



Guaranty Trust Bank plc

GUARANTY TRUST BANK PLC

SHAREHOLDERS' COMPLAINTS

MANAGEMENT POLICY

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Version 1.0

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GUARANTY TRUST BANK PLC

SHAREHOLDERS' COMPLAINTS MANAGEMENT REGISTER

1. INTRODUCTION

Guaranty Trust Bank plc ("the Company"), believes in the protection of the statutory and general rights of shareholders at all times. All shareholders are treated equally, regardless of volume of shareholding or social status.

As a company publicly quoted on the Nigerian Stock Exchange with Global Depository Receipts (GDRs) listed on the London Stock Exchange, the Company remains dedicated to its duties and pledge to safeguard and increase investor value through transparent corporate governance practices.

The Company has an Investors Relations Unit, which deals directly with enquiries from shareholders and ensures that shareholders' views are escalated to Management and the Board. Our shareholders remain critical and key stakeholders in our business and we ensure that fair treatment of all shareholders and stakeholders form an integral part of our business processes.

In keeping with our culture of delivering excellence in service, the Company has codified its existing processes and procedure which will guide every aspect of dealing with enquiries and complaints from our shareholders, in ensuring that our shareholders are treated fairly at all times.

2. DEFINITION

In this Policy, unless the context otherwise requires, the following terms will have the meaning stated below:

Bank/GTBank	means	Guaranty Trust Bank Plc
ISA	means	Investment and Securities Act (2007);
NSE	means	the Nigerian Stock Exchange;
LSE	means	the London Stock Exchange;
Registrar	means	Datamax Registrars Limited, the entity currently vested with the management of the Company's Share Register, and its successor;
Shareholders	means	An individual, entity or corporate body that owns shares in the Company and whose name is registered in the Company's Share Register;
SEC	means	the Securities and Exchange Commission;
The Rules	means	The Rules Relating to the Complaints Management Framework of the Nigerian Capital Market.

3. SCOPE OF THE POLICY

This Policy has been formulated in compliance with the Complaints Management Framework of the Nigeria Capital Market which requires listed companies to establish a clearly defined Complaints Management policy to handle and resolve complaints from their shareholders. It shall address 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.

This Policy sets out the manner in which shareholders make enquiries or register their complaints, and how the Company responds/ addresses shareholders' enquiries, complaints, issues and/or other matters that affect shareholders.

This Policy shall cover interaction between the Company and its shareholders; and shall not extend to cover complaints from other stakeholders, customers or suppliers/vendors as the management of complaints emanating from such stakeholders, customers or suppliers/vendors is covered by the Company's existing "Treating Customers Fairly" Policy.

This Policy is not meant to be all-inclusive, but represents the minimum mandatory requirements and has taken into consideration factors that would lead to improved shareholder relationship in the Company.

Qualifying complaints/enquiries under this Policy shall include complaints with regard to matters relating to the complainant's holding of the shares in the Company, such as confirmation of shareholding, verification of shares, dematerialization/replacement of share certificate, outstanding/unpaid

dividend, revalidation of expired dividend warrants, share transfer or change of ownership of share.

4. OBJECTIVES OF THE POLICY

The objective of this Policy is to codify the Company's existing processes and procedure of handling shareholders' complaints and ensure a fair, impartial and objective management of complaints and enquiries from the Company's shareholders.

This Policy shall ensure that qualifying complaints are investigated fairly and possible conflicts of interest are identified and mitigated.

This Policy was designed to ensure enquiries and complaints from the Company's shareholders are managed in an efficient, fair and timely manner. It will also enable the Company's shareholders access the appropriate contacts as listed herein who are responsible for handling their specific complaints, resolutions and enquiries.

Other objectives of this Policy are as follows:

- i) To lay down the procedure to be followed to ensure efficient, timely and prompt resolution of complaints and enquiries by shareholders;
- ii) To ensure that related matters are promptly acknowledged and addressed in an appropriate manner as stipulated in the Rules;
- iii) To ensure compliance with rules, regulations and directives of the regulatory bodies relating to complaints management framework and

prevent reputational damage, fine and penalties from non-compliance thereof;

- iv) To ensure that the Company avoid possible litigation from aggrieved shareholders originating from inappropriate handling of such shareholder's complaints;
- v) To ensure uniformity, completeness and consistency in the handling/management of shareholders complaints/related activities;
- vi) Manage information gap between shareholders and the Company.

