



THE COMPLAINTS MANAGEMENT POLICY

OF THE

NIGERIAN AVIATION HANDLING COMPANY PLC

(COMPLAINTS RELATED TO CAPITAL MARKETS OPERATIONS 2015)

1. **PREAMBLE**

This Complaint Management Policy ("the Policy") has been established pursuant to the Rules of the Securities & Exchange Commission ("SEC") on the Complaints Management Framework of the Nigerian Capital Market ("Framework") released on 16th February 2015 and also on the directive of the Nigerian Stock Exchange ("the NSE") contained in its Circular No. NSE/LARD/LRD/CIR6/15/04/22 issued on 22nd April 2015 to all listed Companies.

2. **OBJECTIVE**

This policy has established procedure to address the complaints of shareholders of The Nigerian Aviation Handling Company Plc ("NAHCO") efficiently, fairly, impartially, objectively and timeously. It also provides the opportunity for NAHCO's shareholders to have feed-back on matters that affect shareholders.

This policy only relates to shareholders and does not extend to NAHCO's customers, suppliers and other stakeholders.

3. **PROCEDURE FOR HANDLING SHAREHOLDER COMPLAINTS**

Any shareholder who wishes to make any complaints with respect to his/ her shareholding may do so in the following Manner:

- i. **Contact the Registrar:** Shareholders' complaint shall in the first instance be directed to the Registrar of NAHCO. The Registrar maintains / manages NAHCO's register of members / shareholders. Upon receipt of a complaint, the Registrar shall handle and resolve it and immediately provide the relevant details of such complaint to NAHCO for record keeping, monitoring and reporting purposes.

In resolving complaints or enquiries, the Registrar shall be guided by the timelines provided in Clause 3 (iv - vi) of this Policy.

- ii. **Contact NAHCO's Company Secretariat / Office of NAHCO's Company Secretary:** Where the Registrar is unable to satisfactorily resolve the complaints, the shareholders' may lodge their complaints with NAHCO's Company Secretary who will in turn record and refer the complaints to the Registrar and monitor their handling and resolution.
- iii. All shareholders complaint's shall disclose the material facts of the complaints with supporting documents and shall also state the complainant's names, full address, Phone numbers, email address, signature and date.

- iii. All complaints received by e-mail shall be acknowledged within two (2) working days of receipt.
- iv. All Complaints received by post shall be responded to within five (5) working days of receipt.
- v. All Complaints shall be resolved within ten (10) working days of receipt.
- vi. Where a complaint cannot be resolved within the stipulated time frame set out above, the shareholder shall refer the complaint to SEC within two (2) working days. The referral shall be accompanied by a summary of proceedings of events leading to the referral and copies of the relevant supporting documents.

4. **ELECTRONIC COMPLAINTS REGISTER**

NAHCO shall keep and maintain an Electronic Complaints Register which shall contain the following details:

- i. Name of complainant.
- ii. Date of complaint.
- iii. Nature of complaint.
- iv. Complaint details in brief.
- v. Remarks / comments.

NAHCO shall update its complaints register monthly and forward status reports of complaints filed by shareholders to SEC quarterly.

5. **COMPLAINTS RECEIVED DIRECTLY BY NAHCO**

Where a complaint is sent to NAHCO directly, NAHCO shall upon receipt of the complaint use its best endeavors to ensure that:

- i. Relevant details of the complaint are immediately recorded.
- ii. A response and subsequent resolution are achieved within the timelines set out in Clauses 3 (iv-vi) above.
- iii. Where the complaint cannot be resolved within the time frames set out in this policy, the Shareholder shall be notified that the matter is being investigated.

- iv. All shareholders shall be notified in the same manner through which the initial complaint was initiated by the shareholder except where agreed otherwise with the shareholder.

6. **LIAISON WITH NAHCO'S REGISTRAR.**

During the course of investigating a shareholder's complaint, NAHCO may liaise with the Registrar. NAHCO's engagement with the registrars shall be for the purpose of:

- i. Determining the facts;
- ii. Determining what action has been undertaken by the Registrar (if any); and
- iii. Coordinating a response with the assistance of the Registrar.

7. **RELEVANT CONTACTS:**

- i. **The Registrar:** NAHCO's Registrars may be contacted as follows:

CARDINALSTONE REGISTRARS LIMITED
358 Herbert Macaulay Way, Yaba
P.O.Box 9117,
Lagos State, Nigeria
Phone: +234 1 4405107, +234 1 7924462,
email: registrars@cardinalstone.com
Website: www.cardinalstone.com

- ii. **The Company Secretary**
Shareholders seeking to escalate unresolved complaints are invited to contact the Company Secretary as follows:

The Company Secretary/ General Counsel,
Nahco aviance House
Nigerian Aviation Handling Company Plc
Murtala Mohammed International Airport,
Ikeja, Lagos
Telephone: 08023045273
E-mail: f.ode@nahcoaviance.com

8. **SHAREHOLDERS' ACCESS TO THIS POLICY:**

Shareholders shall have access to this policy through the following avenues:

- i. The policy shall be made available on NAHCO's website: www.nahcoaviance.com.

- ii. A copy of the Policy may be requested by contacting the office of the Company Secretary.
- iii. The Policy shall be made available for perusal at the general meetings of the company.

10. Amendment/Review to this Policy

NAHCO may amend/review this policy in accordance with any amendment to the enabling framework. Any changes or subsequent versions of this policy will be uploaded on NAHCO's website.

11. FEES AND CHARGES

As much possible, and subject to statutory requirements, NAHCO shall not charge shareholders for making, giving feedback, or providing a response or for any aspect in the course of resolving any shareholder-related issue.

12. APPROVAL

This Policy was approved by the Chairman, Board of Directors of The Nigerian Aviation Handling Company Plc this 28th day of September, 2015.



.....
DIRECTOR



.....
SECRETARY