



COMPLAINTS MANAGEMENT POLICY

FOR

LEARN AFRICA PLC.

September 2015



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## **1. Introduction**

This Complaint Management Policy ("the Policy") has been prepared 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 22nd April, 2015.

This policy has been prepared in recognition of the importance of effective engagement in promoting shareholder/Investor confidence in the company.

This Policy establishes procedures by which Learn Africa Plc ("the Company"), its Registrar and Company Secretary will effectively manage and resolve complaints from shareholders. It also provides the opportunity for Learn Africa Plc's shareholders to provide feedback to the Company on matters that affect them.

Our commitment to fair, equitable and timely resolution of complaints is described in this Policy.

## **2. Application/Scope of Policy**

This Policy is designed to ensure that complaints and enquiries from the Company's shareholders are managed in a fair, impartial, efficient and timely manner. This Policy only relates to the Company's shareholders and does not extend to its customers, suppliers or other stakeholders.

## **3. Commitment**

We are committed to efficient and effective complaints management. Our commitment involves:

- Acknowledging the right of the shareholders/investors to complain when displeased or dissatisfied with the Company/Management activities or performance and encourages feedback;
- Ensuring that shareholders complaints are dealt with in a responsive, efficient, effective, fair and economical way;
- Knowing that properly handled and analysed, complaints and feedback help the Company to improve its business processes, and therefore time spent on handling complaints is an investment in better service to the shareholders/investors.
- Complaints will be treated confidentially, and complainants will not suffer any reprisal from the Company or officers of the Company for making a complaint
- Facilitating efficient and easy access to shareholder information.

## **4. Procedure for Shareholder Complaints/Enquiries**

Shareholders can make complaints/enquiries and access relevant information about their shareholdings in the following manner:

- a) Contact the Registrar: Shareholders who wish to make a complaint/ enquiry shall in the first instance contact the Registrar (see the contact details set out in section 8 of this Policy). The Registrar manages all the registered information relating to all shareholdings, including

shareholder name(s), shareholder address and dividend payment instructions amongst others.

Upon receipt of a complaint or an enquiry, the Registrar shall immediately provide the relevant details of such complaint or enquiry to Learn Africa Plc for monitoring, record keeping and reporting purposes.

In resolving complaints or enquiries, the Registrar shall be guided by the timelines stipulated in clause 5 (c-f) of this Policy.

b) **Contact Learn Africa's Company Secretary:**

If the Registrar is unable to satisfactorily address shareholders' enquiries and resolve their complaints then shareholders should contact the office of the Company Secretary (see the contact details set out in section 9 of this policy).

c) **Complaints/Enquiries received directly by Learn Africa Plc**

Where a complaint or an enquiry is sent to Learn Africa Plc directly, the Company upon receipt of the complaint or enquiry, shall use its best endeavours to ensure that:

- The relevant details of the complaint or enquiry are immediately recorded.
- A response is provided by the Company or the Registrar within the time-frame set out in sub-clauses c-f below.
- Complaints or enquiries received by e-mail are acknowledged within two (2) working days of receipt.
- Complaints or enquiries received by post are responded to within five (5) working days of receipt.
- Complaints or enquiries are resolved within ten (10) working days of receipt.
- Where a complaint/enquiry cannot be resolved within the stipulated time frame set out above, the shareholder shall be notified that the matter is being investigated. Delays may be experienced in some situations, including where documents need to be retrieved from storage.
- The same or similar medium that was used for the initial enquiry is used in providing a response (whether by email, phone, post or fax), unless otherwise notified to or agreed with the shareholder.

## **5. Electronic Complaints Register and Quarterly Reporting Obligations**

Learn Africa Plc shall maintain an electronic complaints register. The electronic complaints register shall include the following information:

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

Learn Africa Plc shall also provide information on the details and status of complaints to the Securities and Exchange Commission and The Nigerian Stock Exchange on a quarterly basis.

## **6. Liaison with the Registrar**

During the course of investigating a shareholder's enquiry, complaint or feedback, Learn Africa Plc may liaise with the Registrar. Learn Africa Plc's engagement with the Registrar will include:

- Determining the facts;
- Determining what action has been undertaken by the Registrar (if any); and
- Co-ordinating a response with the assistance of the Registrar.

**7. Contact Details of the Registrar**

The Registrar may be contacted as follows:

First Registrars Limited & Investor Services Limited  
Plot 2, Abebe Village Road, Iganmu  
P.M.B. 12692

Telephone: 234-1-2799880. 2701078, 2701079

E-mail: [info@firstregistrarsnigeria.com](mailto:info@firstregistrarsnigeria.com)

Website: <https://www.firstregistrarsnigeria.com>

**8. Contact Details of Learn Africa Plc's Company Secretary**

Shareholders seeking to escalate unresolved complaints are invited to contact the Company Secretary as follows:

DCSL Corporate Services Limited  
235, Ikorodu Road  
Ilupeju  
P.O Box 965, Marina, Lagos  
Nigeria

Telephone: +23412717817

E-mail: [aagbo@dcsl.com.ng](mailto:aagbo@dcsl.com.ng)  
[info@dcsl.com.ng](mailto:info@dcsl.com.ng)

Website: [www.dcs.com.ng](http://www.dcs.com.ng)

**9. Contact Details of Learn Africa Plc**

The Company's contact details are as follows;

Learn Africa Plc  
Felix Iwerebon House  
Plot 52, Oba Akran Avenue  
Ikeja, Lagos

Telephone: +234 (01) 7403967, 4393111

Email: [learnafrica@learnafricaplc.com](mailto:learnafrica@learnafricaplc.com)

Website: [www.learnafricaplc.com](http://www.learnafricaplc.com)

**10. Shareholder Access to this Policy**

Shareholders will have access to this policy through the following avenues:

- The Policy shall be available on Learn Africa Plc's website ([www.learnafricaplc.com](http://www.learnafricaplc.com)).
- A copy of the Policy may be requested by contacting the Company Secretary or the Head office of Learn Africa Plc.
- The Policy shall be made available for perusal at general meetings of the Company.

#### **11. Fees and Charges**

Wherever possible, and subject to statutory requirements, Learn Africa Plc will not charge shareholders for making enquiries, giving feedback, providing a response or for any aspect in the course of resolving a shareholder matter. Shareholders are informed that in some circumstances the Registrar may charge shareholders a fee (for example, to resend previous dividend statements upon request by the shareholder).

#### **12. Amendment/Review of this Policy**

Learn Africa Plc may from time to time review this Policy and the procedures concerning shareholder enquiries, complaints and feedback.

Any changes or subsequent versions of this Policy will be published on Learn Africa Plc's Website: [www.learnafricaplc.com](http://www.learnafricaplc.com)