

**PROCEDURE
FOR HANDLING CUSTOMER COMPLAINTS AND REQUESTS
OF CJSC “DEMIR KYRGYZ INTERNATIONAL BANK”**

1. GENERAL PROVISIONS

1.1. The *Procedure for Handling Customer Complaints and Requests* of CJSC "Demir Kyrgyz International Bank" (hereinafter — the *Procedure*) establishes the process for receiving, registering, recording, and reviewing complaints and requests submitted by the Bank's Customers, as well as defines the main principles for monitoring their consideration.

1.2. This Procedure has been developed in accordance with the legislation of the Kyrgyz Republic, the regulatory legal acts (RLA) of the National Bank of the Kyrgyz Republic (NBKR), and the Bank's internal normative documents (IND).

1.3. The purpose of this Procedure is to establish unified rules and requirements for reviewing Customer complaints and requests, to enhance the relationship with the Bank's Customers, to coordinate work with Customer complaints and suggestions, to analyze the quality of services and the level of customer satisfaction, and to improve the quality of banking product sales.

1.4. The main principles governing the handling of Customer complaints and requests are as follows:

- a) legality, integrity, honesty, transparency, reasonableness, fairness, and social responsibility;
- b) respect for and protection of human and Customer rights and freedoms;
- c) mandatory review of complaints and communication of results;
- d) timeliness, objectivity, and completeness in the review process;
- e) equality of all Customers during complaint consideration;
- f) personal responsibility for the fulfillment of official duties;
- g) ensuring confidentiality and non-disclosure of information constituting banking secrecy.

1.5. The main objectives of this Procedure are to:

- a) define the conditions and procedures for maintaining feedback with Customers;
- b) establish the procedure for interaction among the Bank's structural units when processing Customer complaints and requests;
- c) improve the quality of services provided by the Bank;
- d) eliminate violations and their consequences that led to Customer complaints, as well as to optimize processes to prevent their recurrence in the future.

1.6. Each complaint or request shall be subject to mandatory review. Refusal to review or return of the complaint/request is not permitted. Customer complaints received from the National Bank of the Kyrgyz Republic (NBKR) shall be reviewed within the timeframes established by the NBKR.

1.7. The Bank's Management, as well as the Heads of Branches (OSP), are required to conduct personal meetings with Customers according to the approved schedule published on the Bank's official website and on information boards.

During personal meetings, the Assistant to the Management or the Responsible Employee of the Branch (OSFB) shall maintain a record (minutes) of the meeting. When attending a personal meeting, the Customer must present an identification document. In this case, the Assistant to the Management / OSFB shall:

- organize the Customer's meeting with the Bank's Management, Head of the Branch (OSP), or an authorized representative;
- inform the Customer that the meeting will be recorded in writing or that audio/video recording may be conducted.

1.8. Information about this Procedure, the methods (channels) of submitting complaints/requests, as well as the *Customer Feedback Book (КОП)*, shall be displayed in a visible and easily accessible place for Customers (e.g., information boards, etc.). An electronic version of this Procedure (limited to the sections relevant to Customers) is published on the Bank's official website, with a direct link available on the homepage.

1.9. The main terms and abbreviations used in this Procedure are as follows:

IND of the Bank	Internal regulations and policies governing the Bank's activities.
CFB (COP)	A special logbook used to record Customers' complaints and/or suggestions for subsequent review in accordance with the established procedure.

Contact Center	A structural division of the Bank responsible for handling incoming calls and messages received through various communication channels (telephone, e-mail, WhatsApp, social networks, the Bank’s official website, etc.), and for providing feedback to Customers.
Customer	Any natural or legal person (including an individual entrepreneur) who uses, has used, or intends to use the Bank’s financial services.
NBKR RLA	Legal and regulatory documents issued by the National Bank of the Kyrgyz Republic.
Branch (OSP)	A structural subdivision of the Bank, such as a branch, savings office, mobile cash desk, customer service point, exchange office, or mobile office.
PR Sector of RM Department (SSO ORM)	Public Relations Sector of the Retail Marketing Department. A unit responsible for managing public communication and information exchange on behalf of the Retail Marketing Department.
Responsible Employee of the Branch (OSFB)	Responsible Employee of the Bank’s Branch
SQS (OKS)	Service Quality Section
RMD (ORM)	Retail Marketing Department
Bank Management	Members of the Management Board
EDS (SED)	Electronic Document Management System “DemirFlow”
PR Sector (SCO)	Public Relations Sector of the Retail Marketing Department
CustomerCare	E-mail address (customercare@demirbank.kg) designated for receiving Customer complaints and inquiries.
Clientsappeals	E-mail address (clientsappeals@demirbank.kg) designated for receiving inquiries from the NBKR regarding Customer complaints.

