

**Group :** Compliance  
**Department :** Internal control service (compliance)  
**Item :** Rules for submitting and considering customer requests

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## **Rules for submitting and considering customer requests JSC Denizbank Moscow**

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## 1. Terms and definitions

These Rules for the presentation and consideration of requests from clients of Denizbank Moscow JSC (hereinafter referred to as the Rules) use the following terms and definitions:

**Bank** – JSC Denizbank Moscow.

**Request** – the Client’s requirement to provide clarification of any information on the types of activities of the Bank (except for the provision of statements and certificates of accounts, as well as with the exception of information constituting banking and other secrets protected by law).

**Complaint** – the Client’s demand to the Bank to eliminate or protect his violated rights or legitimate interests or the rights or legitimate interests of other persons.

**Claim** – the Client’s demand to the Bank to resolve a dispute related to the violation of the Client’s property rights and legitimate interests established by contractual obligations with the Bank and/or the legislation of the Russian Federation.

**Appeal** – sent by the Client to the Bank in writing or in the form of an electronic document Request, Claim or Complaint. Application of these Rules is also mandatory for processing Applications received by the Bank from the Bank of Russia within the framework of the provisions of Article 79.3. Chapter XI .2 of the Federal Law of July 10, 2002 No. 86-FZ <sup>1</sup>(hereinafter referred to as Law No. 86-FZ), Article 30.1. Federal Law No. 395-1 <sup>2</sup>(hereinafter referred to as Law No. 395-1 ).

**Client** – a legal entity, individual entrepreneur or individual who has a contractual relationship with the Bank, uses the Bank’s services or intends to enter into a contractual relationship with the Bank, use the Bank’s services (potential client).

**Client's representative** is a person acting on behalf of the Client by virtue of powers based on a power of attorney, agreement, indication of the law or an act of an authorized state body or local government body.

**Parties** – collectively referred to as “Client” and “Bank”.

**Authorized employee** - an employee of the Internal Control Service (Compliance), responsible for considering Appeals in accordance with the job description, or appointed by an administrative act of the Bank. The powers of the Authorized Employee (investigation of the circumstances set out in the Appeal, formation of the final response) may be assigned to the head of the structural unit of the Bank in respect of whom (whose employee) the Appeal was submitted, as well as to the head of the Legal Department on the basis of the relevant organizational and administrative act of the Bank.

## 2. General provisions

2.1. These Rules define the basic conditions and procedure for submission by Clients and consideration by the Bank of Applications, and also regulate the relations arising in this regard between the Parties.

2.2. The main purposes of consideration of Appeals are:

- improving the quality of service to the Bank's clients;
- improvement of the Bank's work;
- elimination of violations and their consequences, which were the basis for the Appeal of Bank Clients, as well as preventing the recurrence of similar situations in the future.

2.3. Elimination of violations and their consequences is carried out by the Bank through the adoption of appropriate decisions by the Bank's management bodies, based on a comprehensive and complete consideration

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<sup>1</sup>Federal Law of July 10, 2002 N 86-FZ “On the Central Bank of the Russian Federation (Bank of Russia)”.

<sup>2</sup>Federal Law of December 2, 1990 N 395-1 “On Banks and Banking Activities.”

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of the substance of the Appeals, their validity (compliance with the actual circumstances) and legality (correlating the substance of the complaint/request with the norms of the legislation of the Russian Federation in force at the time of the actions or the occurrence of events that served as the basis for the relevant Appeal).

2.4. The period for consideration of the Application by the Bank should not exceed 15 (fifteen) working days. The period is calculated starting from the day the Application is received by the Bank and registered. If it is necessary to request additional documents and materials, in order to objectively and comprehensively consider the Application by decision of the President of the Bank, the Bank has the right to extend the period for consideration of the Application, but not more than by 10 (ten) working days, unless otherwise provided by Law No. 395-1, Federal Law No. 59-FZ dated 02.05.2006 <sup>3</sup>(hereinafter referred to as Law No. 59-FZ), other federal laws.

