

CUSTODIAN TRUSTEES LIMITED

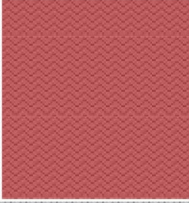
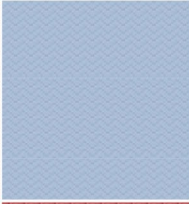
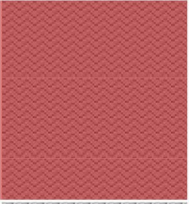
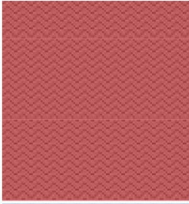
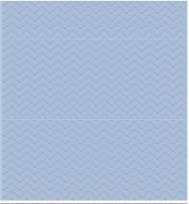
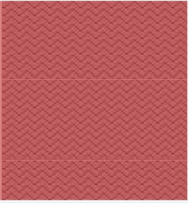


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COMPLAINTS MANAGEMENT POLICY

BACKGROUND

Custodian Trustees Ltd. (“CTL”) is committed to responding to feedback from clients, investors and other stakeholders and has established this Complaints Management Policy (“Policy”) to set out guidelines for the Company to respond effectively and efficiently to feedback in order to improve client experience, deliver better services and exceed customers’ expectations.

The objective of this Policy is to establish a fair, impartial and objective mechanism for the handling of complaints by clients or investors and to establish a mechanism for implementation and monitoring compliance with this Policy.

GUIDING PRINCIPLES FOR MANAGING COMPLAINTS

Custodian shall be guided by the following principles in managing complaints made by clients, investors and other stakeholders:

a. People Focused

CTL recognises and respects everybody’s right to receive feedback and pledges to demonstrate a commitment to providing feedback in a timely manner and without charge. In order to ensure that the complaint is adequately resolved, CTL shall involve the complainant in the process of resolution as far as is practicable and appropriate and shall expect the complainant to participate in the resolution process in good faith.

b. Solution Oriented

Attempts shall be made early to resolve disputes and compromises shall be made by CTL where possible and pragmatic to prevent escalation of perceived grievances by a client or investor. To this end CTL shall seek to offer remedies that are fair to all parties towards minimizing the escalation of a dispute into litigation or other conflict.

c. Visibility and Access

CTL shall ensure that information is available on its website about how and where to make a complaint and shall provide the Complaint Lodgement Form to all aggrieved clients or investors. Furthermore, legitimate complaints made anonymously or through authorised third parties shall be recognised and addressed. The Company shall ensure that this Policy is made available to shareholders of the company at the General Meetings. Furthermore, clients shall be notified of this Policy during the account opening process.

d. Responsiveness

CTL shall record, track, acknowledge and process complaints in a timely manner in accordance with Securities & Exchange Commission Rules relating to the Complaints Management Framework of the Nigerian Capital Market. CTL shall ensure that the complainant is aware of the process, timeframes, their likely involvement, the possible outcomes of the complaint and any other necessary information.

e. Objectivity and Fairness

Complaints shall be managed objectively and dealt with fairly, consistently and without bias. All reasonable steps shall be taken to ensure that a complainant is not adversely affected for making a complaint. Custodian shall protect the rights of any employee that is the subject of a complaint. Nevertheless, Custodian shall have the absolute discretion to decide not to investigate a complaint if it is considered to be abusive, trivial or vexatious.

f. Feedback

Adequate and timely feedback on complaints shall be provided to all parties involved in a complaint. CTL shall ensure that it acknowledges receipt of complaints by email within two (2) working days and shall acknowledge receipt of complaints in writing by return mail within five (5) working days. Where it is deemed necessary by the Complaints Management Officer, a copy of the complaint and acknowledgement letter/email shall be forwarded to the competent regulatory authority.

g. Confidentiality

At all times the Company shall ensure that it deals confidentially with complaints and protects the personal information of complainants.

h. Monitoring and Reporting

Records of complaints and reports on inquiries shall be maintained in electronic complaints register which shall be updated monthly. Status reports on complaints emanating from shareholders and other investors shall be filed with the entries to SEC quarterly.

i. Complaints Register

An Electronic Complaints Register shall be always maintained and updated monthly. The register shall contain the following:

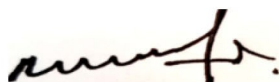
- Name of complainant
- Date of complain
- Nature of complain
- Complaint details in brief
- Remarks/comments

j. Responsible Officer

CTL shall designate a senior management officer to be responsible for the implementation and compliance monitoring of this Policy. The designated officer shall ensure resolution of complaints, communication of feedback to clients, regulatory reporting as well as management of the Complaints Register.

k. Review

This Policy shall be reviewed as deemed necessary but not later than every 5 years.



Approved by the Board of Directors

SCHEDULE 1
COMPLAINT LODGEMENT FORM

1. Information for complainants

Complainants may be contacted and asked to provide additional information to support their complaint.

2. Personal details

Title	<input type="checkbox"/> Mr	<input type="checkbox"/> Mrs	<input type="checkbox"/> Ms	<input type="checkbox"/> Other
Surname?				
Other names?				

3. Contact details

Current contact/ mailing address?			
Email address			
Telephone number			
Tick preferred contact method:	<input type="checkbox"/> Letter	<input type="checkbox"/> Email	<input type="checkbox"/> Telephone

4. Complaint details

Have you lodged a complaint about this issue before?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
	If yes, when:	

5. Complaint summary

When did it happen	
Where did it happen	
Who was involved	
What happened (details of your complaint)	

What would you like to happen to resolve your complaint?

List any documentation you have that supports your complaint (attach copies of the documents to this Form)

6. Acknowledgement

All the information provided above is true and correct to the best of my knowledge.

Signature of complainant		Date	
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7. Privacy notice

We will only use the information collected on this Form to resolve your complaint and access will only be provided to authorised officers.

8. Office use only

Complaints Officer			
Signature		Date	
Complaint lodged	<input type="checkbox"/> Telephone	<input type="checkbox"/> In person	<input type="checkbox"/> In writing

Notes



SCHEDULE 2
COMPLAINTS REGISTER

Reporting Period			Quarter 1		
S/N	Date	Complainants' information	Nature of Complaint	Status & Date of Resolution	Comments

I certify that I have taken steps to satisfy myself and, therefore, believe that the above information is accurate and complete for the period indicated.

CHIEF EXECUTIVE OFFICER/DIRECTOR		COMPANY SECRETARY	
NAME		NAME	
SIGNATURE		SIGNATURE	
DATE		DATE	