Public

CUSTOMER COMPLAINTS AND CLAIMS HANDLING PROCEDURE

Responsible Unit	Approved by
Information Security team	G. Gevorgyan, Chief Executive Officer

Related Documents	"LANDMARK CAPITAL" CJSC RULES ON THE PROVISION OF INVESTMENT AND NON-CORE SERVICES REGULATION 8/04 ON THE MINIMUM REQUIREMENTS AND PRINCIPLES FOR INTERNAL LEGAL ACTS GOVERNING THE CUSTOMER COMPLAINTS AND CLAIMS HANDLING PROCESS
Scope	"LANDMARK CAPITAL" CJSC STAFF
Other provisions	

1. Purpose

This Procedure regulates the process of receiving, registering, reviewing, and resolving to final decision any complaints submitted by clients of LANDMARK CAPITAL Closed Joint Stock Company in relation to investment services.

2. Definitions

Company shall mean "Landmark Capital" Closed Joint Stock Company.

Client shall mean a person (individual or legal) who uses the Company's services, or who has approached the Company with the intention of using such services.

Complaint shall mean a written (including electronic) submission made by a client to the Company, concerning the services provided by the Company, and containing a financial claim. Moreover, a complaint must include at a minimum the client's name and surname, contact details (residential address, telephone number, and email address), signature, and a description of the complaint.

Responsible Employee shall mean the designated employee of the Company's Office responsible for receiving complaints from clients, circulating them within the Company, and providing the client with the necessary information.

3. General provisions

3.1. The Company's responsible employee shall first verbally acquaint any client wishing to submit a complaint with the Company's rules governing the complaint handling process and, at the client's request, provide this Procedure.

3.2. The Company's responsible employee shall also verbally inform the client that a complaint is considered submitted to the Company only when presented in writing- delivered in person, by post, electronically, including through mobile applications (such as WhatsApp, Viber, Messenger, etc.), or via text (SMS) message.

3.3. The Company shall make available on its website, as well as in its Office, the form titled "What to Do If You Have a Complaint" (Appendix 1).

3.4. Any Company employee who receives a client complaint, or to whom a client has expressed an intention to submit a complaint, must direct the client to the responsible employee and provide the client with the contact details of the responsible employee (telephone, email address, etc.).

3.5. The responsible employee shall provide a client wishing to submit a complaint with the form "What to Do If You Have a Complaint" (Appendix 1) as well as the Complaint Submission Application form (Appendix 2). A complaint submitted to the Company may be rejected if it is not prepared in accordance with these rules.

4. Complaint Acceptance Procedure

4.1 Upon receiving a client's complaint, the Company's responsible employee shall, without delay but no later than the next business day, provide the client with a receipt confirming acceptance of the complaint (Appendix 3).

4.2 The Company shall provide any client wishing to submit a complaint with the form "What to Do If You Have a Complaint" completed by the Company, as well as the Complaint Submission Application form to be completed by the client.

4.3 Client complaints shall be accepted on each business day from 09:30 to 18:00. During these hours, a responsible employee must always be present at the Company's office to receive complaints and respond to client inquiries related to complaints.

4.4 The Company undertakes to review a client's complaint if it has been submitted within one year from the moment the client became aware, or could reasonably have become aware, of the violation of his or her rights.

4.5 If the client's written submission meets the requirements set out in clause 2 of this Procedure, the Company shall treat it as a complaint, regardless of its title (application, claim, complaint, etc.).

4.6 The responsible employee shall maintain an Electronic Complaints Register (Appendix 5), which records the date of receipt of the complaint, the client's details, a brief description of the complaint, the responsible employee's name and surname, a brief description of the response, the date of the response, as well as the complaint's serial number and code.

5. Complaint Review and Response Procedure and Timeframes

5.1 Upon receipt of a client complaint, the responsible employee shall verify the accuracy of the submission and subsequently present it to the Company's Chief Executive Officer for a decision on further action.

5.2 If, during the review of the complaint, it is determined that additional documents or justifications are required from the client, the responsible employee shall, within two business days, contact the client with a request to provide the necessary documents. At the same time, upon receiving a complaint or during its examination, the Company may not request from the client any documents:

5.2.1 that are not necessary to substantiate the existence or absence of the complaint or the circumstances underlying it, or to identify the client; or

5.2.2 that are already available to the Company in connection with the services provided to the client, if the client submits written confirmation that the information contained therein has not changed.

5.3 After the complaint has been presented to the Chief Executive Officer, the latter shall review it together with the relevant units (independent experts may be invited if necessary). Following this review, the responsible employee shall draw up a complete written response and submit it to the CEO for approval.

5.4 The Company's final written response to the client's complaint shall include:

5.4.1 the Company's clear position to reject, partially uphold, or fully uphold the complaint,

5.4.2 the reasoning behind the Company's decision,

5.4.3 the details of the unit or individual responsible for the review of the complaint (name of the unit or, if applicable, the individual's name, surname, and position) and contact information (telephone, email, etc.),

5.4.4 information indicating that, in case of questions regarding the outcome of the complaint review, the client may contact the designated department (or person).

5.5 The Company shall inform the client that if dissatisfied with the written response, the client may, in order to protect his or her rights, apply to a court, to the Financial System Mediator, to the Central Bank, or to an arbitration tribunal if an arbitration agreement exists.

5.6 The response to the complaint shall be delivered to the client in person or sent by the method indicated in the complaint.

