



**Oando**

OANDO PLC

COMPLAINT MANAGEMENT POLICY

## COMPLAINTS MANAGEMENT POLICY

### 1. Introduction

- 1.1 Oando Plc. (the "Company") is committed to providing the highest standards of services to its Stakeholders in line with the Oando Quality Policy Statement.
- 1.2 The Company acknowledges that complaints are a common occurrence in all Stakeholder business engagements. The Company further recognizes the right of any person covered under this Policy to raise an issue or make a complaint in the course of their dealings with the Company and shall ensure that their complaints are dealt with in an efficient, responsive, impartial and courteous manner.
- 1.3 This Policy will complement the Company's Whistle Blowing Policy which provides a broader framework for employees and other stakeholders to report unlawful conduct, financial malpractice, harassment or misbehavior at work or an actual or potential infraction of the company's policies and business principles or danger to the public or the environment.

### 2. Regulatory Framework

This Policy is issued in compliance with the provisions of:

- a. the Investment and Securities Act 2007 (ISA);
- b. the Security and Exchange Commission ("SEC") Rules and Regulations 2013; and
- c. Rules Relating to the Complaints Management Framework of the Nigerian Capital Market released by the Securities and Exchange Commission in February 2015.

### 3. Scope and Objective of the Policy

The key objective of this Policy is to provide information about the framework for handling complaints relating to the Company. The Policy will:

- provide a fair complaints procedure which is clear and easy to follow by any Complainant wishing to make a complaint;
- document and publicise the existence of our complaints procedure so that Stakeholders know what to do when they have a complaint.

- make sure that all complaints are investigated fairly and in a timely manner.
- make sure that complaints are, wherever possible, resolved and that relationships are appropriately managed.

#### 4. Definitions

<b>Complaint</b>	<p>A written expression of dissatisfaction (justified or not) made to the Company, relating to an act or omission of the Company covered under the Investment and Securities Act 2007, Securities and Exchange Commission Rules; NSE Listing Rules for which a response or resolution is expected.</p> <p>For the avoidance of doubt, the following shall not constitute a complaint under this Policy:</p> <ol style="list-style-type: none"> <li>a request for information, clarification of service offered or provided;</li> <li>a complaint against any of the Company's unlisted, delisted, wound up or liquidated subsidiaries or affiliates;</li> <li>a request for explanation(s) for non-trading of shares or illiquidity of shares;</li> <li>dissatisfaction with the trading price of the shares of the Company;</li> <li>Complaints whose subject matter are being investigated by competent persons or have been or are currently the subject of legal proceedings.</li> <li>complaints that are not covered under the ISA, SEC Rules, NSE and/or within the purview of other regulatory bodies;</li> </ol>
<b>Complainant</b>	A person, organization or their legal representative who makes a complaint
<b>Competent Authority</b>	Means Self-Regulatory Organizations (SROs) and recognized Capital Market Trade Associations
<b>CMO</b>	Capital Market Operators as defined under ISA
<b>NSE</b>	Nigerian Securities and Exchange Commission
<b>Stakeholder</b>	A shareholder and/or an investor of Oando Plc; including their legal representatives.
<b>SEC</b>	Security and Exchange Commission
<b>SROs</b>	Self-Regulatory Organisations (SROs)

#### 5. Complaints Handling Responsibility

- 5.1 The Chief Compliance Officer & Company Secretary (CCO&CS) shall be responsible for handling all complaints received from complainants. In this context, complaints should be in writing and addressed to any of the following:

- (a) The Chief Compliance Officer & Company Secretary  
Oando Plc

2, AJose Adeogun Street  
Victoria Island  
Lagos

- (b) Head, Investor Relations  
2, AJose Adeogun Street  
Victoria Island  
Lagos.

- (c) Head, Corporate Communication,  
2, AJose Adeogun Street  
Victoria Island  
Lagos.

