

BAMBOO SYSTEMS TECHNOLOGY LIMITED

COMPLAINT MANAGEMENT FRAMEWORK

June 2026

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INTRODUCTION

Bamboo Systems Technology Limited (“Bamboo”) is committed to delivering high standards of service to all our stakeholders. This policy outlines the framework designed to manage stakeholders’ complaints promptly and fairly, while safeguarding customer trust, public confidence, and the organization’s reputation.

For the purpose of this policy, a complaint is defined as any expression of dissatisfaction made to Bamboo regarding the quality of its products, services, processes, the conduct of an employee or individual acting on behalf of the organization, or the complaints handling process itself, where a response or resolution is either explicitly or implicitly expected.

Efforts have been made to align this policy with the following regulatory requirements, as well as best practices in complaints management and any other rules and regulations that may come into effect from time to time:

- **Investment and Securities Act 2025**
- **Securities and Exchange Commission (SEC)** – Rules Relating to the Complaints Management Framework of the Nigerian Capital Market
- Nigerian Exchange Rule Book

POLICY OBJECTIVE

This Policy is designed to ensure the effective and efficient management of complaints raised by stakeholders. We aim to ensure that:

1. Complainants are provided with a fair, responsive, and transparent resolution process.
2. Complaints are analyzed to identify root causes, with corrective actions implemented and trends monitored to drive continuous improvement across the company's operations.
3. Complaints are handled in a consistent and systematic manner.

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4. There is compliance with sector-specific regulations on complaints management, particularly those issued by the SEC, NGX, and any other relevant regulators from time to time.

POLICY STATEMENT

This Policy sets out Bamboo's approach to managing customer complaints. We are dedicated to service excellence and focused on providing high-quality, professional services to our customers.

We encourage all customers to lodge their complaints because when appropriately handled, they provide valuable insights that help us improve our products and services. Similarly, we encourage staff to view complaints as opportunities to learn and proactively anticipate customer needs and expectations.

The organization is committed to ensuring that:

1. Customers, clients, and staff have a clear understanding of the complaint handling process.
2. Complaints are investigated objectively, using all available information and evidence.
3. Each complaint is reviewed fairly, with due consideration of the specific circumstances.
4. Customers' rights to provide feedback and raise complaints about products or services are respected and upheld.
5. A Complaint Management Policy is made available to clients during onboarding.

6. The Complaint Management Policy is made available to all stakeholders via the organization's website and its application.
7. The Complaint Management Policy is also shared with shareholders of the company at the general meetings.

SCOPE

This Policy applies to:

1. Bamboo and its employees.
2. All customers/clients, both internal and external.

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3. Third parties working in partnership, or under contractual arrangements with Bamboo.
4. Auditors, consultants, and service providers engaged by the company.
5. Regulators
6. Other relevant stakeholders not expressly listed above.

COMPLAINTS COVERED BY THIS POLICY

Any individual or organization (the "Complainant") who is dissatisfied with a product or service provided by Bamboo for any reason may raise a complaint in line with this Policy.

This Policy is designed to manage complaints from:

1. Customers' complaints, including but not limited to the following:
 - a. Allegations that Bamboo has failed to comply with the Code of Conduct, applicable laws and regulations, or any agreement/instruction made with a customer.
 - b. Complaints that the organization, its employees, or representatives have acted unprofessionally, dishonestly, fraudulently, or recklessly.
 - c. Allegations that a customer has been treated unfairly or that the organization has delivered products or services below expected or ethical standards.
2. Complaints requiring either formal or informal feedback, such as concerns, disputes, omissions, or points of disagreement.

3. Complaints by competitors, partners, or other stakeholders concerning Bamboo's business practices.
4. Complaints raised directly by regulators (e.g., Securities and Exchange Commission, relevant Investment/Consumer Protection bodies) or through industry associations and self-regulatory organizations.
5. Complaints involving fraud, suspected misconduct, unethical behavior, or market manipulation.

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COMPLAINTS NOT COVERED BY THE POLICY The following types of complaints are not covered under this Policy:

1. Complaints relating to sub-judice matters (matters already before a court of law) or subject to arbitration, including employee-related disputes.
2. Complaints that fall outside the scope of Bamboo's business operations.
3. Feedback or observations that do not require resolution or formal follow-up. While such feedback is valuable and may be considered for service improvement, it does not fall under the scope of this Policy.

