

MEMO

Policy Name: Complaints Management Policy

Type: Compliance

Owner: Head, Risk Management & Compliance

Approved by: Board of Directors (the Board)
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1 Policy Statement

- 1.1 This document sets out First Asset Management Limited (“the Company” or “First AM”) policy on Complaints Management (“the Policy” or “this Policy”).
- 1.2 As part of the pursuit for service excellence and effective Client relationship management, as well as to protect the Company’s reputation, First AM is committed to speedily address and resolve Client Complaints. The Company is also committed to treating its Clients’ fairly.
- 1.3 This Policy sets out the minimum Complaints resolution principles and Client Complaints management. This will ensure that Client Complaints are handled in an accessible, transparent and efficient manner in line with the Company’s commitment to treating its Clients fairly, as envisaged in the Consumer Protection Council Act, Law of the Federation of Nigeria (LFN) 2004 and relevant regulations in Nigeria.
- 1.4 The Company shall ensure that clients are treated fairly, and their concerns are acknowledged and appropriately and independently treated.
- 1.5 The Company shall provide Clients with a mechanism for reporting complaints.
- 1.6 The business of the Company is built on trust and integrity as perceived by its stakeholders, especially its clients, shareholders, regulators and law enforcement agencies.
- 1.7 An important element of trust and integrity is ensuring that the Company conducts its business in accordance with the values and Code of Conduct and Ethics that it has adopted, and in compliance with applicable laws, rules and standards.

2 Applicability

- 2.1 This Policy applies to all employees and directors of First AM including independent consultants, interns and secondees.
- 2.2 All Clients, both internal and external.
- 2.3 Third parties working in association, partnership or in contractual arrangements with the Company.
- 2.4 External auditors.

- 2.5 Regulators.
- 2.6 Other stakeholders, including banks and correspondent banks.
- 2.7 This Policy reflects the minimum requirements for the Company.

3 Policy Requirements

3.1 Complaints Management Imperative

- 3.1.1 The transparent, fair and efficient management of Client Complaints is not only good business practice, but also a statutory and regulatory requirement. Failure to comply with this Policy may therefore attract regulatory fines or penalties and may also result in reputational damage due to loss of confidence in the Company by Clients.
- 3.1.2 Adherence to this Policy remains the responsibility of every employee and it is through this responsibility that employees are expected to ensure that all interactions with Clients, including Complaints resolution, further the purpose and principles underpinning this Policy.

3.2 The Securities and Exchange Commission (SEC) Requirements

In February 2015, the SEC issued its Rules relating to the Complaints Management Framework of the Nigerian Capital Market.

- 3.2.1 The Complaints Management Framework of the Nigeria Capital Market shall address complaints arising out of issues that are covered under the Investments and Securities Act, 2007 (ISA), the Rules and Regulations made pursuant to the ISA, the rules and regulations of Securities Exchanges and guidelines of recognised trade associations.
- 3.2.2 The SEC, Self-Regulatory Organisations (SROs), recognised Capital Market Trade Associations, Capital Market Operators (CMOs) and listed Public Companies shall establish fair, impartial and objective complaints management policies for the handling of:
 - 3.2.2.1 Complaints against operators by clients;
 - 3.2.2.2 Complaints between operators;
 - 3.2.2.3 Complaints against regulators and SROs;
 - 3.2.2.4 Complaints against operators by SROs and Regulator; and

3.2.2.5 Trade manipulation, accounting frauds, Ponzi schemes and such other complaints as may be determined by the SEC from time to time.

3.2.3 All Capital Market Operators and listed Public Companies shall be required to establish a clearly defined Complaints Management policy to handle and resolve complaints from their Clients. The framework shall deal with Complaints against operators by Clients or other operators, shareholders/public companies and investors.

3.3 **Complaint Covered by this Policy**

3.3.1 Clients' complaints.

3.3.2 Complaints by other Capital Market Operators.

3.3.3 Shareholders' complaints.

3.3.4 Investors' Complaints.

3.3.5 Complaints by regulators, investigative bodies and law enforcement agencies.

3.3.6 Complaints by Self-Regulatory Organisations and Trade Associations such as the Nigerian Stock Exchange (NSE), the Financial Market Dealers Quotation (FMDQ), Fund Managers Association of Nigeria (FMAN), Association of Issuing Houses of Nigeria (AIHN), the Association of Corporate Trustees (ACT), Association of Securities Dealing Houses of Nigeria (ASHON) and the National Association of Securities Dealers (NASD).

