

COMPLAINTS MANAGEMENT FRAMEWORK

Policy on Complaints Management

FSDH Capital Limited recognizes the right of its clients, shareholders, regulators, fellow stockbroking firms and other stakeholders to lodge complaints regarding actions taken and omissions that could arise in the ordinary course of business. These include where the quality of our services fall below the expectations of stakeholders and the generally acceptable conduct of a stockbroking firm. It also includes the breach of any regulation governing our operations or laws of the Federal Republic of Nigeria.

Since FSDH Capital Limited has always striven to ensure that its operations are in alignment with our core values of ethical dealing, integrity and professionalism. It is in order to ensure that we maintain high standards that we encourage all our stakeholders to draw our attention to any disagreement or misunderstanding that may arise in the course of their dealings with the company. The management of the company is committed to ensuring that complaints that are raised are thoroughly investigated and resolved.

1. Client Relationships

FSDH Capital places a high premium on its relationships with clients, regulators and other stakeholders. It has therefore established a clearly defined Complaint Management procedure to anticipate, handle and resolve complaints from clients and other stakeholders arising from our business operations.

- a. It is mandatory for every member of staff to be conversant with all company policies and procedures as contained in the FSDH Capital operations manual, the Rules and Regulations of the Nigerian Stock Exchange and the Securities and Exchange Commission and the laws of the Federal Republic of Nigeria.
- b. It is a requirement that every client must be assigned an Account Officer who should have primary responsibility of managing the client's account and must fulfill the statutory "Know Your Customer" requirements.
- c. Every client of FSDH Capital must be treated professionally and with utmost respect. All clients are entitled to, and must be provided with, access to all information regarding portfolios held or products invested in by them.
- d. All clients in the same category must be treated equally.
- e. All clients must be provided with official contact information such as the telephone numbers and email addresses of relevant members of staff members.

2. Complaints/Enquires from other market operators

In order to serve our clients effectively, we deal with other market operators. It is possible for misunderstandings and/or communication failure to result in problems with those counter-parties. In order to ensure that such problems are speedily resolved in the event that they arise, FSDH Capital Limited requires that:

- a. Every member of staff must be conversant with the policies and procedures of the company and approach his/her work with utmost professionalism
- b. Every member of staff must be conversant with the rules and regulation of the Nigerian Stock Exchange and the Securities and Exchange Commission
- c. All dealings with other market operators must be documented (in writing) and signed by the company's authorized signatories.
- d. All communication with regulators must be in writing and signed by both the Compliance Officer and the Managing Director.
- e. In the event there is any ambiguity regarding the interpretation of any rule or law guiding the market, a written legal opinion clarifying the rule or law must be obtained.

The following complaint Management Process should be followed at all times to manage all aspects of complaints regarding our operations and relationship with our clients, regulators and other market operators.

Complaint Management Process

S/N	Task	Responsibility	Action
1a	Receipt of Complaint – Hard Copy	Front Desk Officer	<ul style="list-style-type: none"> - Receive the written complaint - Time-stamp the letter and acknowledgment copy - Forward to compliance officer
1b	Receipt of Complaint – email Copy	Email Recipient	<ul style="list-style-type: none"> - Acknowledge receipt of email - Forward to compliance officer
1c	Receipt of Complaint – Telephone/oral	Officer	<ul style="list-style-type: none"> - Document details of the complaint - Forward to compliance officer
2	Record Complaint	Compliance Officer	<ul style="list-style-type: none"> - Records the complaint in the Complaint Register - Writes to the complainant to confirm that the complaint has been received and that a response will be sent within 10 working days. - Forward the complaint to the MD and the account officer. - If complaint is about the MD, it should be forwarded to the head of Internal Audit
3	Preliminary Review	Account Officer	<ul style="list-style-type: none"> - Check for authenticity: <ul style="list-style-type: none"> ✓ Name ✓ Address ✓ Telephone ✓ Signature ✓ Date etc - Email complaints are acknowledged within 24 hours days stating resolution time frame of 10 days - Forward the complaint to the MD/CEO
4	Review/ Investigate Complaint	Compliance Officer	<ul style="list-style-type: none"> - Review the complaint - Conduct investigation (with the assistance of the Internal Audit Unit of the FSDH Group if necessary) - Write a report including resolution options applicable. - Submit the report to the MD/CEO

5	Review Report	MD/CEO	<ul style="list-style-type: none"> - Review the report and revert to the client by proposing resolution (as authorized by line ED if necessary) to the complainant within 10 working days - Where resolution is acceptable to the complainant, document and close out
6	Complaint Resolution	MD/CEO/Compliance Officer	<ul style="list-style-type: none"> - Report the complaint and outcome to the relevant regulator (NSE, SEC) within two (2) working days of resolution.
7	Inability to Achieve Resolution	MD/CEO	<ul style="list-style-type: none"> - Where the complaint cannot be resolved within the given timeframe, the complaint is referred to the relevant authority (NSE/ SEC) within twelve working days of the receipt of the complaint.

Reporting of Complaint

FSDH Capital Limited will at all times ensure that a record of complaints is maintained and reported as may be required by the Internal Audit and Compliance Units of the FSDH Group as well as the NSE and the SEC.