CHANNELS FOR REPORTING COMPLAINTS

Bamboo shall provide multiple dedicated channels to receive and manage customer complaints, including verbal complaints. A complainant may lodge complaints through one or more of the following avenues:

1. **Electronic Correspondence** – via official email, in-app messaging, or other approved electronic platforms.
2. **Written Communication** – via soft or hard copy, addressed to the organization's physical office.

These channels are designed to ensure accessibility, convenience, and prompt resolution. The following requirements shall apply to all deployed complaint channels:

1. **Accessibility & Availability** – Channels must be effective, functional, efficient, and accessible provided, however, that certain channels or features may be

modified, suspended, or discontinued from time to time at the Company's discretion, subject to applicable law.

2. **Acknowledgement of Complaints** – Every complaint received must be acknowledged within 48 hours of lodgement.
3. **Acknowledgement Details** – The acknowledgement shall include:
 - Expected resolution timelines; and
 - An assurance that the complaint is being addressed.

COMPLAINTS SUBMISSION AND IDENTIFICATION

All complainants shall report complaints to Bamboo through any of the following channels:

1. **Dedicated Email Address:** support@investbamboo.com
2. **In-App Support:** Available directly on the Bamboo app for logged-in customers

COMPLAINANTS' RIGHTS

Bamboo is committed to acknowledging all complaints promptly once they are received. Every complaint will undergo an initial review to determine the appropriate next steps.

As a customer, you have the right to:

- Receive an acknowledgment of your complaint within 48 hours of submission.
- Enquire about the status and progress of your complaint at any time through our official channels.
- Receive clear information on the expected resolution timeline and escalation options where applicable.
- Be assured that your complaint will be handled fairly, transparently, and in line with this Policy.

GUIDELINES FOR THE MANAGEMENT OF COMPLAINT

It is the company's policy to resolve all complaints within the regulatory timelines. However, we recognize that in certain cases, additional time may be required to complete a thorough review. In such instances, we will proactively reach out to the

complainant, provide reasons for the delay, and share an updated timeline for resolution.

Upon conclusion of the review, a formal written response will be provided. If the complainant is not satisfied with the response, they may request a further review by escalating the matter to the compliance unit at compliance@investbamboo.com. Such requests should be submitted in writing via email. The following principles guide our complaint resolution process:

1. Complaints shall be attended to in person or in writing
2. Complainants will always be informed of the expected resolution timeline.
3. Complaints will be acknowledged within 48 hours of receipt.
4. All regulatory or legal complaints shall be forwarded to the legal and compliance team for review and resolution.
5. All complaints will be handled in line with the Investments and Securities Act, 2025 (ISA), the Nigerian Exchange Rulebook, and any other applicable regulations that may be brought into effect from time to time.
6. Reports on complaints will be generated and submitted in line with regulatory requirements.

ROLES AND RESPONSIBILITIES

THE BOARD

The Board is committed to fostering an effective and efficient complaints management framework across the organization. Adequate resources shall be deployed to ensure this objective is achieved. The Board's responsibilities include:

1. Approving the Complaints Management Policy and all subsequent amendments.
2. Ensuring appropriate systems, processes, and mechanisms are in place to enable effective and efficient complaint handling.
3. Reviewing periodic reports on complaints as presented by senior management.
4. Providing directives and recommendations to Senior Management to enhance the complaints management process across the organization.

SENIOR MANAGEMENT

Senior Management ("SM") is responsible for ensuring the effective implementation

of this Policy and compliance with all applicable regulations relating to the management of customer complaints. SM responsibilities include:

1. Establishing appropriate systems, practices, and procedures to support effective and efficient complaints management across the organization.
2. Implementing this Policy as approved by the Board and providing timely reports to the Board on complaint trends, resolution timelines, and overall performance.
3. Executing the recommendations and directives of the Board, as well as adhering to all regulatory circulars and guidelines relating to customer complaints.
4. Supporting, where necessary, the resolution of escalated or complex complaints to ensure timely and fair outcomes for customers.

CUSTOMER EXPERIENCE (CXP)

The Customer Experience Unit is primarily responsible for receiving, managing, and resolving customer complaints across the company. The CXP unit shall be supported by other units in carrying out its responsibilities.