3.3.7 Complaints relating to market abuse, market manipulation, trade manipulation, accounting frauds, Ponzi schemes, and such other complaints as may be determined by the SEC, relevant SROs and the Company from time to time.

3.4 **Complaints not Covered by this Policy**

3.4.1 Complaints on matters that are sub-judice or in arbitration, including employee related dispute.

3.4.2 Complaints falling outside the purview of the Company.

3.4.3 Negative feedbacks which may not require a resolution or formal follow-up. While this type of feedback is valuable, the Policy does not apply to feedback of this nature.

3.5 Evidential Requirements for Complaints Management

Complaints to be addressed by the Company shall contain all material facts with supporting documents. It shall also contain the following details of the Complainant:

- 3.5.1 Name;
- 3.5.2 Full address;
- 3.5.3 GSM number;
- 3.5.4 E-mail address;
- 3.5.5 Signature; and
- 3.5.6 Date the Complaint was dispatched or filed.

3.6 Complaints Handling System and Procedures: General Requirements

The Complaints management system and procedures of the Company must, as a minimum, make provision for the following:

- 3.6.1 Adequate and appropriate resources to manage the receipt, follow-up and resolution of Complaints in a prompt and efficient manner. No undue prejudice must be caused to Clients due to delays caused by insufficient resources;
- 3.6.2 The Complaints handling system should be documented and include written procedures for the reporting and resolution of Clients' Complaints;
- 3.6.3 Proper delegation of powers and mandates of employees to facilitate the proper resolution of disputes. Where Complaints of a serious or non-routine nature are received, proper escalation procedures are required;
- 3.6.4 All employees, including senior management shall be made aware of the system and procedures on Complaints Management. This awareness creation shall be provided via specific training initiatives or employees Attestation (that they have read and understood the content) of this Policy and other relevant procedures and Guidelines on Complaints Management. It may also include giving an overview of the system and procedures on Complaints Management during any induction training;
- 3.6.5 The documented system must include the minimum requirements for handling Complaints, for example, timeframes for response and escalation criteria;

- 3.6.6 The Company shall have a mechanism to receive Clients' Complaints through electronic (e-mails), physical (e.g. letters) and telephone channels;
- 3.6.7 A Complaints Handling Officer shall be appointed or a Complaint Management function shall be created, either as a stand-alone function or as part of the Customer Care Unit (CCU) for the purpose of receiving the Complaints in the first instance, entering details into a register and for passing the Complaint on to a relevant party for response and resolution. In addition, the Officer or function shall monitor the resolution of the Complaint and ensure that it is escalated, if necessary;
- 3.6.8 This Policy shall be hoisted on the Company's website;
- 3.6.9 This Policy shall be made available at all branches/representative offices, if any;
- 3.6.10 The system must provide for the timely acknowledgement of receipt of Complaints received from Clients;
- 3.6.11 Any remedial action shall be promptly undertaken;
- 3.6.12 Complaints must be handled on an individual basis taking into consideration all facts from Clients, information from employees involved in the incident that gave rise to the Complaint and advice from specialist employees;
- 3.6.13 Complaints must be resolved as soon as possible, however, where this is not possible, deliberate effort must be made to provide feedback regarding progress in resolving Complaints to the Client, especially where Complaints were lodged via e-mails;
- 3.6.14 Effective controls, management and oversight of the Complaints system must be in place to ensure adherence to resolution timelines and minimum standards for the management of Complaints;
- 3.6.15 Compliance with requests for information from the regulator where Clients have escalated their Complaints to the regulator, if the regulator has jurisdiction to hear the Complaint;
- 3.6.16 Register of Complaints**
- Complaints shall be recorded in an electronic Register. The complaints register shall contain the following details:
- 3.6.16.1 The name and contact details of the Complainant;

