

COMPLAINTS MANAGEMENT POLICY



OF

COURTEVILLE BUSINESS SOLUTIONS PLC

Table of Contents

1.	Definitions	3
2.	Introduction	3
3.	Objectives.....	3
5.	Scope.....	4
6.	Roles and Responsibilities	4
7.	Steps in the Complaints Management Process	4
8.	Electronic Complaints Register.....	5
9.	Contact details of the Company Secretary	6
10.	Communication of this Policy	6
11.	Review of this Policy	6

1. Definitions

In this Policy, unless the context otherwise requires;

Terms	Definition
“CBSPLC” or “the Company”	Courteville Business Solutions Plc
“Competent Authority”	Self Regulatory Organizations (SROs) and recognized Capital Market trade associations
“NSE”	The Nigerian Stock Exchange
“SEC”	The Securities and Exchange Commission

2. Introduction

The Company is committed to providing excellent service to all our shareholders. Our aim is to continuously improve our service to ensure we are meeting their needs and expectations of our stakeholder and to encourage feedback on our performance. This Policy provides comprehensive guidelines for the management of complaints against the Company by clients/customers or other companies, shareholders, stakeholders.

We recognize that complaints and compliments provide unique information about the quality of service our shareholders receive. The management of a complaint provides the opportunity for complainants to have their issues resolved promptly and efficiently ensures that any identified risks are managed appropriately, and that action is taken to minimise or eliminate those risks.

The Company has therefore issued this Complaint Management Policy (“The Policy”) in line with the requirements of the Securities & Exchange Commission's Rules Relating to the Complaints Management Framework of the Nigerian Capital Market (“SEC Rules”) issued on 16th February, 2015 and the Nigerian Stock Exchange's Directive (NSE/LARD/LRD/CIR6/15/04/22) to all Listed Companies (“the NSE Directive”) issued on 22nd April, 2015.

3. Objectives

The objectives of this Complaints Management Policy are to:

1. Assist the Company with the timely and effective management of complaints.
2. Establish a standard approach to complaints handling including the establishment of performance indicators to monitor compliance.
3. Ensure that the relevant employees of the Company and our Registrar are aware of their responsibilities and are empowered to manage complaints
4. Ensure that complaints and enquiries from the Company's shareholders are managed in a fair, impartial and efficient timely manner.

4. Principles

This Complaints Management Policy is underpinned by the following guiding principles:

The management of the Company is committed to providing quality service to all our shareholders.

- Shareholders are encouraged and enabled to provide feedback about the service they receive from the Company and our Company secretary.
- All complaints are acknowledged and responded to promptly.
- All complaints are dealt with in a manner that is effective, complete, fair to all parties and provides just outcomes.
- Complaint information is openly communicated while protecting confidentiality and personal privacy.
- All complaints are recorded to enable review of individual cases and report on aggregated complaints information.
- Our Complaint Management Policy and practices are regularly evaluated, and the information is used to improve services.

5. Scope

5.1. This Policy shall apply to issues, enquires or complaints from shareholders and other stakeholders to the Company or the Company Secretary.

5.2. Manner of making a complaint

All complaints shall contain at minimum the following;

- Name of complainant
- Full address
- Phone number
- E-mail address
- Signature of the Complaints
- Date of the complaint
- Nature/description of complaints

5.3. The under listed complaints are not covered by this policy

- a. Complaints that are incomplete or not specific.
- b. Allegations without supporting documents.
- c. Offering suggestions or seeking guidance or explanation.
- d. Seeking explanation for non-trading of shares or illiquidity of shares.
- e. Not satisfied with trading price of the shares of the Company.
- f. Non-listing of shares of private offers of securities by private companies

6. Roles and Responsibilities

6.1. The Company Secretary

The Company Secretary shall be the first point of call for all shareholders' issues and complaints and shall ensure that these are attended to courteously, promptly and efficiently.

The Company Secretary has ultimate responsibility for ensuring that shareholders' and stakeholders complaints are received and attended to in a timely and efficient manner and shall ensure that all employees of the Company charged with the implementation of this Policy discharge their responsibilities efficiently and in a timely manner.

7. Steps in the Complaints Management Process

7.1. Complaints and enquiries by shareholders or stakeholders may be made as

follows:

- a. Contact the Company Secretary: Shareholders or stakeholders who wish to make a complaint/ enquiry shall in the first instance contact the Registrar. The Registrar manages all the registered information relating to all shareholdings, including shareholder name(s), shareholder address and dividend payment instructions amongst others.

Upon receipt of a complaint or an enquiry, the Company Secretary shall immediately provide the relevant details of such complaint or enquiry to CBSLC for monitoring, record keeping and reporting purposes.

In resolving complaints or enquires, the Company Secretary shall be guided by the timelines stipulated in clause 6 (c-f) of this Policy.

7.2. Where a complaint or an enquiry is sent to CBSPLC directly, the Company upon receipt of the complaint or enquiry, shall use its best endeavours to ensure that:

- a. relevant details of the complaint or enquiry are immediately recorded.
- b. a response is provided by the Company or the Registrar within the time frame set out in sub-clauses c-f below.
- c. complaints or enquiries received by e-mail are acknowledged within two (2) working days of receipt.
- d. complaints or enquiries received by post are responded to within five (5) working days of receipt.
- e. all other complaints or enquiries are resolved within ten (10) working days of receipt.
- f. The NSE and the SEC will be notified, within two (2) working days, of the resolution of a complaint or enquiry.
- g. Where the complaint is not resolved within the given timeframe, it shall be referred to the relevant Competent Authority 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.
- h. All complaints lodged at first instance with the relevant Competent Authority shall be resolved within twenty (20) working days.
- i. For all complaints that are not resolved, the outcome shall be referred to SEC within twenty (20) working days.
- j. Where there is no relevant Competent Authority, the complaint shall be referred to the Securities and Exchange Commission 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.

8. Electronic Complaints Register

8.1 The Company shall maintain an electronic complaints register.

8.2 The electronic complaints register shall include the following information:

- The date that the enquiry or complaint was received.
- The date that the complaint was received.
- Details of the complainant (including name, address, telephone number, e-mail address).
- Nature and details of the complaints.
- Details of steps taken to resolve the complaints.
- Status of the complaints.
- Date of the resolution of the complaints

9. Contact details of the Company Secretary

The Company Secretary

Jackson, Etti & Edu
3-5 Sinari Daranijo Street
Off Ajose Adeogun
Victoria Island, Lagos

Tel: + 23414626841/3

Email: jacksonettiedu@jacksonettiandedu.com

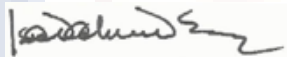
10. Communication of this Policy

This Policy shall be communicated as follows:

- The Policy shall be available on CBSPLC's website (<http://www.courtevillegroup.com/>).
- A shareholder may request a copy of this by contacting the Office of the Company Secretary.
- The Policy shall be made available for perusal at General Meetings of the Company

11. Review of this Policy

This Policy may be reviewed from time to time by management and all changes, amendments or subsequent versions of this Policy will be published on Courteville Business Solutions Plc website (<http://www.courtevillegroup.com/>).



Dr. Adebola Akindele
Group Managing Director



Jackson, Etti & Edu
Company Secretary

JACKSON, ETTI & EDU
Company Secretaries