E-mail: [complaint@oandopl.com](mailto:complaint@oandopl.com)

- 5.2 The CCO&CS shall be responsible for ensuring that the proper process for managing complaints is followed and for monitoring compliance.
- 5.3 The CCO&CS shall designate a Governance Officer to assist him /her in the discharge of these responsibilities.
- 5.4 A copy of this Policy shall be made freely available on the Company website.

## 6. Compliance Handling Procedure

### 6.1 Receipt and Acknowledgment

- 6.1.1 Upon receipt of a Complaint, the Complaint will be recorded in the Electronic Complaints Register by the Governance office.
- 6.1.2 Receipt of an electronic Complaint via email shall be acknowledged as soon as possible (not exceeding 2 (two) working from the date of receipt), whilst a Complaint received by post shall be acknowledged within 5 (five) working days of receipt.
- 6.1.3 Where a Complaint is resolved within the timeframe for acknowledging complaints as set out in paragraph 6.1.2 above, and a response containing the

decision regarding the complaint sent to the Complainant, this will be deemed to be sufficient acknowledgment and resolution of the complaint.

6.1.4 Sufficient records of complaints received by email and the respective email acknowledgement shall be made available to NSE on a quarterly basis. Records for complaints received and resolved via a physical or post office box addresses shall also be sent to the NSE on a quarterly basis. Evidence of posting a response to the complainant shall be deemed sufficient proof that the complaint received attention from the company.

## 6.2 Resolving a Complaint

6.2.1 The CCO&CS shall have the capacity to investigate and take all reasonable steps to resolve complaints and to implement appropriate remedies as may be required.

6.2.2 Upon resolution of a complaint, the outcome shall be communicated to the Complainant and the Governance Officer shall record the decision in the Complaint Register.

6.2.3 Where a complainant is dissatisfied with the decision reached by the Company, the complainant, may, if he/she so wishes, refer the complaint to a Competent Authority.

## 6.3 Timing of Complaint Resolution

6.3.1 All complaints received shall be resolved and a final response sent to the Complainant within 10 (ten) business days of it being received by the Company and the NSE shall be notified of the resolution of the complaint within two (2) working days following the date the response was sent to the Complainant.

6.3.2 Where the Company is unable to resolve a particular complaint within the timeline stipulated above, the complainant shall have a right to refer the complaint to a Competent Authority.

## 7. **Complaints Record Management**

7.1 The Company shall maintain a Complaints Register which shall be in electronic form. The Complaints Register shall contain the following details:

- i. Name of the Complainant;
- ii. Date the complaint was received;
- iii. Nature of the complaint;
- iv. Summary of the complaint;

v. Decision/resolution made.

7.2 Copies of letters, memos sent including any update letters, acknowledgment letters, and response/resolution documents shall form part of the complaint management record that shall be kept in accordance with the Oando Document Management Policy.

#### 8. Malicious Complaints

Any improper use of the Complaint process by way of malicious accusations shall not be tolerated and appropriate actions shall be taken within the confines of the law.

#### 9. Confidentiality

The identity of Complainants shall be kept strictly confidential except where the concern raised is of a criminal nature and requires legal proceedings. However, the Company will to the best of its ability ensure that the Complainant is protected from any form of retaliation, victimization or retribution.

#### 10. Monitoring and Reporting

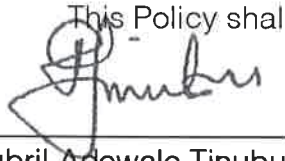
The CCO&CS shall monitor the resolution status of all complaints and shall provide a quarterly report of complaints received and their status, independently verified by the Internal Audit, to the Group Leadership Council of the company. The report shall serve as a monitoring tool which shall enable management monitor the effectiveness of the Company's complaint-handling procedures, other related policies and/or procedures and identify relevant trends (if any) which could indicate areas for future focus or improved performance.

#### 11. Publicity


This Policy shall be published on the Company's website together with details of the contact person(s) mentioned in section 5 above and the procedure described under section 6 above.

#### 12. Commencement Date

This Policy shall come to force on the 30th day of November 2015.



Jubril Adewale Tinubu  
Group Chief Executive



Ayotola Jagun (Ms.)  
Chief Compliance Officer & Company Secretary