

SHAREHOLDER COMPLAINTS AND GRIEVANCE MANAGEMENT POLICY

AMALGAMATED TELECOM HOLDINGS LIMITED

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Overview of Shareholder Grievance Management Policy

The Shareholder Complaints and Grievance Policy is established to outline and provide the requirements and mechanism of addressing shareholder complaints that are related to the ATH services, and dividend payouts, other shareholder concerns and questions.



1. Purpose

- 1.1. The Shareholder Complaints and Grievance Policy is established to outline and provide the requirements and mechanism of addressing shareholder complaints that are related to the ATH services, dividend payouts, other shareholder concerns and questions.
- 1.2. This policy is formulated to provide efficient services to shareholders and to effectively address grievance in a fair, impartial way and to deliver timely resolutions.
- 1.3. It is vital to have a critical procedure prepared in recognition of the importance of effective engagement in promoting shareholder confidence in ATH. As this will enable better communication and accountability in management of grievances and complaints.

2. Policy Coverage

- 2.1. This policy sets out grievance redressal mechanism with respect to ensuring that adequate steps are taken to resolve any shareholder complaints and ensure that ATH Management and staff manage shareholder complaints and grievances as per this policy.

3. Grievance Governing Principles

- 3.1. In order to ensure that the shareholder grievance and complaints are managed and aligned to the applicable statutory and regulatory requirements. The principles that are to be taken into account are as follows:
 - The fair treatment of all shareholders at all times;
 - Complaints, grievances and queries raised by shareholders to be dealt promptly and with courtesy;
 - Shareholders to be informed of the avenues to escalate their complaints, grievances and queries within ATH and their rights to alternative method if they are not fully satisfied with the response; and
 - ATH will ensure that all complaints, grievances and queries efficiently and fairly managed within the procedure outlined in this policy.

4. Management of the Grievance and Complaints

- 4.1. For the purposes of this Policy and the management of complaints and grievances, ATH Risk and Compliance Team is in charge of handling all shareholder grievances made under this Policy including considering the relevance, complexity and sensitivity of complaints.
- 4.2. The Risk and Compliance Team shall follow the escalation process and procedure outlined in this policy for timeliness and effective management of the shareholder complaints and grievance.

5. Shareholder Grievance Procedure

Step by Step Process

- 5.1. All grievances and complaints may be lodged in writing (email to [Complaints@ath.com.fj]), or in person at the registered office with (the Company Secretary or SPX Compliance Officer)), or verbally, either as an individual person or a party, or through an authorized representative. All complaints and grievances are to be acknowledged within 24 hours of receiving to ensure that the shareholder is made aware that the issue is being looked into. Ensure that the staff acknowledges receipt of the grievance and updates the grievance register. Any person investigating the complaints should not be involved, either directly or indirectly, in the subject matter of complaints.
- 5.2. The receiving staff to ensure that all relevant information and supporting documentations are provided by the shareholder so that the investigation can commence.
- 5.3. Once the investigation has been concluded and with the approval from Head of Risk and Compliance, the resolution and the outcome are conveyed to the shareholder via a formal letter, email or by meeting. This communication of the resolution will depend entirely on how the shareholder wants the outcome to communicated.
- 5.4. Where the shareholder is dissatisfied with the outcome or the way the grievance or complaint was handled, the dissatisfaction is to be advised to the Head of Risk and Compliance who will provide the shareholder with internal and external review options.
- 5.5. If the shareholder is still dissatisfied with the outcome, the grievance and complaint will be escalated to the CEO.
- 5.6. Upon resolution or decision on the complaint and grievance, the grievance register is updated and supporting documents are filed for reference purpose.

