



Approved by
Management Board
Microfinance Organization Asian Credit Fund
LLC
Minutes No. ____ dated December 19, 2025

Applications Processing Policy
of Microfinance Organization Asian Credit Fund LLC

Revision No. 4.2

Almaty, 2025

TABLE OF CONTENTS

I. Terms and Definitions 3

II. General Provisions 3

III. Authorities and Responsibility 6

IV. Applications Acceptance and Registration 6

V. Procedure for acceptance and consideration of the applications from the applicants locally in ACF (in the offices/branches) 7

VI. Procedure for Acceptance and Processing of the Applications in the HO 8

VII. Applications Processing Time Limits and Levels 9

VIII. Response Preparation 10

IX. Analysis, Monitoring and Control of the Process of Applications Consideration 10

Annex 1 11

Annex 2 12

Annex 3 13

Annex 4 16

Annex 5 17

Matrix of the time limits for applications processing by level of importance 17

Revision History 17

I. Terms and Definitions

Anonymous Application - an application in which the personal and contact details of the applicant according to which a response should be sent are not specified. It is not possible to identify the applicant.

HO is the Head Office of ACF.

Complaint - a request of the applicant to eliminate the unlawful actions or omissions of the company and its employees, to restore or protect violated rights, freedoms or his/her legitimate interests.

Applicant - a natural person, an individual entrepreneur or a legal entity that has applied to ACF with a written application. In ACF, the applicants are the borrowers - ACF clients, employees and third parties.

Borrower - Client - a natural person, an individual entrepreneur or a legal entity entering into the legal relationships with ACF or their official representative.

Quality Assurance and Client Support Department (QACSD) - an information and advisory operational service for the requests received through various types of remote calls, including incoming telephone calls, electronic applications. The QACSD is responsible for reception, registration, coordination of work, timely sending and receipt of the applications, preparation of the responses thereto.

Application - an individual or collective, written, oral or in the form of an electronic document, proposal, statement, complaint, enquiry sent to ACF.

Responsible unit - a department of ACF responsible for processing of the applications and preparation of the responses.

Proposal - a recommendation to improve the policies and procedures in order to improve the internal processes, procedures and customer service quality of ACF.

Registration of application - recording in the electronic book of incoming correspondence with assignment of an incoming registration number for each incoming application containing the details in accordance with the internal documents of the microfinance organization.

SCC - Senior Credit Committee.

Employee - a natural person who has an employment relationship with ACF and directly performs the works under an employment contract.

Third parties - the individuals and legal entities, governmental and non-governmental bodies and organizations that may directly or indirectly interact with ACF and enter into the civil law relations with it.

II. General Provisions

2.1. Scope of the Policy:

2.1.1. This Applications Processing Policy of MFO Asian Credit Fund LLC determines the procedure of acceptance, registration of processing and provision of the responses to the applications of the applicants coming to ACF.

2.1.2. The Policy was developed on the basis of the regulatory legal acts of the Agency of the Republic of Kazakhstan on Regulation and Development of Financial Market on Protection of the Financial Services Consumers' Rights, practical recommendations of the international organization SMART Campaign and in accordance with the requirements of the legislation of the Republic of Kazakhstan.

2.1.3. Every applicant — whether a client, employee, partner, contractor or representative of a government agency — can express their opinion or make suggestions about the company's work. This may concern:

- ✓ products and services quality;

- ✓ debt settlement;
- ✓ changes in the legal status of the borrowers, guarantors, sureties or authorized representatives;
- ✓ questions about the credit products and other services offered by the company.

Feedback can take the form of a complaint, suggestion or application, either verbal or written. All such applications shall be considered in accordance with the procedure established by this Policy.

