

**APT SECURITIES AND  
FUNDS LIMITED  
COMPLAINT  
MANAGEMENT  
MANUAL/POLICY**

## **INTRODUCTION**

The Complaints Management Framework of the Nigeria Capital Market shall address complaints arising out of issues that are covered under the Investments and Securities Act, 2007 (ISA), the Rules and Regulations made pursuant to the ISA, the rules and regulations of Securities Exchanges and guidelines of recognized trade associations.

Therefore, APT Securities and Funds limited has produced this manual based on the recommendation of Securities and Exchange Commission, and shall also adopt the framework issued by SEC. Also covered in this manual is the communication policy of our company.

There shall be a five (5) working days circle for correspondence coming into the organization on complaints by clients and regulators to be responded to. See below the process:

1. Day one (1) Receipt of all forms of correspondence including letters, electronic mails (emails), memos and facsimile (fax) at the front desk by customer service staff or via APT Securities and Funds Limited official email. Such correspondence is registered into mail log and forwarded to the Managing Director accordingly for review.
2. Day two (2), received mails or correspondence are forwarded from the Managing Director to the relevant Executive Manager / Head of unit and Compliance Manager for investigation and further reviews.
3. Day three (3), the Executive Manager / Head of unit / Compliance Manager after investigation, should respond to the letters, electronic

mails (emails), memos and facsimile (fax) after discussing his findings with the Managing Director.

4. Day four (4), signed copy of the response is sent to the respective client, regulator, or any interested party and an acknowledged copy filed accordingly.
5. Day five (5), where no response is available or investigation on the issues raised are still ongoing, Executive Manager / Head of unit should write to the client, regulator or any interested party. In a situation where the deadline cannot be met, a holding reply should be communicated immediately.

*The above is subject to a situation when no particular deadline is given.*

Ensure that all response to complaints is signed by two authorized officials which should include Managing Director and Executive Manager / Head of unit. Proper filing of such letters, electronic mails (emails), memos and facsimile should be done.

APT Securities and Funds Limited shall maintain an electronic Complaints Register. The Complaints Register shall contain the following details:

- i. Name of the complainant
- ii. Date of the complaint
- iii. Nature of complaint
- iv. Complaints details in brief
- v. Remarks/comments
- vi. The Complaints Register shall be up dated monthly.

vii. Status reports of complaints filed with the regulatory entities shall be forwarded to the SEC quarterly.

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**Acceptance Form**

I..... having read the Compliant Management Policy of the APT Securities and Funds Limited; hereby confirm my acceptance of the rules and standards contained therein.

**Signature:** .....

**Dated this..... day of..... 201\_**