



READINGS INVESTMENTS LIMITED

COMPLAINT MANAGEMENT/DISPUTE RESOLUTION POLICY

DISPUTE MANAGEMENT POLICY

PREFACE

This document shall deem to be official guidelines, policies and procedures to be followed by READINGS INVESTMENTS LIMITED while carrying out its business activities as a Stock Brokerage firm dully licensed by the Nigerian Stock Exchange and Securities & Exchange Commission (SEC) to carry on the business of stock brokerage and financial advisory services.

Readings Investments Limited is committed to providing clients with the highest quality service we can. We recognize that in the course of our business dispute are inevitable hence the necessity of amicable resolution of these disputes should be sought and employed.

Dispute is defined an argument or disagreement between two people, groups or countries. Dispute is set to question whether something is true, valid or genuine. A complaint is an expression of dissatisfaction made to an organization relating to its services.

Likely causes of disputes between stockbrokers and their clients include;

- Insufficient disclosure about fees e.g verification fee, portfolio management fee e.t.c
- Unwritten mandates/ transaction orders
- Some investors' poor knowledge of the market
- Unmet expectations e.g unrealized capital appreciation, unpaid guaranteed return on investment
- Customer dissatisfaction such as delay in process of verification of shares,
- Delay in execution of mandates
- Non/delay in dissemination of market information
- Insufficient knowledge of the risk appetite of clients by their brokers
- Unauthorized sale of shares by stockbrokers
- Non remittance of sales proceeds
- Non submission of applications during public offerings, e.t.c.

The Board and management of Readings Investments Limited recognize Complaints as;

- about accountability;
- an important part of customer service;
- inevitable and must be managed effectively;

- cost money and reflect badly on the company if not handled properly;
- Can and should lead to business improvement.

Dispute resolution mechanism also shows how our community sees us in terms of our reputation for integrity as it reveals ethical standard of the firm.

Ultimately, complaint resolutions principles also provide opportunity for continuous review of our internal control processes.

POLICY STATEMENT.

We recognize everyone's right to express their opinion about our services.

We shall provide our clients and community with the opportunity to influence the way we work by meaningfully engaging them, listening and responding to their feedback, and protecting their confidentiality and privacy.

Readings Investments Limited wants staff to be 'complaints friendly' and not defensive or negative about feedback and complaints;

Readings Investments Limited also recognizes that properly handled and analyzed complaints and feedback help the company to improve its business processes, therefore time spent on handling complaints is an investment in better service to our client and public.

We shall seek to resolve complaints at the earliest opportunity in a way that respects and values the client's feedback ensuring that our clients have positive feeling and confidence about our service.

Client Brokerage Agreement

Reading Investments Ltd shall institute clients Stockbrokerage agreement which aim to inform and educate clients on their rights, responsibilities and outcomes as well as the company's rights and responsibilities.

Scope and Application of the Policy

This Complaint policy and procedures shall apply to all Departmental services (such as, client services and Account services) and all officers of the Department (such as, branch officers, and branch manager)

Complain Handling Procedure

The Compliance Officer shall be designated to manage the company's Dispute resolution process.

Readings Investments Limited complaint management procedure shall be based on the following element;

1. VISIBILITY AND ACCESS

Complaints may be made in person, by phone call, email or in writing.

The Front desk officer shall receive complaint letter, minor complaints shall be resolved at first contact wherever possible.

Serious or complex complaint shall be forwarded to the Chief Compliance officer for review.

All complaints shall be duly logged into the Complaints register for analysis.

(Note: complaints involving suspected official misconduct shall be referred to the CEO to assess.)

2. RESPONSIVENESS

Readings Investments Limited complaint management process shall be responsive and provide to;

- To educate and make all staff to be familiar with the content of the Company's complain policy and procedures
- All complaints shall be duly acknowledged within 24 hours of lodgment.
- Minor issue shall be resolved immediately. (We shall listen, empathize and acknowledge when our service was not the best it could have been)
- Complex or major complain may require comprehensive assessment or investigation as such a time frames of 5 working days.

3. ASSESSMENT AND ACTION.

ISO 10002:2006 Customer satisfaction Guidelines for complaints handling states that “after receipt, each complaint should be initially assessed in terms of criteria such as severity, safety implication, complexity, impact, and the need and possibility of immediate action”

Readings Investments Limited investigative framework shall adopt other forms of resolution such as negotiation, mediation or informal resolution

- Complain adjudged to be urgent, serious, unfair, bad process e.t.c shall be referred to the Chief Compliance Officer
- The Compliance officer or investigating team shall conduct a thorough investigation with fairness and objectivity, analyse the complaint and make a report to the Managing Director or the Executive Director

- Relevant information shall be obtained and recorded during the investigation.
- Findings shall be soundly based on tenets of relevant policy and legislation
- The privacy and confidentiality of the information shall be observed

4. FEEDBACK

Readings Investment Limited's complaint feedback shall involve explanation of what happened and why, what will be done to fix the issue, and who will do it, how we shall communicate our progress and how we will check things are on track.

After investigation,

- A proposed resolution shall be forwarded to the Management for approval.
- A detailed resolution shall be forwarded to the client immediately; we shall provide adequate reasons for decision and offering remedies.
- Where more time is required, the client shall be notified stating the reason for the extension.
- Invalid complaints shall be rejected and we shall inform complainant of entitlement to seek independent external review.

