

Access Investors Services Nominees Limited

FRAMEWORK FOR RESOLVING CUSTOMER EXPERIENCE ISSUES

December 2025

Risk Rating: Above Average



RETURN THIS POLICY TO CONDUCT AND COMPLIANCE UNIT AFTER APPROVAL

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Document Owner

This document is owned by the undersigned. She is responsible for ensuring that the policy is reviewed in line with the requirements of the Policy Approval, Broadcast and Administration Framework.

Name	Role	Date	Version
Bunmi Arowosafe	Head, Access Investors Services	December 2025	1.0

Document History

Author	Dates	Version	Comment
Oluwayemisi Lewu	November, 2020.	1.0	The main purpose of this document is to provide general guidance on the management of Customer Complaints and other Customer Experience issues in Access Investors Services Nominees Limited embedded the SEC Complaint Framework and Access Bank's Complaint Management Framework

1.0 INTRODUCTION

Audience

The intended audience of this document is all levels of staff within Access Investors Services Nominees Limited (AISNL).

Executive Summary

This document addresses how Customer Experience issues in AISNL would be addressed, platforms to log the issues, proper resolution of logged issues within approved set timelines and all pertinent issues relating to the platforms use.

Access Bank has approved the use of Dynamics 365 CRM as the tool for logging all Customer related issues as it has the 360-degree advantage and concludes the feedback cycle by providing feedback to the customer. This will be adopted for Access Investors Services Nominees Limited (AISNL).

The service Desk platform would be retained to log all other issues that affect us internally within Access Bank.

Mode of Implementation

All Customers' feedback received in the form of Complaints, Enquiries or Service requests through our various channels shall be logged by Staff on the CRM, which is the approved platform for handling Customer Experience issues and issues resolved properly within the approved timelines.

Service Disruption

The recent global realities on Health, Security and Economy has made it important for us to establish a Business continuity plan, to ensure we are accessible at all times.

Access Investors Services Nominees Limited adopts Access Bank's General disruption plan which ensures that a team on ground in a secured location fully prepared for any form of crisis, disaster or emergency.

The team consists of volunteers from various teams within the Contact Center who would be available and responsible for ensuring that customers can contact us with ease from their respective locations, make uninterrupted transactions at will and have their issues captured, resolved appropriately and timely.

We have different BCP locations, one of which is currently situated at Access Bank Joel Ogunnaike Street in Ikeja GRA with 35 working systems with a nearby lodge at Ayoola Coker street. Transportation has also been provided to convey staff from the lodge to the office. Access Investors Services BCP location is Access Bank's PGD Building, Oniru VI, Lagos.

Periodic Review

This Framework is to be reviewed Bi-annually in line with the above average risk rating of this document to ensure it remains relevant to AISNL's business and

strategic goals.

2.0 PURPOSE OF THE FRAMEWORK

The objective of this framework is to provide guidance on capturing and resolving all Customer experience issues brought to the attention of AISNL.

It is therefore necessary that customers are aware of and can easily access AISNL, via our channels at all times and in all circumstances irrespective of social or economic unrest that could result to service disruptions, such as we have experienced.

Our First Contact resolution processes and the new Contact Centre IVR would aid timely and proper resolution of customer complaints and other experience issues. Effective measures and proper escalation paths have been put in place to improve Customer experience.

All steps for capturing and resolving all Customers feedback, complaints, enquiries, and service requests have also been included in this document.

3.0 STAKEHOLDERS AND RESPONSIBILITIES

STAKEHOLDERS	RESPONSIBILITIES
ACCESS INVESTORS NOMINEES LIMITED / ACCESS BANK'S CONTACT CENTER	Receive and log all customers issues, and first contact resolutions within agreed timelines
CENTRALIZED OPERATIONS	Resolve all issues that gets logged against the team within agreed timeline
DIGITAL AND BUSINESS BANKING GROUP	Resolve all issues that gets logged against the team within agreed timeline
TECHNOLOGY GROUP	Provide Support for the platform Resolve all issues that gets logged against the team within agreed timeline
CONDUCT AND COMPLIANCE	Ensure the agreed timelines is in line with CBN guidelines for SLA and policy for treating Customers fairly Resolve all issues assigned to the team
OPERATIONAL RISK MANAGEMENT	To monitor risks associated with customers complaints and ensure issues are treated.
INTERNAL AUDIT	Audit of the Platform usage. Resolve all issues that get logged against the team within agreed timeline.
CUSTOMER EXPERIENCE GROUP	Managing the platform, its usage and quality of resolution
SEC	Regulatory oversight and escalations

GOVERNANCE AND POLICY

IMPORTANCE OF TIMELY LOGGING AND RESOLUTION OF CUSTOMER COMPLAINTS

The Central Bank of Nigeria has released the industry-wide timelines for handling customer complaints with accompanying sanctions for non-logging and delay in handling these complaints.

