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Customer Claim Handling Procedure

Bishkek - 2023

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1. General provisions

- 1.1. This Customer Claim Handling Procedure (hereinafter referred to as the "Procedure") has been developed to protect the rights and legitimate interests of customers of the "MCC "Bailyk Finance" LLC (hereinafter referred to as the "Company"), as well as to form the social responsibility of the Company's staff.
- 1.2. This Procedure is an internal document of the Company, and regulates the process of handling claims, registration, and recording of complaints; the process of providing feedback, as well as the formation of reporting for accounting and analysis; the process of the Company's interaction with partner organizations; determines the manner for equipping the Company's offices and official website with information on the provision of financial services and customer feedback channels.
- 1.3. This Procedure has been developed according to the current legislation, and regulatory legal acts of the National Bank of the Kyrgyz Republic, in particular the Regulation on the minimum requirements for the procedure of providing financial services and handling consumers' claims, the Company's local regulations, as well as generally accepted standards and principles of customer service and protection.
- 1.4. A claim means a verbal or written (or electronic) complaint, statement, or suggestion of customers containing information about violations of their rights, requirements of regulatory legal acts, and requests for financial services, including amendments in the terms and conditions of the contract.
- 1.5. Claims shall be accepted mandatorily at all offices of the Company, on the official website, through electronic means of communication, as well as through the Company's partners.
- 1.6. The procedure is mandatory when handling complaints/suggestions from the Company's customers.
- 1.7. The review of claims is free of charge.
- 1.8. In reviewing customer claims, the Company shall be guided by the following basic principles:
 - 7 Principles of Customer Protection;
 - Legality, honesty, integrity, transparency, reasonableness, fairness;
 - Respecting and ensuring the rights and legitimate interests of customers, and partner attitude towards them;
 - Obligatory consideration of claims and provision of the results of their consideration;
 - Timeliness, objectivity, and completeness of consideration of claims;
 - Consideration of customer claims on the principles of parity (equality of customers).

Equipping offices with information about the procedure for the provision of financial services and feedback channels

- 2.1. To provide customers with an opportunity to make a complaint or suggestion, each office of the Company shall have a Book of Complaints and Suggestions, which shall be bound, numbered, and signed by the Chief Executive Officer or Director of the Regional Office and certified by the Company's or a Branch's seal. The Book of Complaints and Suggestions shall be drawn up according to the sample specified in Annex 1 to this Procedure and shall be posted in a place visible to customers. The Book of Complaints and Suggestions shall be kept for at least 5 years.
- 2.2. In all offices of the Company, information about the feedback ways and channels should be posted in a place visible to customers.
- 2.3. The Company shall provide **10** feedback **channels** for interaction with customers:
 - 1) **"Helpline"** – telephone line for receiving calls **(0701) 51 17 61**;
 - 2) **"WhatsApp"** – communication via WhatsApp claim through the number **(0701) 51 17 61**;
 - 3) **"Book of complaints and suggestions"** – a special book for recording customer complaints and suggestions, available in each office of the Company, including the Head Office, to reflect complaints and suggestions;
 - 4) The **"Leave a Complaint"** section of the website at https://bf.kg/ru/ostavit_zhalobu is for leaving a complaint online;

- 5) Personal reception of customers by the Company's management according to the schedule specified in clause 5.5.
- 6) **E-mail kairyluu@bf.kg** - to accept claims by e-mail;
- 7) **Instagram** - for connection via Instagram social media <https://www.instagram.com/bailykfinance.kg/>
- 8) **Facebook** - Facebook Posts <https://www.facebook.com/www.bf.kg>
- 9) **Telegram** bot - The official bot in the messenger Telegram **@BailykFinance_bot**;
- 10) **Call Center** - Single Information Center **(0220) 99 11 11, (0559) 99 11 11, (0509) 99 11 11.**

2.4. The electronic version of this Procedure shall be posted on the Company's official website.

2.5. At the customer's request, the Company employees shall be obliged to explain to him/her the prescribed procedure for handling claims.

3. Procedure for acceptance and registration of claims

3.1. The Company shall accept claims in the Kyrgyz and the Russian languages in the following forms:

- orally (via helpline by calling the Call-Center, or in person);
- in writing (received by hand, to the postal address; an entry in the Book of Complaints and Suggestions);
- electronically (messages received via e-mail, WhatsApp, Telegram, social media Facebook, Instagram, as well as in the site section "Leave a complaint").