2. TYPES OF COMPLAINTS AND REQUESTS

2.1. For the purpose of differentiated processing, all complaints and requests received from Customers are classified as follows:

- a) **Suggestion** – a Customer’s recommendation aimed at improving the Bank’s operations.
- b) **Complaint** – a description of a violation and/or request for the restoration of rights, requirements of the NBKR regulatory acts, or the Customer’s dissatisfaction with the Bank’s services.
- c) **Appreciation (Gratitude)** – a positive comment or expression of thanks addressed to the Bank’s employees or Branches (OSP).
- d) Other inquiries related to banking services that do not contain any claims and/or dissatisfaction with the Bank’s services are not subject to review under this Procedure. Such inquiries are reviewed by the responsible Branch (OSP) as part of standard banking operations, in accordance with the relevant rules and internal procedures of the Bank.

3. METHODS OF SUBMISSION OF COMPLAINTS AND REQUESTS

3.1. A Customer may submit a written complaint or request to the Bank through one of the following channels:

- a) by delivering a letter or statement to the Bank in person;
- b) by entering a record in the *Customer Feedback Book (COP)*;
- c) by sending it to the Bank via postal or courier services;
- d) by e-mail to CustomerCare@demirbank.kg;
- e) through the “Leave Feedback” link on the Bank’s official website homepage.

3.2 Complaints and requests received through the Contact Center shall be processed in accordance with the provisions set out in the [Customer Service Procedure when contacting the Contact Center of CJSC “Demir Kyrgyz International Bank.”](#)

3.3. If complaints or requests are received via the Bank’s official social media platforms (Instagram, Facebook, Twitter, etc.), the *Public Relations Sector of the Retail Marketing Department (SSO ORM)*, jointly with the *Contact Center*, conducts Customer identification and complaint analysis, and takes all necessary actions to resolve the issue. If the Customer’s identity is verified, the SSO ORM forwards the Customer’s complaint to the e-mail ServiceQualityComplaints@demirbank.kg for registration and further review in accordance with this Procedure. If the Customer cannot be identified or the issue cannot be resolved promptly, the SSO ORM invites the Customer to contact the *Contact Center* to prepare a written complaint and send it to ServiceQualityComplaints@demirbank.kg for registration and review in accordance with this Procedure.

3.4. If a complaint received through the Bank’s social media channels is not of a personal nature and generally concerns comments or recommendations on the Bank’s products or processes, the SSO ORM jointly with the *Service Quality Section (OKS)* shall forward such feedback to the relevant business process or product owner. The respective department analyzes the complaint for validity and, if necessary, submits improvement proposals to the Bank’s Management.

4. PROCEDURE FOR RECEIVING AND REGISTERING COMPLAINTS AND REQUESTS

4.1. A written complaint or request submitted by a Customer must contain the following information:

- the Customer’s full name (surname, given name, and patronymic, if applicable);
- the Customer’s residential address;
- the substance of the complaint or request (a detailed description of the claim, complaint, inquiry, or proposal);
- the Customer’s contact information (postal address, e-mail address, or telephone number);
- the date of submission;
- the Customer’s personal signature, except for complaints or requests sent to the Bank via e-mail, provided that the sender’s e-mail address is registered in the Bank’s systems;
- for legal entities and individual entrepreneurs — the signature of the person listed in the *Signature and Seal Sample Card* held by the Bank as the first signatory, along with the company seal (if applicable).

4.2. To confirm the validity of a complaint or request submitted to the Bank, the Customer may provide supporting documents (or copies thereof) along with the submission, evidencing the claims made.

4.3. If the Customer has not attached the documents necessary for a full and comprehensive review of the complaint or request, such documents may be requested from the Customer, specifying a deadline for their submission. If the requested documents are not received within the specified timeframe, the complaint or request shall be reviewed based on the documents available, within the period established by clause 6.2 of this Procedure, calculated from the date on which the deadline for providing additional documents expires.

4.4. Written complaints or requests submitted in the form of statements are to be registered in accordance with the Regulation on Recordkeeping and Document Flow of CJSC “Demir Kyrgyz International Bank.”

4.5. A Customer may leave suggestions, innovations, expressions of gratitude, or complaints regarding the work of Branch (OSP) employees, the Contact Center, or complaints addressed to the Bank’s Management, in the Customer Feedback Book (COP).

4.6. The Customer Feedback Book (COP) shall be available in every Branch (OSP) of the Bank in a place accessible to Customers.

4.7. The Customer Feedback Book (COP) must be paginated, stitched, certified by the signature of the Service Quality Section (OKS) curator, and stamped with the Bank’s seal. The Book shall be retained for a period of not less than five (5) years.

4.8. The Head of each Branch (OSP) of the Bank is responsible for the availability and safekeeping of the Customer Feedback Book (COP), for taking appropriate actions regarding the complaints and requests received,

and for ensuring that necessary measures are taken promptly. The Head of the Branch (OSP) is also responsible for organizing the timely provision of responses to Customers based on the entries made in the Customer Feedback Book (COP).

