CENTRAL DEPOSITORY

CUSTOMER COMPLAINTS HANDLING PROCEDURES

2021 (Revised 2025)

Table of Contents

1. Policy Statement

The Central Depository and Settlement Corporation (CDSC) is committed to delivering high standards of customer service and addressing the needs and concerns of our customers and potential customers in a timely and effective manner.

This Complaints Management Policy outlines the procedures through which CDSC receives, assesses and resolves complaints. It serves as a guide for both customers and staff, ensuring that all complaints are handled in a consistent, fair and impartial manner.

2. Scope

This Policy applies to all investors who wish to lodge a complaint concerning any aspect of the services provided by CDSC. It covers complaints related to the quality and range of services offered, as well as the conduct of any CDSC employee or authorized Agent in the course of service delivery.

3. Objective of the Policy

CDSC is committed to maintaining and enhancing its reputation for delivering high quality services to our customers. We view complaints as valuable feedback that enables us to continuously improve our services and overall customer experience.

The objectives of this policy are to ensure that:

1. Customers are informed of our complaint lodgment and resolution procedures.
2. Both customers and CDSC staff clearly understand the complaints handling process.
3. Complaints are investigated objectively and impartially, with due consideration given to all relevant information or evidence.
4. Reasonable measures are taken to safeguard the confidentiality and protection of customers' personal information.
5. Each complaint is assessed fairly and on its own merits, with consideration of the individual's specific circumstances and needs.

4. Definition of a Complaint

A complaint is defined as any expression of dissatisfaction by a customer regarding an action, inaction or the quality of service received in connection with securities registration, depository, custody, clearing and settlement services or any other services provided by CDSC or any of its authorized Agents.

5. Roles and Responsibilities

5.1. CDSC shall:

i) Establish and maintain a structured system for handling investor complaints:

ii) Take proactive measures to raise investor awareness about the available complaints handling mechanisms.

iii) Provide multiple accessible channels through which investors can lodge complaints.

iv) Ensure timely, consistent, fair and professional resolution of investor complaints in an efficient, and equitable manner.

v) Escalate unresolved complaints to the Capital Markets Authority and any other relevant authorities, as appropriate.

5.2. The investor shall:

i) Raise complaints or concerns in a timely manner upon becoming aware of any issue.

ii) Provide accurate, clear and concise information related to the complaint or concern raised.

iii) Submit any relevant documentation or evidence to support their complaint.

5.3. Central Depository Agents (CDAs) shall:

i) Respond to complaints lodged against them in a timely and appropriate manner.

ii) Provide supporting evidence to substantiate their responses to complaints.

iii) Maintain internal complaint handling mechanisms.

iv) Make every effort to resolve client complaints satisfactorily and efficiently.

5.4. The Capital Markets Authority (CMA) shall:
Protect investors' interests by ensuring that complaints lodged against market intermediaries, including CDSC and its Agents, are appropriately addressed in accordance with applicable laws, regulations and best practices.

6. Making a Complaint

6.1. A complaint may be submitted through any of the following channels:

a. By completing a feedback form on our website at **www.cdsckenya.com** ;
b. By calling us on +254 020 2912000, 0724256130 or any other contact number that may be provided from time to time;
c. By writing to:
The Chief Executive
Central Depository & Settlement Corporation (CDSC)
10th Floor, Europa Towers; Lantana Road, off Rhapta Road, Westlands
P.O. Box 3464 00100 Nairobi, Kenya
d. By emailing us at: helpdesk@cdsckenya.com ;
e. In person, by speaking directly with or submitting a written complaint to any of our customer service representatives.

6.2. To enable timely and effective resolution, the following information should be provided when lodging a complaint:

a. Full name and contact details (including mobile phone number and email address).
b. Customer identification (such as National ID, Passport or Certificate of Registration for legal entities) and the relevant CDS account details.
c. A clear description of the nature of the complaint.
d. Details of any actions already taken in an attempt to resolve the issue.
e. Any prior communication with CDSC staff or the relevant CDA, or any other party in connection with the complaint.
f. Copies of any supporting documents or evidence relevant to the complaint.

7. Assistance When Making a Complaint

7.1. The individual receiving or handling the complaint shall provide the complainant with any reasonable assistance required to lodge the complaint. Should the complainant require further support, they may contact our Customer Care Help Desk located on the 10th Floor, Europa Towers, Lantana Road, off Rhapta Road, Westlands.

7.2. We recognize that, in certain instances, a customer may be unable to submit a complaint personally. In such cases, we will accept complaints submitted by a third party, provided there is sufficient evidence that the customer has granted the third party the authority to act on their behalf.

8. Timelines for Lodging Complaints

We encourage our customers to lodge complaints as soon as they become aware of the issue in question. While this procedure does not impose a specific time limit for submitting a complaint to us, customers should note that statutory time limits may apply if legal action becomes necessary. Failure to act within these legal timeframes may affect the ability to pursue legal remedies arising from the complaint.

