



COMPLAINTS MANAGEMENT POLICY

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COMPLAINTS MANAGEMENT POLICY

1.0. Policy Statement

The objective of this policy is to provide a clearly defined complaints management procedure for the Company, to ensure effective handling and resolution of concerns and complaints within the purview of regulations.

1.1 Policy Review & Approval

The Board of Directors shall annually review and approve the Complaints Management Policy through the Audit and Compliance Committee.

Name	Designation	Surname	Date
	Board of Directors		
	Chairman, Audit and Compliance Committee		
	Managing Director/CEO		
	Management Committee		

1.2 Version Control

Version No.	Author	Date	Revision carried Out Section Nos.
	Board of Directors		
	Chairman, Audit and Compliance Committee		
	Managing Director/CEO		
	Management Committee		

This document has been reviewed by:

Reviewer History

Reviewer	Date	Review Comments
Mr. Olusegun Adeniyi Chief Risk Officer		
Mr. Elie Ogunigni Head, Risk and Internal Control		
Mr. Samuel Ogbodu Managing Director/CEO		

2.0. SCOPE AND APPLICATION

The Policy shall be applicable to employees, officers of the Company, directors and other stakeholders.

This policy shall guide the resolution of complaints involving the following;

- a. complaints against Company by clients/customers
- b. complaints between Company and other business operators
- c. complaints against Company by Regulators

3.0. RESPONSIBILITY

Overall responsibility for this policy and its implementation lies with the Senior Management of SUNU Assurances Nig. Plc.

4.0. DEFINITIONS

“Complaint” means any expression of dissatisfaction about any aspect of SUNU Assurances Nig. Plc. services

“Competent Authority” means Self-Regulatory Organizations (SROs) and recognized Capital Market trade associations.

“CMO” means Capital market Operators as defined in the Investments & Securities Act

“ISA” means Investments and Securities Act

“NSE” means Nigeria Stock Exchange

“SEC” means Securities and Exchange Commission

“SROs” means Self-Regulatory Organizations as defined in the Investments and Securities Act

5.0. CONFIDENTIALITY

All complaints information will be handled sensitively and shall be treated on a need-to-know basis only and in line with the relevant customer confidentiality requirement.

6.0. COMPLAINTS MANAGEMENT PROCEDURE

6.1. Customers may lodge complaints against SUNU Assurances Nig. Plc. with the Company directly or with the Regulators.

Complaints may be sent to the Customer Service Officer, Brokers Representatives, Heads of Departments or the Managing Director through the Company address **at Plot 1196, Bishop Oluwole Street, Victoria Island, Lagos State** or by email at nigeria@sunu-group.com

6.2. Verbal complaints may be made by phone to **01-2802012; 01-4405541** or in person to any of SUNU Assurances Nig. Plc. designated officer or front desk officer.

6.3. The Customer Service Officer should document the follow up and resolution status of the complaint and ensure that an adequate follow-up mechanism is in place to ensure that complaints are resolved within the prescribed timeline and recurring complaints are evaluated and resolved.

6.4. The Customer Relations Officer shall maintain an Electronic Complaint Register capturing the name of the complainant, nature of the complaint, date of the complaint, the expected date of resolution, personnel responsible for resolution, the actual date of resolution and status of the complaint (whether the complaint is still active or closed). The resolution and related correspondences are filed in a separate Customer Complaints File, and a copy retained in the respective customer transactional file.

6.5. On a **monthly basis**, the Complaints Register shall be updated while status of complaints is reported to SEC on a **quarterly basis**. SUNU Assurances shall notify NAICOM of the resolution of the complaint within **two (2) working days** of resolution.

7.0. Stage 1: Acknowledgement of Complaints

7.1. **Email Channel:** Complaints received through the emails shall be acknowledged **within two (2) working days**.

7.2. **Postal Channel:** Complaints received by postal letters and other forms of written messages sent by post shall be acknowledged in writing within **five (5) working days** of the receipt of the complaint. Copies of the complaint and the acknowledgement letter shall be forwarded to NAICOM.

