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CENTRAL BANK OF NIGERIA

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MD/CEO, LAGOS OFFICE,
UNITY BANK PLC,
28 FEB 2022 AM08:47

FPR/PRD/CON/CCG/001/011

January 15, 2022

The Managing Director/CEO
Unity Bank Plc
Plot 42 Ahmed Onibudo Street
Victoria Island
Lagos

25 FEB 2022 PM01:51

MD/CEO, LAGOS OFFICE.

Dear Sir,

RE: EXECUTION OF SHAREHOLDERS COMPLAINT MANAGEMENT AND COMMUNICATION POLICY OF UNITY BANK PLC

Your letter dated December 2, 2021 on the above subject refers.

Principle 27.1 of the Nigerian Code of Corporate Governance requires banks to "adopt and implement a stakeholder management and communication policy" to encourage engagement and communication with stakeholders.

Furthermore, the Policy does not require certification by the CBN, however, the submission is noted.

Yours faithfully,

HARUNA I. YOLE
FOR: DIRECTOR, FINANCIAL POLICY AND REGULATION DEPARTMENT

SHAREHOLDERS

COMPLAINT MANAGEMENT

AND

COMMUNICATION

POLICY

OF

UNITY BANK PLC

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SHAREHOLDERS COMPLAINT MANAGEMENT

1. Scope

The Complaints Management Policy of Unity Bank details the manner, circumstances and major components of the management of complaints received from its shareholders in the Capital Market arising out of issues that are covered under the Investment and Securities Act, 2007. The components include the receipt, management and determination of all shareholder complaints.

The Bank's Registrars, Unity Registrars has its own resolutions handling procedures and policies, which are not governed by this policy. The share registry may be contacted on the details provided on page 7 of this Policy.

2. Terminology

Unless otherwise described in this policy, the following terms and definitions apply throughout this policy:

Unity Bank: Unity Bank Plc. which has ordinary shares quoted on the Nigerian Exchange Group (NGX Group)

SEC: Securities and Exchange Commission

SRO: Self-regulatory Organizations as defined

CMO: Capital Market Operators

APC: Administrative Proceedings Committee

ISA : Investment and Securities Act 2007

Shareholder: Registered owner of ordinary shares in Unity Bank Plc

3. The Goal of this Complaint Management Policy is to:

- 3.1. Provide efficient and easy access to shareholder information.
- 3.2. Provide an avenue for shareholders to channel their complaints.
- 3.3. Recognize, promote and protect the shareholders' rights, including the right to comment and provide feedback on service.
- 3.4. Provide an efficient, fair and accessible framework for resolving shareholders' complaints and monitoring feedback to improve service delivery.
- 3.5. Enabling shareholders to have shareholder related matters acknowledged and addressed; and
- 3.6. Provide staff with information about the shareholder feedback process.

4. Principles of Complaint Management

- 4.1. Information on how and where to complain should be well publicized to shareholders, staff and other interested parties.

4.2. Complaint management processes should be easily accessible to all complainants. The process should be easy to find, use and understand.

5. Objectives of the Unity Bank Policy

Unity Bank shall:

- 5.1. Address each complaint in a timely, sensitive, fair, transparent, equitable, objective, professional and unbiased manner through the complaints handling process.
- 5.2. Operate from the view that a shareholder who makes a complaint is entitled to a review of the issues raised and a considered response.

6. Nature of Complaint Channels

There are various channels through which Unity Bank shareholders can lay their complaints. All reported complaints in each channel must be consolidated for reporting purposes. The channels are:

- 6.1. Shareholders Portal in line with CBN Code.
- 6.2. Investor Relations Department.
- 6.3. Unity Bank Contact Centre.
- 6.4. Unity Bank branch offices.
- 6.5. Letters to the Internal Audit Group.
- 6.6. Emails to bank's website.
- 6.7. Unity Registrars.

7. Nature of Complaints

The possible categories of complaints are not exhaustive. However, they include the following:

- i. Unauthorized sale of shares.
- ii. Non-payment of proceeds of sale.
- iii. Non-verification of share certificates.
- iv. Refusal to transfer a client's account to other Dealing Members as requested.
- v. Unauthorized transfer of a client's account to another Dealing Member.
- vi. Guaranteed return investments.
- vii. Fund/Portfolio management.
- viii. Non-payment of dividend.
- ix. Non receipt of Share Certificates.

