NCBA INVESTMENT BANK - BROKERAGE COMPLAINTS PROCEDURE

1. Objective

To outline the process of handling customer complaints to ensure effective handling of complaints at all touch points. A complaint is defined as any expression of dissatisfaction by a customer or potential customer about service delivery by the company or its agents, and/or about company or industry policy.

2. Scope

This procedure covers NCBA-IB Brokerage Unit.

3. Sub procedures

This procedure should be applied hand in hand with other related NCBA Group operations and service policies, procedures & documents.

<table>
<tr><th>Step</th><th>Process</th><th>Activity</th></tr>
<tr><td>1.0</td><td>Receive Complaint</td><td>Complaint is received from customer:

Staff receiving complaint either by phone, email or in person should try and resolve it on the spot involving their manager or supervisor if necessary:

Listen to complaint – be understanding, calm and helpful.
Apologize or cushion as appropriate and do not blame others.
Accept ownership of problem - where possible, take responsibility for resolving the problem.
Discuss options for fixing the problem.
Keep promises made to customer – do not promise what you cannot deliver.
Ensure complaints resolution or escalation is handled promptly and effectively
Escalate all complaints that cannot be resolved at your level
Thank customer for bringing the problem to our attention

If staff is unable to resolve the complaint, staff escalates to their manager immediately.
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Step	Process	Activity

2.0	Log Complaint	• If complaint is received at contact center by either phone or email:
		  ◦ Financial Advisor to forward to the FMO team for investigation and solutions
		• Log Customer Complaint in the Complaints Register and/or CRM.
		• Complete all the fields, as follows
		  ◦ Date complaint is reported
		  ◦ Name of client
		  ◦ Officer against whom the complaint was made or who was responsible for the action that led to the complaint;
		  ◦ Nature of the complaint
		  ◦ Whether it was received from Legal Department, directly, CMA, NSE or CDSC
		  ◦ Mode of communication (email, letter etc)
		  ◦ Comments upon investigation
		  ◦ Status of the complaint (pending, resolved etc)
		  ◦ Date resolved
		  ◦ Staff member(s) who investigated and resolved the complaint

3.0	Investigate Complaint	**Investigate Complaint to find a solution:** • Ensure to follow the Customer Complaints Handling Procedure • Thoroughly check the relevant facts • Ensure there is no bias towards anyone involved • Obtain responses from all appropriate staff • Make every effort to address all issues raised in the customer complaints • Follow up and advice the customer on progress on a weekly basis until the issue/s is/are satisfactorily concluded.

4.0	Resolve Complaint and advise customer	**Resolve complaint and advise customer:**
		• Address issues raised in the complaint and respond to customer as quickly as possible. The response to the customer should include:
		  ◦ The outcome of any internal investigation
		  ◦ The actions taken to remedy the source of dissatisfaction and/or to improve our service
		  ◦ Any compensation offered if appropriate
		• If the customer provided a daytime phone number, call the customer and attempt to resolve the complaint by telephone.
		  ◦ If the customer agrees that issue is resolved at the end of the call, confirm the conversation by email to the customer indicating the issue has been resolved.
		• If the customer is unhappy with the first response or any relevant compensation offered, the Managing Director will review the complaint.

Step	Process	Activity
		• We will respond to the customer again either supporting our original response or explaining a new decision. • The second response will include the name and position of the manager who reviewed the case. • Once a complaint has been resolved, thank the customer and re-assure them of our concern and commitment to offer satisfactory service as we value their business support. • All complaints will be resolved within 14 days from the date of record. If this is not achieved, resolution will not exceed 30 days from the date of record unless it is dependent on a third party individual or organization where NCBA has no control.
5.0	Reporting to CMA	• Within two days after the end of every quarter, the Senior Manager, Brokerage will inform CMA in written form of all complaints that were received during the quarter and their status of resolution. A NIL report will be filed if no complaints were received.
6.0	Minimizing Complaints	• NCBA-IB will fully address any internal control aspects that may be found to be primary causes of client complaints.
7.0	Disclosure	• NCBA-IB will disclose the complaints handling procedure in its website for the information of all clients.