- 2.1.4. The company does not consider anonymous applications, except in cases where they contain the information about the crimes being planned or committed, or threats to state or public security. Such applications are immediately forwarded to the competent state authorities. Similarly, the applications without specific content (without substance or subject matter), applications containing profanity, threats to the life, health or property of the employees and their families shall not be considered. All applications shall be considered free of charge. The Company may not deprive or restrict the applicants of their right to submit an application. When submitting a written application, the client receives confirmation of its receipt — either a separate document or a note on the copy. Refusal to accept the written applications is not allowed, except in cases specified in this Clause.
- 2.1.5. At the request of an applicant, ACF employees shall explain to the applicant the procedure for processing of the applications set out in this Policy.
- 2.1.6. Compliance with the procedure for processing of the applications and preparation of the responses thereto, specified in this Policy, shall be binding on all ACF employees.
- 2.1.7. ACF management and employees shall avoid the situations that may entail a conflict of interest when accepting, processing and responding to the applications.
- 2.1.8. For violation of the provisions and requirements set out in this Policy, guilty employees shall bear responsibility established by the labour contract, ACF job descriptions and the laws of the Republic of Kazakhstan.
- 2.2. Policy Development and Updating:
- 2.2.1. This Policy shall be reviewed at least once a year in order to bring it into compliance with the applicable laws of the Republic of Kazakhstan.
- 2.2.2. The QACSD Head is responsible for development and updating of this Policy in accordance with the applicable laws of the Republic of Kazakhstan.
- 2.3. Policy Goal:
- 2.3.1. Providing the ACF applicants with the tools and opportunities to protect their rights and legitimate interests, communicating their proposals and comments on ACF activities, by sending the applications to ACF.
- 2.3.2. Determining the procedure for submitting the applications, processing and responding to the applications in a lawful manner.
- 2.3.3. Assigning responsibility and authority to the responsible employees in accepting, processing and responding to the applications.
- 2.3.4. Use of the information contained in the applications to improve the products of the provided services, implementation of relevant processes in the work when carrying out the direct activities of ACF.
- 2.3.5. The principles when processing the applications shall be:
- ✓ Legality, honesty, due diligence, transparency, reasonableness, fairness, timeliness;
 - ✓ Respecting and ensuring the rights and legitimate interests of the applicants;
 - ✓ Obligatory processing of the applications and provision of the results of their processing to the applicant;
 - ✓ Objectivity and completeness of applications processing;
 - ✓ Compliance with equality of the rights of the applicants when processing the applications;

- ✓ Ensuring that applicants' confidential information is protected when they apply to ACF and not disclosed to the third parties.

2.4. Rights and Obligations of an Applicant:

- 2.4.1. An applicant has the right to apply directly to ACF.
 - 2.4.2. An applicant who contacts ACF has the right to receive a written response from ACF employees in accordance with the procedure set out in this Policy.
 - 2.4.3. An applicant has the right to withdraw his/her application at any time.
 - 2.4.4. An applicant may submit an application to ACF on his/her own or with the assistance of a representative, whereby the applicant's representative shall provide ACF with a notarized power of attorney confirming his/her right to represent the applicant's interests.
 - 2.4.5. When applying to ACF, the applicant shall submit and sign his/her application with his/her signature and attach a copy of his/her identity card or passport to verify the signature of the signatory, or if the application is sent on behalf of the applicant by his/her legal representative, it is necessary to attach a copy of the signatory's identity card or a copy of his/her passport to verify the signature in the application, except for the cases of signing by means of authentication with EDS key. The receiving party represented by ACF cross-checks the legal validity of the signature through the relevant official resource of the state authorized body of the Republic of Kazakhstan.
 - 2.4.6. ACF accepts the applications for processing in Kazakh and Russian languages. The response shall be provided to the applicant in the language in which the application was submitted.
 - 2.4.7. If it is necessary for the applicant to provide the documents and additional information on the facts and circumstances referred to in the application, the applicant shall provide them as an annex to the application, or provide them within the period specified in the response to the enquiry of ACF employee.
 - 2.4.8. The client requests by telephone shall be recorded. Telephone conversations with the clients are recorded with their consent, provided they are notified of this at the beginning of the conversation.
- #### 2.5. Applications Classification by Severity.

The applications are classified according to three levels of importance:

High importance – include those applications that could affect goodwill of the company, lead to the legal consequences or cause significant financial damage to the clients and the company itself.

Examples:

- Complaints about fraud, corruption by both the employees and clients
- Unlawful disclosure (loss) or use of the confidential data.
- Aggressive or illegal methods of debt collection (threats, physical influence, pressure on family members)
- Denial of service or discrimination on any basis
- Critical failures in operation of the credit programmes.
- Violations of the legislation and borrowers' rights resulting in the legal consequences.
- Applications from the state authorities and mass media

Medium importance – these are those applications that do not bear the critical financial, legal or reputational risks, but may have a material impact on the customer experience, trust in the company and operating activity.

