

AXA Mansard COMPLAINTS MANAGEMENT POLICY

Overview

At AXA Mansard, we strive to personally and professionally demonstrate AXA values in our actions. We are disciplined and reliable and engender trust and integrity - we are up-front, honest, transparent and responsive. The Company appreciates that on occasions clients may not be satisfied with the service they receive from our organization. We recognize the right of any individual or entity covered by this policy to raise an issue or make a complaint and we are committed at all levels of the organization to their efficient, impartial and courteous resolution.

This Policy is applicable to AXA Mansard Insurance Plc which is a listed public company, and AXA Mansard Investments Limited which is a Capital Market Operator.

Purpose

The Complaints Management Policy addresses 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. The SEC, Self-Regulatory Organizations (SROs), recognized Capital Market trade groups and Capital Market Operators (CMOs) and listed public companies are also required to establish fair, impartial and objective complaints management policies.

Complaints Management Framework

This Policy provides information about the framework that is in place for handling complaints from the following:

- a. Complaints against operators by clients.
- b. Complaints between operators.
- c. Complaints against regulators and SROs.
- d. Complaints against operators by SROs and Regulator
- e. Trade manipulation, accounting frauds, Ponzi schemes and such other complaints as may be determined by the SEC from time to time.

Complaints to be addressed by Competent Authorities shall contain all material facts with supporting documents. It shall also contain the following:

- a. Name
- b. full address
- c. GSM number
- d. e-mail address
- e. signature of the complainant; and
- f. date

The following complaints are not covered by 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

Register of Complaints

We are required to maintain an electronic Complaints Register. The Complaints Register shall contain the following details:

- i. Name of the complainant
- ii. Date of the complaint
- iii. Nature of complaint
- iv. Complaints details in brief
- v. Remarks/comments

The Complaints Register shall be up dated monthly. Status reports of complaints filed with the Company shall be forwarded to the SEC quarterly.

Requirements

1. The Company shall acknowledge receipt of complaints received by email within two (2) working days. Where complaints are received by post the Company shall respond in writing within five (5) working days of the receipt of the complaint. Copies of the complaint and the acknowledgement letter shall be forwarded to the relevant Competent Authority.

2. All complaints shall be resolved by the public companies/capital market operators within ten (10) working days from the date the complaint was received. The Competent Authority shall be notified of the resolution of the complaint within two (2) working days.
3. Where the complaint is not resolved within the given timeframe, the complainant or Company shall refer the complaint to the relevant Competent Authority within two (2) working days. The letter of referral shall be accompanied by a summary of proceedings of events leading to the referral and copies of relevant supporting documents.
4. Where there is no relevant Competent Authority, the complaint shall be referred to the SEC within two (2) working days. The letter of referral shall be accompanied by a summary of proceedings of events leading to the referral and copies of relevant supporting documents.

Glossary of terms

'Competent Authority' in relation to these rules means Self-Regulatory Organizations (SROs) and recognized Capital Market trade associations.


"CMO" means Capital market Operators as defined in the ISA.

"SEC" means Securities and Exchange Commission

"SROs" means Self-Regulatory Organizations as defined in the ISA.

"APC" means Administrative Proceedings Committee

Approval

1. Company Secretary: 

2. Chief Client Officer: 