The CXP team shall be responsible for:

1. Receiving complaints submitted by customers through various channels, including online platforms and email.
2. Ensuring that all complaints are accurately logged.
3. Promptly acknowledging all received complaints in line with the provisions of this policy.
4. Reviewing and analysing all complaints to determine root causes and required actions.
 5. Ensuring the timely and appropriate resolution of complaints, escalating unresolved or complex matters to senior management where necessary.
6. Providing customers with regular updates on the status of their complaints and communicating final resolution outcomes clearly.
7. Reviewing resolved cases to ensure appropriate handling and resolution by case owners.
8. Conducting root cause analysis and initiating service improvement actions where applicable.
9. Preparing and submitting periodic reports on complaint trends, resolution timelines, and customer feedback to management.

10. Update the complaint register monthly and submit quarterly reports on complaints to the compliance team.

COMPLIANCE

The Compliance Function is responsible for ensuring that the organization maintains full compliance with this policy and all applicable regulatory requirements.

The Compliance function shall be responsible for:

1. Ensuring adherence to this Policy across the organization.
2. Responding to complaints from regulators.
3. Making relevant regulatory directives, circulars, and legislations relating to customer complaints management available to stakeholders across the organization.
4. Proposing updates to the policy in line with changes in the operating environment, regulations, laws, and industry best practices.
5. Reviewing the organization's compliance with this policy and applicable regulatory standards.
6. Providing reports, as appropriate, to the Board and Senior Management regarding the management of customer complaints.
7. Submitting the status reports of complaints filed with the organization to the regulators where necessary.

LEGAL

The Legal function shall be responsible for:

1. Reviewing complaints that may give rise to potential legal or regulatory liability;
2. Advising on dispute resolution, settlement, or escalation where customer complaints may proceed to litigation or arbitration;
3. Ensuring that complaint handling practices align with applicable laws, contractual obligations, and regulatory requirements;
4. Supporting Compliance and Customer Experience teams in interpreting regulations, customer agreements, and terms of service as they relate to complaint management; and
5. Maintaining oversight of legal risks associated with complaints and providing regular updates to Senior Management where necessary.

EMPLOYEES

All employees of the organization play an important role in the effective handling of customer complaints. Key responsibilities of employees include:

1. Taking ownership of any complaint brought to their attention by a customer until escalation is received by the CXP team.
2. Ensuring that all complaints received, regardless of channel or format, are promptly and accurately logged.
3. Supporting the organization's continuous improvement efforts by properly escalating and documenting complaints to help identify policy, process, and product improvement opportunities.

TIMELINE FOR COMPLAINTS RESOLUTION

It is the organization's policy to ensure that all customer complaints are handled promptly, fairly, and transparently. While it may not always be possible to define a single resolution time frame due to the varying nature and complexity of complaints, Bamboo shall adhere to applicable regulatory timelines in managing and resolving complaints.

Bamboo shall:

1. Maintain a robust complaints register to track, monitor, and manage all customer complaints across the organization.
2. Render regular reports on customer complaints in line with internal governance and regulatory requirements.
3. Ensure that the Compliance Function monitors adherence to regulatory reporting obligations and the effective implementation of this Policy.

DISCLOSURE AND RECORDKEEPING

Bamboo shall make the following disclosure and record-keeping

1. The Complaints Management Policy shall be made available to all customers during onboarding and shall be accessible on its websites and platforms.

2. The organization shall provide the required information on complaints received to the relevant regulators in line with applicable customer complaint reporting obligations. Such reporting shall cover the number, type, and status of complaints received.
3. All complaint records, including supporting documents, shall be always maintained for a minimum period of five (5) years and in line with regulatory requirements as may be amended from time to time from the date of logging the complaint, regardless of whether the complaint has been resolved.
4. Information regarding complaints shall be recorded in a manner that is clear, standardized, and retrievable for customers, regulators, and other authorized adjudicators upon request

REPORTING

The customer experience team is responsible for handling complaint management across the organization, and they shall also ensure the timely submission of all complaint reports to the compliance team. The compliance team is responsible for filing returns on customer complaints to the regulatory authority when due.

POLICY REVIEW, UPDATE, AND APPROVAL

This policy shall be subject to review from time to time at least every two years and or in line with changes in the internal and external environment of the organization. However, more frequent reviews shall be necessitated by changes in the regulatory and legal requirements.