Examples:

- Errors in calculations, loan accruals.
- Complaints about employees' work. For example, long delays in processing the requests, inappropriate treatment of the clients by the clients, touting of the credit products
- Insufficient availability of the information on the credit products
- Insufficiently transparent explanation of the loan terms
- Questions about the loan terms and conditions.

Low importance – Requests for informational purposes only that do not require prompt intervention and complaints that do not have significant consequences but require attention to improve the quality of service.

Examples:

- Inconvenient office location or complaints about the working hours
- Advices on the loan terms and conditions.
- Requests for the documents unrelated to the problems.
- General questions about the products and services.
- Applications about product or service improvements

III. Authorities and Responsibility

- 3.1. The QACSD Head shall be responsible for implementation and functioning of the procedures for processing of the applicants’ applications, as well as for reporting on the results of analysis of the applications.
- 3.2. The employees of the QACSD shall be responsible for registration of the applications through all existing communication channels and entering full information about the applications into the applications base.
- 3.3. The QACSD Head shall be responsible for distribution of the applications for further processing and controls timely provision of the responses to the applicants’ applications. This obligation may be delegated by the Management Board or the Chairman of the Management Board to another employee by executing the corresponding ACF order.
- 3.4. The heads of the corresponding departments/subdivisions are responsible for timely transfer of the applicants’ applications to the QACSD.
- 3.5. The Heads of the responsible departments of ACF Head Office and branches involved in direct processing of the applications are responsible for compliance with the deadlines for processing of the applications and impartial attitude in the process of their consideration.

IV. Applications Acceptance and Registration

4.1. ACF has the following channels for receiving and registering the applications:

Communication channel	Form	Contact data
Written application	It is necessary to fill in the application form provided for the applicants at ACF offices and send it via Kazpost JSC (Annex 1 - form for the written applications).	Address: 050008 Republic of Kazakhstan, Almaty, 60 Auezov Street, 4th Floor, Office 10 Microfinance Organization Asian Credit Fund Limited Liability Company -
	It is necessary to fill in the application form provided for the applicants at ACF offices and leave it to the Office Supervisor for further transfer to the QACSD (Annex 1 - form for the written applications).	ACF Offices.
	Leave your application in the book “Complaints and proposals” or further	ACF Offices.

	transfer of the complaint to the QACSD.	
	Book a callback on the ACF website.	www.asiancreditfund.com
	Send a written application to the e-mail according to Clause 1.4. of this provision.	info@acfund.kz
Oral application	Business WhatsApp	+7 771 765 3982
	Free Hot Line (on a mobile)	5061

- 4.2. In order to inform the clients about the available channels for providing the feedback to ACF, the QACSD shall inform the active clients twice a year: once via SMS and once via voice message.
- 4.3. The channels for accepting the applications are placed in all branches and offices of ACF in a place visible for the applicants. (Annex 2 - Announcement). The clients' applications received through the microfinance organisation's computer systems, including its official website and other means of communication, shall be registered in accordance with the procedure established by the microfinance organisation's internal regulations. The specified computer systems provide a functional solution that enables submission of the applications to ACF, which is accessible and clearly identifiable to the clients.
- 4.4. The applicant may apply with his/her application orally or in writing:
- ✓ written requests sent by personal delivery, post, email or to the IT systems of the organization;
 - ✓ verbal requests received by telephone and during direct visits by the client of the microfinance organization;
- 4.5. All applications that are received at the branches or offices should be scanned and sent to the ACF Head Office QACSD email account (info@acfund.kz) within one day after receipt.
- 4.6. The day of receipt of the application is considered to be the day of registration of the application in ACF QACSD, unless otherwise established by the legislation of the Republic of Kazakhstan.

V. Procedure for acceptance and consideration of the applications from the applicants locally in ACF (in the offices/branches)

- 5.1. The employee who received the application, in accordance with his/her official duties, shall take all necessary actions for proper resolution of the issue stated in the application promptly, in due time.
- 5.2. When considering the application, the ACF employee should follow the following procedure:
- ✓ Thank the applicant for contacting ACF.
 - ✓ Listen carefully to the applicant's explanations.
 - ✓ Understand the essence of the problem. If the employee does not understand the essence of the issue, the problem being presented, it is necessary to ask the clarifying questions necessary to find out the reason thereof. It is necessary to make it clear to the applicant that you understood him/her, for this purpose you should be patient, attentive, accurate in your speech, show your favour to the applicant.
 - ✓ The employee shall never be impatient, rude, inattentive, or show any dislike or lack of favour towards the applicant.
 - ✓ In resolving the substance and subject matter of the problem in a face-to-face meeting with the applicant, the employee shall verify the information, if necessary, apologize on behalf of ACF and resolve the issue, if it is within his authorities.
 - ✓ Ensure that the applicant is satisfied with the outcome of the processing his/her application.