3.2. According to Annex 3, there shall be accepted for review the claims with the following information:

- Customer's last name, first name, patronymic;
- The name and address of the office where the customer was served;
- Customer's address, and contact information to send a response;
- The essence of the complaint, request, complaint, wishes, and the date of contact.

3.3. All claims submitted in the prescribed manner shall be subject to mandatory review. Refusal to accept complaints and claims, as well as the requirement for the customer to present documents for getting access to the Book of complaints and suggestions, shall not be allowed.

3.4. The following shall not be subject to review:

- A customer's written claim, which does not contain his/her personal and contact information (the customer's surname, first name, patronymic, telephone number), or mailing address to which a response should be sent (anonymous claims);
- A customer's written claim containing obscene or abusive language, threats to the life, health, and property of the Company employee, as well as his/her family members;
- Consumer repeated claims, which do not cite new arguments or circumstances, provided that previous claims have been fully answered and all necessary measures have been taken;
- Claims, which contain questions, the consideration of which is not within the legal competence of the Company, provided that the customer is explained where and how he/she should apply.

3.5. All claims received by the Company, including the Head Office, offices of the Company, and partner organizations must be registered in the electronic register of claims - CRM system, according to the sample shown in Annex 2. The Contact Center Employees receiving the customer claims, when registering the complaint/suggestion should clarify the possibility of calling the customer according to the results of the customer's complaint/suggestion review. In the case of a positive response from the customer, it is necessary to ask for the customer's contact phone number, except for claims received by e-mail.

3.6. Contact Center Operators shall register customer claims in the electronic register.

- 3.7. Registration of claims received at the Head Office of the Company. The Contact Center operator shall accept and register in the electronic register of claims all claims received through the feedback channels specified in clause 2.3 of this Procedure and all letters sent by hand to the postal address of the Company.
- 3.7.1. At the Head Office, an employee of the Sales Support Department shall accept claims from the Company's customers, scan the corresponding page of the Book of Complaints and Suggestions and send it to the e-mail address kairyлуу@bf.kg or callcenter@bf.kg to register them in the electronic register of claims.
- 3.7.2. When the claims are received via mail – an employee of the Sales Support Department shall open the envelope, register it in the prescribed manner, scan the letter, and send it to the e-mail address kairyлуу@bf.kg or callcenter@bf.kg not later than the next business day after receipt of the letter.
- 3.7.3. Upon the arrival of claims to the e-mail address: office@bf.kg, the Administrative Assistant shall forward the claim to the e-mail address kairyлуу@bf.kg or callcenter@bf.kg no later than the next business day after receipt of the claim.
- 3.8. Registration of claims received at the offices of the Company. The cashier-operator of the database (hereinafter referred to as "COBD") of each office or a person substituting him/her shall be obliged to transfer to the Contact Center the information about the claims received by the office (orally, during the visit of the customer and by calling the office phones) for registration purposes in the form of an e-mail to kairyлуу@bf.kg or callcenter@bf.kg with a description of the claim according to clause 3.2;
- 3.8.1. Upon receiving claims by recording them in the Book of Complaints and Suggestions – the COBD shall scan the corresponding page of the Book of Complaints and Suggestions and send it to the e-mail address kairyлуу@bf.kg or callcenter@bf.kg not later than the next business day after the receipt of the claim with additional comments about the claim, if any;
- 3.8.2. Upon receiving claims through the mail the COBD shall open the envelope, put the date of receipt on the letter, scan the letter and send it to the e-mail address kairyлуу@bf.kg or callcenter@bf.kg not later than the next business day after receipt of the letter.
- 3.8.3. The Funding Manager of the relevant office or a person substituting him/her shall exercise control over the timely transfer of information on claims to the Contact Center;
- 3.8.4. It is recommended for the COBD to set up his/her email to automatically remind to send information on time;
- 3.8.5. In case of incomplete information, the Contact Center Operator shall contact the person submitting the information on the claim to clarify all circumstances relevant to the consideration and implementation of registration.
- 3.9. Registration of claims received through the Company's partners.
- 3.9.1. Upon receipt of claims to an insurance company, collection agency, or other partner organization with which the Company has contractual relations, the partner organization shall send the text of the claim to the e-mail address kairyлуу@bf.kg or callcenter@bf.kg not later than the next business day after receipt of the claim with additional comments about the claim, if any. Further claim handling shall be carried out according to Section 4 of this Procedure.
- 3.9.2. Upon receipt of the claims addressed by the partner organization to the Company's office, the COBD or the person substituting him/her in the Head Office – an employee of the Sales Support Department – shall send the claim to the e-mail address kairyлуу@bf.kg or callcenter@bf.kg not later than the next business day from the receipt of the claim with additional comments about the claim, if any. The Contact Center operator shall accept and register the claim, and pass it to the partner organization to the contacts specified in the Cooperation Agreements.
- 3.10. Upon receipt of letters from the National Bank containing customer claims addressed to the Company to office@bf.kg, the Contact Center Operator shall be guided by the provisions of Section 4 of this Procedure.