- 3.6.16.2 Date of Complaint or date Complaint was received;
- 3.6.16.3 Method of notification;
- 3.6.16.4 Product or service affected by the Complaint;
- 3.6.16.5 The nature of the Complaint;
- 3.6.16.6 Complaint's details in brief;
- 3.6.16.7 Remarks/comments;
- 3.6.16.8 How the Complaint has been classified, if any classification criteria (material or less serious);
- 3.6.16.9 Who the Complaint has been assigned to for response/resolution (division, department, unit and individual);
- 3.6.16.10 Actions taken to resolve the Complaint and how it has been responded to;
- 3.6.16.11 Whether the Complaint was resolved or appropriately handled within the allocated timeframe;
- 3.6.16.12 A commentary on the root cause of Complaints that will inform corrective action, prevent similar Complaints in the future and will drive improvements to processes, products and/or services, as required;
- 3.6.17 The Complaints Register shall be kept up to date;
- 3.6.28 Status reports of Complaints filed with the Company shall be forwarded to the SEC on a quarterly basis;
- 3.6.19 The Compliance function shall have access to and monitor the Complaints Register to ensure that Clients' Complaints are properly managed. In addition, the Compliance function shall consider the adequacy and effectiveness of the system and procedures and make any recommendations for improvement to senior management.
- 3.6.20 The Compliance function shall review Complaints received over a period for purposes of identifying areas of non-compliance or potential weakness which may require specific monitoring and recommendation for improvement; and
- 3.6.21 A summarised Complaints report should form part of the Compliance function's monthly and quarterly reports to relevant Committees.

- 3.7 Complaints Handling System and Procedures: Specific Requirements**
- 3.7.1 First AM shall acknowledge receipt of Complaints received by e-mail within two (2) working days.
- 3.7.2 First AM shall respond to Complaints received by post within five (5) working days of the receipt of the Complaint. Copies of the Complaint and the acknowledgement letter shall be forwarded to the relevant SROs.
- 3.7.3 First AM shall resolve all Complaints within ten (10) working days from the date Complaint was received. The relevant SRO shall be notified of the resolution of the Complaint within two (2) working days after the expiration of the initial timeframe (10 working days).
- 3.7.4 Where any Complaint that falls within the scope of this Policy is not resolved within ten (10) working days, the Company shall refer the Complaint to the relevant SRO within two (2) working days after the expiration of the initial timeframe (10 working days). The letter of referral shall be accompanied by a summary of proceedings of events leading to the referral and copies of relevant supporting documents.
- 3.7.5 Where there is no relevant or active SRO, the Complaint shall be referred to the SEC within two (2) working days after the expiration of the initial timeframe (10 working days). The letter of referral shall be accompanied by a summary of proceedings of events leading to the referral and copies of relevant supporting documents.
- 3.8 How to Lodge a Complaint**
- A complaint can be lodged by phone/mobile or in writing (post or e-mail). The Complainant shall explain in detail the facts behind the Complaint, providing all relevant supporting documentation.
- 3.8.1 If sending the Complaint by post, it should be sent to any of the following addresses:
- 3.8.1.1 The Customer Care Unit
First Asset Management Limited
16, Keffi Street
South-West Ikoyi
Lagos, Nigeria
- 3.8.2 For Complaints by e-mail, please send to CustomerCare@first-assetmanagement.com

- 3.8.3 For Complaints by phone, please call the following telephone number:
• 02018886722
- 3.9 The Company's opening hours: Every working day between 8 a.m. and 5p.m. with the exception of public holidays. The Company is open to receive personal complaints and calls within the period stipulated above.
- 3.10 **Record Keeping (Retention of Complaints Records)**
- All records regarding Complaints, including the Complaints' Register and supporting documents shall be maintained for a minimum of ten (10) years from the date of lodging the Complaint, together with an indication of whether or not the Complaint has been resolved.
- 3.11 **Record Keeping (Retention of Complaints Records)**
- The company is committed to acknowledging all complaints immediately upon receipt. Once a complaint has been received, First AM will undertake an initial review of the complaint. The complainant has the right to enquire as to the status of a complaint by contacting appropriate contact persons handling the complaint. Details of representatives of the company authorised to handle complaints are defined in this Policy.

4 Roles and Responsibilities

- 4.1 **First AM Board of Directors**
- 4.1.1 Has ultimate responsibility for this Policy.
- 4.1.2 Adopts and approves this Policy.
- 4.1.3 Familiarises itself and adheres to the Policy.
- 4.1.4 Initiate any disciplinary action required for any breach of this Policy by a Director.
- 4.1.5 Institute and maintain measures and controls to ensure adherence to this Policy.
- 4.2 **Management Committee (MANCO)**
- 4.2.1 Considers this Policy.
- 4.2.2 Minutes any exceptions or deviations allowed in terms of this Policy.
- 4.2.3 Review reports on non-compliance with this Policy.

4.3 Heads of Departments/Heads of Units (collectively referred to as “HODs”)

4.3.1 Familiarise themselves with and adhere to this Policy and related Complaints Management Procedures and Guidelines.

4.3.2 Ensure that all employees in their respective Departments/Units familiarise themselves with and comply with this Policy.

4.3.3 Ensure that all employees in their respective Departments/Units know that they must forward all Complaints received to the Complaint Management function through one of the recommended channels under Section 3.8 of this Policy.