- ✓ If processing the applicant's application is beyond his/her authorities, it is necessary to accept the applicant's application with all documents attached to it on any media and transfer it to the competent ACF employee for solving the issue on its merits.
- 5.3. In resolving the applicant's application, the employee shall not:
- ✓ Undertake any obligations to the applicant;
 - ✓ Consider any issues outside his official competence;
 - ✓ Commit ACF to taking any actions or decisions on its own without approval of the ACF authorized body.
- 5.4. In the event that the applicant's application cannot be resolved immediately, the ACF subdivision employee shall invite the latter to contact any of the communication channels specified in this Policy to submit the application.
- 5.5. If the applicant wishes to submit his/her application in writing in ACF office, he/she should be provided with the application form according to Annex 1 - form for the written applications. If the applicant for any reason is unable to draw up the application, the application shall be drawn up by an ACF employee in person. In this case, the applicant should make a note in the application "it was written according to my words correctly" and put his/her signature. The applicant is given a copy of the application with the date of drawing up, initials and position of the person who accepted the application.
- 5.6. The application prepared shall be scanned and sent to the email address of the ACF QACSD (info@acfund.kz) for registration and further processing thereof.

VI. Procedure for Acceptance and Processing of the Applications in the HO

- 6.1. All applications are received for registration and processing at the ACF QACSD.
- 6.2. The Call Centre accepts both written complaints from all channels of applications receipt and oral complaints received by telephone.
- 6.3. In case a call with an application from an applicant is received by the office manager of the head office or any other employee, it should be forwarded to the QACSD.
- 6.4. Anonymous applications are not accepted and are not processed, except for those specified in Clause 2.1.4.
- 6.5. All applications are obligatory registered by the QACSD in the electronic book of incoming correspondence with indication of the incoming number, date of receipt of the application and full name of the applicant.
- 6.6. As the applications are received, the QACSD enters the applications into the applications base and attaches the scanned application to the created task. In case a phone call is received from an applicant, the QACSD operator asks the applicant to write a statement and send it to ACF Business WhatsApp.
- 6.7. After reviewing the applicant's application, the QACSD operator, after coordination with the QACSD Head and the lawyer, shall assign the application in the applications base to the responsible unit/employee that is best suited to resolve the application and prepare a response.
- 6.8. The responsible departments, if necessary (with establishment of the deadlines), request full information and explanations from other departments, including ACF branch network on the facts/issues stated in the application or identified in the course of analysing the consideration of the application, with the copies of the supporting documents (if necessary). The explanations shall contain the answers to all the questions indicated in the application and reasonable arguments, including justification for the actions/inactions of the employee, a proposal to solve/resolve the situation with prior agreement with the responsible department. Responsibility for completeness, quality and timeliness of the explanations/information shall be assigned to the responsible person or unit.
- 6.9. The responsible subdivision ensures objective, comprehensive and timely consideration of the application. Based on the results of consideration, the responsible subdivision prepares a draft response and submits it to the lawyer for expert review. The lawyer shall provide the expert opinion to the

- responsible subdivision for signing and further dispatch to the applicant.
- 6.10. If necessary, a commission and a working group (hereinafter referred to as WG) shall be established to investigate the facts stated in the application and develop the proposals and recommendations. The Commission/WG investigates the facts of the unlawful acts, prepares a conclusion with the findings and proposals. The conclusion shall be submitted to the chairman of the Management Board for approval. Following the results of the conclusion, the commission/WG prepares a response to the applicant and submits the documents to the lawyer of ACF for review.
 - 6.11. The lawyer of ACF shall conduct an expert review of the official response and submit his/her expert opinion to the responsible person. The person responsible for signing is chosen depending on the subject matter and importance of the application. The most important applications are signed by the Chairman of ACF Management Board, the least important ones - by the Branch Directors or Branch Deputy Directors.
 - 6.12. Once the official response is signed, the letter is registered in the outgoing information book of the head office or branch.
 - 6.13. The employee of the responsible department, who was engaged in solving the issue on the application and preparing a response, puts the letter in the applicant's application in the applications base and enters the brief data on the decision made.
 - 6.14. The QACSD employee checks completion of the task and closes the application in the database.
 - 6.15. If the application contains the issues, consideration of which is not within the scope of ACF legal regulation, the applicant is explained where and in what order he/she should apply further. Procedure for acceptance and processing of the applications are indicated in Annex 3.

