

**COMPLAINTS MANAGEMENT POLICY  
OF  
BETA GLASS PLC**

**Table of Contents**

- 1. Overview ..... 3
- 2. Scope ..... 3
- 3. Applicability .....3
- 4. Our Commitment ..... 3
- 5. Procedure for Shareholders Complaints/Enquires ..... 4
- 6. Complaints/Enquiries made directly ..... 5
- 7. Complaints not covered under the Policy ..... 5
- 8. Working with the Registrar ..... 5
- 9. Electronic Register of Complaint and Quarterly Reporting Obligations...6
- 10. Shareholders' Access to the Complaint Management Policy.....6
- 11. General Statements .....6

## **1. OVERVIEW**

This Complaint Management Policy (“the Policy”) has been prepared in line with the requirements of the Securities & Exchange Commission’s Rules relating to the Complaints Management Framework in the Nigerian Capital Market issued on February 16, 2015 and the Nigerian Stock Exchange directive (NSE/LARD/LRD/CIR6/15/04/22) to all listed companies issued on April 22, 2015.

The Complaints Management Framework of the Nigeria Capital Market has been established to entertain complaints arising out of issues that are covered under the Investments and Securities Act, 2007 (ISA), the Rules and Regulations made pursuant to the ISA, the rules and regulations of Securities Exchanges and guidelines of recognized trade associations.

This policy therefore sets out the framework and platform by which Beta Glass PLC. (“Beta Glass” or “the Company”) and its Registrars will provide assistance regarding shareholder issues and concern. It also provides the opportunity for the shareholders of Beta Glass to provide feedback to the Company on matters that affect respective shareholder.

## **2. SCOPE**

This policy sets out the principle and procedure for handling complaints and enquiries from the Company’s shareholders and seeks to ensure that they are managed in a fair, efficient, timely and satisfactory manner. This policy is also aimed at identifying and mitigating possible conflicts of interest.

## **3. APPLICATBILITY**

This policy relates only to the Company’s shareholders and does not apply to the Company’s customers, suppliers or other stakeholders.

## **4. OUR COMMITMENT**

As part of Beta Glass’ commitment to protecting the rights of its shareholders, BETA GLASS is also committed to:

- providing efficient and high standards of services for shareholders;
- providing a platform for easy and quick communication channel;
- providing a platform for efficient handing of shareholder complaints and enquiries;

- providing resources to ensure that shareholders' complaints and enquires are treated in an efficient and timely manner; and
- Enabling easy access to shareholders' information.

## **5. PROCEDURE FOR SHAREHOLDERS COMPLAINTS/ENQUIRES**

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

### **A. Contact made to the Registrar**

- i) Shareholders who wish to make a complaint or an enquiry shall in the first instance contact the Registrar using the following details:

Cardinalstone Registrars Limited

358 Herbert Macaulay Way,

Yaba, Lagos.

Telephone: +234 1 4405107

Email:

Website: [www.cardinal-stone.com](http://www.cardinal-stone.com)

- ii) The Registrar shall manage all the registered information relating to all shareholdings, including shareholders' name(s), shareholders' addresses and dividend payment instructions amongst others.
- iii) Complaints or enquiries received by electronic mail are acknowledged within two (2) working days of receipt.
- iv) Complaints or enquiries received by post are responded to within five (5) working days of receipt.
- v) Complaints or enquiries are resolved within ten (10) working days of receipt.
- vi) Where a complaint or an enquiry cannot be resolved within the stipulated time frame set above, the shareholder shall be notified that the matter is being investigated. This applies to but not limited to delays occasioned by retrieval of documents from storage.
- vii) Upon receipt of a complaint or an enquiry, the Registrar shall immediately provide all relevant information relating to such complaint or enquiry to BETA GLASS for record keeping, reporting and monitoring purposes.

**B. Contact made to the Company Secretary of Beta Glass**

Where the Registrar is unable to satisfactorily address shareholders' enquiries and resolve their complaints or enquiries, the shareholder should contact the office of the Company Secretary using the following details:

The Company Secretary  
Beta Glass Plc  
Iddo House,  
Iddo, Lagos.  
Telephone: +234 1 440-8134 (ext. 6000)  
Email: [ttalabi@agleventis.com](mailto:ttalabi@agleventis.com)  
Website: [www.frigoglass.com](http://www.frigoglass.com)

**6. COMPLAINTS/ENQUIRIES MADE DIRECTLY TO BETA GLASS**

Where a complaint or an enquiry is made directly to Beta Glass, the Company upon receipt of such complaint or enquiry, shall use its best endeavours to ensure that:

- a. Relevant details of the complaint or enquiry are immediately recorded.
- b. The Company or the Registrar will provide a response within the time frame set out in clause 5A (iii-vi) of this policy

**7. COMPLAINTS NOT COVERED BY THIS POLICY**

The under listed complaints shall not be handled under this 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 and Exchange Commission.

**8. WORKING WITH THE REGISTRAR**

In the course of dealing with a shareholder's complaint or enquiry, Beta Glass may liaise and work hand in hand with the Registrar to determine the facts, determine what necessary action has been undertaken by the Registrar (if any); and coordinate a response with the cooperation of the Registrar.

## **9. ELECTRONIC REGISTER OF COMPLAINT AND QUATERLY REPORTING OBLIGATIONS**

- a. BETA GLASS shall maintain an electronic register of complaints.
- b. The electronic register of complaints shall include the following information:
  - The date of receipt of the complaint or enquiry.
  - Complainant's information (such as Name, Address, Telephone number and e-mail address).
  - Nature and details of the complaint or enquiry.
  - Remarks and comments (including status and date of the resolution of the complaint).
- c. BETA GLASS shall update the register of complaints monthly and provide Status reports of complaints filed to the Securities and Exchange Commission on a quarterly basis.

## **10. SHAREHOLDERS' ACCESS TO THIS COMPLAINT MANAGEMENT POLICY**

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

- a. Beta Glass' website ([www.frigoglass.com](http://www.frigoglass.com));
- b. The Office of the Company Secretary of Beta Glass; or
- c. At the General Meeting of the Company.

## **11. GENERAL STATEMENTS**

- a. Subject to statutory requirements, BETA GLASS will not charge shareholders any fee for making complaints, enquiries, giving feedback, providing a response or for any action taken in the course of resolving a matter related to their shareholdings.
- b. In some circumstances, the Registrar may charge shareholders a fee (e.g. to resend previous dividend statements upon request by the shareholder).
- c. BETA GLASS may from time to time review this policy and the procedures concerning shareholders' complaints, enquires and feedback.
- d. Any change or subsequent version of this policy will be published on the website of BETA GLASS ([www.frigoglass.com](http://www.frigoglass.com)).

*Complaints Management Policy of Beta Glass PLC*

Defined and endorsed by the Senior Management team on this **17<sup>th</sup>** day of **March, 2016**

**Signed by:**

Managing Director

Company Secretary