

COMPLAINTS MANAGEMENT FRAMEWORK

SUMMARY OF CHANGES

Document Review History

Version	Date	Purpose	Approved By
1.0	March 2021	Initial Document	The Board
2.0	October 2022	Second Document	The Board
3.0	July 2023	Third Document	The Board

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.

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 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 during their dealings with the company. The management of the company is committed to ensuring that complaints 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 Complaints 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 Exchange Group 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.

2. Complaints/Enquires from other market operators

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 counterparties. To ensure that such problems are speedily resolved if 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 regulations of the Nigerian Exchange Group 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 Complaints Management Process should always be followed to manage all aspects of complaints regarding our operations and relationship with our clients, regulators, and other market operators.

3. Complaints Management Process

S/N	Task	Responsibility	Action
1a	Receipt of Complaint - Hard Copy (Walk-in)	Front Desk Officer	<ul style="list-style-type: none"> - Receive the written complaint - Timestamp the letter and acknowledgment copy - Forward to Account officer
1b	Receipt of Complaint - email Copy	Email Recipient	<ul style="list-style-type: none"> - Acknowledge receipt of email - Forward to Account officer
1c	Receipt of Complaint - Telephone/oral	Officer	<ul style="list-style-type: none"> - Document details of the complaint - Forward to relevant Account officer
2	Record Complaint	Account 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 appropriate unit Head for resolution. - 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 working hours stating resolution time frame of 10 days - Forward the complaint to the relevant unit Head.
4	Review/ Investigate Complaint	Compliance Officer (on issues involving counter parties and escalated clients' complaints)	<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 through the Head, Sales

5	Review Report	Head, Sales	<ul style="list-style-type: none"> - Review the report and revert to the client by proposing resolution (as authorized by MD, if necessary) to the complainant within 10 working days
6	Inability to Achieve Resolution	MD/CEO/ Compliance Officer	<ul style="list-style-type: none"> - Where the complaint cannot be resolved within the given timeframe, the complaint is referred to the relevant authority (NGX/SEC) within twelve working days of the receipt of the complaint.

4. 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 NGX and the SEC.

S/N	Task	Responsibility	Action
1	Maintenance of Complaints Register	Account 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 (NGX, SEC)

2	Update of Complaints Register	Account Officer	<ul style="list-style-type: none"> - Update the Complaint Register monthly with relevant details and resolutions reached. - Where necessary, obtain a written confirmation from the complainant that proposed resolutions are acceptable. - Track the implementation of the resolutions
3	Liaison with Regulatory Authorities	FINCON	<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.

5. Complaints can be reported as follows:

Email: stockbrokingcustomercare@fsdhgroup.com

Phone: 234-1-2702880

APPROVALS

THIS FRAMEWORK WAS APPROVED BY THE BOARD OF DIRECTORS ON 27TH JULY 2023

Rilwan Belo-Osagie

MR, RILWAN BELO-OSAGIE
BOARD CHAIRMAN

Signature Certificate

Reference number: WPPWY-C6KFB-5DPFL-RFWJ8

Signer

Timestamp

Signature

Rilwan Belo-Osagie

Email: rnbosagie@gmail.com

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11 Aug 2023 10:19:11 UTC

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11 Aug 2023 10:29:31 UTC

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Rilwan Belo-Osagie

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