

C-PL-002

# CORPORATE POLICY

GROUP POLICY NO. 2 | COMPLAINTS MANAGEMENT POLICY

# CONTENTS

<b>Purposes, Objectives and Scope</b>	1	<b>Appendices</b>	5
1.1 Purposes	1		
1.2 Objectives	1		
1.3 Scope	1		
<b>Definitions, Abbreviations</b>	2		
2.1 Definitions	2		
2.2 Abbreviations	3		
<b>Policy Description</b>	3		
3.1 Application of Policy	3		
3.2 Policy Statement	3		
3.3 Disclosure	3		
3.4 Procedure	3		
3.5 Audit Review	4		
3.6 Responsibilities	4		
3.7 Review	4		

## Purposes, Objectives and Scope

### 1.1 Purposes

The purpose of this Complaints Management Policy is to ensure that Julius Berger achieves excellence in complaints management. This policy applies to all participants in the complaints management process. First and foremost, rule 5 of the Rules Relating to the Complaints Management Framework of the Nigerian Capital Market issued by the SEC sets out the requirements for the maintenance of a Complaints Management Policy.

This document, in line with the applicable regulatory and industry requirements, serves to establish an effective internal complaints management system and procedures.

### 1.2 Objectives

1. Make information available to all on the complaints management process in the Julius Berger Group.
2. Establish procedures for the complaints management process in the Julius Berger Group.

### 1.3 Scope

The scope of this Policy is applicable to all products, services provided by the Julius Berger Group and the actions and conducts of officers or representatives of the Julius Berger Group.

This Policy does and is not intended to replace or interfere with legislations or policies in effect within the Julius Berger Group.

## Definitions and Abbreviations

### 2.1 Definitions

Board of Directors	The Board of Directors of the Company.
Business Day	Any day except a Saturday, Sunday, or public holiday in Nigeria.
The Commission or SEC	The Securities and Exchange Commission.
Complainant	Includes the employees of the Julius Berger Group, its clients, suppliers, agents, and regulators.
Complaint	<p>An expression by a Complainant, written or oral:</p> <ul style="list-style-type: none"> <li>▪ Of dissatisfaction about the services or products provided to a Complainant which has resulted in loss, damage, or prejudice.</li> <li>▪ Of dissatisfaction about the action(s) of an employee, agent, representative or officer of Julius Berger Group which has resulted in loss, damage, or prejudice.</li> <li>▪ Of contravention or failure to comply with a provision of law or statute.</li> </ul> <p>Where a response or resolution is explicitly or implicitly expected. The following are not classified as complaints:</p> <ul style="list-style-type: none"> <li>▪ Enquiries and requests for information.</li> <li>▪ Service requests.</li> <li>▪ Input and feedback provided as a result of consultation processes.</li> </ul>
Component	Current subsidiaries and associated companies and any other future subsidiaries or associated companies of Julius Berger.
Employee	A person, employed by the Julius Berger Group, including directors.
Julius Berger Nigeria Plc or Julius Berger or the Company	Julius Berger Nigeria Plc or its successors in title.
Julius Berger Group	Julius Berger Nigeria Plc and all its Components.
Rule(s)	The rule(s) of the SEC.

## 2.2 Abbreviations

---

SEC	Securities and Exchange Commission.
-----	-------------------------------------

---

## Policy Description

### 3.1 Applications of Policy

If any member of the group of Complainants mentioned above is unsure as to any matter within this Policy or its application or applicability, they should consult the Chief Compliance Officer.

### 3.2 Policy Statement

Julius Berger is committed to:

1. Ensuring that complaints are investigated fairly, and possible conflicts of interest identified and mitigated.
2. Resolving complaints by applying the following principles – visibility, accessibility, responsiveness, restitution, objectivity, confidentiality, fairness and equity, accountability.
3. Consistency in its resolution and application of remedies.
4. A continuous improvement of complaints management.
5. Ensuring that Complainants suffer no reprisals or detriment for making a complaint in accordance with this policy.

### 3.3. Disclosure

In order to maintain transparency, this policy is to be publicized in the internal communications of the Company and the website in a manner consistent with its disclosure policy.

### 3.4 Procedure

1. Complainants may submit their complaints face to face on any business day. Resolution may be immediate otherwise it shall be escalated to the Chief Compliance Officer. In such cases, the Complainant shall make a written submission of his/her complaint which will be logged electronically by the employee at the point of contact.
2. Complainants may submit their complaints via any one of the following options, together with any relevant supporting documentation addressed to the “Chief Compliance Officer”:
  - i. Website: [www.julius-berger.com](http://www.julius-berger.com) under the “Contact Us” option
  - ii. Email: [complaints@julius-berger.com](mailto:complaints@julius-berger.com).
  - iii. Post: 10 Shettima A. Munguno Crescent | Utako 900 108 | FCT Abuja.
3. Every complaint received will be treated.
4. Anonymous complaints will be treated as appropriate.
5. All complaints will and must be logged electronically in the complaints management register of Julius Berger as required by the rules of the SEC.

6. Improvement resulting from a complaint will be referred to the officer with responsibility for the appropriate action.
7. Personal data collected, processed, or used under this Policy will not be disclosed to third parties, unless explicitly required or allowed for by law.
8. An appeal against a resolution may be made to the ombudsman at:

Femi Okunnu & Co  
3 Karimu Kotun Street  
Victoria Island, Lagos.

### **3.5 Audit Review**

Compliance with this policy will be monitored by the Audit Committee of the Board of Directors.

### **3.6 Responsibilities**

The Chief Compliance Officer is responsible for the management and administration of this policy.

### **3.7 Review**

This policy will be reviewed and updated every year.

## Appendices

None

## Document Revision History

S/N	Rev.	Description	Prepared by/ Date	Reviewed by/ Date	Approved by/ Date
<b>Issue 1</b>					
1	1.0	Issued for use	-		Board 29.09.2015
<b>Issue 2</b>					





**Julius Berger Nigeria Plc**

10 Shettima A. Munguno Crescent  
Utako 900 108 | FCT Abuja  
RC No. 6852

T: +234 803 906 7000

E: [info@julius-berger.com](mailto:info@julius-berger.com)