8. Process Flow

8.1. Process and Record Complaints:

Upon receipt of a complaint from a shareholder, the Customer Care Department will record enquiries and complain including details about the enquiry or complaint to assist in the thorough investigation of the matter.

Information recorded may include recording all or some of the following information:

- a. The date and time that the enquiry or complaint was received.
- b. Name of the shareholder.
- c. Shareholder Reference Number (SRN) or Holder Identification Number (HIN).
- d. Telephone number or other contact details.
- e. Nature of enquiry or complaint.
- f. What the shareholder is seeking.
- g. Whether there is any cost associated.
- h. Action taken.

8.2. The Customer Care Department will:

- a. Log in the complaint and any relevant data.
- b. Categorize it for resolution and record-keeping. Categories must be clearly defined and exclusive of one another.
- c. Assign the complaint to a staff member for handling.
- d. Forward the complaint to another level of authority, if appropriate.

8.3. Acknowledge Complaint

Unity Bank understands that Shareholders do not register complaints with only a casual interest in their disposition. A complaint involves some inconvenience and, possibly, expense. Loyal shareholders with strong feelings are often involved.

Therefore Unity Bank will:

- a. Personalize the response.
- b. Talk to the shareholder, if possible, by phone or in person.
- c. Use letters when necessary, but avoid impersonal form letters.
- d. Take extra time, if need be, to help shareholders with special needs, such as language barriers.

All these are to be done within 7 days of receipt of complaint.

8.4. Resolve the Problem in a Manner Consistent with the Bank's Policy

- a. Forward the complaint to the appropriate level of authority for resolution.
- b. Keep the shareholder informed through progress reports.
- c. Notify the shareholder promptly of a proposed settlement.

8.5. Investigation of complaint

During the course of investigating a shareholder's enquiry, complaint or feedback, Unity Bank will liaise with Unity Registrars. If necessary, Unity Bank's engagement with the share registry will include:

- a. Determining the facts.

- b. Determining what action has been undertaken by the share registry (if any).
- c. Coordinating a response with the assistance of the share registry.
- d. Keep records in the complaint file of all meetings, conversations or Findings.

8.6. Follow-Up

- a. Find out if the shareholder is satisfied with the resolution, and ensure that it was carried out?
- b. Refer the complaint to a third-party dispute-resolution mechanism, if necessary.
- c. Cooperate with the third-party.

8.7. Prepare and file a report on the disposition of the Complaint, and periodically analyse and summarize Complaints

- a. Circulate complaint statistics and action proposals to appropriate departments.
- b. Develop an action plan for complaint prevention.
- c. Make sure the shareholder viewpoint is given appropriate consideration in company decision making.

Channel	Bank Communication	Action shareholders can take
Branches	The Bank will have provided a complaint management system. Shareholders are immediately given confirmation that his/her complaint has been received, logged and will be resolved by x date based on the SLA for each complaint type.	Call or visit a branch in person. Fill in a shareholder feedback card available in all branches.
Unity Bank Contact centre	Provide the complaint at the point.	Call hotline 07080666000
Website	Email shareholder and acknowledge receipt of complaint	Visit www.unitybankng.com
Email	Email shareholder and acknowledge receipt of complaint	Email to we_care@unitybankng.com customercare@unitybankng.com
Letter	Logger to call shareholder and acknowledge receipt of complaint	

8.8.Sources for Information.

Shareholders need to know where and how to file complaints or make inquiries. This is available on Unity Bank's website www.unitybankng.com (www.unitybankng.com).

The shareholders can also get information regarding the following on the website:

- Current Financials
- Historical Bank Performance
- Dividend history;
- Dividend Reinvestment Plan information;
- Bonus Issue if any
- Calendar of key dates;
- Useful shareholder forms;
- Frequently asked questions; and
- Capital

Shareholders who wish to make an enquiry or complaint about their shares should initially contact Unity Bank Registrars located at 25, Ogunlana Drive, Surulere, Lagos or the Company Secretariat Department of the Bank located at the Head Office Unity Bank Plc Plot 42, Ahmed Onibudo Street, Victoria Island, Lagos. The share registry manages the bank's Shareholders Register:

- Shareholder name(s).
- Shareholder's holding in the Bank.
- Shareholder address, Phone number, email address.
- Whether information is sent to shareholders by email or post.
- Whether shareholders wish to receive the annual report by e-mail or post.
- Dividend payment instructions.