VII. Applications Processing Time Limits and Levels

- 7.1. Regardless of the level of severity of an application, ACF establishes the uniform time limits for processing in accordance with the legal requirements. This is because even the most important cases require careful analysis and detailed investigation in order to make an informed decision. ACF has the following time limits for consideration of the applications:
 - ✓ The requests received verbally (by telephone or during a personal visit by the client) are considered immediately, and if possible, a response to the client's verbal request is provided immediately. If a verbal request cannot be resolved immediately, it shall be submitted by the customer in writing and shall be handled as a written request. The client shall be informed about the necessary procedures and the time limit for reviewing such requests.
 - ✓ The application, which does not require obtaining the information from other subjects, officials or on-site inspection, shall be considered within 15 (fifteen) working days from the date of application receipt;
 - ✓ If it is necessary to establish the facts relevant to the proper consideration of the request, the period for consideration of the request shall be extended by 15 (fifteen) working days by written decision of the microfinance organization body authorized to make such decisions. The client shall be notified of such extension within 3 (three) working days from the date of extension of the consideration period.
 - ✓ When reviewing a request, if the information provided is insufficient, the microfinance organization shall demand the additional documents and information from the client.
 - ✓ In those cases when the solution of the issues stated in the application requires a long period of consideration, the application is put on additional control until its final execution, which is reported to the applicant within three calendar days from the decision date.
- 7.2. To ensure efficient and fair processing of the applications, ACF applies **a matrix of escalation levels (Annex 5)**, which defines distribution of the complaints by severity levels and respective responsible employees.

VIII. Response Preparation

- 8.1. A response shall be prepared to any application. The microfinance organization shall ensure the objective, comprehensive and timely consideration of the appeals from the individuals and legal entities, and informs the clients of the results of consideration of their requests and the measures taken.
- 8.2. The result of consideration of the application is communicated to the applicant by one of the possible ways of informing, depending on the preferences and request of the applicant: an oral response by phone or in person at the ACF office, or a written response is sent to the e-mail address provided by the applicant or by sending a letter via Kazpost.
- 8.3. **Written response to the application** shall be provided in the language in which the application was submitted and shall be written in simple and understandable language for the applicant. The response shall contain:
- reasonable and justified arguments on each of the applicant's questions, requests, demands, petitions or recommendations;
 - references to the legislation of the Republic of Kazakhstan, internal documents of the microfinance organisation, as well as the provisions of the agreements relating to the issue under consideration;
 - statement of the facts of the application;
 - explaining the customer's right to appeal the decision made.
- 8.4 If the client request is justified and lawful, the microfinance organization shall decide to remedy the violation and restore the client's rights and legitimate interests.
- 8.5. The response to the client's written application shall be sent in the manner specified in the microcredit agreement.

A response is considered delivered if it is sent to the client:

- ✓ To the place of residence specified in the microcredit agreement or in the client's registered letter with notification of delivery, including if received by one of the borrower's adult family members residing at the specified address;
 - ✓ To the email address specified in the microcredit contract or client request;
 - ✓ Using other means of communication provided for in the microcredit contract, ensuring that the client's response is recorded.
 - ✓ When a client (or his/her authorized representative) visits the microfinance organization, the response is handed over in person against signature, which is recorded in the written requests book, except for the responses delivered by the methods specified in this Clause.
 - ✓ If a response is returned with a note indicating that it could not be delivered to the addressee or recipient, or due to refusal to accept it, a response shall be deemed to have been duly delivered.
- 8.6. The response to the written request shall be signed by an authorized representative of the microfinance organization.

The use of facsimile signature copying or other methods provided for in the internal regulatory documents of the microfinance organization is permitted.

No signature by an authorized representative of the microfinance organisation is required for a response to a written request sent by the means provided for in the third and fourth paragraphs of clause 8.5.