2.5. These Rules *do not apply* to Client requests received orally by the Bank.

2.6. These Rules are binding for the Client and the Bank when resolving disputes relating to the activities of the Bank. Appeals submitted by the Client to the Bank in the prescribed manner are subject to mandatory consideration by the Bank.

2.7. These Rules are approved by the President of the Bank, come into force in accordance with the organizational and administrative act of the Bank and are valid until the new edition of the Rules comes into force.

2.8. The department responsible for the development and updating of the Rules is the Internal Control Service (Compliance) (hereinafter referred to as ICS).

2.9. These Rules are subject to posting on the official website of the Bank [www . denizbank . ru](http://www.denizbank.ru) , information stands of the Bank.

### 3. Submission of Applications by Clients

3.1. If the Client/Client's Representative has any queries, complaints or claims against the Bank, the Client/Client's Representative submits to the Bank the appropriate Appeal (Request, Complaint or Claim):

3.1.1. in writing on paper by:

- transfer to the Bank in person at Customer service locations at an address within the Bank's location;
- referrals to the Bank via postal/courier service;

3.1.2. in writing electronically by:

- sending it by email [postoffice.ru@denizbank.com](mailto:postoffice.ru@denizbank.com) , [info.ru@denizbank.com](mailto:info.ru@denizbank.com) , [compliance . ru @ denizbank . com](mailto:compliance.ru@denizbank.com) ;
- sending it to the personal work email address of a Bank employee <sup>4</sup>;
- transmitting a message through the "Client-Bank" system (if the Client has concluded an agreement with the Bank on connecting to the system, as well as if there is technical possibility).

3.2. The appeal is drawn up in Russian.

3.3. The Bank, upon receiving the Application, takes all measures to promptly identify and eliminate (if any) shortcomings and errors made in the execution of orders, during mutual settlements, as well as in other cases.

3.4. Written Appeals are issued:

- in the form of Appendix No. 1 to these Rules - for individuals;
- in the form of Appendix No. 2 to these Rules - for legal entities and individual entrepreneurs;

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<sup>3</sup>Federal Law of May 2, 2006 N 59-FZ "On the procedure for considering appeals from citizens of the Russian Federation."

<sup>4</sup>For example, to the email address of the client manager serving the Client.

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- in any form indicating the mandatory information specified in clause 3.6 of these Rules - for legal entities, individual entrepreneurs and individuals.

3.5. Each Application, if desired, is signed by the Client/Client's Representative. A signature is not required if all other requirements provided for in clause 3.6 are met. Rules

3.6. Applications submitted to the Bank must contain the following mandatory information:

- surname, name and patronymic of an individual / full name of a legal entity / individual entrepreneur of the Client (upon presentation of the Application by the Representative - the Client and the Representative);
- type of document certifying the identity of the Client (upon presentation of the Application by the Representative - Client and Representative), series, number, name of the authority that issued the document, date of issue, validity period, if available (for individuals);
- registration address, postal address, e-mail address, telephone number of the Client (upon presentation of the Application by the Representative – the Client and the Representative);
- name and details of the Client's banking product (for example, loan agreement number, bank account number, name of the product and/or tariff plan), if the request concerns the Bank's products;
- the essence of the appeal (indication of the essence of the Client's claim, complaint, request or proposal);
- date of the application;
- personal signature of the Client - an individual / his Representative (in cases where the application is submitted to the Bank on paper by the Client / his Representative, if desired);
- signature of the person included in the Card with sample signatures <sup>5</sup>and a seal imprint at the Bank or the signature of a person authorized to submit Applications and a seal imprint (if any) - for legal entities and individual entrepreneurs. If documents confirming the authority of such person/persons have not previously been provided to the Bank, they must be submitted together with the Application.

3.7. To confirm the legality of the Application sent to the Bank, the Client/Client's Representative may, simultaneously with submitting the Application, submit documents (copies of documents) confirming the requirements presented by the Client.