9. Third Party Dispute Resolution

If complaints cannot be resolved directly between:

- a. The Bank's shareholder and CMO
- b. Operators in the capital market
- c. Complaints against regulators and Self-Regulatory Organization (SRO)
- d. Complaints against Operators by SROs and regulators

The parties involved can be referred to a third-party dispute resolution. Third party mechanisms use the services of unbiased regulatory bodies or panels to resolve disputes through conciliation, mediation and arbitration.

1. Conciliation:

A neutral conciliator brings the parties together and encourages them to find a mutually acceptable resolution to the dispute.

2. **Mediation:**

A neutral mediator becomes actively involved in negotiations between the parties. The mediator can propose a resolution, but cannot dictate a settlement of the dispute.

3. **Arbitration:**

An independent regulatory body or panel hears the facts on both sides of a dispute and reaches a decision. Usually both parties have previously agreed to abide by the decision, but in some systems, only the business agrees in advance to abide by the outcome of the arbitration.

SHAREHOLDERS COMMUNICATION

Unity Bank Plc recognizes the value of providing up to date and important information to its shareholders.

The Managing Director/CEO and Company Secretary have the primary responsibility of engaging and communicating with shareholders of the Bank.

Unity Bank Plc communicate with Shareholders through the following means:

1. Regular disclosure to Regulators of all material changes and information;
2. Periodic disclosure via the Annual Report, Quarterly and Half yearly Financial Reports e.tc.;
3. Notices of Meetings;
4. The Annual General Meeting;
5. The Bank's website at <https://unitybankng.com>

The Company is committed to the promotion of investor confidence by ensuring that trading in the Company's securities takes place in an efficient, competitive and informed market.

Electronic Communication and Website

The Company believes that communicating with shareholders by electronic means, particularly through its website, is an efficient way of distributing information in a timely and convenient manner.

The Company's website includes the following pages, which contain relevant information for shareholders:

- a. Section on the Company's corporate governance policies and practices;
- b. Reports section, which contains copies of annual, half yearly and quarterly reports;
- c. News section, containing sections on newsletters, NGX announcements, media clippings and power point presentations;
- d. Press releases; and
- e. Research section, which may contains broker research reports published on the Company.

The Company's website will be updated with material released to the NGX as soon as practicable after confirmation of release by the NGX.

All website information will be regularly reviewed and updated to ensure that information is current, or appropriately dated and archived.

In addition to the above, provision is made on the Company's website for shareholders to register to receive information updates.

Written communication and Annual Report

Shareholders have been given the opportunity to elect to receive a printed copy of the annual report from the Company. In addition, the Company publishes its annual report on the Company's website and notifies all shareholders of the web address where they can access the annual report.

Annual General Meeting

The Company recognises the rights of shareholders and encourages the effective exercise of those rights through the following means

- a. notices of meetings are distributed to shareholders in accordance with the provisions of the Corporations Act;
- b. notices of meeting and other meeting material are drafted in concise and clear language;
- c. shareholders are encouraged to use their attendance at meetings to ask questions on any relevant matter, with time being specifically set aside for shareholder questions;
- d. notices of meetings encourage participation in voting on proposed resolutions by lodgment of proxies, if shareholders are unable to attend the meeting;
- e. it is general practice for a presentation on the Company's activities to be made to shareholders at each annual general meeting; and
- f. it is both the Company's policy and the policy of the Company's auditor for the lead engagement partner to be present at the annual general meeting and to answer any questions regarding the conduct of the audit and the preparation and content of the auditors' report.

Amendment, Modification and Waiver

This Policy shall be amended, modified or waived only by the Board and must be publicly disclosed if required by any applicable law or regulation.

Effective Date

This Policy is effective this **19th Day of November, 2021** and shall be read together with any previous Policy or Code of Ethics of the Bank in this regard.

Approval

The Policy was approved by the Board of Directors on **19th Day of November, 2021**.