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Regulation
on Customer Petitions Resolution Mechanisms
within O.C.N "Microinvest" SRL
(version 1.5)

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Endorsement					
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1 General provisions

1.1 Objective

This Regulation has been developed in accordance with the legislation in force of the Republic of Moldova and it is an essential part of the prudent risk management within the OCN "Microinvest" SRL (further referred to as the Company). The Regulation establishes the manner and procedure for the examination and resolution of petitions received from customers and other persons (further referred to as the Customer or Client).

The main purpose of the Regulation is establishing the mechanism and determining the way in which Company representatives should handle customer petitions received in connection with the activity carried out, and consequently about recording, analyzing, determining the measures, and responding to them in legally prescribed terms.

Other purposes of the Regulation are:

- Determining the way of proceeding and monitoring over examination within the Company, of petitions and complains received from Customers;
- Ensuring the company's competitiveness on the financial market (protecting the interests of customers through improving the quality of services provided and relationships with customers).

The "Customer Petitions Resolution" OCN "Microinvest" SRL Regulation is approved by the Administrative Board and is reviewed whenever as needed.

1.2 The legal framework

- Law on Non-Banking Credit Organizations #1 of 16.03.2018;
- Law # 105 of 13.03.2003 on the consumer protection;
- Law # 202 of 12.07.2013 on consumer loan agreements;
- Decision # 1141 of 04.10.2006 for the approval of the Regulation on the management of the Complaints Register;
- Decision of the CNFM # 38/14 of 28.09.2012 regarding the approval of the Regulation of the procedure for the examination of petitions by professional participants on the non-banking financial market.

2. Definitions and abbreviations

2.1 Definitions

Petition – in the context of this regulation, a petition is a written or verbal statement that makes a request, proposal, complaint or any other act of will by the petitioner addressed to the Company concerning services, employees or company's activity.

Petitioner – an individual or legal person or group of persons who complain to the Company under the law and / or this regulation.

Complaints registry - registry for customer complaints and acknowledgements. The Complaints Registry is kept in the manner established by law and authorized by applying the stamp and signature of the Company's administrator and the representative of the local public administration. The registry is placed in a visible place for clients in Secondary Offices, usually at the pay desk.

Petitions Record Registry - an electronic document owned by ICAMLU, with the purpose of recording, storing all petitions and acknowledgements. Based on this registry, reports will be generated on the record of petitions and their status.

Responsible Department - the owner of the process that caused the appearance of the petition and/or acknowledgement, and it is responsible for preparing the response for petition or, as the case may be, prepare the response in accordance with this Regulation and propose its final version.

The Person who Receives the Petition - any employee of the Company who received a petition from the customer or third parties through any available in the company channel.

Internal Control and AML Unit - internal subdivision of the Company, whose employees are responsible for examining petitions and managing the work process with the petitions received by the Company.

Secondary Office - the internal structural unit of the Company, located outside the head office, that performs some of the related or auxiliary activities of the Company.

2.2 Abbreviations

NCFM - National Commission for Financial Market;
CEO – Chief Executive Officer of OCN "Microinvest" SRL;
OCN - Non-Banking Credit Organization;
SO - Secondary Office;
HO - Head Office;
ICAMLU- **Internal Control and AML Unit**;
SMT - Senior Management Team;

3. Objectives of the normative act

All petitions must be resolved by the Company to the fullest extent possible under the terms and conditions described in this Regulation and in the "Petitions Management Procedure within O.C.N "Microinvest" SRL. Each petition is an important tool for improving the quality of customer service of the Company in the future. Petitions which according to the "Petitions Management" Procedure do not require an official response from the Company, including acknowledgements from the customers, are reviewed as well.

Each Customer has the right to submit a petition whenever he/she considers that the company is not consistent in providing the agreed services or conditions, or his/her rights as a client have been violated. Petitions can also be made when customers are dissatisfied with the quality of the services provided, the behavior of the company's employees, the situations considered deviations from legal or contractual terms.

The company provides customers with at least five petitions channels, listed in the "Petitions Management" Procedure, through which Customers can submit their claims. The variety of petitions receiving channels show the Company's openness to customer communication with the purpose of resolving petitions as quickly and efficiently as possible, as well as continuously improving the Company's services.

