FIDELITY FINANCE COMPANY LIMITED

(A Member of the Nigerian Stock Exchange)

COMPLAINTS HANDLING PROCEDURE FOR NEW CLIENTS

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1. Purpose

The purpose of this procedure is to ensure that all complaints received from clients are handled promptly, fairly, transparently, consistently, and in accordance with the Company's approved Complaints Management Framework and applicable regulatory requirements.

The procedure forms part of the Company's Client Account Opening Procedure and ensures that new clients are adequately informed of their rights and the channels available to them for lodging complaints.

2. Scope

This procedure applies to all new and prospective clients of the Company and covers complaints relating to, but not limited to:

- Account opening and documentation;
- Client identification and verification;
- Trading activities and execution of transactions;
- Settlement of transactions;
- Account balances and statements;
- Charges, commissions and fees;
- Unauthorized or disputed transactions;
- Delays in processing client instructions;
- Staff conduct or service delivery;
- Access to client information or account records; and
- Any other service or activity provided by the Company.

3. Client Notification at Account Opening

At the point of account opening, every new client shall be informed of the Company's complaints handling process.

The client shall be provided with information on:

1. The Company's available channels for submitting complaints;
2. The information required when making a complaint;
3. The expected acknowledgement and resolution process;
4. The client's right to receive feedback on the status of the complaint;
5. The client's right to escalate an unresolved complaint to the appropriate regulatory authority where applicable; and
6. The Company's commitment to handling complaints fairly and without retaliation.

The client shall acknowledge receipt and understanding of the complaint's procedure as part of the account opening documentation.

4. Channels for Lodging Complaints

Clients may submit complaints through any of the Company's approved channels, including:

- ❖ Written complaint submitted at the Company's office; 3rd Floor, Niger Insurance Plaza, 48/50, Odunlami Street, Lagos P.O. Box 3043, Marina-Lagos.
- ❖ Official Company email; info@fidelityfinanceng.com
- ❖ Official telephone/customer service channel; 08023312011, 08138670223
- ❖ Online complaint channel; https://www.fidelityfinanceng.com/

Where a complaint is received verbally, the responsible staff member shall document the complaint and, where necessary, request the client to provide supporting details or documents.

5. Information Required from the Client

To facilitate prompt investigation, the client should provide, where applicable:

- Full name;
- Client/account number;
- Contact details;
- Date of the transaction or occurrence;
- Nature and details of the complaint;
- Transaction reference number, where applicable;
- Relevant supporting documents or evidence; and
- The specific resolution being requested.

Failure to provide complete information shall not automatically prevent the Company from registering and investigating a complaint.

6. Receipt and Registration of Complaint

All complaints received shall be promptly forwarded to the designated officer responsible for complaints management.

Each complaint shall be recorded in the Company's Complaints Register with, at minimum:

- Complaint reference number;
- Date received;
- Client name and account number;
- Nature/category of complaint;

- Staff or department responsible;
- Actions taken;
- Date of acknowledgement;
- Investigation findings;
- Resolution provided;
- Date of resolution; and
- Date of closure.

The complaints record shall be maintained securely and made available for regulatory or internal review when required.

7. Acknowledgement of Complaint

The Company shall acknowledge receipt of a complaint within the period prescribed by its approved Complaints Management Framework and applicable regulatory requirements.

The acknowledgement should include:

- Confirmation that the complaint has been received;
- Complaint reference number;
- The officer/department handling the complaint, where appropriate;
- Any additional information required from the client; and
- An indication of the expected timeline for resolution.

8. Investigation of Complaint

The responsible officer shall conduct an impartial and objective investigation of the complaint.

The investigation may include:

- Reviewing the client's account records;
- Reviewing transaction records and instructions;
- Examining relevant correspondence and communication;
- Obtaining information from relevant departments or staff;
- Reviewing applicable policies and procedures; and
- Obtaining additional information from the client where necessary.

Where a complaint involves a particular staff member, the investigation shall be handled independently and objectively to avoid conflicts of interest.

9. Resolution of Complaint

1. Following investigation, the Company shall communicate the outcome of the complaint to the client.
2. Where the complaint is upheld, the Company shall take appropriate corrective action and, where applicable, provide the appropriate remedy to the client.
3. Where the complaint is not upheld, the Company shall provide the client with a clear explanation of the basis for the decision.
4. All resolutions shall be properly documented in the Complaints Register.

10. Escalation of Complaints

1. Where a complaint cannot be resolved at the initial level, or where the client is dissatisfied with the resolution provided, the complaint shall be escalated in accordance with the Company's Complaints Management Framework.
2. Where applicable, the client shall be informed of the appropriate regulatory or external escalation channel available to them, including the relevant capital market regulatory authority.
3. The Company shall not prevent or discourage a client from exercising their legitimate right to escalate a complaint.

11. Complaints Involving Regulatory, Legal or Compliance Issues

Complaints that involve suspected:

- Fraud;
- Unauthorized transactions;
- Money laundering or terrorist financing concerns;
- Breach of regulatory requirements;
- Misconduct by staff;
- Material financial loss;
- Conflict of interest; or
- Potential legal action

shall be immediately referred to the Compliance Officer and/or Management, as appropriate.

Where necessary, the matter shall be reported to the relevant regulatory or law enforcement authority in accordance with applicable laws and regulatory requirements.

12. Confidentiality and Data Protection

All complaints shall be handled confidentially.

Information relating to a complaint shall only be disclosed to persons who require such information for the purpose of investigating, resolving, supervising, or reporting the complaint, or where disclosure is required by law or regulation.

Client information shall be handled in accordance with the Company's confidentiality, data protection, information security and record-keeping requirements.

13. Protection Against Retaliation

No client shall be subjected to discrimination, intimidation, retaliation, or adverse treatment merely for lodging a genuine complaint or seeking redress.

Staff shall treat all clients who submit complaints professionally and respectfully.

14. Monitoring and Reporting

The Compliance Officer and/or designated complaints officer shall periodically review complaints received to identify:

- Recurring complaints;
- Systemic weaknesses;
- Operational failures;
- Staff-related issues;
- Potential regulatory breaches; and
- Areas requiring improvement.

Management shall receive periodic complaints reports containing relevant statistics, trends, outstanding complaints, resolutions and recommendations for corrective action.

15. Record Retention

1. All complaints and related documents shall be retained for the period prescribed by applicable laws, regulations and the Company's approved record retention policy.
2. Records shall be stored securely and be readily retrievable for internal audit, compliance monitoring, regulatory inspection or other legitimate purposes.

16. Client Acknowledgement

As part of the account opening process, the client shall confirm that they have been informed of the Company's complaints handling procedure and understand the available channels for submitting a complaint.

The client's acknowledgement shall form part of the account opening documentation.

Client Acknowledgement Statement

I acknowledge that I have been informed of the Company's complaints handling procedure and understand the channels available to me for lodging complaints regarding my account or services provided by the Company. I understand that complaints will be handled fairly, confidentially and in accordance with the Company's approved procedures and applicable regulatory requirements.

Client Name: _____

Account Number: _____

Signature: _____

Date: _____

Authorized Staff: _____

Signature: _____

Date: _____

17. Review of Procedure

This procedure shall be reviewed periodically by the Compliance Officer and/or relevant responsible officer to ensure that it remains consistent with the Company's operations, approved Complaints Management Framework and applicable regulatory requirements.

Any material amendment shall be subject to the Company's applicable approval process before implementation.