4. Claim Handling Procedure

- 4.1. Contact Center employee shall register the customer's claim in the electronic register of claims according to Annex 2, as well as assign a category of claim/complaint according to the following types:
 - 4.1.1. complaints about rudeness, improper actions, and/or omissions of the employees of the Company's offices;
 - 4.1.2. requests to amend the terms and conditions of the loan agreement (deferment, prolongation, restructuring, write-off, etc.);
 - 4.1.3. complaints about mistakes in documents (wrong calculations in loan agreements, repayment schedules, CIB, etc.);
 - 4.1.4. complaints about queues at the offices;
 - 4.1.5. complaints about the inconvenient location of the office;
 - 4.1.6. complaints about the unsatisfactory operation of the cash desk;
 - 4.1.7. complaints about the complicated process of processing the loan (the package of documents, the duration of the loan);
 - 4.1.8. complaints about the granting process, the terms of financing according to Islamic principles;
 - 4.1.9. complaints about incorrect information about the Company's credit products and services;
 - 4.1.10. complaints about delays or refusals to issue collateral documents;
 - 4.1.11. complaints about work, actions of collectors;
 - 4.1.12. complaints about the work, the actions of the insurance company;
 - 4.1.13. complaints about the work, and actions of partner organizations with which the Company has contractual relationships;
 - 4.1.14. complaints received by the Company as pre-trial measures (disputes, dispute resolution, etc.);
 - 4.1.15. complaints of breach of contract with the customer;
 - 4.1.16. complaints of discrimination against the customer (gender, age, nationality, etc.)
 - 4.1.17. suggestions for the Company's work;
 - 4.1.18. recognition, gratitude;
 - 4.1.19. other complaints.
- 4.2. After registration of the claim, the Contact Center Operator shall send it to the officials and/or structural subdivisions of the Company, the competence of which includes the customer's question (hereinafter referred to as the "Competent Subdivision"), in particular:

Competent subdivision	Type of customer complaint/claim
Director of Regional Office, District Directors, Chief Operating Officer	Requests to amend the terms and conditions of the loan agreement (deferment, prolongation, restructuring, write-off, etc.);
	complaints about queues at the offices;
	complaints about the inconvenient location of the office;
	complaints about the unsatisfactory operation of the cash desk;
	complaints about the complicated process of processing the loan (the package of documents, the duration of the loan granting);
	complaints about the granting process, the terms of financing according to

	Islamic principles;
	complaints about incorrect information about the Company's credit products and services;
	complaints of discrimination against the customer (gender, age, nationality, etc.);
	suggestions for the Company's work;
	claims, received by the Company as pre-trial measures to resolve disputes (claims, offers to settle a dispute through the pre-trial process, letters, indicating the customer's intention to apply to the judicial authorities);
	other complaints.
Head of Legal Department, Chief Operating Officer, District Directors	complaints of breach of the terms and conditions of the agreement with the customer (incorrect calculations or information in the loan agreement, repayment schedule, CIB);
	claims containing complaints about the actions of employees of a collection agency engaged by the Company to collect overdue debts.
	complaints about the delay or refusal to issue collateral documents;
	claims containing a dispute about the Customer's right (letters disputing the legality of the Company's actions, disputing the validity of contracts, decisions, etc.);
	complaints received by the Company as pre-trial measures (disputes, dispute resolution, etc.);
	claims which are court documents (lawsuit and other claims filed with judicial and other law enforcement authorities against the Company, subpoena and/or court notices, court ruling and/or decision, writ of execution, bailiff service ruling, other letters, etc.).
Head of Human Resources, District Directors, and Chief Operating Officer	recognition, gratitude to a Company employee;
	complaints about rudeness, improper actions, and/or omissions of the employees of the Company's offices.
Collection/Insurance Companies/Partner Organizations, District Directors, Chief Operating Officer	complaints about the work, the actions of the insurance company;
	claims containing complaints about the actions of employees of a collection agency engaged by the Company to collect overdue debts.