If the Application of the Client/Client's Representative is not accompanied by documents necessary for their comprehensive and complete consideration, such documents may be requested from the Client/Client's Representative indicating the deadline for provision.

In this case, the consideration period is increased by the period specified in paragraph two of this subclause, but not more than by 10 (ten) working days, in accordance with subclause 2.4. of these Rules.

If the requested documents are not received within the specified period, the Application will be considered on the basis of the available documents.

3.8. If a written Appeal is submitted again, it must indicate the date and number of the initial written appeal. The Client can clarify the incoming number under which the initial application to the Bank was registered by contacting the Bank secretary by phone 8 (495) 725-10-20 ext. 101, 127.

The Client is recommended to save the incoming registration number of the written request to optimize subsequent interaction with the Bank.

3.9. Appeals are subject to mandatory registration in accordance with the "Regulations on working with incoming correspondence" adopted by the Bank, no later than the working day following the day of its receipt by the Bank.

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<sup>5</sup>If the Application is submitted via the Client-Bank system, an electronic digital signature (EDS) is used as a personal signature.

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3.10. Notification of registration, notification of extension of the period are sent to the Client depending on the method of receipt of the application in writing to the e-mail address or postal address specified in the application, or in the manner provided for by the terms of the agreement concluded between the Parties. If the Client, when sending the Application, indicated the method of sending a response to the Application in the form of an electronic document or on paper, the response to the Application must be sent in the manner specified in the Application. If an Application is received in the form of an electronic document, the Bank is obliged to notify the Client about registration of the application no later than the day of registration.

3.11. If the appeal contains a claim of a property nature, which is related to the restoration by the Bank of the Client's violated right and is subject to consideration by the financial ombudsman, the submission of the Appeal constitutes the Client's compliance with the obligation provided for in Part 1 of Article 16 of the Federal Law of June 4, 2018 No. 123-FZ <sup>6</sup>(hereinafter referred to as the Law No. 123-FZ), and the Appeal is subject to consideration in the manner and within the time frame established by Law No. 123-FZ.

3.12. Refusal to accept applications is not permitted except in cases where:

- The appeal is not a Claim, Complaint or Request in accordance with the terms established in these Rules;
- the Application does not contain the mandatory information specified in clause 3.6 of these Rules <sup>7</sup>;
- the text of the Address does not allow us to determine its essence;
- the text of the Appeal contains profanity, phrases and expressions discrediting the honor and dignity of the Bank and/or its employees, or messages containing information of a provocative nature;
- the name of the Client/Client's Representative (last name, first name, patronymic of an individual / name of a legal entity) is indicated in the Application is illegible or the content of the Application does not allow one to clearly identify the person submitting the Application;
- The appeal is of an advertising nature or of another nature not related to the work of the Bank;
- The appeal is submitted by a person who is not the Client/Client's Representative;
- the transmission of the Application was carried out through a third party who is not the Client's Representative;
- The court has already made a decision on this issue or the consideration of the case on the merits, the subject of which is the Appeal, has already been started in court.

## 4. The procedure for receiving Customer Applications and sending responses to Applications by the Bank

4.1. Written requests from Clients regarding the activities of the Bank are accepted and registered exclusively by the Bank's secretary upon personal application from the Client or when the Client sends a postal item to the Bank's location address: 123022, Moscow, st. Zvenigorodskaya 2-ya, 13 bldg. 42, or when sent electronically, in accordance with clause 3.1.2. of these Rules.

4.2. Applications from Clients/Client Representatives are accepted throughout the Bank's entire operating day.

4.3. When submitting a written Application in person, the Client is given a copy of the written Application with a mark of acceptance and indicating the date of acceptance.

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<sup>6</sup>Federal Law of June 4, 2018 N 123-FZ "On the Ombudsman for the Rights of Consumers of Financial Services."