9. Recording and Reviewing Complaints

9.1. Upon receipt of a complaint, we will document the following information to ensure a thorough and transparent handling process:

i. Customer’s full name,
ii. Identification number,
iii. CDS account number and contact details.
iv. Date the complaint was received
v. Channel through which the complaint was submitted
vi. Nature of the complaint, including relevant facts and underlying cause(s)
vii. Division or organization to which the complaint relates
viii. Outcome of the action taken at the frontline resolution stage
ix. Date of escalation, where applicable
x. Actions taken during the investigation stage

xi. Outcome of the investigation

xii. Root cause of the complaint and any remedial actions implemented

xiii. Date the complaint was officially closed

xiv. All communication exchanged between CDSC and the complainant

9.2. As part of our continuous improvement efforts, all complaints will be regularly monitored and reviewed by management to assess resolution timeliness, identify emerging trends and evaluate the effectiveness of corrective and preventative measures taken to mitigate recurrence of identified issues.

10. Complaints Resolution Process and Timelines

10.1. CDSC is committed to resolving customer issues at the first point of contact whenever possible. However, where immediate resolution is not feasible, a structured and comprehensive complaints handling process will be initiated.

10.2. We will acknowledge receipt of a customer complaint within one (1) business day. Following this, an initial review of the complaint will be conducted to determine the appropriate course of action.

10.3. During the review or investigation process, there may be a need to seek clarification or request additional documentation from the customer. In such cases, we will clearly communicate the purpose of the request and provide an update on the status of the complaint.

10.4. We aim to resolve all complaints within ten (10) business days from the date of receipt. If resolution within this timeframe is not possible, we will notify the customer of the reason for the delay and provide an estimated date by which a final response will be issued.

10.5. Customers are entitled to enquire about the status of their complaints at any time by contacting our customer service team.

10.6. Where we have requested additional information from a customer, we encourage timely responses to facilitate prompt resolution. If no response or feedback is received from the complainant within **three (3) months,** the complaint will be closed**.** Should the customer provide feedback after closure, a new file will be opened, and the matter will be treated as a new submission.

11. CDSC Six Point Complaint Handling Process

11.1. *We acknowledge:*

We will acknowledge receipt of the complaint within one (1) business day of receiving it.

11.2. *We review:*

An initial review of the complaint will be conducted to determine if any additional information or documentation is required. If necessary, we will contact the complainant to clarify details or obtain further information.

11.3. *We investigate:*

Within five (5) business days of receiving the compliant, we will undertake an objective and impartial investigation. This will include evaluating the information provided by the complainant, reviewing our internal actions and interactions with the customer and considering any other relevant information available to support the investigation.

11.4. *We respond:*

Upon completion of the investigation, we will communicate our findings to the customer, along with any actions taken to address the complaint.

11.5. *We take action:*

Depending on the outcome of the investigation, we will take appropriate remedial actions, which may include resolving the issue, escalating it to internal teams and implementing changes to our business practices or policies to prevent recurrence.

11.6. *We record*

All complaints will be documented and maintained as part of our continuous improvement and quality assurance processes. These records will be reviewed regularly to identify trends and opportunities for service enhancement.

12. Complaints about CDSC Employees

12.1. If a customer wishes to raise a complaint regarding a member of CDSC staff, the matter will be handled with utmost confidentially, impartiality and fairness. All individuals involved will be treated equitably. The complaint will be thoroughly investigated by gathering the relevant facts, engaging with the concerned parties and verifying explanations wherever possible.

12.2. Complaints against staff members may be submitted in writing to the CDSC postal or physical address.

12.3. In handling such complaints, CDSC will ensure the staff member concerned is treated objectively by:

a) Notifying them of the complaint regarding their conduct or performance.
b) Offering them an opportunity to present their perspective.
c) Providing appropriate support throughout the process.
d) Keeping them informed about the progress and outcome of the investigation.

12.4. Where possible, we will strive to resolve complaints at the first point of contact. Should this not be feasible, a formal investigation will be undertaken and the complainant will be informed of the outcome.

12.5. If the complainant is dissatisfied with the manner in which the complaint was handled or with the resolution provided, they may escalate the matter to the Chief Executive of CDSC.

12.6. Should the issue remain unresolved to the complainant's satisfaction, they retain the right to escalate the matter further to the Capital Markets Authority or any other relevant regulatory authority or law enforcement agency.

13. Complaints Under Investigation by a Regulator or Law Enforcement Agency

13.1. Where a complaint has been escalated and is under active investigation by a regulatory authority or law enforcement agency, such as the Capital Markets Fraud Investigation Unit (CMFIU) or a court of law, CDSC may suspend its internal resolution process in respect of that complaint until the external investigation or legal proceedings have been concluded.

13.2. CDSC shall cooperate fully with all relevant authorities and will provide any information, or assistance requested in support of such investigations.

13.3. The complaint shall be classified in the register as "Under External Review" and tagged appropriately as either "CMA Investigation" or "Court Matter".

13.4. CDSC shall issue a formal communication to the complainant informing them that:

a) The matter is under investigation by an external authority.

b) The internal complaint file will be closed pending the outcome of the external process.

c) They may re-engage CDSC should there be residual matters after conclusion.

13.5. The complaint shall be marked as "Closed – Referred to External Authority" in the complaint register.

13.6. CDSC may reopen the complaint internally if the authority refers the matter back or if new information emerges.

14. Contacting Us

All complaints, queries or requests should be directed to CDSC through the following official channels:

a) **Email:** helpdesk@cdsckenya.com

b) **Postal Address:**

The Chief Executive
Central Depository & Settlement Corporation (CDSC)
10th Floor Europa Towers, Lantana Road, off Rhapta Road, Westlands,
P.O Box 3464 – 00100,
NAIROBI.