4. Types and content of petitions

4.1 Types of Petitions

The company accepts two types of petitions:

Verbal - are those petitions in which the complainant is speaking directly or on the phone with a company employee, expressing his request, dissatisfaction or gratitude to the Company's services or its employees.

Written - all petitions except verbal, expressed in physical or electronic form.

Petitions can also be classified into personalized and anonymous.

4.2 Content of the petition

The process of investigating petitions / requests and preparing the response is regulated in details by the Procedure on "Petitions Management".

In cases where a petition has been received, the text of which cannot be deciphered or any information from the content of the petitions has been omitted and it cannot be examined, the complainant will be notified within the timeframe indicated in the Procedure on "Petitions Management", requiring the necessary information to specify the issue.

If a petition is addressed by mistake (not addressed to the Company), it will be returned to the complainant within the timeframe indicated in the "Petitions Management Procedure".

Petitions that contain uncensored or offensive language or contain threats to the Company or its employees will be examined, but the Company will not prepare a response to them.

Petitions whose initiators cannot be identified or whose expression is considered inappropriate and the complained service / employee / activity cannot be identified, the request will not be taken in consideration and will be considered anonymous. For this type of petition, the Company keeps the right not to respond.

5. Petition process

The petition process is divided into two stages:

- Receiving petitions.
- Petition processing.

5.1 Receiving petitions

By means of the informative materials placed at the Company's SO, on the website <https://microinvest.md/en/sesizati-o-incalcare/> and by the means of its employees, the Company informs clients/ third-party persons about the channels through which petitions can be submitted.

All petitions that have come to the Company's address, including anonymous petitions or without contact or gratitude messages, must be forwarded by the employees to ICAMLU via e-mail, superior shall be in copy.

In the case of receiving the Verbal Petition, Company employees are obliged to hear out the complainant with politeness and care, ensuring that the information is correctly recorded so that the petition can be analyzed and resolved. The employee who has received a Verbal Petition must note the content of the petition and must forward it to the ICAMLU via e-mail, superior shall be in copy.

ICAMLU is responsible for maintaining, registering, and managing the flow related to receiving and resolving petitions in due time. The maintenance, recording and management of the petitions flow will be made through the Petitions Record Registry under the "Petitions Management Procedure".

ICAMLU may request from one SMT member the opinion on who should be the owner of the petition if it is difficult to identify the person in charge. In case of petitions that represent a high degree of risk to the company's reputation, or may cause some financial loss, the ICAMLU from the start notifies at least one SMT member. The Petition Record Registry is a strictly internal registry. Access and editing of all fields in this registry have the following employees:

- **Internal Control and AML Unit;**
- SMT members.

The purpose of this registry is to ensure efficient record and management of the petitions flow in the terms provided for in this Regulation as well.

In addition to this, Administrative Board delegates Ombudsmen (member of the Board) and all employees have the opportunity and are encouraged to report or inform about any event of misbehavior, abuse or breach of Company values and code of conduct by senior management. Currently designated Ombudsmen is Uwe Konst who can be contacted on email address uwe.konst@freihandel.info.

5.2 Petition Processing

All petitions received by Company employees and registered by ICAMLU will be distributed according to the Procedure for "Petition Management" within OCN "Microinvest" SRL.

5.2.1 Processing of verbal petitions, written on paper, and electronic

The ICAMLU after receiving the petitions will forward them to the responsible department for examination and later based on the opinions/decisions received from them will formulate an answer or, as the case may

be, will request the preparing of the answer by the responsible department, which after approval will be sent to the complainant. The reply formulated for the complainant/petitioner must be adequate, coherent and respond to all its requests. Once the letter has been signed, it will be sent to the complainant by Moldovan Post Office, or by other electronic means, including on the channel of its receipt or on the request of the petitioner.

If the complainant wishes to receive the reply by e-mail, the letter with the response to the petition will be sent via e-mail, being included in confidential copy of the Manager of the Responsible Department and the ICAMLU .

If the complainant wishes to receive the verbal answer, or if the petition was submitted verbally and the petitioner did not request another form of answer, then the final draft will be communicated to the complainant either by telephone or by the means of direct discussion. It is important that the person who held the discussion with the applicant should note the details of the discussion in free form, either on paper or in an electronic document attached to the petition material, or completed in the petition record register if the answer was communicated by ICAMLU or if the call was recorded, the audio recording will be attached.