<sup>7</sup>Appeals that do not contain identification data of the Client/Client Representative are recognized as anonymous, but can be taken into account by the Authorized Employee to improve operational risk management procedures and operational efficiency.

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4.4. Received written Appeal (copy), except for the cases specified in clause 3.12. of these Rules, after its registration within one working day is sent to the Authorized Officer for consideration. The original of the Appeal is sent to the Vice President in accordance with the “Regulations on working with incoming correspondence.”

4.5. An appeal received electronically, except for the cases specified in clause 3.12. of these Rules, after its registration within one working day is sent to the Authorized Officer for consideration. In addition, the Appeal is sent to the Vice President in accordance with the “Regulations on working with incoming correspondence.”

4.6. An authorized employee, having received the Appeal, studies it and makes a decision on the admissibility of considering the Appeal. On the day of receipt of the Application, the Authorized Employee sends a copy of the Application to the Risk Management Service to register it in the unified information database on realized (incurred) operational losses (damages) (DB OR) within the framework of the current Operational Risk Policy<sup>8</sup>.

4.7. If the Appeal is not allowed for consideration, the Authorized Employee notifies the Client/Client's Representative in writing about the impossibility of considering the Appeal, notification of this decision is sent to the Client within 5 (five) business days from the date of registration of the appeal in the manner specified in clause 3.10, indicating the reasons impossibility of considering the Appeal on its merits.

4.8. An authorized employee comprehensively and fully investigates the circumstances set out in the Appeal, requests the necessary information<sup>9</sup> from the head/employees of the structural unit to which the Appeal relates, and, if necessary, involves managers/employees of other structural divisions of the Bank in the investigation through appropriate requests.

4.9. Based on the results of the review, the Authorized Officer forms a final response, which must contain a reasoned, clearly stated decision on satisfaction, partial satisfaction, or otherwise with reference to specific regulatory legal acts of the Russian Federation and internal documents of the Bank. The response to the Application must be sent to the Client within 15 ( fifteen ) business days from the date of registration of the Application, unless other deadlines are provided for by Law No. 395-1, Law No. 59-FZ, other federal laws and these Rules.

4.10. Having received the Application, the Bank takes all measures to quickly identify and eliminate (if any) shortcomings and errors made when servicing the Client, as well as in other cases.

4.11. Analysis of Appeals in order to identify the causes of problems and correct them is carried out by an Authorized Employee in accordance with internal regulations in the field of compliance (regulatory) risk management<sup>10</sup>.

4.12. The analysis of indicators of the dynamics of Client Applications and the analysis of the Bank's compliance with the rights of Clients in terms of the implementation of regulatory risk is carried out by the head/employee of the ICS.

4.13. The response to the received Appeal is transmitted to the Client/Client's Representative<sup>11</sup> at the Bank's discretion:

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<sup>8</sup>Operational risk management policy (approved by the Board of Directors, minutes 193 of October 20, 2023).

<sup>9</sup>Explanatory notes, comments, copies of primary and other documents, other materials.

<sup>10</sup>“Compliance Risk Management Policy”, “Regulations on the Internal Control Service (Compliance Service)”, “Instructions on Internal Control of a Professional Participant of the Securities Market”.

<sup>11</sup>The response must be drawn up in accordance with the procedure of office work adopted by the Bank (drawn up on a form with the Bank's details, contain the personal signature of an authorized person from the Bank's Management (President, Vice-President), seal of the Bank, have a registration number and date).

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- by mail by regular letter or registered mail with return receipt requested to the address specified in the Client's/Client's Representative's Application;
- by handing it in person upon the appearance of the Client/Client's Representative at the Bank;
- by e-mail (in cases where the Application was received electronically, and if the Bank's response does not contain confidential information, information constituting a banking secret, as well as other secrets protected by law);
- through the "Client-Bank" system (in cases where the Application is received in the same way and if technically possible).

