



Policy Family:	Customer Service
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This Policy details out the Complaints Management Framework for Africa Prudential Plc ("AP Plc" "the Company"). It is the property of the Company, and shall, under no circumstances, be copied, sold or reproduced for private or commercial use or given to third party without the express permission of the Company's Board of Directors, or their delegates.

September 2019

Approval

This Complaint Management Policy is approved by the Board of Directors of Africa Prudential Plc as signed and dated below.

Revised by:	Date	Signature
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Reviewed by: David Ubaka Head, Internal Control & Audit		
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Overview

1.1. Introduction

Africa Prudential Plc is a leading investor services and business solutions provider. The firm ranks No.1 in terms of automation and innovation among all corporate registrars in Nigeria.

Africa Prudential Plc is very passionate about transforming the African continent through innovative solutions, superior investor relations, and business support services. The company is a pride among others, primed to maximize mutual possibilities.

1.2 Purpose of Policy

This policy is designed to ensure that complaints from the Company's shareholders, customers, investors and relevant stakeholders are duly documented and managed in a fair, efficient and timely manner.

This document contains the policy of Africa Prudential Plc ("AP" or "The Company") on Complaints Management Framework to address complaints of Shareholders, Customers, Investors and relevant Stakeholders arising out of the business operations of the Company.

1.3 Terms and Definitions

Complaint: A complaint is defined as an expression of dissatisfaction made against the Company's products and services or the complaints management process itself, where a response is expected.

1.4 Scope of the Policy

This Policy covers complaints made by or in respect of the following:

- 1.4.1.1 Client companies
- 1.4.1.2 Shareholders or investors
- 1.4.1.3 AP Customers

However, the policy shall not cover complaints in respect of the following:

1.4.1.4 Complaints against private wound up and liquidated companies;

1.4.1.5 Complaints on matters that are sub-judice or in arbitration

1.4.2 Complaints falling outside the purview of the business activities of the Company.

1.4.3 Explanation for non-trading of shares or illiquidity of shares

1.4.4 Non-satisfaction with trading price of the shares of the companies

1.4.5 Non-listing of shares of private offers of securities by private companies

1.4.6 Complaints on behalf of individuals or businesses to resolve complaints with any of the Company's counterparties.

2. Complaints Management Process

2.1. Receipt of Complaints

Where a complaint is about a particular AP product or service, the complainant may wish to address the complaint to AP orally, by telephone, by letter, and or email.

The Company may be contacted as follows:

Africa Prudential Plc

Address: 220B Ikorodu Road, Palmgrove, Lagos.

Telephone: 0700-AFRIPRUD

E-mail: cfc@africaprudential.com

Website: www.africaprudential.com

If the Company is unable to satisfactorily resolve their complaints then the Complainant should contact the office of the Audit & Control Department using the details below;

The Audit and Control Department

Africa Prudential Plc

Address: 220B, Ikorodu Road, Palmgrove Lagos

Telephone: 0700-AFRIPRUD

E-mail: cfc@africaprudential.com

Website: www.africaprudential.com

2.2 Acknowledgement of complaints

Upon the receipt of a complaint, the assigned Complaints Officer either at the Head office or branch will:

- 2.2.1** Review and record the complaint in the Complaints Register;
- 2.2.2** The designated Complaints Officer will determine whether the complaint falls within the scope of the policy and purview of complaints handled by AP
- 2.2.3** Where complaints are received via email, post or telephone, the designated complaints officer shall acknowledge receipt of complaints received within one (1) working day and refer such complaint to the appropriate Unit or Department within AP for resolution
- 2.2.4** All complaints received with regulatory implications would be forwarded to the legal department to handle

2.3 Initial assessment and addressing of complaints

During the course of investigating a complaint or feedback, the designated Complaints Officer of the Company (at the Head office or branch) shall:

- 2.3.1** Ascertain the facts of the complaint
- 2.3.2** Provide appropriate response where information is available.
- 2.3.3** Refer the complaint to the relevant department for resolution where relevant information is not readily available
- 2.3.4** Review the action(s) taken on the complaint by the relevant department; and
- 2.3.5** Coordinate the company's response or actions in addressing the complaint in conjunction with the assistance of the relevant department.
- 2.3.6** And where applicable, the designated Complaints Officer (at the HO or branch) shall submit a quarterly report on shareholders' complaints to the Control and compliance unit for review and submission to the relevant regulator.
- 2.3.7** Where appropriate, the designated Complaints Officer may liaise with the company's Senior Management in relation to a complaint to assist in determining the appropriate response or resolution.

2.3.8 There may also be the need to escalate matters to the Board. This will be highly dependent on the nature of the complaint and would be routed through the department that interfaces with the board or regulators for resolution

2.4 Communication of outcome of assessment of complaints

2.4.1 AP shall endeavor to resolve complaints within ten (10) working days of receiving the complaint and the Complainant shall be informed of such as soon as possible.

2.4.2 However, where it is impracticable to resolve the complaint within 10 working days, the Company shall contact the complainant to explain the reasons for the delay, and indicate a possible date for resolution of the complaint.

2.4.3 The same or similar medium that was used for the initial complaint shall be used in providing a response (whether by email, or post [where other faster means of communication are not practicable], unless otherwise notified to or agreed with the complainant.

2.5 Record Keeping and Redress

AP shall keep a record of all complaints received in the company's Customer Relationship Management application (CRM) managed by the Customer Fulfilment Center (CFC). The CRM shall be updated by the CFC on a daily basis.

The CRM shall track the complaints lodged and contain the following details:

2.5.1 The date that the complaint was received.

2.5.2 Complainant's information (including name, address, Telephone number, e-mail address)

2.5.3 Nature of the complaint

2.5.4 Brief details of complaint

2.5.5 Action Taken/ Status i.e Date of resolution of the complaint, final response provided by AP.

2.5.6 Records of complaints will be retained for a minimum of ten years in line with company document retention policy

2.5.7 AP shall provide information on number and nature of complaints received, differentiated according to their various criteria regarding

complaints and complaints-handling for review by the Monthly Performance Review Session

3. Accountability

3.1 Escalation Level on Service Delivery

S/N	Complaints	Escalation Level
1	1 st reminder from complainant	Unit Head/Audit in a copy, Response of operation must copy Audit /Head of operation
2	2 nd reminder from complainant	Head of Operations/Audit in Copy
3	3 rd reminder from complainant	Chief Operating Officer/Audit in copy/CEO in copy

4. REVIEW AND CONTINUOUS LEARNING OF THE POLICY

- a. This Policy should be reviewed every 2 years.
- b. The Customer Fulfilment Center shall be responsible for the review of this policy
- c. Any question regarding interpretation or scope of application of this policy should be referred to the Customer Fulfilment Center
- d. Any changes or subsequent versions of this Policy will be published on AP's website **www.africaprudential.com**