FIDELITY FINANCE COMPANY LIMITED

(A Member of the Nigerian Stock Exchange)

COMPLAINTS MANAGEMENT POLICY

Complaints Management Policy

Owner/Issuer: FIDELITY FINANCE COMPANY LTD

Who does this Policy apply to?

Location	Nigeria
Legal Entity	FIDELITY FINANCE COMPANY LIMITED
Business Area	All
Roles	All employees and contractors

Approved by the Board of Directors on 15th April, 2026

Non-adherence to any part of this policy may result in disciplinary action including dismissal.

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1. Complaints Management Policy (Complaints Handling SOP)

1.1 Introduction

We strive to provide a high level of service to our clients but on some occasions, the service we provide does not meet our own high standards and can lead to a customer complaint.

A complaint is defined by NSE Rule 13.4 as a complaint in relation to the provision of services, in which the client alleges that he has suffered, or is likely to suffer financial prejudice as a result of the Dealing Member:

1) Contravening or failing to comply with any instruction given by the client, or any agreement or mandate entered into with the client;
2) Contravening or failing to comply with The Exchange's rules and directives;
3) Acting dishonestly, negligently or recklessly; or
4) Treating the client unreasonably or unfairly

1.2 Objectives

The objectives of this Policy are to:

- Ensure complaints are handled efficiently and fairly
- Provide clear channels for lodging complaints
- Enhance client satisfaction and trust
- Ensure compliance with regulatory obligations

1.3 Policy

In accordance with the requirements of the SEC Rules relating to the complaints management framework of the Nigerian Capital Market and the NSE Rule 13.4, the firm's complaints handling policy is the following:

A. Acknowledge in writing and within two (2) working days, all complaints received by email
B. Acknowledge in writing and within 5 working days, all complaints received by post
C. Resolve all complaints within ten (10) working days of receiving the complaint

1.4 Complaint Channels

Clients may lodge complaints through any of the following channels:

- **Email: info@fidelityfinanceng.com**
- **Telephone:** 08023312011, 08138670223
- **Physical Address:** 3rd Floor, Niger Insurance Plaza, 48/50, Odunlami Street, Lagos P. O. Box 3043, Marina-Lagos

- **Website**: http://www.fidelityfinanceng.com/
- **Written Correspondence:** Letters addressed to the firm

All complaints received through any channel shall be properly recorded and acknowledged.

1.5 Compliant Handling Procedure

The firm's complaint handling procedure is outlined below

1. Acknowledgement
2. Entry in the Complaints Register
3. Investigation
4. Resolution
5. Communication
6. Escalation
7. Monitoring

1. Acknowledgement

All complaints will be acknowledged in writing by the firm within 2 working days for complaints received by email and 5 working days for complaints received by post.

2. Entry in the complaints register

On receipt of a complaint, the firm will record the following details in our complaints register:

- Name of the client and/or complainant
- Contact details
- Date received
- Nature and description of the complaint
- Contact person at the firm

3. Investigation

On receipt of the complaint, the firm will ensure that the complaint is investigated promptly by the compliance officer or, at his direction, a senior member of the firm who is not involved in the subject of the complaint. The compliance officer shall ensure that the complaint is resolved within 10 business days of receipt of the complaint by the firm.

4. Resolution

Complaints that are not resolved within 10 working days must be referred to the NSE within 2 working days after the end of the 10 working days resolution period. A summary of the complaint, resolution attempts and supporting documents must be included.

5. Communication of outcome
   - The firm will provide a copy of the complaints handling procedure to new clients as part of its account opening process;

- The complaints handling procedures will also be displayed on the firm's website.

6. Escalation
    - Unresolved complaints may be escalated internally to senior management.
    - Clients may also escalate complaints to relevant regulators where necessary.

7. Monitoring

The Compliance function will at intervals specified in the firm's compliance monitoring programme, review all complaints recorded in the firm's complaint register to confirm that. there are no unresolved complaints and/or that the complaints handling procedure had been adhered to. The Board of Directors will also be provided with a quarterly compliance report on complaints covering the following:

- Number of complaints received and by subject matter
- Number of complaints resolved within 10 business days
- Number of complaints not resolved and forwarded to the NSE
- Trend analysis of the complaints

1.6 Regulatory Reporting

The firm shall report complaints in line with regulatory requirements to:

- **NASD OTC Securities Exchange**
- **NGX Regulation Limited (where applicable)**
- Any other relevant regulatory authority

Periodic reports shall include:

- Number of complaints received
- Nature of complaints
- Resolution status

1.7 Quarterly complaints reporting to the NSE

The Compliance Officer shall, on behalf of the firm, forward to the NSE every quarter, the following information:

- Complaints received within the quarter
- The complaints by subject matter
- Complaints resolved within the 10 business days' time frames
- Complaints not resolved within 10 business days and forwarded to the NSE within 2 business days

1.8 Record keeping

All records relating to a customer complaint will be kept for a minimum of 5 years after the end of the business relationship.

Standard Information

1. Definitions and Glossary

Complaint: Any expression of dissatisfaction by a client regarding the firm's services
Complainant: Individual or entity lodging a complaint
Resolution: Final outcome of a complaint after investigation
Escalation: Process of referring unresolved complaints to higher authority

2. Related Documents

- ✓ NSE's Minimum Operating Standards
- ✓ NSE's Rulebook
- ✓ SEC 2013 Consolidate Rules
- ✓ SEC Complaint Management Rules
- ✓ Investment and Securities Act 2007

Annex

Annex 1: Sample Complaint Form

- Name:
- Contact Details
- Nature of Complaint
- Date of Incident
- Supporting Documents

Annex 2: Escalation Matrix

Level	Responsible Officer	Timeline
Level 1	Customer Service	2 days
Level 2	Compliance Officer	5 days
Level 3	Management	10 days

Annex 3: Complaints Register

- Date of Receipt
- Client Name
- Account No.
- Nature
- Channel
- Status
- Resolution.

EXTRACT OF THE MINUTES OF THE MEETING OF THE BOARD OF DIRECTORS OF FIDELITY FINANCE COMPANY LIMITED. HELD ON 15th April, 2026 at BOARDROOM

AGENDA: CONSIDERATION AND APPROVAL OF POLICIES

The Board considered the need to strengthen the Company's governance, operational, and compliance frameworks in line with applicable regulatory requirements. The following policies were presented for review:

- Complaints Management Framework
- Policy on Trading Operations & Systems
- Staff Recruitment Policy
- Business Continuity Plan & Technical Infrastructure
- Account Opening Procedure

The Board noted that the policies had been circulated prior to the meeting for review and deliberation.

RESOLVED THAT:

The Board hereby approves and adopts the above-listed policies as the official policies of the Company, and Management is authorized to implement and ensure compliance with their provisions across all relevant units of the Company.

There being no further business, the meeting was adjourned.

Osa Osunde,
Chairman

Kenneth Emenua,
Company Secretary

Date: 15th April, 2026