

OPERATING POLICIES AND PROCEDURES

Complaints Policy and Procedures

As amended 1 January 2019

1. Policy

- 1.1 PIDG will take all complaints seriously and review them in accordance with the procedures set out below.

2. Procedures

2.1 Complaints by a member of the public

- 2.1.1 If you have evidence of a breach of the Code by the PIDG Group, or believe that you have been negatively affected by such a breach, please tell us. Broadly speaking, the Code covers anti-corruption and integrity, personal and corporate ethical conduct, risk management and internal control, procurement, tax, disclosure of information, environmental and social sustainability, recruitment, remuneration and travel and expense reimbursement. We welcome the reporting of any suspicions of money laundering, bribery, corruption or other financial malpractice.

- 2.1.2 Concerns should be raised with us using one of the methods set out in paragraph 2.1.3. All communications will be treated confidentially if this is requested. We will promptly investigate your complaint and, if we deem it appropriate (please see below), seek a solution that addresses the complaint as quickly as possible.

- 2.1.3 To submit a complaint you have several options:

- Online – you can submit a complaint by using the online form at www.pidg.org. Please follow the instructions and describe the complaint as clearly as possible.
- Or by letter to the address below:

The Private Infrastructure Development Group Ltd
6 Bevis Marks
London
EC3A 7BA
UK

- 2.1.4 We will acknowledge receipt of your complaint within 5 working days and then review whether your complaint is, in our view, eligible for further investigation. We commit to informing you of our decision regarding eligibility within a reasonable time – our aim will be to inform you within 30 working days. Once a complaint has been accepted as eligible for investigation and unless prohibited by law, we will begin a process of investigation. We may encourage other members of the PIDG Group to work with the complainant, if the complainant agrees, as part of a process of finding an appropriate resolution to the problem.

Complaints can be submitted by an individual or a group directly and materially affected, or potentially directly and materially affected, by:

- the activities of the PIDG Group; or
- the operations of a company in which PIDG funding is invested.

2.1.5 Complaints can also be submitted by:

- an individual or group authorised to act on behalf of the complainant(s);
- individuals or registered non-governmental organisations (NGO) with evidence of an apparent breach of the Code or specific expertise in the topic to which the complaint refers. This may be particularly relevant in the case of environmental issues where the impact may primarily be on biodiversity rather than on people.

2.1.6 PIDG will not investigate what it reasonably believes are¹:

- frivolous or malicious complaints;
- complaints motivated by an intention to obtain commercial, financial, personal, political or other advantage, not directly related to the nature of the complaint;
- complaints filed after PIDG funding is no longer invested in a business, company or project to which the complaint relates²;
- issues which PIDG has:
 - previously reviewed³;
 - made a recommendation; or
 - reached a decision;

unless justified by clear and compelling new evidence or circumstances not known at the time; or

- complaints or queries relating to the adequacy or suitability of PIDG's own policies and procedures.

2.1.7 PIDG will contact the complainant to inform him / her / it of the steps it intends to undertake (if any) to progress the complaint. Once any investigation by PIDG is concluded, the complainant and (unless prohibited by law) the Board of PIDG Ltd will be provided with a summary of the outcome. PIDG's decisions will be final but may be reviewed if new evidence is brought to the attention of PIDG.

2.1.8 The executive team of PIDG Ltd. is responsible for dealing with any complaint under the supervision of the Chair of the PIDG Ltd. Board (unless the complaint relates to the conduct of PIDG Ltd. in which case the PIDG Ltd. Board is responsible for dealing with the matter).

2.1.9 An anonymous summary of any complaints received by PIDG and the manner in which they have been addressed will be provided on PIDG's website annually.

¹ As determined by PIDG in its absolute discretion.

² If the PIDG Group is no longer invested in a company, its ability to resolve a situation is likely to be very limited. However, if we are able to contact the new owners to inform them that the issue has been raised, we will endeavour to do so and consider what other steps could be taken.

³ In the context of a complaint under this complaints procedure or otherwise.

2.1.10 We would ask you to provide as much information as you can in order to help us establish whether a complaint is eligible for further investigation. The following information will help us:

- *Contact Details* - The name, address and contact details of the complainant. If you wish your identity or any other information you are providing to us to remain confidential, please state this very clearly in your communications with us. PIDG will use its best efforts to respect requests for confidentiality, subject to any legal requirements to disclose information. The identity of any whistle blower will be protected;
- *Role of Complainant* - If you are directly affected, please state in what capacity – employee, local resident etc. If you are submitting a complaint as a representative of an affected person or community, please provide the identity of those on whose behalf the complaint is made. If the complaint is being submitted by an entity claiming expertise please state the relevant expertise of that entity;
- *Company Information* - The name and details of the operations of the company concerned, including location;
- *Nature of Complaint* - Details of the way in which the complainant believes that the Code has been breached, including the nature of the breach, when the problem started, the scale of the issue (area or number of people affected and severity) and evidence where possible;
- *Actions Taken* - Where available, information regarding what has been done by the complainant or affected parties to attempt to resolve the problem, including any contact with the PIDG Group or the local authorities and the results of such contact, or if no contact has been made, the reasons why; and
- *Other Relevant Information* - Any other relevant facts, context or supporting documents that will help us to deal with your complaint effectively and quickly, such as details of any other organisations that might have useful information directly relating to the complaint.

2.1.11 PIDG may seek further information or clarification from the complainant.

2.1.12 The procedure for investigating allegations of fraud or corruption (or any other integrity violation) is set out in the PIDG OPPs (Anticorruption and Integrity Policy and Procedures). The procedure for investigation of complaints about procurement decisions is set out in the PIDG OPPs (Procurement Policy and Procedures).

2.1.13 In relation to all other complaints, when a complaint is considered eligible for further investigation, PIDG has approximately 120 working days to conduct an assessment of the complaint and the alternatives for resolving the issue(s). The purpose of this assessment is to clarify issues raised by the complainant, to gather information on how other stakeholders view the situation, and to help the parties determine whether and how they may be able to resolve the complaint.

2.1.14 The PIDG may use independent third-party facilitators who possess the appropriate cultural and linguistic skills to assist with local stakeholders to help resolve issues.

- 2.1.15 In helping parties craft solutions, the PIDG will not support agreements that may be coercive to one or more parties, are contrary to PIDG policies, or that violate relevant domestic or international laws.
- 2.1.16 The PIDG will respect any requests for confidentiality of stakeholders' identities or information communicated to the PIDG. Parties will be advised by the PIDG if confidentiality may constrain efforts to seek a satisfactory resolution.
- 2.1.17 Based on the results of the assessment, the PIDG will (using whatever independent external or internal resource as it deems necessary) work with the stakeholders to develop a jointly agreed process of assisted negotiation or other collaborative strategy for addressing the issues raised in the complaint.
- 2.1.18 In cases where the subject of the complaint is found to be in compliance with the Code, PIDG will close the investigation. In cases where the subject of the investigation is not found to be in compliance, the PIDG will keep the investigation open and monitor the situation until actions taken by the subject of the investigation assure PIDG that the subject of the investigation is back in compliance.
- 2.1.19 Nothing in these Complaints Policy and Procedures is intended to deprive any person of their recourse to a formal judicial process.