S/N	Task	Responsibility	Action
1	Maintenance of Complaints Register	Compliance Officer	<ul style="list-style-type: none"> - Shall maintain an electronic Complaints Register - The Complaints Register shall contain the following details: <ul style="list-style-type: none"> i. Name of the complainant ii. Date of the complaint iii. Nature of complaint iv. Complaints details in brief v. Remarks/comments - Update the Complaints Register monthly. - Track the resolution of complaints - Ensure appropriate reporting to the MD/CEO, EXCO, Board Audit and Risk Management Committees & Regulatory Authorities (NSE, SEC)

2	Update of Complaints Register	Compliance Officer	<ul style="list-style-type: none"> - Update the Complainant Register monthly with relevant details and resolutions reached - Obtain a written confirmation from the complainant that proposed resolutions are acceptable - Track the implementation of the resolutions - Issue the completion report
3	Liaison with Regulatory Authorities	MD/CEO/Compliance Officer	<ul style="list-style-type: none"> - Status reports of complaints filed with the FSDH Capital shall be forwarded to the SEC quarterly - Provide information on complaints and complaints-handling to the relevant Competent Authority on a quarterly basis - All reports and information must be signed off by both the Compliance Officer and the MD.

In addition to this, stakeholders can activate the whistle blowing policy of the FSDH Group to report any unethical conduct involving or affecting the organisation. The details of the policy as are stated below:

1) **What should be reported?**


- 1.1 Fraudulent activities
- 1.2 Illegal activities
- 1.3 Bribery and corruption
- 1.4 Gross misuse of company's assets including information asset
- 1.5 Conflict of interest and abuse of office on the part of any member of staff or director
- 1.6 Activities likely to endanger life or property
- 1.7 Insider dealings
- 1.8 Use of fake/forged certificates
- 1.9 Theft/leakage of information assets
- 1.10 Purchase of goods at inflated prices
- 1.11 Purchase of inferior goods
- 1.12 Concealment of any malpractice
- 1.13 Override of controls
- 1.14 Abuse of authority
- 1.15 Sexual harassment
- 1.16 Other unethical activities

2) Who should report?

- 2.1 Employees
- 2.2 Directors
- 2.3 Clients
- 2.4 Vendors and service providers


3) Procedure for making whistle-blowing reports

3.1 All whistle-blowing reports should be made using the KPMG Ethics Line. The telephone lines and email address are given below:

 Toll free numbers for calls from MTN numbers only:

■ 0703-000-0026

■ 0703-000-0027

 Toll free numbers for calls from Airtel numbers only:

■ 0808-822-8888

■ 0708-060-1222

 Email: kpmgethicsline@ng.kpmg.com

3.2 The following procedure should apply for all telephone reports.

 **Step One**

- ✓ Dial the hotline from any telephone of your choice
- ✓ You may call anonymously. Even if you decide to supply your name, your identity will remain confidential and will NOT be disclosed to FSDH except with your consent
- ✓ The call operators are not employed by FSDH, thus ensuring that your confidentiality is maintained at all times

 **Step Two**

- ✓ When you call, the call operator will interview you to obtain as much information as possible
- ✓ Ensure you provide all the details
 - Nature of the incident
 - People involved
 - Dates of incident
 - Place of occurrence
 - How the incident occurred
 - Any other useful information



Step Three

- ✓ You will be given a reference number (PIN). Keep this confidential as you will need this number if you make a follow-up call
- ✓ You may call back for feedback on your report or to provide additional information
- ✓ KPMG Ethics Line will not call you back since it does not know your identity

Step Four

- ✓ All information received is captured onto a call sheet memorandum for direct transmission to designated persons within FSDH for further action.
- ✓ Calls are toll-free provided they are within the same network

3.3 Reports sent through e-mail address

-  You may decide to send your report through the designated email address in paragraph 3.1.
-  You should also ensure that you provide all the details required in paragraph 3.2 (Step two)

3.4 Feedback

If you desire, KPMG will give you feedback if you call back (for reports via phone) or through your email address (for reports sent via email)

4) Protection for whistle-blower

- 4.1 Whistle-blowing is done through KPMG's Ethics Lines. KPMG is a reputable international firm.
- 4.2 FSDH does not have access to the whistle-blowing reports ensuring that the whistle-blower is fully protected.
- 4.3 Calls are answered by trained personnel who understand the concerns of the whistle-blower and will ensure that all the relevant facts are obtained from the whistle-blower in a manner that will ensure full protection and confidentiality for the whistle blower.
- 4.4 You are not required to disclose your identity. Even if you disclose your identity to KPMG, your identity will not be disclosed to FSDH without your consent.
- 4.5 The facilities are secure and not accessible to unauthorized persons

5) Obligation of the whistle-blower

In making whistle-blowing reports, the whistle-blower should ensure that:

- 5.1 The report is made in good faith
- 5.2 He or she has reasonable ground to believe that the report is true. The whistle-blower is encouraged to report even if he or she does not have all the relevant information.
- 5.3 He or she is not making the report for personal gain

6) What happens after the report?

- 6.1 The issues will be thoroughly investigated, using all available evidence. The whistle-blower may be called upon, if the report is not anonymous, to provide in strict confidence any available evidence necessary to confirm all the issues raised in the report.
- 6.2 Regular feedback will be provided to the whistle-blower if he or she calls back for feedback. If the report is through an email address, feedback will be provided by KPMG using that same email address

Where the allegations are confirmed, the company undertakes to take necessary disciplinary measures against identified offenders in line with the company's policy. Where injuries have been suffered by the whistle-blower, the company undertakes to provide necessary remedies as may be permitted by the company's policy.