The Bank communicates all channels of engagements to our customers for easy access, as it is imperative that an efficient customer experience issues handling process that is beneficial to all stakeholders is in place.

As a Capital Market Operator, AISNL will also adopt the SEC's Complaint Management Framework for the Nigerian Capital Market which entertains 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.

4.0 STATEMENT OF POLICY

- Our individual and corporate responsibility is to take ownership when a customer makes a complaint.
- AISNL Staff will treat every customer equally, whether discussing new business or when reporting a complaint.
- AISNL staff will put themselves in the shoes of the complainant and treat all customers with respect.
- Efforts will be made to resolve customers' complaints at first level. Where this cannot be done, they are immediately referred to the appropriate people for resolution.
- All employees must be aware of and comply with the complaint handling procedures.
- All complaints will be handled fairly and with integrity.
- Every effort should be made to resolve the complaint to the satisfaction of the complainant at the earliest possible time. If the complaint cannot be resolved immediately or before the specified TAT, the complaint should be escalated to Customer Experience unit.
- All complaints will be logged and tracked by the receiving staff appropriately for resolutions and progressive feedback will be provided to the customer accordingly.
- A clear distinction will be made between eligible customer complaints and other customer experience issues.
- Any expression of dissatisfaction, whether oral or written, and whether justified or not, on behalf of a customer about the Bank's provision of, or failure to provide,

a financial service which alleges that the complainant has suffered (or may suffer) financial loss or material inconvenience will be regarded as eligible customer complaint.

- Any expression of dissatisfaction which may lead to a negative experience, financial loss or material inconvenience to the customer will be taken as customer experience issues.
- All eligible complaints would be reported to CBN monthly by Internal Audit as required, in the specified format.
- Adequate attention will be given to all customer experience issues. This is to enhance the loyalty of the Bank's customers.
- The Customer Experience unit will maintain a database of customer complaints with their resolution status and make monthly reports.
- Regardless of whether the complaint is resolved immediately or not, every complaint and customer experience issue will be reported to Internal Audit and Operational Risk at the end of every month, for collation and proper tracking.
- All complaints will be properly investigated, and the root cause determined to ensure adequate remedy, preventive and improvement actions are taken.
- Our individual and collective responsibility throughout the handling of a complaint is to be professional, to be open and honest, to ensure we listen to, learn from and respond appropriately to customer issues and complaints as feedback. All complaints and customer experience issues received must be logged on BPMS and reported appropriately.

5.0 DEFINITION OF CUSTOMER EXPERIENCE ISSUES.

Customers provide feedback on their Customer Experience issues via feedback, insights and opinions on our products, services, and general perspective of the Bank.

This information can be a Complaint, Enquiry, Service Requests, Suggestions and or Commendations. It is important that the Bank captures this data, for proper resolution of issues and data analysis which will improve the Banks overall performance in all areas.

Customer Experience issues received in the Bank are to be classified into two broad categories as follows:

5.1 Eligible Complaints – Complaint is any expression of dissatisfaction, whether oral or written, and whether justified or not, from or on behalf of a customer about the Bank's provision of, or failure to provide, a financial service which alleges that the complainant has suffered (or may suffer) **financial loss** or **material inconvenience**. Customer complaints may lead to **litigation** if not properly handled. All eligible complaints would be reported to CBN monthly.

6.1.1 Accordingly to the SEC framework, Eligible complaints include:

- (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.

6.1.2 The following matters are not considered as complaints for deliberation by**Competent Authorities within the Capital Market**

- a. Complaints that are incomplete or not specific.
- b. Allegations without supporting documents.
- c. Offering suggestions or seeking guidance or explanation.
- d. Seeking explanation for non-trading of shares or illiquidity of shares.
- e. Not satisfied with trading price of the shares of the companies.
- f. Non-listing of shares of private offers of securities by private companies.
- g. Disputes arising out of private agreement with companies or intermediaries.
- h. Any other matters as may be determined by the SEC from time to time.

6.1.3 The underlisted complaints shall not be handled under the Complaint Management Framework of the Nigerian Capital Market:

- a. Complaints against unlisted, delisted, wound up, liquidated or ailing companies.
- b. Complaints that are sub-judice.
- c. Complaints falling under the purview of other regulatory bodies.

5.2 Other Customer Experience issues - In line with AISNL's focus on delivering 'Enjoyable' customer experience to our customers, any expression of dissatisfaction which may not lead to financial loss or material inconvenience to the customer will be taken as other customer experience issues. This may include but is not limited to various experiences encountered by customers due to moderate service delays, staff attitude, and delay in completion of transactions etc. Paying attention to customer experience issues will enable the AISNL to take actions that will improve the experience of the customer.