- 4.3. Customer's complaint received by the Company shall be considered within 10 business days from the date of its registration, except for judicial claims and requests of other law enforcement agencies, and requests of the National Bank, the handling period for which may be different. If the consideration of a customer's complaint requires additional verification or other measures, the period of complaint

review can be prolonged for 10 business days with the indication of the reason for extension in the electronic register of claims. In case of an extension of consideration of the customer's claim, Contact Center Operator shall notify the customer of the extension indicating the reason.

- 4.4. When sending a claim to the competent subdivision of the Company, the Contact Center Operator shall warn the responsible employee about the 10-day maximum period within which the claim is to be considered.
- 4.5. *The Competent Subdivision shall be obliged to:*
 - 4.4.1. determine a specific employee responsible for handling the claim on the merits of the issue raised in it;
 - 4.4.2. refer the complaint to the Security Department if an internal investigation is necessary;
 - 4.4.3. request from other departments the information required to consider the claim, if necessary;
 - 4.4.4. contact the customer to clarify their complaint or request, if necessary;
 - 4.4.5. initiate a claim to the Loan Committee, if the customer's claim involves matters within the competence of the Loan Committee;
 - 4.4.6. initiate official investigations into the facts voiced in the claim, if necessary;
 - 4.4.7. prepare a draft response to the claim on behalf of the Company, and organize its approval and signing.
- 4.5. The response must contain a clear justification regarding the satisfaction (full or partial) or rejection of the claim, or an explanation of the customer's rights and obligations. The response must contain information about the responsible employee and its contact details. If necessary, copies of documents shall be attached to the response.
- 4.6. The Company's response to the customer on the results of the claim shall be given in the language of the claim: the state or the official language of the Kyrgyz Republic.
- 4.7. In case of reasonableness and legitimacy of the customer's claim, the Company shall take measures to eliminate violations, restore the rights and legitimate interests of the customer or take other appropriate measures.
- 4.8. If the claim contains questions or consideration which is not within the legal competence of the Company, the customer shall be given a written explanation of where and how he should apply.
- 4.9. The Competent Subdivision shall be responsible for meeting the deadline for handling the customer's request.
- 4.10. Unless prepared by the Legal Department, the draft response shall be subject to approval by the Legal Department, which checks the response for legality and ensures compliance with the Company's corporate records management style.
- 4.11. The Contact Center Operator shall be obliged to:
 - 4.11.1. To ensure that the response is sent to the customer to the addresses specified in the claim (if the claim is collective, the response shall be sent to the address listed first in the claim, unless otherwise specified in the claim itself), or to send the response to the Office Finance Manager from whom the claim was received to enter the response to the customer's complaint in the Book of complaints and suggestions;
 - 4.11.2. Fill in the section "Result of the claim handling" in the claim card in the electronic register of the claims about the measures taken as a result of the claim handling;
 - 4.11.3. Put the claim, the response, and attachments thereto in a separate folder and ensure their storage for at least 5 years.
- 4.12. Based on the results of the review of the customer's written claim, the Finance Manager or a person substituting him/her shall record in the Book of Complaints and Suggestions the result of the customer's complaint/claim investigation:
 - the Company's clarification in response to a customer's complaint/claim;
 - the date of the response to the customer;

- the full name of the employee who gave the explanation.
- 4.13. If the claim was rejected (specify the reason why the claim was dismissed).
- 4.14. Finance Managers, or persons substituting them, should send scanned copies of the Book of Complaints and Suggestions to the Contact Center Manager quarterly for verification of correct completion.

