



Union Diagnostic & Clinical Services Plc

Complaints Management Framework for
Investors & Investing Public

SIGN OFF SHEET:

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Declaration:

This document details out the Framework for the management of complaints received from Investors and Investing Public. It is the property of UDCS Plc, and shall, under no circumstances, reproduced, sold or given to third party without the express permission of the Bank.

Document Information

Approver: Managing Director / Chief Executive Officer

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Document Review

Recommendation for Approval	Company Secretary
Approval	Managing Director / Chief Executive Officer

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1.0 INTRODUCTION

This document contains the policy of Union Diagnostic & Clinical Services Plc on complaints management.

The Complaints Management Framework is developed to drive the management of complaints from Investors and Investing Public in line with the rules relating to the complaints management framework of the Nigerian Capital Market released by the Securities and Exchange Commission.

This policy only relates to the company's shareholders and does not extend to its employees, customers, suppliers and or other stakeholders.

2.0 LEGAL BACKGROUND

This complaint Management Policy has been prepared in line with the requirements of the Securities & Exchange Commission's rules relating to the Complaints Management Framework of the Nigerian Capital Market [SEC Rules] issued on 16th February 2015 and the Nigerian Stock Exchange Directive [NSE/LARD/LRD/CIR6/15/04/22] to all listed companies [the NSE Directive] issued on the 22nd of April, 2015.

3.0 SCOPE OF IMPLEMENTATION

The framework is aimed at managing complaints arising out of issues covered under:

- The Investments and Securities Act 2007
- Rules and regulations of Securities and Exchanges Commission
- Guidelines of recognized trade associations

4.0 OBJECTIVES OF THE FRAMEWORK

This policy is designed to ensure that complaints are duly documented and handled in an impartial, efficient and timely manner.

5.0. UDCS PLC'S COMMITMENT

UDCS Plc is committed to putting standardized processes in place and implementing same to manage and resolve complaints from its shareholders within clearly defined turn around time.



6.0 COMPLAINTS CHANNELS

Complaints may be received through the following channels:

- Telephone
- E-mail

- Referral by the Regulator
- By Post or courier
- Personal delivery

Such complaints should be addressed to –

**The Company Secretary / Legal Adviser
Union Diagnostic & Clinical Services Plc
5 Eletu Ogabi Street,
Off Adeola Odeku Street,
Victoria Island,
Lagos.**

Email : legal@uniondiagnostic.com.ng

Telephone nos: 08074516930, 08111111401, 08111111402

For whichever source complaint is received, it shall be assigned a case number and recorded in the Complaints Register.

7.0 PROCEDURE FOR HANDLING COMPLAINT

7.1 Valid and Acceptable Complaint

- For a complaint to be valid and accepted for investigation, it must be received through authorized channel and shall at minimum contain all material facts, supporting documents and the following:
 - (a) Name
 - (b) Full address
 - (c) Contact Telephone number
 - (d) E-mail address
 - (e) Signature of the complainant; and
 - (f) Date.

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7.2. The company secretary upon receipt of the complaint shall ensure that –

- All relevant details of the complaint are immediately recorded in the Complaints Register.
- A response is provided within the time frame set below -
 - Where complaint is received through email and telephone, it shall be acknowledged within 2 working days
 - Where complaint is received by post, courier, personal delivery or referred by SEC, it shall be responded to within 5 working days
 - All complaints shall be resolved within 14 working days
 - Notify SEC within 2 days of resolution/closure of complaints
- Where a complaint cannot be resolved within the stipulated time frame above, the shareholder shall be notified that the matter is being investigated. The company shall ensure that the shareholder is updated regularly until the resolution of the complaint.
- The same or similar medium that was used for the initial complaint shall be used in providing a response.

8.0 DISCLOSURES IN THE COMPLAINTS REGISTER

The complaint register shall indicate the following among others:

- Case number
- Date complaint was received
- Name of the complainant
- Nature of complaint
- Brief description of the complaint
- How the complaint was resolved
- Date complaint was resolved/closed
- Further actions required – if referred to SEC
- Remarks/comments

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9.0 ROLES AND RESPONSIBILITIES OF KEY STAKEHOLDERS

The company secretary shall

- Maintain complaints register
- Respond to complaints within established TAT
- Ensure that complaints are resolved within the established TAT
- Where complaints are referred to third party for resolution, follow through to ensure that they are closed within established TAT
- Render quarterly regulatory returns

10.0 DISCLOSURE REQUIREMENTS

In line with the regulatory requirements, the following disclosures shall be established:

- Complaints management framework shall be hoisted in the website
- Complaint management framework shall be made available to shareholders at the Annual General Meeting
- Rendition of quarterly returns on complaints to SEC. Such returns shall show the following:
 - a) number and nature of complaints received,
 - b) complaints resolved within established turn-around-time,
 - c) those resolved outside the turn-around-time and
 - d) The complaints referred or appealed to SEC to adjudicate.

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