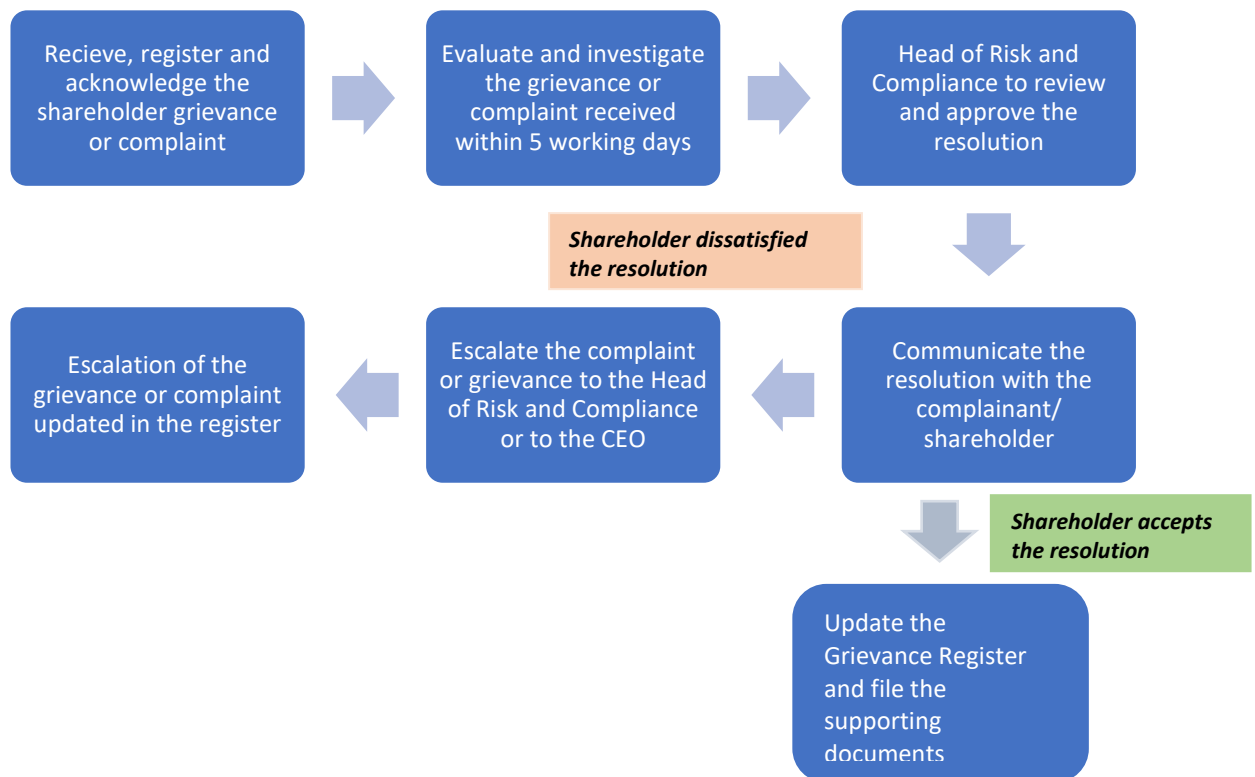
Shareholder Grievance Register

- 5.7. A shareholder grievance register shall be maintained by the Risk and Compliance Team which shall be used to record all shareholder complaints and grievances with the details of the shareholder.
- 5.8. The Head of Risk and Compliance shall ensure that:
 - The data of all the complaints and grievance are centralized into one register; and
 - Shareholder complaints received and attended to during the year and reasons of unresolved or unattended complaints are detailed into the Annual Compliance Report on Corporate Governance and provided to SPX in accordance with SPX or RBF requirements.

5.9. The Shareholder Grievance Register may contain, amongst other information, the following:

- The date of the grievance
- The details of the affected party
- The details of the complaint or grievance.
- The name of the staff who received the complaint or grievance and who is handling the issue.
- A summary of the complaint and grievance, its progress, follow-up made and outcome.
- The date the grievance was resolved and communicated to the shareholder or further escalated upon dissatisfaction of the shareholder.
- Personally, identifiable information of complainants should be made available and used only for the purpose of addressing the complaint and should be actively protected from disclosure, unless the complainant expressly consents to its disclosure.

Graphical Illustration of the Grievance Process





6. Resolution of the Grievance

- 6.1. Adequate steps should be taken for expeditious redressal of grievance, complaint or questions where possible within 5 working days from the date of receipt of the complaint or grievance and to be communicated to the shareholder unless legal proceedings are required, the shareholder shall be duly informed of the action taken. ATH shall provide details regarding shareholders complaints received and attended to during the year and reasons of unresolved or unattended complaints in the Corporate Governance Report, Annexure P in its annual report for the financial year.

7. Conflict of Interest

- 7.1. Any staff investigating the complaint or grievance should not be involved, either directly or indirectly, in the subject matter of complaint or grievance. If the staff is known to the shareholder on a personal or professional ground, this to be declared to the Head of Risk and Compliance so that a decision is made on the staff involvement in the resolution process.

8. Confidentiality

- 8.1. Personal information of complainants should be made available and used only for the purpose of addressing the complaint or grievance and should be actively protected from disclosure unless the complainant expressly consents to its disclosure.
- 8.2. All the information used and disclosed to be managed in a confidential manner by the staff of ATH and if found contravening this policy, disciplinary actions shall be taken.

9. Reporting

- 9.1. Quarterly internal reports to be prepared and presented to the senior management and CEO on the number of complaints and grievances received, investigated, resolved, and escalated.

10. Monitor and Review

- 10.1. The Head of Risk and Compliance is responsible for the operation of this policy and the implementation of the procedures as stated in the policy.
- 10.2. This policy becomes effective from the date approved by Board and is to be reviewed once every 3 years at the least.



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10.3. ATH is incorporated in Fiji and subject to the Companies Act 2015 including the general supervision of the Reserve Bank of Fiji with expectations that ATH act in accordance with the Corporate Governance Code for the Capital Markets and SPX Listing Rule 60.1 which requires the establishment of an effective mechanism for addressing shareholders' complaints and grievances approved by the Board of Directors of ATH in line with relevant Reserve Bank policies. This policy is compliant with these requirements.

11. Review Log

Drafted by	[Ashvini Sahayam]	Version	[one]
Responsible department	Risk and Governance]	Approved by Board on	[04/07/2023]
		Scheduled review date	[July 2026]

This policy is published on ATH's website and intranet and is accessible to all Group employees, officers and members of the public at <http://www.ath.com.fj>