IX. Analysis, Monitoring and Control of the Process of Applications Consideration

- 9.1. ACF is committed to continually analysing data on processing of the applications so that they identify and address any recurring or systematic problems, as well as the potential legal and operational risks.
- 9.2. On a weekly basis, the QACSD head generates the reports on consideration of the applications from the applications base, finalises them in case of missing information (e.g., exceeding the time limits for

- processing, lack of the decisions on the application, etc.) and submits them to the SCC meeting.
- 9.3. If necessary, the SCC identifies the need for improvement and decides to establish a working group to develop an action plan, including the tasks, time limits and responsible persons for implementation of the action plan.
 - 9.4. If there are systemic issues that require changes to ACF procedures and products, the issue is brought to the SCC. The SCC decision is sent to the branches/units responsible for their implementation. Their implementation shall be monitored by authorized ACF employees.



to the Applications Processing Policy
of MFO Asian Credit Fund LLC

WRITTEN APPLICATION FORM

To the Chairman of the Management Board
of MFO Asian Credit Fund LLC
Zh.B. Zhakupova

at the address: 050008
Republic of Kazakhstan, Almaty,
60 Auezov Street, 4th Floor, Office 10,
phone/fax: 8 (727) 250 61 90

From _____
Address: _____
Tel. _____

Application

Essence of the application

The way in which the applicant wishes to receive a response from the Company

Documents, if any, shall be attached to the application.

Applicant _____ 20____
(signature, first name, surname)

After completing the application, give it to the office supervisor or send it yourself to the above address (via Kazpost, Kazakhtelecom or by fax to 8 (727)250-61-90).

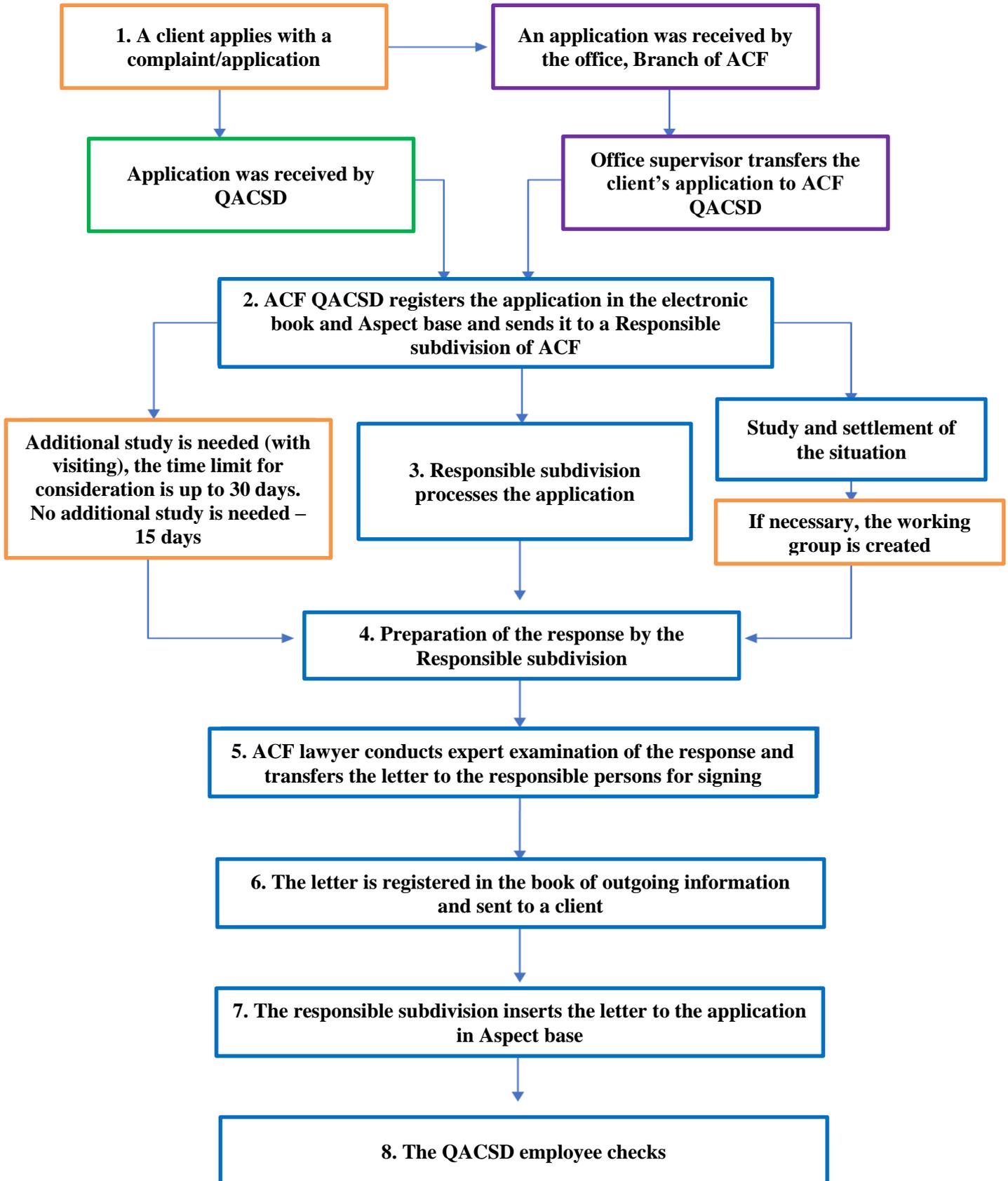
Annex 2
to the Applications Processing Policy
of MFO Asian Credit Fund LLC

