

# **THE TOURIST COMPANY OF NIGERIA PLC (RC 3781)**

(Trading as Federal Palace Hotel & Casino, Victoria Island, Lagos)

## **COMPLAINTS MANAGEMENT POLICY**

## 1. Our policy

The Tourist Company of Nigeria Plc (the Company) is committed to providing qualitative services to all our shareholders. If you are a shareholder and are dissatisfied with the Company on any matters relating to shares, shareholding and meetings of members, then please communicate your grievances in writing as soon as possible within five (5) working days of the occurrence of the incident. This will assist us to expeditiously attend to the complaint in a fair, objective and impartial manner, and continually improve our service to you.

## 2. What to do if you have a complaint

2.1 To lodge your complaints, please contact us at the address stated below for the attention of the Company Secretary, detailing the nature of your complaint, all material facts and documents (if any) to support the complaints. We would require you to kindly provide your contact details as follows:

- (a) Full names of the Complainant
- (b) Full contact address
- (c) Mobile numbers
- (d) e-mail address
- (e) A signed and dated Complaint letter

Also please indicate your preferred method of communication from the Company in the complaint letter, e.g. telephone, email or courier, to enable us attend to you promptly.

2.2 Our contact details for receiving your complaints and correspondence are stated below:

Address: The Company Secretary  
IHL Services Limited  
84 Opebi Road  
Ikeja  
Lagos

Email: [muyiwa34@yahoo.com](mailto:muyiwa34@yahoo.com)

## 3. Complaints procedure

3.1 Complaints shall be made by letter or email only.

3.2 All complaints must be lodged in writing in clear English.

3.3 We will acknowledge receipt of your complaint, using your preferred method of communication, within two (2) working days of receipt.

3.4 We aim to resolve every shareholder's complaints within ten (10) working days of receipt of the complaint. The length of time will depend on the issues involved. If it is not possible to reach a prompt conclusion, we will contact you with an explanation, and set out expected timelines by which the complaint lodged should be resolved.

3.5 Should the complaint not addressed in a satisfactory manner, the complainant may lodge a complaint with the General Manager of the Tourist Company of Nigeria Plc using the following address:

Address: The General Manager  
Federal Palace Hotel & Casino  
6-8 Ahmadu Bello Way  
Victoria Island  
Lagos

Email: [TCN\\_GM\\_shareholdercomplaints@suninternational.com](mailto:TCN_GM_shareholdercomplaints@suninternational.com)

3.6 Correspondence will be treated in confidence except where a third party is implicated by your complaint, and for which we need to discuss the details of your issue with the third party in order to reach a satisfactory conclusion.

3.5 Where the shareholder's complaint is not resolved within the given timeframe, the complainant can refer the complaint to the Nigerian Stock Exchange (NSE) two (2) working days thereafter. The letter of referral shall be accompanied by a summary of proceedings of events leading to the referral and copies of relevant supporting documents and the Company should be copied with the letter of referral for record purposes.

3.6 All complaints lodged with the NSE by shareholders are expected to be fully resolved within twenty (20) working days, subject to the discretion of the NSE.

#### 4 Register of Complaints:

4.1 The Company shall maintain an electronic Complaints Register which shall contain the following details:

- ▯ Date of the complaint
- ▯ Complainant's information
- ▯ Nature and details of complaint
- ▯ Status and date of resolution
- ▯ Comments

4.2 The Complaints Register shall be updated monthly.

4.3 Status reports of complaints filed with the Company shall be forwarded to the NSE quarterly.

## **5 Application of the Policy**

All complaints applies to:

- 5.1 Complaints against the Company from shareholders
- 5.2 Complaints against the Company from other public companies and capital market operators.
- 5.3 Complaints against the Company by Regulatory agencies.
- 5.4 Any matter that is sub-judice or in arbitration is excluded from this procedure.

## **6. Type of complaints**

- 6.1 The type of complaints covered by the policy is listed below and only applies to complaints relating to official transactions with respect to a duly registered member's shareholding in the Company such as matters relating to:
  - (a) Public Offers, Rights Issue, Capital Reconstruction, Capital Reorganisation, Bond Issuance, Debentures, Collective Investment Schemes, Mutual Funds, Memorandum Listing; Scheme of Arrangement, Merger, Acquisition, etc.
  - (b) Non-receipt of Offer documents, circulars, certificates, delayed Interest (bonds), delisting pay off;
  - (c) Non- receipt of dividends, Non- receipt of bonus after declaration and approval;
  - (d) Non- receipt of Annual Reports, related party transactions;
  - (e) Transfer and Transmission of shares which the Registrars have failed to implement.
- 6.2 With regards to complaints specifically relating to distribution of annual reports, dividends, bonus, change of name/address, transfer and transmission of shares, all shareholders are expected to have initially contacted and exhausted all necessary measures with the relevant Registrars to provide the necessary assistance, before reporting any of such matters to the Company. All complaints must be genuine, made in good faith, and free of malice, libel, slander or intention to deliberately disparage or harness undue favoritism.

## **7 Complaints by the Company**

- 7.1 The Company may also seek redress and take legitimate action against frivolous and unwarranted complaints against any person or company. All shareholders who may have any official dealings with the Company are also expected to conduct themselves in a professional and ethical manner at all times.
- 7.2 Where any shareholder is found wanting or in contravention of any policy, law or regulation in the course of any official transactions or dealings, the Company or any of its officers also have the right and liberty to lodge complaints with the NSE, Securities and Exchange Commission (SEC) or the relevant Competent Authority designated by the SEC, as applicable.

**8. Distribution of policy**

8.1 The company secretary shall ensure that Company's annual report includes a copy of the policy. The Company's senior management shall ensure the policy is posted on its website.

**9. Consequences for Non-Compliance with this Policy by staff**


9.1 The Company's senior management and the company secretary will be advised of this policy and its importance, and the consequences of failure to apply the policy.

**10. Annual Review of Policy**

10.1 Subject to the final approval of the Executive Management, this policy will be reviewed on an annual basis or as required to ensure compliance with changing regulations or internal policy.

**11. Policy Authorization:**

11.1 This Policy has been reviewed and approved by the Management effective 8 October, 2015 as evidenced by the following authorization:

Name	Position	Signature
Sir RC Hawkins, Bt.	Director	
Mr. OA Adefope	Company Secretary	