



COMPLAINT MANAGEMENT POLICY

REVISION HISTORY

REVIEW DATE	NAME OF REVIEWER	SECTIONS IMPACTED	APPROVED BY

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1 INTRODUCTION

The objective of this policy is to assist AFRINVEST and its employees in resolving complaints in an efficient, effective and professional manner.

A complaint under this policy is defined as follows:

An expression of dissatisfaction, made either orally or in writing, related to its product, the standard of service, actions or inaction by Afrinvest Asset Management Limited ("Afrinvest" or the "Company") affecting an individual customer or group of customers.

The following will not be registered as complaints:

- a. A request for service
- b. A request for information
- c. A negative feedback

In this document, Self-Regulatory Organization means the Fund Managers Association of Nigeria.

2 PURPOSE

AFRINVEST aspires to the maintain its reputation as a world class asset management delivering quality professional investment services. The Policy is designed to provide guidance on the mode in which Afrinvest receives and handles complaints made against the Company and its employees.

3 GUIDING PRINCIPLES

Adherence to the guiding principles as outlined in ISO 10002, should be considered for effective handling of complaints.

3.1 Visibility

Our complaint management policy is available on the website and internally to Clients, employees and other interested parties.

3.2 Accessibility

Our complaint management policy is accessible to all clients and employees. The complaint handling process is easy to understand.

3.3 Responsiveness

Receipt of each complaint will be acknowledged to the complainant immediately and complaint will be addressed promptly in accordance with their urgency.

3.4 Objectivity

Each complaint is addressed in an equitable, objective and unbiased manner through the complaints-handling process.

3.5 Charges

There will be no charge to the complainant for making a complaint.

3.6 Confidentiality

Personal identifiable information of the complainant will be actively protected from disclosure unless the client or complainant expressly consents to its disclosure.

3.7 Customer-focused approach

Our focus at Afrinvest is to ensure clients satisfaction comes first. The Company is open to complaints and committed to resolving complaints in efficient and fair manner.

3.8 Accountability

All employees of Afrinvest accept responsibility for effective complaints handling. All issues raised in the complaints handling process will be reflected in affected employee performance evaluation.

3.9 Continual Improvement

Our complaints management policy will be reviewed at least annually, to improve the effectiveness and efficiency of the complaints-handling process.

4 HANDLING A COMPLAINT

4.1 How A Complaint May Be Made

Complaints should be in writing detailing the nature of the complaint and signed by the complainant. Complaints can also be sent to the Company by filling the Complaint Form (Schedule 1) attached to this document. Telephone and verbal complaints will be acted upon. However, the complainant should within 24 hours of making the verbal complaint confirm same in writing.

All complaint should be addressed to:

The Complaints Officer
Afrinvest Asset Management
27, Gerrard Road
Ikoyi
Lagos State
Nigeria
email: Complaints@afriinvest.com

4.2 Information Required When Making A Complaint

- Your name and contact details
- Your relationship with Afrinvest (Customer or non- customer)
- The nature of the complaint
- Details of Afrinvest employee involved (If applicable)
- Copies of any documentation which supports your complaint.

4.3 Procedure for Handling A Complaint

The procedures described below outline the processes which will be followed by Afrinvest in ensuring Complaints are resolved in an effective and fair manner.

- I. We shall acknowledge receipt of complaints received by email within two (2) working days. Where complaints are received by post, we shall respond in writing within five (5) working days of the receipt of the complaint. Copies of the complaint and the acknowledgement letter shall be forwarded to the SRO.

- II. All complaints received will be accessed in terms of criteria such as severity, safety, complexity, impact and the need and possibility of immediate action. This will be forwarded to the best personnel to deal with it.
- III. All complainants will be provided with a written response with respect to their complaints not later than 10 (ten) working days from receipt of the complaint. The SRO shall be notified of the resolution of the complaint within two (2) working days.
- IV. Where a complainant is dissatisfied with the proposed decision or action, the complainant has the right to ask for reconsideration of the response by the Complaints Officer. Such a request should be made in writing and forwarded by post or email to the address provided above.
- V. Where the complaint is not resolved within the given timeframe, the complainant or officers of the Complaint Unit shall refer the matter to the SRO for resolution within 2 (two) working days from the expiration of the period stated in item III above. A summary of the proceedings of resolution together with relevant supporting documents shall accompany the letter of referral sent to the SRO.
- VI. All complaint referred to the SRO shall be resolved not later than 20 (twenty) working days from receipt of the complaint.
- VII. Where Afrinvest or and the Complainant is not satisfied with the decision of the SRO, the matter shall be referred to the Securities & Exchange Commission for resolution not later than 2 (two) working days from the date of the SRO's final decision. A summary of the proceedings of resolution together with relevant supporting documents shall accompany the letter of referral sent to the regulatory body.

5 CONTROL

Resolved complaints or responses to complaints will be monitored to ensure complaints are handled objectively.

Periodic review of the complaints handling process will be carried out to assess:

- the conformity of complaints handling process with the company's policy
- the extent to which complaints-handling procedures are being followed
- strengths and weakness of the complaints handling process, and
- opportunities for improvement in the complaints-handling process and its outcome

SCHEDULE 1
CUSTOMER COMPLAINT FORM

Details of Complainant

Name _____

Address: _____

Telephone No: _____

E-mail Address: _____

Nature of Complaint

What actions would you like taken to effectively deal with this complaint?

Additional Comments (if any): _____

Complainant's Signature & Date: _____

Received By: _____

Signature & Date: _____

*** By signing this form, you affirm the information provided is truthful and accurate.*