

LOTUS CAPITAL LIMITED
COMPLAINTS MANAGEMENT FRAMEWORK



Purpose

This Complaints Management Framework ("CMF") has been designed to facilitate timely and effective resolution of complaints from customers and other stakeholders.

Lotus Capital Limited and its subsidiaries ("Lotus") recognize the role of complaints and feedback in the success of any enterprise and the opportunity it offers to improve products and services.

Lotus Capital is committed to ensuring that all complaints received from clients are handled fairly, objectively, expeditiously, professionally and in line with best practices recommended by the Securities & Exchange Commission from time to time.

This policy does not cover complaints and enquiries by the company's suppliers, vendors or other stakeholders falling outside the purview of the Securities and Exchange Commission.

The following matters are not considered as complaints for the purpose of this policy:

- a. Complaints that are incomplete or not specific.
- b. Complaints without supporting documents.
- c. Offering suggestions or seeking guidance or explanation.
- d. dissatisfaction with the price or value of any of our mutual funds.

Any person or organization (the complainant) who is dissatisfied with any service provided by Lotus may contact us to complain. We will review the complaint in line with the framework approved by the Securities and Exchange Commission (SEC).

This policy applies to all business units and subsidiaries of Lotus Capital Limited.

Handling Complaints

1. Receipt of Complaints

1.1. Customers may lodge complaints via our website <http://www.lotuscapitallimited.com/index.php/customer-care/enquiry-complaints-form>, or via email to customercare@lotuscapitallimited.com, or via WhatsApp message to 0908 705 8406, or calls to 01-2914624/ 01-2914626/0908 705 8407, or via post to P.O Box 55472, Falomo, Ikoyi, Lagos.

1.2. Complaints must be accompanied with all the relevant information and documents so that Lotus can respond expeditiously.

2. Acknowledgment of Complaints

2.1. Lotus will acknowledge receipt of the complaint to the complainant within **forty-eight hours** where such complaint is received on a business day for complaints received by email/WhatsApp and **five (5) business days** for complaints by post.

2.2. A reference number would be generated for each complaint for proper tracking.

2.3. Lotus will respond using the same or similar medium that was used for the complaint unless otherwise notified or agreed with the complainant.

3. Initial Assessment of Complaints

3.1. The Company will assess the complaint and seek to resolve the complaint as soon as possible but in any event no later than **five business days** from the date it received the complaint and relevant supporting information and documents.

3.2. Where it is impracticable to resolve the complaint within the given time frame, such difficulty would be communicated to the complainant with a new timeline.

3.3. Where the complaint is not resolved within the given time frame, the Complainant may refer the complaint to the Fund Managers Association of Nigeria within two (2) business days from its receipt of Lotus' decision enclosing a summary of events leading to the referral and copies of relevant supporting documents.

4. Communicating the Outcome of the Assessment

4.1. Lotus will notify the Client in writing, via email, short message service, WhatsApp message or any other means of its resolution of the complaint.

4.2. Lotus will respond using the same or similar medium that was used for the complaint unless otherwise notified or agreed with the complainant.

5. Closing the Complaint

5.1. The complaint will be deemed closed when the complaint has been resolved.

5.2. Lotus shall consider a complaint closed in any of the following situations:

5.2.1. When it has resolved the complainant's request;

5.2.2. Where the complainant has accepted Lotus response;

5.2.3. Where Lotus' legal and compliance unit certify that Lotus has met its contractual, statutory or regulatory obligations to the complainant.

5.3. Redress and Review

5.3.1. If the complainant is not satisfied with Lotus' resolution of the complaint, he may refer the complaint to the Fund Managers Association of Nigeria within two (2) working days, enclosing a summary of events leading to the referral and copies of relevant supporting documents.

5.3.2. If the Complainant is not satisfied with FMAN's decision, FMAN will refer the issue to the SEC within 2 business days from the date of its decision.

5.4. Record Keeping

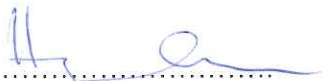
5.4.1. Lotus shall maintain a complaint register where all complaints will be registered and all documentation relating to complaints lodged would be maintained for at least six years.

5.4.2. The Complaints Register shall contain the following details: name of the complainant, date of the complaint, nature of the complaint, brief details of the complaint and remarks/comments.


6. Accountability and Learning

6.1. Lotus is committed to continuously improving its processes and so, will if required; adapt its processes based on customer complaints and other feedback.

DATED THIS DAY OF 27th JULY 2017



HAJARA ADEOLA
CHIEF EXECUTIVE OFFICER



MAS'UD BALOGUN
COMPANY SECRETARY