4.14. The response to the Appeal is subject to registration by the Bank's secretary in the logbook of incoming/outgoing correspondence with the assignment of an outgoing number. The method of sending outgoing correspondence is selected on a case-by-case basis by the Authorized Employee. Copies of outgoing documents are filed in a folder with outgoing correspondence and remain in the custody of the Bank secretary. After receiving notification of delivery of a postal item, the Bank Secretary makes a copy of such notification and transfers it to the Authorized Employee. The original notification of delivery of the postal item is filed with a copy of the outgoing document in the folder with outgoing correspondence.

4.15. If the Bank receives an Application from the Bank of Russia as provided for in Article 79.3 of Law No. 86-FZ, the Bank is obliged to consider the Application in accordance with the requirements of these Rules, and also send to the Bank of Russia a copy of the response to the application and copies of notifications (if any) provided for on the day they are sent to the Client.

4.16. Received Applications and responses to them are stored in the Bank's archives for at least three years from the date of registration of the Applications.

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**Appendix No. 1**

to the Rules for the presentation and consideration of requests from clients of Denizbank Moscow JSC

**CLIENT'S APPLICATION<sup>12</sup> No. \_\_\_\_\_**  
(for individuals)

FULL NAME

Registration address

Postal address for sending  
correspondence \_\_\_\_\_

Identity document \_\_\_\_\_ Series: \_\_\_\_\_ No.: \_\_\_\_\_

Date of issue: \_\_\_\_\_ Issued by: \_\_\_\_\_

Telephone/Fax: \_\_\_\_\_ Email : \_\_\_\_\_

Type of Complaint: ----- Complaint ----- Claim ----- Request

Essence of the Appeal:

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Specifying personal data:

- I confirm that I provided personal data voluntarily;
- I hereby give my consent to Denizbank Moscow JSC, located at: 123022, Moscow, st. Zvenigorodskaya 2-Ya, 13 bldg. 42, for the processing of my personal data specified in this Appeal for 3 years, using automation tools and/or without the use of automation tools, in order to respond to this Appeal. The withdrawal of this consent to the processing of personal data is carried out by submitting a written statement to Denizbank Moscow JSC. Denizbank Moscow JSC, for these purposes, stops processing personal data within three working days from the date of receipt of a written application to revoke consent.

Date/Signature: \_\_\_\_\_ / \_\_\_\_\_

<sup>12</sup> All details of this Application are required to be filled out (personal signature is optional)



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**Appendix No. 2**

to the Rules for the presentation and consideration of requests from clients of Denizbank Moscow JSC

**CLIENT'S APPLICATION<sup>13</sup> No. \_\_\_\_\_**  
(for legal entities, individual entrepreneurs)

\_\_\_\_\_  
*(full name of the legal entity/individual entrepreneur)*

No. of the account opened with the Bank, or No. of the agreement (if any) \_\_\_\_\_

\_\_\_\_\_  
*(Full name of a representative of a legal entity/or individual entrepreneur)*

Fax : \_\_\_\_\_ Email : \_\_\_\_\_

Legal address \_\_\_\_\_

Postal address for sending correspondence \_\_\_\_\_

Type of Complaint: ----- Complaint ----- Claim ----- Request

Essence of the Appeal:

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

Specifying personal data:

- I confirm that I provided personal data voluntarily;
- I hereby give my consent to Denizbank Moscow JSC, located at: 123022, Moscow, st. Zvenigorodskaya 2-Ya, 13 bldg. 42, for the processing of my personal data specified in this Appeal for 3 years, using automation tools and/or without the use of automation tools, in order to respond to this Appeal. The withdrawal of this consent to the processing of personal data is carried out by submitting a written statement to Denizbank Moscow JSC. Denizbank Moscow JSC, for these purposes, stops processing personal data within three working days from the date of receipt of a written application to revoke consent.

\_\_\_\_\_  
*(position)*

\_\_\_\_\_  
*(signature)*

\_\_\_\_\_  
*(full name)*

M.P.

<sup>13</sup> All details of this Application are required to be filled out.