5. Verbal claim handling procedure

- 5.1. All employees of the Company, who accepted verbal claims from customers, received through telephone or personal conversation, shall be obliged to provide advice on feedback channels for filing a claim, to assist customers in drafting a written claim.
- 5.2. If the customer completes the conversation by drafting a written claim, a Company employee shall mandatorily transfer the information to the Contact Center for its registration to the e-mail address kairyлуу@bf.kg or callcenter@bf.kg according to Section 4 of this Procedure.
- 5.3. In the case of a verbal claim, a Company employee with the customer's consent may make an audio recording of the conversation for use in further consideration of the claim. To provide high-quality feedback, all received verbal claims should be transferred to the Contact Center according to clause 3.8. of this Procedure.
- 5.4. If a verbal claim does not require additional verification and does not contain information about the facts of the violation, then the response to the claim may be given promptly verbally (by telephone or personal conversation).
- 5.5. The Regional Office Director or other authorized persons, as well as the heads of the respective districts and/or offices, shall conduct personal reception of visitors according to the following schedule:
 - 5.5.1. Regional Office Director – every Tuesday from 10:00 to 11:00 at the Company's Head Office;
 - 5.5.2. The District Director or Finance Manager of the respective office – daily from 10:00 to 11:00.
- 5.6. Following the results of a personal reception, a protocol or a written claim shall be drawn up, as well as audio and video recordings may be made if the customer agrees. In the case of a written claim, it shall be handled according to Section 4 of this Procedure.

6. Control and Responsibility

- 6.1. The Head of the competent subdivision shall exercise control over the timeliness of consideration of claims and preparation of responses for the Contact Center Operator.
- 6.2. In cases of failure to meet deadlines for review without good cause, or failure to respond to claims, the Head of the Contact Center shall inform the Chief Executive Officer and the Chief Operating Director of such facts.
- 6.3. The Internal Audit Service shall verify that the Book of Complaints and Proposals is properly compiled and maintained and that the Company's employees comply with the requirements of this Procedure during audits.
- 6.4. Employees who are guilty of violating the procedure for handling claims outlined in this Procedure may be subject to disciplinary action stipulated in the laws of the Kyrgyz Republic, the Code of Corporate Ethics, the Personnel Policy, and other internal regulations of the Company.
- 6.5. All information received by the Company employees in the course of consideration of customers' claims shall be recognized as confidential and shall not be disclosed, except for cases where such disclosure is allowed under the laws of the Kyrgyz Republic.

7. Analytics and reporting

- 7.1. The Head of the Contact Center shall quarterly prepare and submit to the Company's management a report on complaints and claims received through all communication channels.
- 7.2. At the request of other subdivisions, the Head of the Contact Center can provide consolidated statistical data on customer claims and results of their consideration.
- 7.3. The Head of the Contact Center on a semi-annual basis shall prepare and submit to the authorized structural subdivision of the National Bank of the Kyrgyz Republic a report on written consumer complaints. The report shall be made according to the form prescribed by the regulatory acts of the National Bank of the Kyrgyz Republic, signed by the Chief Executive Officer of the Company, and submitted by the twentieth day of the month following the reporting half-year.

8. Final Provisions

- 8.1. This Procedure may be amended and supplemented by order of the Chief Executive Officer as necessary.

9. Annexes:

1. Book of Complaints and Suggestions;
2. Electronic register of claims;
3. The form of reception of the customer claims.

Annex 1
to the Customer Claim Handling Procedure

Format of the "Book of Complaints and Suggestions"

Date	Customer's full name, Company's name	Contact information (address, phone number, e-mail)	Description (essence) of the complaint or suggestion	Company's Clarifications (measures taken)	Date	Full name of the employee, who gave explanations

Annex 2
to the Customer Claim Handling Procedure

Format for registration of claims in the electronic register of claims

Name of the field in the CRM system	Description of the field and format of its filling.
Claim No.	Generated automatically.
Date of receipt	The date on which the complaint, suggestion, or claim was received.
Type	Specifies the type of claim according to Section 4.1 of the Procedure.
Source	The source of information (feedback channel) shall be selected from the drop-down list, corresponding to section 2.3 of the Procedure.
The office where the claim was received	The office where the claim was received is indicated (if necessary).
The office concerning which the claim was received	The office, which is the subject matter of the claim, is indicated.
Full name of the applicant	Full name of the applicant.
Contact information	The contact number, e-mail, or mailing address (address of residence) of the applicant for the provision of a response to his/her claim.
Description of the claim	The essence of the claim is filled in.
Company's clarifications	A brief, clear explanation provided by a competent unit or employee is completed.
Response Format	Indicate the format in which the response was provided to the applicant.
Response Date	The date on which the response was provided to the applicant.
Full name of the person who gave the explanation	Specify the name of the competent subdivision or employee who gave the explanation.
Degree of customer satisfaction with the resolution of the complaint	The degree of satisfaction of the person with the received response shall be identified and filled in last by the Contact Center Operator.