6.0 COMPLAINTS CHANNELS _

Customer Complaints and other Customer Experience Issues in the AISNL are received through emails to ais@accessbankplc.com and the following channels of Access Bank plc.

- Branch Operations - By walk in customers, telephone, sending formal letters and using the hotline.
- Access Bank Contact Center/ Resolve and Refer – By telephone, e-mails, text messages, the hotline, live chat and social media.
- Customer Experience Unit - By telephone, E-mail, periodic surveys and voice of the customer (VOC) across all channels.
- Social media (Access Bank social media handles – Instagram, Facebook, Twitter, etc.)
- Group Internal Audit– By formal complaints letter from CBN or other regulators.
- The Ombudsman – By E-mails, telephone and formal complaints letter.
- Conduct and Compliance Unit - Whistle Blowing hotlines, By E-mail and telephone calls.
- Executive Management or other staff also receive complaints through telephone calls and text messages and letters.

FEEDBACK CAPTURE AND LOGGING ON ONE PLATFORM

- Staff have the responsibility to receive and capture customers' complaints.
- Customers should also be able to log complaints from our website, social media platforms etc.
- Auto generated acknowledgements sent to customers on every complaint logged (Phone and Emails) with applicable timeline
- Ability to check case status by staff for follow-up purposes.
- Integration with the bank's platforms
- Inclusion of sufficient fields for non-customer such as demography, location etc.

7.0 CASE MANAGEMENT

- Complaints Categories, Issues and SLAs must be in line with Regulatory timelines
- Fields as defined by CBN, SEC and our internal processes.
- Automatically routing complaints to the case owner responsible for the category or issue.
- Ability to send out mails to the enterprise via the platform to show history for ease of tracking.
- Bulk reassignments of cases.
- Seamless input to cases by multiple units, with interaction automated through email and e-forms.

7.1 ACCESS LEVEL, TRACKING, ESCALATIONS AND AUDIT TRAIL.

- Various access levels for all responsible stakeholders based on responsibilities.
- Inclusion of various resolution outcomes for ease of tracking logged issues e.g. pending, escalated to branch/unit, resolved, not resolved etc.
- Field that records action taken at every stage of the resolution process, accessible to all users.
- Automated Set timelines (SLAs) for resolution based on priority levels of complaints.
- Escalations done via email alerts before and after timelines have elapsed.
- Audit trails for control purposes.

7.2 FEEDBACK MANAGEMENT

Auto-generation of acknowledgements, additional information, updates, responses and other correspondence, by email.

7.3 ROOT CAUSE ANALYSIS

Continuous controls monitoring functionality that enables the analysis of case data to proactively identify issue patterns and necessary treatment

7.4 REPORT MANAGEMENT

Report generation for monitoring, relevant escalations to stakeholders for process and service improvement.

7.5 SLA BREACH

- It is the responsibility of every Unit Head and Team Lead to ensure that their teams do not allow cases breach on their queue and all issues are treated properly within approved SLAs and timelines.
- Appropriate sanctions would be given to teams that are found liable.
- SLA breaches will form basis for computation of SIG scoring for staff appraisals
- All instances of SLA breaches will be investigated to determine possible root causes – human error, technology system or process flaws. Sanctions will be applied as appropriate in line with grid below.

SLA Breach: - Category, Description and Corrective Actions

Category of SLA breach	Description	Corrective Actions
Human Error	Staff incompetence	1 st offender – Caution
	Inputter error i.e. incomplete or wrong details	2 nd offender – Warning
	Incessant wrong routing of customer complaint	3 rd offender – To face Disciplinary Committee
	Negligence	
	Evasion i.e. closure of cases toby-pass SLA	

Process Flaws	Siloed Interdependencies	Harmonization of SOPs and interdependencies to align with overall customer journey and experience.
	SLA timelines not congruent with Regulatory and/or internal agreed timelines	Revised processes to align with Regulatory and internal approved timelines.
Technology Glitches	System/Platform timeout	Ensure stability of systems, support and uptime.
	Maintenance and system override.	Update system maintenance checklist to include platform impact analysis as part of job certification
Others	This applies to other reasons as may be determined based on root cause analysis	Corrective actions taken will be deemed commensurate in resolving and addressing root cause.

7.6 CASE MANAGEMENT MODALITIES

According to SEC's Complaint Management framework,

- AISNL shall have 2 working days to acknowledge receipt of complaints received by email. Where complaints are received by post the CMO and public companies shall respond 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.
- All complaints shall be resolved 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.
- Where the complaint is not resolved within the given timeframe, the complainant or CMO shall refer to 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.
- Where there is no relevant Competent Authority, the complaint shall be referred to by 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.

Note: All banking-related cases will be logged/escalated to the relevant teams for resolution.

