



# **CONTINENTAL REINSURANCE PLC**

## **COMPLAINTS MANAGEMENT POLICY**

(Approved by the Board of Directors on October 30, 2015)

## COMPLAINTS MANAGEMENT POLICY

### 1. INTRODUCTION

The purpose of this policy is to establish an effective and efficient complaints management system that is based on accountability, responsiveness, confidentiality, fairness and transparency in accordance with the Securities and Exchange Commission (SEC) Rules relating to the Complaints Management framework of the Nigeria Capital Market (framework). This Policy sets out the direction and procedures for the handling and resolution of complaints in order to ensure that complains of clients/shareholders/investors are heard and are addressed promptly, fairly and objectively. The policy provides details on (i) types of complaints; (ii) the process for lodging of complaints; and (iii) the system of handling complaints.

### 2. SCOPE

2.1 The policy covers complaints arising out of issues that are covered under the Investment and Securities Act, 2007 (ISA) and include complaint against the Company by clients, shareholders and investors and include complaints relating to:

2.1.1 Public Offers/Rights Issue/Capital Reconstruction/Capital Reorganization/Bond Issuance/Debentures/Collective Investment Schemes/Mutual Funds/Memorandum Listing;

2.1.2 Non-receipt of : Offer documents, circulars, certificates, delayed interest (bonds) delisting pay off;

2.1.3 Corporate Actions : Non-receipt of dividends, Non-receipt of bonus;

2.1.4 Corporate Governance : Non-receipt of Notice of Annual General Meetings or Extraordinary General Meetings and Annual Reports

2.1.5 Dissatisfaction about a service, procedure, practice or policy of the Company;

2.1.6 Related party transactions;

2.2 This policy does not cover the following:

- Complaints on matters that are sub-judice or in arbitration
- Complaints falling outside the purview of the Securities and Exchange Commission

### 3. LODGING COMPLAINTS

3.1 Complaints shall be made in writing (by post and by e-mail).

3.2 All complaints shall contain all material facts in respect of the issue(s) with supporting documents and shall also contain the following:

- (a) Name of the complainant
- (b) Full address of the complainant
- (c) GSM number of the complainant
- (d) E-mail address of the complainant

- (e) Signature of the complainant; and
- (f) Date

#### 4. COMPLAINTS MANAGEMENT SYSTEM

- 4.1 The Executive Management shall be responsible for the implementation of this Complaints Management Policy and for monitoring compliance.
- 4.2 All complaints shall be addressed to the Complaints Management Officer (CMO) who shall be responsible for handling complaints made under this policy. The CMO shall register all complaints received in the complaints register.
- 4.3 Where a complaint is received by e-mail, the CMO shall acknowledge receipt of the complaint within two (2) working days.
- 4.4. Where a complaint is received by post, the CMO shall respond in writing within (five) working days of receipt of the complaint.
- 4.5 The CMO shall forward copies of the complaint and the acknowledgement letter to The Nigerian Stock Exchange (NSE).
- 4.6 The CMO will be responsible for investigating complaints, identifying possible conflicts of interest and recommending appropriate method(s) of resolving the issues raised to the Executive Management.
- 4.7 All complaints shall be resolved within ten (10) working days from the date of receipt of the complaint and the CMO shall notify the NSE of the resolution of the complaint within two (2) working days.
- 4.8 Where a complaint is not resolved within the given timeframe, the complainant or the CMO may refer the complaint to the NSE within two (2) 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.
- 4.9 Complaints referred to the NSE shall be resolved within twenty (20) working days of receipt of the complaint. Complaints that are not resolved shall be referred to the SEC.
- 4.10 Where the complainant is dissatisfied with the decision of the NSE, the complainant shall refer the matter to the SEC within two (2) working days.

#### 5. RESPONSIBILITIES OF THE EXECUTIVE MANAGEMENT

- 5.1 The Executive Management shall:
  - 5.1.1 ensure that complaints are effectively and efficiently addressed in accordance with this policy.
  - 5.1.2 take appropriate decisions on complaints received based on the recommendations of the CMO.
  - 5.1.3 ensure the implementation of decisions taken.

5.1.4 ensure that the CMO and other staff that may be assigned to the Complaints Management Unit with roles in handling complaints are adequately trained.

6. COMPLAINTS REGISTER

6.1 The Company shall maintain an electronic Complaints Register.

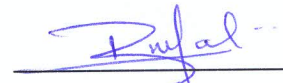
6.2 The Register shall contain the following details:

- (a) Name of complainant
- (b) Date of complaint
- (c) Nature of complaint
- (d) Complaint details in brief
- (e) Remarks/comments

6.3 The CMO shall ensure that the register is updated monthly.

6.4 The CMO shall file status reports of complaints quarterly with the NSE and the SEC.

  
CHIEF EXECUTIVE OFFICER

  
COMPANY SECRETARY