



THE TOURIST COMPANY OF NIGERIA PLC

RC3781; TIN No.: 00275919-0001



FEDERAL
PALACE
HOTEL & CASINO
***** VICTORIA ISLAND • LAGOS

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THE TOURIST COMPANY OF NIGERIA PLC

(TRADING AS FEDERAL PALACE HOTEL & CASINO)

COMPLAINTS MANAGEMENT POLICY

1. PREAMBLE

This Policy is an Investor/Capital Markets Complaints Management Policy as required by the Securities and Exchange Commission (SEC), and does not apply to hotel/guest complaints which are governed by hotel operations procedures. TCN recognises that an effective complaints management process is an important element of good corporate governance, shareholder engagement, accountability and continuous improvement. The Company is committed to providing a clear and accessible avenue through which concerns may be raised, considered and appropriately resolved.

2. SCOPE & EXCLUSIONS

For the purpose of this Policy, a complaint means any expression of dissatisfaction or concern about an act, omission, conduct, behaviour, decision or service of the Company or any person acting on its behalf in the course of business, including concerns relating to the standard, quality or adequacy of a service provided to a shareholder/stakeholder.

Complaints may include, but are not limited to: fraud, suppression or suspected financial impropriety; misrepresentation or material service-quality concerns; forgery or suspected falsification of documents; bribery, corruption or conflicts of interest; matters relating to shareholding, dividends, shareholder records or investment in the Company; and other matters determined by Management or the appropriate complaints oversight function.

This Policy applies to the Company, its employees and authorised representatives in relation to shareholder dealings, products and services within the Company's responsibility. It does not apply to:

- matters pending before a court, arbitration, tribunal or other body established by law, where the matter is being determined or investigated through that process;
- matters on which a final decision has already been reached through a formal referral or adjudicatory process;
- complaints that are outside the purview of the Securities and Exchange Commission (SEC);
- complaints against private, wound-up, liquidated or dissolved entities;
- complaints by current employees in their capacity as employees, which shall be dealt with under the Company's applicable employee grievance or disciplinary procedures; and
- any matter which the Company is legally, judicially or regulatorily precluded from entertaining.

3. OBJECTIVE

The objective is to ensure that complainant's enquiries and complaints are handled efficiently, fairly, consistently and promptly, and that complainants have clear access to the appropriate Company or Registrar contact.

4. TCN'S COMMITMENT

- Provide efficient and accessible complainant information and assistance.
- Ensure complainant enquiries and complaints are acknowledged and appropriately addressed.
- Provide sufficient resources for timely investigation and resolution.
- Use complaint information to identify recurring issues and improve complainant's services.

5. HOW COMPLAINANTS MAY LODGE COMPLAINTS

5.1 Registrar

Complainants should initially contact the Registrar on matters relating to their registered shareholding, including shareholder records, dividends, share certificates, transfers/transmissions, changes to particulars and other Registrar-administered services.

5.2 Company Secretary

Where the Registrar is unable to satisfactorily resolve a complaint, the complainant may escalate the matter to the Company Secretary. Complaints may also be submitted directly to the Company Secretary where appropriate.

5.3 Information to be provided

Complaints should include the complainant's name and contact details, relevant shareholder/reference number, details of the complaint, the resolution sought and supporting documents where available.

6. HANDLING OF COMPLAINTS

Upon receipt of a complaint, the Company Secretary or designated officer shall:

- listen to and consider the complaint;
- record the relevant details and supporting documents;
- confirm particulars where the complaint is received by telephone;
- determine the appropriate course of action and, where necessary, refer the matter to the Registrar or relevant Company officer;
- keep the complainant informed of progress where resolution requires additional time; and
- communicate the outcome clearly and concisely.

TCN shall commence investigation within one (1) business day of receiving the complaint and shall aim to provide a response within five (5) business days. Where a response cannot be provided within five (5) business days, the complainant shall be notified that the matter remains under investigation and, where practicable, provided with an indication of the expected next step or timeframe. The response shall normally be sent through the same or a similar channel used for the complaint.

The Company shall also provide information on the details and status of complaints to the Securities and Exchange Commission on a quarterly basis.

7. RECORDING AND REGISTER

TCN shall maintain an electronic register of complaints and enquiries. The record shall contain, as applicable:

- date received;
- complainant's name and contact details;
- shareholder/reference number;
- nature of the enquiry or complaint;
- resolution sought;
- action taken and current status;
- date and details of resolution; and

- copies of material correspondence.

8. LIAISON WITH THE REGISTRAR

In investigating a complaint, TCN may liaise with the Registrar to establish the facts, determine action already taken and coordinate an appropriate response. The Registrar shall provide reasonable assistance and relevant information necessary for resolution.

9. ESCALATION AND RESOLUTION

Where circumstances require, a complaint may be escalated to Executive Management and, where material or appropriate, to the Board or relevant Board Committee. In resolving a complaint, TCN shall determine the facts, consider whether any legal or regulatory requirement has been breached, determine the appropriate action and communicate the outcome to the complainant.

10. CONFIDENTIALITY AND FAIR TREATMENT

Complaints shall be handled objectively, fairly and confidentially. Personal information shall be protected and used only for legitimate complaint-handling, legal, regulatory or oversight purposes. No complainant shall be disadvantaged for making a genuine complaint in good faith.

11. FEES AND CHARGES

TCN will not ordinarily charge complainants for making enquiries, providing feedback, receiving a response or having a complaint investigated. The Registrar may, however, charge applicable statutory or service-related fees for specific shareholder services.

12. CONTACT DETAILS

12.1. The Registrar

Contact	Details
Name	GREENWICH Registrars and Data Solutions Ltd
Address	274 Muritala Mohammed Way, Yaba, Lagos
Phone	+234-(0)201-7006700-2, +234-(0)201-2275427-9
Email	info@greenwichregistrars.com
Website	www.greenwichregistrars.com

Complainants should ordinarily contact the Registrar first for complaints relating to registered shareholding records and Registrar-administered services.

12.2. The Company Secretary

Contact	Details
Office	The Company Secretary
Company	Tourist Company of Nigeria Plc
Address	6-8 Ahmadu Bello Way, Victoria Island, Lagos
Email	info@tcn.ng.com
Website	www.tcn.com.ng

Complainants may contact the Company Secretary for complaints received directly by the Company or for escalation of complaints that have not been satisfactorily resolved by the Registrar.

13. ACCESS, RESOURCES AND REVIEW

This Policy shall be made available to shareholders/stakeholders through the Company's website and upon request from the Company Secretary. TCN shall provide adequate resources for effective complaint handling. The Policy shall be reviewed periodically, including to identify systemic or recurring complaints and implement appropriate remedial action. Amendments shall be approved in accordance with the Company's governance framework.

14. APPROVAL

Item	Details
Recommended by	Company Secretary / Management
Approved by	Nomination, Remuneration and Governance Committee
Approved by	Board of Directors
Review Date	August 2026