4.3.4 Ensure any contractors, vendors, consultants or others are briefed on the requirements of this Policy.

4.3.5 Where applicable, make formal application to Compliance for any dispensations to the minimum requirements of this Policy.

4.3.6 Deal with breaches of this Policy and related procedures.

4.4 Compliance Officer must:

4.4.1 Develop, review and maintain this Policy;

4.4.2 Monitor adherence to this Policy and related procedures and guidelines;

4.4.3 Report any irregularities to the relevant Committees and/or the Board;

4.4.4 Give approvals in line with this Policy;

4.4.5 Raise awareness in terms of this Policy;

4.4.6 Advise employees, line managers and HODs, where necessary;

4.4.7 Query and report any violation of this Policy;

4.4.8 Provide training, awareness and guidance in respect of this Policy; and

4.4.9 Facilitate, in conjunction with the Complaints Management function, any regulatory, internal/external audit or internal investigation in respect of this Policy.

4.5 Customer Care function

4.5.1 Develop and maintain procedures and guidelines to support the

principles of this Policy.

4.5.2 Treat all Complaints efficiently and fairly as they can damage the Company's reputation and business if handled otherwise.

4.5.3 Review Client Complaints and emerging trends.

4.5.4 The Complaints Management function shall, where practicable, obtain documentary evidence from Complainants on satisfactory resolution of their Complaints. This practice would help prevent possible denial of amicable resolution of Complaints by Complainants in the future.

4.6 Employees must:

4.6.1 Familiarise themselves with and adhere to this Policy and related Complaints Management procedures and guidelines;

4.6.2 Comply with the requirements of this Policy as they apply to their roles and responsibilities;

4.6.3 Treat Clients fairly at all times;

4.6.4 Treat Complaints lodged by Clients with courtesy and on time;

4.6.5 Work in good faith and without prejudice to the interests of their Clients;

4.6.6 If a written Complaint is received by an employee not in the Complaints Management function, he or she shall without delay pass on the Complaint to the Complaint Management function where the Complaint would be registered and handled; and

4.6.7 In case of Complaint received through the phone by an employee not in the Complaints Management function, the employee shall without delay pass on the details of the Complaints to the Complaints Management function.

5 Related policies and procedures in First Asset Management Limited

5.1 Code of Conduct and Ethics.

5.2 Anti-Bribery and Corruption Policy.

5.3 Whistle-Blowing Policy.

6 Disciplinary Action

- 6.1 Failure to adhere to this Policy (either intentionally or as a result of negligence) or employees found to be in breach of this Policy shall result in disciplinary action, which may lead to the termination of employment.
- 6.2 In addition, an employee may be held personally liable for civil or criminal penalties, which may include fines, payment of damages or imprisonment.

7 Definitions

7.1 Client

A person or persons or institution that holds or maintains a relationship with First AM or expresses or indicates an intention to do so (including but not limited to a consultant, broker, counterparty, vendor or other service providers).

7.2 Complaint

For the purpose of this Policy, a Complaint is defined as any oral or written expression of dissatisfaction made to an organisation, related to its products, services, the attitude of an employee, or otherwise and where a response or resolution is explicitly or implicitly expected. For example, where Clients feel they have been treated unfairly or that First AM has failed to comply with legislation or regulation.

7.3 Consumer Protection Council Act (CPC)

The Consumer Protection Council Act, Law of the Federation of Nigeria (LFN) 2004, aims to promote a fair and accessible marketplace for consumer products and services and for that purpose to establish national norms and standards relating to consumer protection; to provide speedy redress to consumers Complaints through negotiations, mediation and conciliations; to prohibit certain unfair business practices; to promote responsible consumer behaviour; and promote a consistent legislative framework.

7.4 Employees

Employees of the Company in the context of this Policy shall include the following:

- 7.4.1 Permanent employees;
- 7.4.2 Independent consultants;

- 7.4.3 Interns;
- 7.4.4 Contractors and secondees;
- 7.4.5 Consultants (excluding consultants providing external assurance services); and
- 7.4.6 Any other category of staff, regardless of specific job responsibilities, department or location.

8 Policy Administration

Contact Person:

Title	Head, Risk Management & Compliance
Department	Compliance
Telephone	+234 (1) 279 8300
Email	compliance@first-assetmanagement.com

Key Words	Complaint
	Clients Complaints
	Complaint Handling
	Complaints Management
	Complaint Resolution
	Code of Conduct and Ethics