ANNOUNCEMENT

Communication channel	Form	Contact data
Written application	It is necessary to fill in the application form provided for the applicants at ACF offices and send it via Kazpost JSC (Annex 1 - form for the written applications).	Address: 050008 Republic of Kazakhstan, Almaty, 60 Auezov Street, 4th Floor, Office 10 Microfinance Organization Asian Credit Fund Limited Liability Company -
	It is necessary to fill in the application form provided for the applicants at ACF offices and leave it to the Office Supervisor for further transfer to the QACSD (Annex 1 - form for the written applications).	ACF Offices.
	Leave your application in the book “Complaints and proposals” or further transfer of the complaint to the QACSD.	ACF Offices.
	Book a callback on the ACF website.	www.asiancreditfund.com
	Send a written application to the e-mail according to Clause 1.4. of this provision.	info@acfund.kz
	Oral application	Business WhatsApp
Free Hot Line (on a mobile)		5061



“PROCEDURE FOR ACCEPTANCE AND CONSIDERATION OF THE APPLICATIONS” SCHEME



Annex 4
to the Applications Processing Policy
of MFO Asian Credit Fund LLC

LETTER OF GRATITUDE TO ACF CLIENT

Microfinance Organization Asian Credit Fund LLC

Gratitude

Dear Mr. (Mrs.) _____,

Microfinance Organization Asian Credit Fund Limited Liability Company expresses its sincere gratitude to you for your appeal!

We appreciate your efforts aimed at improvement of interaction with our clients. We are glad that you are our reliable client and partner! We firmly believe in further successful development of our relations and look forward to fruitful co-operation in future.

Chairman of the Management Board

Zh.B. Zhakupova

Annex 5
to the Applications Processing Policy
of MFO Asian Credit Fund LLC

Matrix of the time limits for applications processing by level of importance

Level of importance	Impact on the Company	Responsible persons depending on the type of a complaint	Level of control
● High	The applications that may affect ACF reputation, lead to the legal consequences or cause financial damage to ACF or clients	Management Board, Information Security Service, Legal Department, Internal Audit Service	Chairman of the Management Board. If necessary, the Supervisory Board
● Medium	The applications that do not bear the critical financial, legal or reputational risks, but may have a material impact on the customer experience, trust in the company and operating activity.	The departments and branch managers, Quality Assurance and Customer Support Department, Legal Department	Chairman of the Management Board
● Low	The applications with no significant implications for ACF or clients	Quality Assurance and Customer Support Department, Branch Directors, Loan Administration Department, Legal Department	Heads of the departments, Branch Directors

Document information:

Document title	Applications Processing Policy of Microfinance Organization Asian Credit Fund LLC
Document version	1.0
Document date	12.01.2021
File name	Applications Processing Policy.doc.x
Document author	Zh.B. Zhakupova

Revision History

Revision	Brief description of the document revision	Approval date
4.1	The document was amended in connection with introduction of the Matrix of the time limits for applications processing by level of importance.	25.04.2025



4.2	The document was amended upon request of AΦP CYP.	19.12.2025
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