



Private Infrastructure
Development Group
Pioneering infrastructure changing lives

Complaints Management Procedures

Document scope:	PIDG Trust and All PIDG Companies
Document custodian:	PIDG Chief Risk Officer
Document approver:	PIDG Risk Committee
Document number:	OPP003/02
Document status:	Final
Version:	1
Issue date:	17 June 2021
Review date:	Annual

1. Introduction

The Private Infrastructure Development Group (PIDG, as defined below) is committed to operating to a high standard with every person with whom it has business relations. However, from time-to-time things do go wrong or people behave in ways which are not appropriate or acceptable. If this happens, PIDG want to help resolve the matter as quickly as possible and put things right.

This document sets out PIDG's complaints procedures ("Procedures") so that complaints relating to PIDG business may be raised quickly and easily, and the steps that will be taken to investigate and address such complaints. These Procedures should be read in conjunction with PIDG's Complaints and Whistleblowing Operating Policy ("Policy").

2. Who can make a complaint?

These Procedures may be used by any person who wishes to make a complaint about the Private Infrastructure Development Group Trust (the "PIDG Trust") or any PIDG Company including The Private Infrastructure Development Group Ltd ("PIDG Ltd"), InfraCo Africa, InfraCo Asia, The Emerging Africa Infrastructure Fund Ltd, GuarantCo Ltd and ICF Debt Pool (together "PIDG").

3. What is a complaint?

Any expression of dissatisfaction with service provided by a PIDG Company (whether justified or not) is treated as a complaint.

A complaint may be about:

- the standard of service provided by PIDG
- the conduct or behaviour of staff
- any action or lack of action by staff affecting an individual or group
- breach of applicable laws (e.g. data protection laws) or PIDG policies and procedures (e.g. PIDG Procurement Policy and Procedures).

The complaint could relate to a PIDG Company, PIDG Service Provider, PIDG Recipient or a PIDG financed project.

PIDG also encourages individuals to speak up about matters of public interest and concerns about malpractice or wrongdoing in relation to PIDG activities including bribery and corruption, fraud, and health and safety regulations. This should be done by following the procedures outlined in PIDG Whistleblowing Procedures. As detailed in the Policy, if a person wishes to make a complaint or pursue a dispute relating to their own circumstances or treatment, the complainant should refer to the grievance policies outlined in the relevant staff handbook or contract, as appropriate.

4. How to make a complaint

Any person who has a complaint should, in the first instance, attempt to resolve the matter through their main point of contact with PIDG and/or in accordance with the complaints or grievance mechanism set out in their contractual arrangements.

If the matter has not been satisfactorily resolved, then they may elevate the complaint by contacting PIDG Compliance using one of the following channels:

Online using the enquiry form on the [Contact Us](#) page

Send email to: compliance@pidg.org

Telephone: +44(0) 203 848 6740

Write to: PIDG Compliance
The Private Infrastructure Development Group Ltd
6 Bevis Marks
London EC3A 7BA

There is no prescribed format for making a complaint, but the individual should provide as much information as possible so that the complaint can be fully investigated. This should include, as far as possible:

- Name and contact information of the person making the complaint
- Date, place and time of the incident
- Name of the relevant PIDG Company to which the complaint relates
- Name of the PIDG project (if any) to which the complaint relates
- Details of the PIDG parties involved
- Details of the basis of the complaint or actual or suspected breach
- Any documentary or other evidence to substantiate the incident or actual or suspected breach.

5. How PIDG will deal with complaints

Upon receipt of a complaint PIDG will:

- Acknowledge receipt of the complaint as soon as possible but always within seven days of receipt.
- Request any additional information from and provide any feedback to the complainant.
- Conduct the investigation in an independent, fair, confidential and unbiased manner with respect to all parties involved. This will include collating and assessing information relating to the complaint as quickly as possible and draw evidence-based conclusions, including, where appropriate, collating information from the relevant PIDG individuals or teams.
- Provide a report of the outcome of the investigation as soon as possible but always within one month from the acknowledgement of receipt of the complaint. If the investigation has not been completed, PIDG Compliance will provide an explanation for the delay and an indication of when the outcome will be reported. This will be within one month of acknowledgement of receipt.
- Log all complaints so that the types of problems can be monitored, and in order to determine the best way to sort them out and how long it is taking to deal with them. This also helps PIDG to take a closer look at how improvements can be made to service delivery by the PIDG Companies.
- Keep records in an organised and confidential manner. Data provided will be held securely in accordance with PIDG Privacy Policy and applicable data protection legislation. Details of the report, the identity of the complainant and anyone mentioned in the report will be kept confidential throughout and after the investigation and only shared on a need-to-know basis or as required by law or regulation.

6. Remedies

When PIDG get things wrong it will act to:

- accept responsibility
- explain what went wrong and why
- put things right by making any changes required.

The action taken to put matters right in response to a complaint, may include any combination of the remedies, including as set out in the list below or other appropriate action. The general principle followed by PIDG is that a complainant should, so far as possible, be put in the position the person would have been in, had things not gone wrong.

The remedy chosen needs to be proportionate and appropriate to the failure in service and take into account what resolution or redress individuals are looking for when they complain. This may include:

- a sincere and meaningful apology (explaining what happened and or what went wrong) - an apology is not an acceptance of liability;
- remedial action, which may include reviewing or changing a decision which gave rise to the complaint;
- putting things right (for example change of procedures to prevent future difficulties of a similar kind, either for the complainant or others); or
- training or supervising staff.

7. Complaint not satisfactorily resolved

In the event that a person is not satisfied with the investigation and/or conclusion of PIDG, they may, within a maximum of 28 days from the date of the final response from PIDG, request that their complaint be reviewed by PIDG's Chief Risk Officer by contacting:

Chief Risk Officer

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

E-mail: layth.al-falaki@pidg.org
Telephone: +44(0) 203 848 6742

If a person remains dissatisfied following the CRO's review, they can ask to have their complaint reviewed by the Chair of PIDG Ltd's Risk Committee by contacting:

Chair, Risk Committee

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

E-mail: patrick.crawford@pidg.org