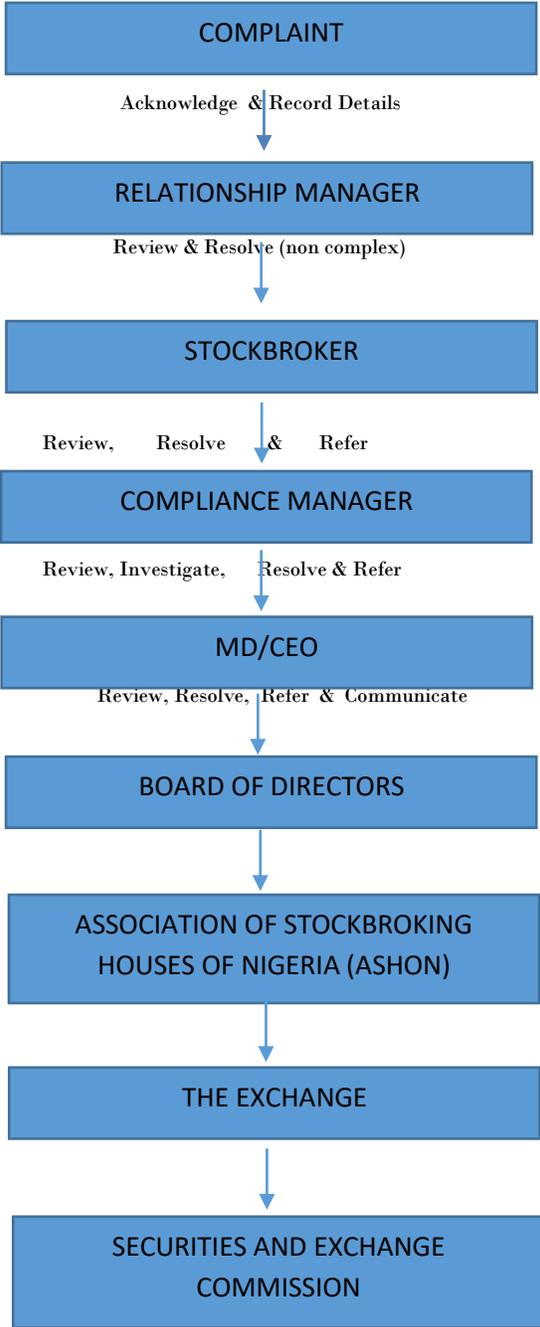
Where customer complaints have been received by the regulators and forwarded to the company for resolution, the compliance officer shall acknowledge receipt in writing and a copy of the resolution shall be forwarded to the regulator by the compliance officer.

Where complainant is dissatisfied with internal resolution of the complaint, he/she have the right to pursue such complaint until it is resolved to their satisfaction.

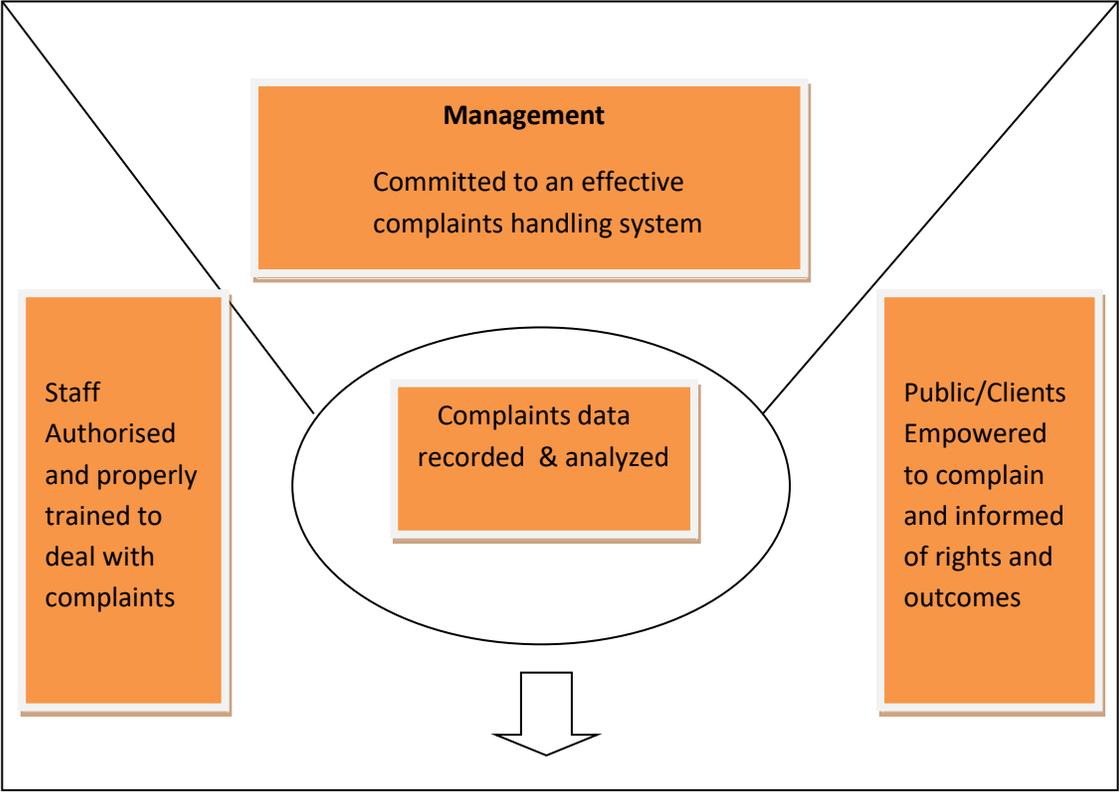
IMPROVEMENT FOCUS

On a periodic basis, the Chief Compliance Officer shall undertake a root cause analysis, track and advise the Board and Management on possible strategies to enhance customer satisfaction.

COMPLAINT PROCESS



A holistic view of Readings Investments complaint management



Policy Administration

Contact Person: Chief Compliance Officer

Email: info@readingsinvestmentsltd.com; tunde.alabi@readingsinvestmentsltd.com