

**PORTLAND PAINTS AND PRODUCTS
NIGERIA PLC
SHAREHOLDERS' COMPLAINTS
MANAGEMENT POLICY**

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1. PREAMBLE

This document contains the policy of Portland Paints and Products Nigeria Plc (“Portland Plc” or “The Company”) on complaints management framework to address complaints of Shareholders and Investors arising out of issues covered under the Investments & Securities Act, 2007 (ISA), the Rules & Regulations made pursuant to the ISA, and the Rules & Regulations of SEC.

This Policy only relates to the Company’s shareholders and does not extend to its employees, customers, suppliers or other stakeholders.

The following complaints shall not be handled under the policy:

- a) Complaints against private wound up and liquidated Companies;
- b) Complaints on matters that are sub-judice or in arbitration;
- c) Complaints falling outside the purview of the Securities & Exchange Commission.

2. LEGAL BACKGROUND

This Complaint Management Policy (“the Policy”) has been prepared in pursuant to 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 April, 2015.

3. OBJECTIVE

This Policy is designed to ensure that complaints from the Company’s shareholders and Investors are duly documented and managed in a fair, efficient and timely manner.

4. PORTLAND PLC’S COMMITMENT

Portland Plc is committed to providing high standards of services to its shareholders, as regards complaints management and resolution by:

- Ensuring that all shareholders complaints or suggestions are documented

- Providing a platform for efficient handling of shareholder complaints
- Ensuring that shareholders' complaints and issues are dealt with promptly in an efficient and timely manner; and
- Enabling efficient and easy access to shareholder information.

5. MEDIUM FOR LODGING COMPLAINTS:

All shareholder complaints shall be in writing and sent to:

- a) **Company Registrar:** Shareholders who wish to make a complaint shall in the first instance contact the Registrar as below:

CONTACT DETAILS OF THE REGISTRAR

The Registrar may be contacted as follows:

Africa Prudential Registrars Plc

220B, Ikorodu Road, Palmgrove, Lagos.

T: +234 (0)7080606400 |

E: info@africaprudentialregistrars.com

www.africaprudentialregistrars.com

- b) **Company Secretary:** If the Registrar is unable to satisfactorily resolve their complaints then shareholders should contact the office of the Company Secretary using the details below.

The Company Secretary

Portland Paints and Products Nigeria Plc

UAC House, 1-5, Odunlami Street,

Lagos. Lagos State.

Telephone: 07043050014

E-mail: info@portlandpaintsng.com

Website: www.portlandpaintsng.com

6. PROCEDURE FOR HANDLING SHAREHOLDER COMPLAINTS

- Receive complaint from Shareholder
- Upon receipt of a complaint, the Registrar shall immediately provide the relevant details of such complaint to the Company Secretary of Portland Plc for monitoring, record keeping and reporting purposes.

- The Company upon receipt of the complaint shall ensure that:
 - i. Relevant details of the complaint are immediately recorded.
 - ii. A response is provided by the Company Secretary or the Registrar within the time frame set out in sub-clauses c-f below.
- All received complaints either by e-mail or post shall be acknowledged within two (2) working days of receipt.
- Complaints shall be resolved within ten (10) working days of receipt.
- The Nigerian Stock Exchange is notified, within two (2) working days, of the resolution of a complaint.
- Where a complaint cannot be resolved within the stipulated time frame set out above, the shareholder shall be notified that the matter is being investigated. The Company shall ensure periodic updates (quarterly) are sent to the relevant shareholder(s) to resolution or closure of the complaint. The Company Secretary shall be responsible for giving the updates
- The same or similar medium that was used for the initial complaint shall be used in providing a response (whether by email, or post, unless otherwise notified to or agreed with the shareholder).

7. COMPLAINTS REGISTER AND QUARTERLY REPORTING OBLIGATIONS

Portland Plc shall maintain a Shareholders' Complaints Register to track all complaints in accordance with the Rules relating to complaints management. The Complaints Register shall be updated by the Company Secretary on a monthly basis. The Register shall contain the following information:

- The date that the complaint was received.
- Complainant's information (including name, address, Telephone number, e-mail address).
- Nature and details of the complaint.
- Action Taken/ Status.
- Date of the Resolution of the complaint.

Portland Plc shall through the office of the Company Secretary provide information on the details and status of complaints to the Securities and Exchange Commission and The Nigerian Stock Exchange on a quarterly basis.

Portland Plc's Company Secretary shall provide information on number and nature of complaints received, differentiated according to their various criteria regarding complaints and complaints-handling for review by Risk & Governance Committee of the Board at its quarterly meetings;

8. LIAISON WITH THE REGISTRAR

During the course of investigating a shareholder's complaint or feedback, the Company Secretary shall liaise with the Registrar to:

- Ascertain the facts of the complaint;
- Review the action(s) taken on the complaint by the Registrar (if any); and
- Coordinate the company's response or actions in addressing the complaint in conjunction with or with the assistance of the Registrar.
- Obtain a quarterly report on shareholders' complaints for review and submission to SEC and NSE.

9. SHAREHOLDER ACCESS TO THIS POLICY

The Policy shall be available and accessible by shareholders on Portland Plc's website (www.portlandpaintsnig.com). Copies may also be requested by contacting the Office of the Company Secretary.

- The policy shall be made available at the General Meetings of the Company.

10. FEES AND CHARGES

- As much as possible, and subject to statutory requirements, Portland Plc will not charge shareholders for making, giving feedback, or providing a response or for any aspect in the course of resolving a shareholder matter.

11. REVIEW AND INTERPRETATION OF THE POLICY

- This Policy and the procedures concerning shareholder, complaints and feedback shall be reviewed every 2 years.
- The Company Secretary shall be responsible for the review of this policy
- Any question regarding interpretation or scope of application of this policy should be referred to the Company Secretary.
- Any changes or subsequent versions of this Policy will be published on Portland Plc's website (www.portlandpaintsng.com).