employee summarizes and submits to the Executive Director a summary report on the complaints received during the reporting month by day 10 of the following month (Appendix 6), and the Interested Employees who received orders as a result of the complaint review submit a report on the implementation of the orders.

Every year, during the first month following the year, the Executive Director submits to the General Meeting a summary report on the complaints received during the reporting year and the corrective and preventive actions taken. The General Meeting considers the submitted report and, if necessary, instructs the Internal Auditor to conduct a follow-up audit and submit the results to the General Meeting.

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7. APPENDICES

Appendix 1 - "What to do if you have a complaint" form.

Appendix 2 - Form of the letter for submitting a complaint by the Client.

Appendix 3 - Form of complaint receipt.

Appendix 4 - Electronic register of complaints.

Appendix 5 - Sample form of response to client complaints.

Appendix 6 - Sample form of a summary report on complaints received from clients.

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Appendix 1

Procedure for Submission and Consideration of Client Complaints

Organizati
on Logo

WHAT TO DO IF YOU HAVE A COMPLAINT?

1. KNOW YOUR RIGHTS

Every employee of the organization is obliged to:

- Direct you to the employee in charge of complaints
- Provide the necessary communication details (phone number, email address)

The responsible employee is obliged to:

- Inform you about your rights and the complaint review process
- Provide the relevant rules in force in the organization and the Application Form.

2. APPLY

Submit a written complaint to the responsible employee or send it to the following addresses:

You may also submit your complaint through the Financial System Mediator.

- Provide your details to receive a response
- Make sure that your complaint has been accepted and keep the information confirming the receipt until the final resolution of the complaint

WITHIN 10 DAYS

3. REVIEW THE RESPONSE

The organization makes a decision on the complaint (satisfy, partially satisfy, reject) within 10 working days.

If you have any questions, contact the responsible person.

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NOT SATISFIED?

4. APPLY TO

THE FINANCIAL SYSTEM MEDIATOR, if

- You are an individual, an individual entrepreneur considered a micro-entrepreneur, or a legal entity, including a guarantor, pledger, or other person who has a complaint related to a security measure (for example, a pledge).
- The complaint relates to the service provided and you have a monetary claim (up to AMD 10 million), or the complaint relates to your credit history
- You have not received a response within 10 working days or you are not satisfied with the response,
- The complaint is not being considered by a court or arbitration tribunal or by the Financial System Mediator,
- No more than 6 months have passed since the response
- The disputed action or inaction occurred after August 2, 2008.

SERVICES ARE FREE OF CHARGE

15 M. Khorenatsi, Elite Plaza Business Center, 7th floor, Yerevan 0010, +374 60 701 111, info@fsm.am

ARBITRATION TRIBUNAL

- If an arbitration agreement has been concluded between you and the organization, then disputes arising between you are subject to resolution by the arbitration tribunal
- When concluding the contract, you have the right to refuse the arbitration agreement, and the organization is obliged to provide you with the service.
- Remember: even in the presence of an arbitration agreement, you may apply to the Financial System Mediator, as long as the complaint has not been considered by the tribunal.
- The Mediator is not authorized to accept the complaint if it is already being considered by the tribunal.

COURT

- You may always apply to court
- The court decision is not subject to review by the Financial System Mediator.

CENTRAL BANK

- You may also apply to the Central Bank, and your complaint will be answered within 15 working days
- 6 V. Sargsyan, Yerevan 0010 +374 592 697, consumerinfo@cba.am
- If your complaint falls within the jurisdiction of other bodies, the Central Bank will direct it to their domain.
- The Central Bank advises you to first apply to the Financial Organization upon your request (Step 2)

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For questions, contact

(name of the organization, address, phone number, email address)

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Appendix 2

CUBE INVEST CJSC

Procedure for Submission and Consideration of Client Complaints

FORM OF THE LETTER FOR SUBMITTING A COMPLAINT BY THE CLIENT

CUBE INVEST CJSC

Executive Director: _____

COMPLAINT

Client's Full Name or Company Name _____

Client's details: passport details, address, phone number, email address

Content of the complaint _____

List of documents attached to the complaint (indicated if available and/or necessary)

Signature of the complainant _____

Date of complaint submission /--/--/----/

CUBE INVEST notes

Accepted on /--/--/----/ (signature of the recipient)

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COMPLAINT RECEIPT

Regarding the acceptance of the complaint from citizen/legal entity _____

Your complaint submitted to “CUBE INVEST” CJSC on _____ 202- was accepted on _____ 202-, entry number: _____.

The response to your complaint can be received at the office of CUBE INVEST CJSC (address: Yerevan, _____) or it can be sent by mail or email at your request.

We also provide you with:

1. _____,

You may also obtain the Procedure regulating the process of reviewing client complaints of CUBE INVEST CJSC from the website of CUBE INVEST CJSC: _____ or from the office of CUBE INVEST CJSC: Yerevan, _____.

Responsible Employee accepting the complaint: _____ 20__ (signature)

Phone: _____

E-mail: _____

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Appendix 5

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Procedure for Submission and Consideration of Client Complaint

SAMPLE FORM OF RESPONSE TO CLIENT COMPLAINTS

Client (full name or the name of the organization)

Address: _____

RESPONSE TO THE COMPLAINT

Dear (client details), hereby we present the response to the complaint you submitted to ____ CJSC on /--/--/----/.

The Company's position: _____

(reject, satisfy, or partially satisfy the demand)

Justification of the Company's position _____

For further clarifications, contact: _____

(employee's name, surname, position) and means of communication (phone and email address)

Dear client, if you are not satisfied with the written response to the complaint, you may apply to the court or the Financial System Mediator to protect your rights.

The "What to Do if You Have a Complaint" form is attached to this response.

-----/position-----

-----/name, surname/-----

/signature/-----date-----

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Appendix 6

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SAMPLE FORM OF SUMMARY REPORT ON COMPLAINTS RECEIVED FROM CLIENTS

Brief information on the registration of complaints and/or suggestions.

(period from to)

No.	Brief content of complaints and/or suggestions	Quantity	Specific weight %	Commentary
1.				
2.				
3.				
4.				
5.				

Responsible Employee

-----/name, surname/-----

-----/signature/-----

/date/-----