4.9. All complaints and requests received from the Bank’s Customers are subject to mandatory registration and review, except for the following cases:

- Anonymous complaints — those that do not contain the Customer’s full name, telephone number, address, and/or other contact details required for providing a response;
- Written complaints that do not indicate personal or contact information and do not include a postal address for sending the response — such complaints are considered anonymous and shall not be subject to review;
- Complaints submitted via the “CustomerCare” e-mail or through the “Leave Feedback” link on the Bank’s official website without complete contact details. In such cases, the *Service Quality Department (OKS)* sends an e-mail to the Customer requesting contact information and notifies the Customer about the receipt and review period of the complaint. If the Customer fails to respond within five (5) business days, the complaint shall be deemed anonymous and shall not be registered or reviewed;
- Written complaints containing obscene or offensive language, or threats to the life, health, or property of a Bank employee or their family members, may be left without review;
- Complaints in which the name of the individual or the representative of a legal entity (full name or company name) is illegible, preventing the identification of the complainant;
- Complaints of advertising or other non-related nature that are not connected with the Bank’s activities and do not contain a Customer’s claim or request;
- Repeated complaints that do not present new arguments or circumstances, provided that comprehensive responses were previously given and all necessary measures were taken.

4.10. Complaints and requests received by post, e-mail, through the Bank’s official website, or via the Contact Center, which fall under the responsibility of a particular *Branch (OSP)*, shall be registered in that Branch’s *Incoming Correspondence Log*.

4.11. Responses to oral complaints shall be provided to Customers orally. If a Customer submits a written complaint but requests a verbal response, such a response shall be given by telephone.

4.12. The review of written complaints addressed to the Head of a Branch (OSP) falls within the competence of the Head of that Branch.

4.13. The Head of each Branch (OSP) bears personal responsibility for the impartial and timely review of written complaints and for providing written responses to Customers within the timeframes established by this Procedure, in accordance with the requirements specified in paragraphs 7.3–7.6 hereof.

4.14. The *Service Quality Department (OKS)* is responsible for handling written complaints and expressions of gratitude addressed to the Bank’s Management.

5. TIMEFRAMES FOR REVIEW AND PREPARATION OF RESPONSES TO CUSTOMER COMPLAINTS

5.1. In the event that a written complaint or statement from a Customer is submitted to the Head of a Branch (OSP), containing claims, dissatisfaction with the Bank’s services, or expressions of gratitude, the Responsible Branch Employee (OSFB) shall, no later than the next business day following the date of receipt, scan and register the document in the Electronic Document Management System (SED) under the tab “Customer Complaints and Gratitude.” The analysis, review, and closure of such complaints shall be carried out independently at the level of the respective Branch (OSP).

5.2. If a Customer submits a complaint to the Branch (OSP) of the Bank by making an entry in the Book of Feedback and Suggestions (KOP), the Responsible Branch Employee (OSFB) shall, no later than the next business day after the date of the entry, scan the record from the KOP and register it in the SED under the tab “Customer Complaints and Gratitude” for tracking and further review by the Service Quality Department (OKS) in accordance with the established procedure.

5.3. The response period for Customer complaints shall not exceed thirty (30) calendar days from the date of registration in the SED.

5.4. The response to the Customer must provide a clear and reasoned explanation regarding the satisfaction (full or partial) or rejection of the complaint, as well as clarification of the Customer's rights and obligations. Where possible, the Bank's responsible structural unit reviewing the complaint shall obtain a written statement from the Customer confirming the absence of any claims against the Bank, following delivery of the response (in case of personal handover).

5.5. The response to the Customer shall be provided in the language of the complaint, unless otherwise specified in the complaint.

5.6. The response shall be sent to the Customer using the communication channel specified in the complaint: by post (to the address indicated in the complaint), in person upon the Customer's visit to the Bank, or by e-mail (to the e-mail address provided).

5.7. For collective complaints, the response shall be sent to the address of the Customer listed first in the complaint, unless otherwise stated therein.

5.8. Depending on the type of response and method of delivery, scanned copies of the correspondence sent to Customers, along with notifications confirming dispatch/delivery, shall be stored in the SED.

5.9. If a Customer is dissatisfied with the decision or response provided by the Head of a Branch (OSP), the Customer shall be advised to submit a written complaint addressed to the Bank's Management. Such complaints, as well as those directly addressed to the Bank's Management without prior submission to the Branch, shall be reviewed in accordance with Section 6 of this Procedure.

5.10. When the Service Quality Department (OKS) receives a written complaint addressed to the Bank's Management via the SED, the Responsible OKS Employee shall coordinate the process and send a request through the SED to the relevant Branch (OSP) for a detailed explanation regarding the received complaint. The Responsible OKS Employee shall monitor the response preparation timeline, ensuring that it does not exceed ten (10) business days from the date of receipt of the written complaint.