5. PROCEDURE FOR COMPLAINTS MANAGEMENT

5.1) Filing Complaints

Aggrieved shareholders may contact the Company and register their complaints through electronic means, by post or by delivering same to the registered address [or branch] of the Company.

Complainants shall ensure that their complaints contain all material facts and supporting documents including the following details:

- Complainant's name;
- Complainant's full address;
- Complainant's telephone/mobile number;
- Complainant's e-mail address;
- Signature of the Complainant; and
- Date.

.i) Electronic means:

The complainant may send the Complaint by e-mail to the dedicated e-mail address, investorsenquiries@gtbank.com. The Complaint may also be submitted on the Company's website at <http://www.gtbank.com/help-centre>

.ii) Post/Courier:

Complaints may also be posted to the Head Office of the Company or to the Investors Relations Unit of the Company at the addresses below:

Head Office: P. O. Box 75455

Victoria Island

Lagos

.iii) Hand delivery:

Complaints may be hand delivered to the Head Office of the Company (attention: the Company Secretary) at the office addresses below:

Plot 635, Akin Adesola Street

Victoria Island

Lagos

Where complaints/enquiries are lodged/forwarded directly to the Registrar, the Registrar will forward the details of the complaint to the address stated above.

The Registrar may be contacted at the address below:

Datamax Registrars Limited

2C, Gbagada Expressway

Anthony Oke Bus Stop (by Beko Ransome Kuti Park)

Gbagada, Lagos

5.2) Timeline/Turn-around-Time

- .i) The Company shall acknowledge receipt of qualifying complaints received by electronic mail within two (2) working days;
- .ii) Where complaints are received by post, the Company shall acknowledge receipt of same within five (5) working days of the receipt of the complaint;
- .iii) The Company shall endeavor to resolve all complaints received by the Company within ten (10) working days from the date the complaint was received;
- .vi) Where the complaint is not resolved within the given timeframe (i.e. ten (10) working days from the date of receipt of the complaint), the complainant may refer the complaint to the SEC within two (2) working days from the end of the 10 days stated herein.

The letter of referral shall be accompanied by a summary of proceedings of events leading to the referral and copies of relevant supporting documents.

5.3) Process flow for Complaints Management/Handling

Upon receipt of the Complaint, the responsible officer shall within the timelines stipulated below undertake the following, in order to ensure prompt, fair and timely resolution of the complaint:

- i) Review the complaint and seek verification of the shareholder status of the complainant from the Registrar.
- ii) Acknowledge receipt of the complaint by issuing a "hold-on" letter to the shareholder within the timeline stated herein, stating that the complaint has been received and is being investigated/resolved;
- iii) Commence investigations into the complaints contained therein and seek resolution for the complaints;
- iv) Liaise with the Registrar to determine the facts and course of action to be taken in order to resolve the complaint and ensure prompt, fair and timely resolution of the complaint.

Refer the matter to the Registrar for resolution if the need arises.

- v) Keep the complainant updated on the status of the resolution process where it becomes likely that the process may exceed the timeline stipulated herein;

- vii) Upon conclusion of investigation and final resolution, forward a response to the complainant. Thereafter the officer shall update the Complaints Register with the status and date of resolution.

5.4 The Complaints Register

The Company shall maintain an electronic Complaints Register in the format stated in Schedule 1 hereto, and 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 updated monthly.

5.5 Reporting Obligations

The Company shall provide status reports of complaints filed with the Company to the SEC quarterly.

The information should cover the number and nature of complaints received and should be differentiated according to their various criteria.

6. Dissemination of information relating to the Policy/Accessibility of the Policy

In order to ensure that this Policy is easily accessible and information relating to this Policy is properly disseminated:

- i) The Company shall make this Policy available to shareholders at its General Meetings.
- ii) The Company shall also make the Policy available on the Company's website, www.gtbank.com;

In addition to the above, the Company shall ensure that complaints are registered in accordance with the Rules in a timely and appropriate manner.

7. Amendments to the Policy

This Policy Manual will be reviewed periodically based on current realities, new developments and changes impacting the Company and the Companying industry.

The Company Secretariat will be responsible for ensuring that this Policy Manual is reviewed and updated as and when required.

8. Certification:

The policy has been approved and endorsed by the Executive Management of Guaranty Trust Bank plc, which shall also be responsible for its implementation and monitoring.

MANAGING DIRECTOR	COMPANY SECRETARY
Name : Segun Agbaje	Name : Olutola Omotola
Signature :	Signature :
Date :	Date :

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