5.2.2 Petitions registered in the Complaints Register

In order to ensure the timely resolution of petitions received and registered by the Complaints Register, the employee who received the petition after handing the complainant will compulsorily transmit the scanned content of petition to ICAMLU and will inform the direct superior. If the employee of the company is the cause of the claim, then a decision to request a written explanation could be made¹.

The final draft of the response is sent to the responsible Department for confirmation of compliance with the legislation in force and/or with the company's internal documents. Subsequently, the letter will be sent to the applicant. The copy of the response will be emailed to the SO, from where it came, order the Complaints Register to be filled in. At the same time, the copy of the response will be kept in the SO where it has been submitted, in a special map. Copies of responses to HO petitions will be retained by ICAMLU .

Branch Manager is responsible for checking whether all petitions from the Registry of complaints have been resolved and the registry has been duly completed at least once per month in the subordinate SO. If unresolved petitions are detected, ICAMLU will immediately be notified.

The Regional Manager appoints one person for each SO where there is no SO Manager who will be responsible for checking the Complaints Register. If he has not designated any person for the SO which he is responsible, then those obligations fall to him.

Employees of the **Internal Control and AML Unit** will also check Complaints Registry each time they will visit the Secondary Office.

¹ ICAMLU may request an explanation from the employee involved only in cases with high reputational or financial risk for the Company.

6. Terms for examining and sending replies for petitions

If the employee receives a petition through any communication channel, he is required to pass it on to the ICAMLU. The Regional Manager/Head of Department is responsible for monitoring the process of forwarding petitions to ICAMLU in due time.

The terms for examining petitions and submitting answers to the petitioner are:

- Maximum five (5) calendar days from the receipt of the petition in the Complaints Register.
- Maximum 14 calendar days from the receipt of the petition from the customers using Company's services.
- Petitions other than those mentioned in the previous points will be examined within a maximum of 15 calendar days from the receipt and registration of the petition. Petitions that require further or in-depth study and examination may be examined within a maximum of 30 days.
- The terms for examining the petition may, in special cases, be extended by a maximum of one month, with notification of the petitioner about the extension.
- Petitions received from the supervisory authorities or other national authorities shall be examined within a maximum of 15 days from the receipt and registration of the petition, or within a shorter period expressly provided in the request.

More detailed provisions regarding the terms of registration, internal management, examination and presentation of the response to the Petitioner, are stipulated in the Procedure on "Petitions Management" within O.C.N. "Microinvest" SRL.

7. The reports preparation

For each quarterly Risk Committee, ICAMLU will prepare a report, according on the "Petition Management Procedure", based on the Petition Record Registry, and will review petitions received during the previous quarter.

For the purpose of managing operational risks at the end of each year, or as required by SMT members' advice, ICAMLU will carry out an analysis of petitions for the previous year or for another indicated period, based on criteria established by the ICAMLU or based on criteria approved by the SMT.

8. Company's Rights

1. In case of a clear violation of the legislation in force or internal regulations is found during the process of receiving or examining the petition, the Company has the right to set an additional deadline for conducting the investigation and creating an investigation commission.
2. In the case when the job investigation reveals that the employee/employees have violated the legislation or internal regulations, the Company has the right to apply the disciplinary sanctions according to the legislation in force.

3. If it is found that the actions invoked in the petitions have constitutive signs of contravention or offense, or reputational or financial damage to the Company is significant, the Company has the right to address the competent law bodies.
4. In the case that a petition contains threats to the security of the company's assets, to the life and health of employees and their family members, the Company has the right to remit them to the competent law enforcement authorities.

9. Final provisions

1. This Regulation, after Company's Administrative Board approval, will be communicated to all employees by email by the Office Manager or the person replacing it.
2. If, after the date of this regulation coming into force, a statutory and/or statutory provision amends/supplements/ repeals its provisions, the statutory and/or legal provisions in force with the application of the subsequent amendment of the regulation(s) (with regard to "Petitions Management" inclusive) within 6 months, unless the legal provision provides otherwise, or the Company's senior management bodies do not set another term.
3. The Petition Process is described more detail in the "Petition Management Procedure".