



COMPLAINTS MANAGEMENT POLICY
OF
CAVERTON OFFSHORE SUPPORT GROUP PLC

TABLE OF CONTENTS

1. INTRODUCTION	3
2. PURPOSE	3
3. COMMITMENT	3
4. PROCEDURES FOR SHAREHOLDER COMPLAINTS/ENQUIRES	4
5. COMPLAINTS/ENQUIRES RECEIVED DIRECTLY BY COSG	4
6. ELECTRONIC COMPLAINTS REGISTER AND QUARTERLY REPORT	5
7. LIASION WITH THE REGISTRAR	5
8. ACCESSIBILITY	5
9. CHARGES	6
10. REVIEW OF POLICY	6
11. CONTACT DETAILS OF REGISTRAR	6
12. CONTACT OF COMPANY SECRETARY	6

1. INTRODUCTION

This Complaints Management Policy has been prepared in accordance to the requirements of the Securities & Exchange Commission's (SEC) Rules relating to the complaints management framework of the Nigerian Capital Market issued on the 16th day of February, 2015 and the Nigerian Stock Exchange Directives NSE/LARD/LRD/CIR6/15/04/22 to all Listed Companies issued on April 22nd, 2015.

The policy averred in this framework by Caverton Offshore Support Group Plc (COSG) and its Registrar will provide assistance regarding shareholder complaints, enquiries and comments. It will also give a Shareholder of COSG the opportunity of receiving feedback based on Shareholder's complaints on matters affecting the Shareholder(s).

This policy only relates to Shareholders of COSG and does not extend to customers, supplies, staff, or other stakeholders.

2. PURPOSE

The purpose of this policy is intended to ensure that we handle complaints/enquires from the Company's Shareholders fairly, impartial, efficiently and effectively. Our Complaint management system is designed to;

- Enable us respond to issues raised by shareholder in a timely and cost-effective manner.
- Boost public confidence in our Company process, and
- Provide information that can be used to deliver quality improvements in our services, systems and complaints handling.

This policy provides guidance to our Shareholders/Public Companies and Investors who wish to make a compliant(s) on the key principles and concepts of our complaint management system.

3. COMMITMENT

COSG is committed to providing high standards of services for shareholders, including:

- ❖ Regulate review reports about trends and issues arising from complaints
- ❖ Assist Individuals who wish to make complaints access the COSG's Complaint process
- ❖ Be aware of COSG'S Complaint handling policies and procedures.
- ❖ Provide multiple and accessible ways to make complaints
- ❖ Provide with reasons for our decision(s) and any options for redress or review.

4. PROCEDURES FOR SHAREHOLDER COMPLAINTS/ENQUIRES

COSG Shareholders can make complaints/enquires and have access to relevant information about their shareholdings in the following manner;

- **THE REGISTRAR:** Shareholders shall at first instance of making complaints/enquiries contact our registrar (See the contact details set out in section 11 of this policy). The Registrar manages all registered information relating to all shareholdings, including shareholder name(s), shareholders address, and dividend payment instructions among others.

Upon receipt of a complaints/enquires, the Registrar shall provide the relevant details of such complaint or enquiry to COSG for monitoring, record keeping and reporting purposes.

In resolving complaints / enquires, the Registrar shall be guided by the timelines stipulated in clause 5 of this policy.

- **COSG COMPANY SECRETARY:** Where the Registrar is unable to satisfactorily address enquires and resolve a Shareholder's complaints, such Shareholder should contact the office of the Company Secretary (see the contact details set out in section 12 of this policy).

5. COMPLAINTS/ENQUIRES RECEIVED DIRECTLY BY COSG

Where a complaint or enquiry is sent directly to COSG, the Company upon receipt of the complaint or enquiry shall use its best endeavor to ensure that:

- The record of the complaint/enquires are documented
- Contact details of the person making a complaint are obtained
- Responses to complaints made are provided by the Company or the Registrar within the time frame set out in this policy.
- Complaints / enquires received by email are acknowledge within two (2) working days of receipt.
- Complaints or enquires received by post are responded to within five (5) working days of receipt.
- Complaints or enquires are resolved within ten (10) working days of receipt.
- Where a complaint/ enquires cannot be resolved within the stipulated time frame set out above, the shareholder shall be notified that the matter is being investigated. Delay

may be experienced in some situations, including where documents need to be received from storage.

- The same or similar medium that was used for the initial enquiry is used in providing a response (whether by mail, post, phone or fax), unless otherwise notified to or agreed with the shareholder.

6. ELECTRONIC COMPLAINTS REGISTER AND QUARTERLY REPORT

COSG shall maintain an electronic complaints register

The electronic complaints register shall include the following information:

- The date that the complaint / enquiry was received by either the Registrar or the Company Secretary
- Complaint to be addressed to competent authority shall contain the following information (Name, Full address, Telephone Number, e-mail address).
- Nature and Details of the complaint or enquiry.
- Steps taken/ status
- Date of the Resolution of complaint.

COSG shall also provide information on the details and status of complaints to the Securities and Exchange Commission and The Nigerian Stock Exchange on a quarterly basis.

7. LIAISING WITH THE REGISTRAR

In the course of investigation of shareholder's enquiry, complaint or feedback COSG may liaise with the Registrar. COSG's engagement with the registrar will include:

- I. Determining the fact
- II. Determining what step has been taken by the Registrar
- III. Coordinate a response with the assistance of the registrar.

8. ACCESSIBILITY TO POLICY

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

- The policy shall be available on COSG website (www.caverton-offshore.com)
- A copy of the policy may be requested by contacting the General Adviser/Company Secretary of COSG
- Policy shall be made available to shareholders at general meetings.

9. CHARGES

Where possible, and subject to statutory requirements, **COSG** will not charge shareholders for making enquiries, giving feedback, providing a response or for any aspect in the course of receiving a shareholder(s) matter.

Shareholders are informed that in some circumstances the Registrar may charge shareholder(s) a fee (for example, to resend previous dividend statements upon request by the shareholder).

10. REVIEW OF POLICY

COSG may from time to time review this policy and the procedure concerning shareholder enquiries, complaint and feedback.

Any changes or subsequent versions of this policy will be published on COSG's website (www.caverton-offshore.com).

11. CONTACT DETAILS OF REGISTRAR

The Registrar may be contacted as follows:

UNITED SECURITIES LIMITED
10, Amodu Ojikutu Street,
Victoria –Island
Lagos.

Telephone: 232(1) 2714566-7
Fax: 234(1) 9032155
Website: www.unitedsecuritieslimited.com

12. CONTACT OF COMPANY SECRETARY

The Company Secretary may be contacted as follows:

Office of the Group Company Secretary / Legal Adviser
Caverton Offshore Support Group Plc
1, Prince Kayode Akingbade Close
Victoria- Island
Lagos

Telephone: 234(1) 2705656
Fax: 234(1) 4618745
Website: www.caverton-offshore.com