



1. Overview

1.1 Introduction

FCMB Group Plc. (FCMB) is a non-operating financial holding company incorporated in 2012 with four wholly-owned operating entities, namely First City Monument Bank Limited (Bank), FCMB Capital Markets Limited, CSL Stockbrokers Limited (CSLS) and CSL Trustees Ltd. The subsidiaries are in banking, stock brokerage, investment advisory and trustee businesses.

FCMB's breadth of expertise covers corporate and investment banking including advisory and capital markets, asset finance, corporate finance, research, stockbroking and custody services. Personal and business banking is the retail arm of the Group's business. It provides services to customers in personal markets, high net worth individuals and commercial, small and medium scale enterprises. Products include mortgage lending, asset finance, card products, lending, etc.

1.2 Policy Statement

FCMB is committed to handling complaints in a prompt, responsive, effective, efficient, fair and consistent manner

1.3 What is a complaint?

In this Policy, a complaint is defined as an expression of dissatisfaction made to FCMB, in relation to its products and services, or the complaints management process itself, where a response is explicitly or implicitly expected.'

2. Complaints Management Objectives & Principles

2.1 Objectives

The key policy objectives are to:

- a) ensure consistency when managing complaints and comments;



- b) give guidance, confidence and support to FCMB staff with regards to appropriate complaints management;
- c) ensure FCMB observes all regulatory and procedural requirements in relation to information received through complaints and comments;
- d) give confidence to stakeholders and members of the public that their concerns are dealt with in a fair and appropriate manner;
- e) ensure appropriate confidentiality is maintained;
- f) maximise the value of comments and complaints to FCMB as an information source to improve product and service delivery;
- g) the greatest extent possible address causes of complaints; and
- h) deliver high standards of service in relation to matters involving complaints and comments.

2.2 Complaint Management Principles

FCMB staff will follow the guiding principles of effective complaints management as set out in the table below in addressing complaints received:

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| Visibility | To maintain a transparent approach to management of complaints by publishing the Policy on a publicly available section of the FCMB website. |
| Accessibility | To ensure that the Policy is readily accessible to staff, clients and other stakeholders, with proper guidance on lodgment of complaints. |
| Responsiveness | To ensure, fair, prompt and efficient response to complaints. |
| Objectivity | To ensure procedural fairness , consistency and effectiveness in complaints management |
| Charges | Response to complaints shall be at no cost to the complainants. |
| Confidentiality | To maintain a high standard of confidentiality unless permission is expressly given for the identification of the complainant or non-identification of the complainant would be inappropriate in the regulatory context |
| Customer-focused approach | To ensure proper feedback to complainants and commitment to resolving complaints. |
| Accountability | To appoint a designated Complaint Officer specifically for the management of the Policy. |



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| Continual improvement | To maintain best practice in relation to complaints management by regularly reviewing and updating the Policy as the need arises. |
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3. Scope of the Policy

This Policy shall apply to complaints made in respect of the following:

- a. clients or other operators
- b. shareholders/public
- c. shareholders or investors

However, the policy shall not cover complaints in respect of the following:

- a. complaints that are incomplete or not specific
- b. allegations without supporting documents
- c. offering suggestions or seeking guidance or explanation
- d. explanation for non-trading of shares or illiquidity of shares
- e. non-satisfaction with trading price of the shares of the companies
- f. non-listing of shares of private offers of securities by private companies
- g. complaints on behalf of individuals or businesses to resolve complaints with any of FCMB's counterparties
- h. determination of the occurrence or otherwise of a breach of the legislation, or provide individuals or businesses with legal advice
- i. complaints made by way of negative feedback, which may not require a resolution or formal follow-up
- j. general matters and requests handled by FCMB in the course of its day-to-day, unless the stated intention of the complainant
- k. matters that are sub-judice or in arbitration
- l. complaints falling outside the purview of the Securities and Exchange Commission.



4. Complaint Making Process

4.1 How a complaint can be made

Where a complaint is about a particular FCMB product or service for which the complainant has an existing FCMB contact, the complainant may wish to address the complaint to that contact orally, by letter, email or fax.

The complainant may also refer the complaint directly to a designated Complaints Officer who shall be a staff of the Group Internal Audit Department of FCMB.

The Complaints Officer
FCMB Group Plc.
P.O.Box 9117, Lagos.
Email: complaints@FCMB.com

4.2 Relevant information from the complainant

To enable FCMB provide adequate response when the complainant makes a complaint, the complainant should:

- a) consider accessing information and publications on FCMB website before contacting FCMB;
- b) provide accurate and complete information and where possible supporting documentation, including:
 - i. Complainant's name, position and contact details including telephone number and email addresses;
 - ii. Complainant's relationship with FCMB;
 - iii. Complainant's contact person within FCMB (if applicable);
 - iv. the nature of the complaint;
 - v. the signature of the complainant where applicable.