5.7 The Company shall provide the client with a final written response within 10 business days from the date of receipt of the complaint.

5.8 The response to the complaint shall be prepared in accordance with Appendix 5, signed by the Chief Executive Officer, and sealed with the Company's seal.

5.9 In case of rejection or partial satisfaction of the complaint, the Company shall attach to the written response the form "What to Do If You Have a Complaint" completed by the Company, in accordance with Appendix 1, or, if the complaint was submitted electronically, send the same electronically.

5.10 If the Company fails to provide the client with a written response within 10 business days of receipt of the complaint, the client may, in accordance with the law, file a claim with the Financial System Mediator.

6. Other provisions

6.1. The Company's Internal Audit Department shall periodically analyze the outcomes of client complaint reviews with the aim of identifying and eliminating the underlying causes and grounds for their occurrence.

6.2. The results of the Internal Audit analysis shall be incorporated into a report and submitted to the Company's General Meeting.

Appendix 1

Important Notice	**WHAT TO DO IF YOU HAVE A COMPLAINT**	
1. KNOW YOUR RIGHTS	Every employee of the Company is obliged to: • **Direct** you to the staff member responsible for handling complaints; • **Provide** you with the necessary contact details (telephone number, email address).	The responsible employee is obliged to: • **Inform** you about your rights and the complaint review process; • **Provide** you with the applicable Company rules and the Complaint Application Form.
2. APPLY	Name of the Company Submit your written complaint to the responsible employee or send it to the following addresses: info@landmarkcapital.am	• **Indicate** your contact details in order to receive a response; • **Make sure you take** the receipt and keep it till final resolution of your complaint.
In 10 days 3. REVIEW THE RESPONSE	The Company shall make a decision regarding the complaint (to uphold, partially uphold, or reject) within 10 business days	If you have questions, contact the responsible person tel.: +37460 277274
Not Satisfied? 4. APPLY TO	**THE FINANCIAL SYSTEM MEDIATOR** if: • You are a natural person, • The complaint concerns a provided service and includes a financial claim (up to AMD 10 million), or relates to information included in credit report; • You have not received a response within 10 business days or the response does not satisfy you; • The complaint is not under review by a court, an arbitration tribunal; • No more than 6 months have passed since the response; • The disputed action or inaction took place after August 2, 2008. **THE SERVICES ARE FREE OF CHARGE** (Yerevan 0010, 15 M. Khorenatsi, Elite Plaza Business Center, 7th floor, +374 60 701 111, info@fsm.am)	**ARBITRATION TRIBUNAL** • If an arbitration agreement has been concluded between you and the Company, disputes arising between you shall be subject to resolution by the arbitration tribunal. • When entering into the agreement, you have the right to refuse the arbitration agreement, and the Company is obliged to provide you with the service. • Remember: even if an arbitration agreement exists, you may apply to the Financial System Mediator, provided the complaint has not yet been reviewed by the tribunal. • The Mediator is not authorized to accept the complaint if it is already under review by the tribunal.
	CENTRAL BANK • You may also apply to the Central Bank, and your complaint will be answered within 15 business days (Yerevan 0010, 6 V. Sargsyan, +374 592 697, consumerinfo@cba.am). • If your complaint falls within the competence of other institutions, the Central Bank will refer it to them. • The Central Bank recommends that, upon your request, you first contact the financial institution (Step 2).	**COURT** • You may always apply to the court. • The court's decision is not subject to review by the Financial System Mediator.

If you have any questions, apply to:

Landmark capital CJSC, area 118, Vazgen Sargsyan 10, c. Yerevan 0010, RA, info@landmarkcapital.am

(name, address phone number and e-mail address of the company)

Appendix 2

COMPLAINT SUBMISSION APPLICATION N

Client Information

Name / Surname / Patronymic ----------

Place of residence (or business activity) ----------

Passport details (for natural persons) ----------

TIN (for legal entities) ----------

Contact details ----------

The Company shall provide its response

to the complaint to the client at ----------

(address / email address / fax)

CONTENT OF THE COMPLAINT

(If the allocated space is not sufficient, you may set out the complaint on a separate sheet and attach it to the application)

Client's signature:

Date of submission:

For Company's Notes

Appendix 3

Complaint Receipt

Complaint Identification Number _____

Date of Receipt _____

(day/month/year)

Company's Responsible Employee

_____

(name / surname / patronymic)

Signature of the Responsible Employee _____

Appendix 4

COMPLAINT RESPONSE

Client Information

Name / Surname / Patronymic ----------

Place of residence (or business activity) ----------

Passport details (for natural persons) ----------

TIN (for legal entities) ----------

Contact details ----------

In response to your Complaint N__ of 20__

Landmark Capital CJSC hereby:_____

rejects, partially upholds, or fully upholds the claim

Justification

_____
_____
_____
_____
_____
_____

Details of the Company's Responsible Person

Name / Surname, Patronymic

Position Held

Phone

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e-mail address

In case of any questions regarding the outcome of the complaint review, you may contact the above-mentioned responsible person of the Company.

If you are not satisfied with the Company's written response to your complaint, you may, within ten days, apply to the court, the Financial System Mediator, or the Central Bank of the Republic of Armenia in order to protect your rights.

*Director*_____

L. S.

Appendix 5

Landmark Capital CJSC Client Complaints Register

N	Date of Complaint Submission	Client's Name, Surname	Brief Description of Complaint	Date of Response	Brief Content of Response	Name, Surname of Responsible Employee