7.2.1. **Verbal Complaints:** Complaints received verbally shall be handled as follows;

- a. Take the complainant's name, address, email and telephone number
- b. Notify the complainant that the conversation may be recorded for quality assurance purposes
- c. Write down the facts of the complaint and register same in the Complaint Form and Register

- d. Note down the relationship of the complainant to SUNU Assurances Nig. Plc
- e. Tell the complainant what will happen next and the minimum expected time of complaint resolution
- f. Forward the Complaint Form to the appropriate authority for evaluation and resolution

7.3. Stage 2: Investigation and Assessment

- 7.3.1. Once a formal complaint is received and acknowledged in line within the earlier prescribed timelines, the receiving officer shall record details of the complaints in the complaints register
- 7.3.2. The complaint form and all accompanying documents shall be forwarded by the receiving officer to the Managing Director/CEO who would initiate a full investigation in respect to the complaint. IF UNRESOLVED;
- 7.3.3. The Complaints shall be referred to the Internal Complaint Resolution Committee
- 7.3.4. If the complaint relates to a specific person, he/she will be informed and given a fair opportunity to respond
- 7.3.5. Where necessary, a face-to-face meeting may be convened

7.4. Stage 3: Review and Resolution

- 7.4.1 After completing the assessment stage, the findings and all support documents are forwarded to the Head, Compliance Officer who after review, will forward the same to the MD/CEO or designated authority for approval of suitable corrective action.
- 7.4.2 Upon approval, the resolution shall be sent to the complainant **within ten (10) working days** from the date the complaint was received.
- 7.4.3 SUNU Assurances shall notify NAICOM **within two (2) working days** of the resolution of the complaint.

7.5. Stage 4: Complaints Referrals

- 7.5.1. Where the complaint is not resolved within the given timeframe, the complainant shall by a referral letter, refer the complaint to NAICOM authority **within two (2) working days**. The letter of referral shall be accompanied by a summary of proceedings of events leading to the referral and copies of relevant supporting documents.

7.6. Stage 5: Monitoring and Reporting

- 7.6.1 On a **monthly basis**, the Complaints Register shall be reviewed and updated.
- 7.6.2 Status of complaints shall be rendered to SEC **every quarter**.

8. SUNU COMPLAINT MANAGEMENT SYSTEM



9. APPENDIX
9.1 FORMS

CUSTOMER COMPLAINT FORM

DATE: -----TIME: -----PHONE NO: -----

NAME OF CLIENT(S): -----

COMPANY/ORGANIZATION: -----

CLASS &POLICY NUMBER (if any):-----

CLAIMS NUMBER (if any):-----

COMPLAIN: -----

SIGNATURE OF CLIENT: -----

FOR OFFICIAL USE ONLY

TREATED BY: -----DEPT: -----

ACTION TAKEN: -----

Please call
01-2770990, 01-2770988, 01-2802012

Or email: nigeria@sunu-group.com; nigeria.customercare@sunu-group.com

If you would like to discuss your experience in person

9.1.2 CONTENTS OF ELECTRONIC COMPLAINT REGISTER

The Electronic Complaints Register shall include the following:

- a. Name of the complainant
- b. Date of the complaint
- c. Nature of complaint
- d. Complaints details in brief
- e. Actions Taken
- f. Remarks/comments

9.1.3 SAMPLES OF COMPLAINTS REGISTER¹

REPORTING PERIOD _____ 20_____			Q1	Q2	Q3	Q4 ²
S/N	Date ³	Complainant's Information ⁴	Nature and Details of Complaint ⁵	Status and Date of Resolution ⁶	Comments	
1.	19 May 2015	Mrs. Halima Ifeoma Adeosun 11A Ibadan Road, Ebute Meta Lagos. adeosun@xmail.com.ng Shareholder	Shareholder did not receive her notice of 2014 AGM and Annual Report.	Resolved. Shareholder had changed her address and was directed to the registrar to update her address. She was also given the 2014 Annual Report. 30 May 2015	N/A	

¹ The Complaints Register should be placed on the listed company's letter headed paper. The table above should be populated with the information on complaints as per the example in row 1 of the table.

² Indicate the relevant quarter.

³ Provide the date the complaint was made.

⁴ Name, home/ mailing address, e-mail, phone number and nature of relationship to listed company.

⁵ The list that follows includes types of complaints. It is non-exhaustive and the information provided is for guidance purposes only. Type of complaints include: (1) Relating to Public Offers/ Rights Issue/Capital Reconstruction/Capital Reorganization/ Bond Issuance/Debentures/ Collective Investment Schemes/Mutual Funds/Memorandum Listing; (2) Relating to Non -receipt of : Offer documents, circulars, certificates, delayed Interest (bonds) delisting pay off; (3) Relating to Corporate Actions: Non - receipt of dividends, Non- receipt of bonus, Non- receipt of Interest; (4) Corporate Governance: Non- receipt of Annual Reports, Related party transactions; and (5) Others: e.g., Transmission of shares.

⁶ Indicate whether the complaint is resolved or unresolved and provide summary on status or resolution.

We certify that we have taken steps to satisfy ourselves and, therefore, believe that the above information is accurate and complete for the period indicated.

Managing Director/Chief Executive Officer		Company Secretary	
Name		Name	
Signature		Signature	
Date		Date	

APPROVED BY THE BOARD OF DIRECTORS