



BUA CEMENT PLC

COMPLAINT MANAGEMENT POLICY ("THE POLICY")

Table of Contents

1. Preamble2

2. Objective.....2

3. BUA Cement’s Commitment.....2

4. Procedures for Shareholder Complaints/ Enquiries.....2

5. Complaints/ Enquiries received directly by BUA Cement3

6. Electronic Complaints Register and Quarterly Reporting Obligations.....3

7. Liaison with the Registrar.....4

8. Contact Details of the Registrar4

9. Contact Details of BUA Cement’s Company Secretary4

10. Shareholder Access to this Policy4

11. Fees and Charges5

12. Amendment /Review of this Policy5

1. Preamble

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 Exchange Limited Directive (NSE/LARD/LRD/CIR6/15/04/22) to all Listed Companies (“the NSE Directive”) issued on 22nd April, 2015.

Further, this policy has been prepared in recognition of the importance of effective engagement in promoting shareholder / investor confidence in the company. This Policy sets out the broad framework by which BUA Cement Plc (“BUA Cement” or “the Company”) and its Registrar will provide assistance regarding shareholder issues and concerns. It also provides the opportunity for BUA Cement’s shareholders to provide feedback to the Company on matters that affect shareholders.

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

2. Objective

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.

3. BUA Cement’s Commitment

BUA Cement is committed to providing high standards of services for shareholders, including:

- Providing a platform for efficient handling of shareholder complaints and enquiries;
- Enabling shareholders to have shareholder related matters acknowledged and addressed;
- Providing sufficient resources to ensure that shareholders’ complaints and enquiries are dealt with adequately, and in an efficient and timely manner; and
- 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 take appropriate action to resolve the issue and immediately provide the relevant details of such complaint or enquiry to BUA Cement 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 BUA CEMENT'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).

5. Complaints/Enquiries received directly by BUA CEMENT.

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

- a) relevant details of the complaint or enquiry are immediately recorded.
- b) It forwards the complaint or enquiry to the Registrar and that a response is provided by the Company or the Registrar within the time frame set out in sub-clauses (c-f) below.
- c) complaints or enquiries received by e-mail are acknowledged within two (2) working days of receipt.
- d) complaints or enquiries received by post are responded to within five (5) working days of receipt.
- e) complaints or enquiries are resolved by the Registrar or company within ten (10) working days of receipt.
- f) The Nigerian Exchange Limited is notified, within two (2) working days, of the resolution of a complaint or enquiry.
- g) 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.
- h) 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.

6. Electronic Complaints Register and Quarterly Reporting Obligations

BUA Cement 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.

BUA Cement shall also provide information on the details and status of complaints to the Securities and Exchange Commission and The Nigerian Exchange Limited on a quarterly basis.

7. Liaison with the Registrar

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

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

8. Contact Details of the Registrar

The Registrar may be contacted as follows:

Africa Prudential Registrars Plc
220B, Ikorodu Road, Palmgrove,
P.M.B. 12649 Marina, Lagos
Telephone: +234 (0) 7080606420
E-mail: info@africaprudentialregistrars.com
Website: www.africaprudentialregistrars.com

9. Contact Details of BUA Cement's Company Secretary

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

Office of the Company Secretary/Chief Legal Officer
BUA Cement Plc
PC 32, Churchgate Street, Victoria Island, Lagos
Telephone: +234 (0) 9036531172
E-mail: hauwa.satomi@buacement.com
Website: www.buacement.com

10. Shareholder Access to this Policy

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

- The Policy shall be available on BUA Cement's website (www.buacement.com)

- A copy of the Policy may be requested by contacting the Office of the Company Secretary/Chief Legal Officer.
- The Policy shall be made available to shareholders at general meetings of the Company.

11. Fees and Charges

Wherever possible, and subject to statutory requirements, BUA Cement 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 or to process transmission through probate etc.).

12. Amendment/Review of this Policy

BUA Cement may from time to time review this Policy and the procedures concerning shareholder enquiries, complaints, and feedback to ensure that it remains current and consistent with best practices and applicable laws.

Any changes or subsequent versions of this Policy will be published on BUA Cement's website (www.buacement.com).

Approved by the Board of Directors of BUA Cement PLC.



.....
Chairman of the Board

Abdul Samad Rabiou, CFR



.....
Governance, Establishment and

Remuneration Committee

Khairat Abdulrasaq-Gwadabe