

# apis | partners

## Grievance Mechanism



## Grievance Mechanism - Policy and Procedure

### 1. Overview

Apis Partners Group (UK) Limited ("Apis" or "Apis Partners") strives to ensure that its investment activities and operations do not inappropriately or adversely affect those who interact with, do business with, or reside near the facilities of the companies in which Apis invests.

Apis Partners Group (UK) Limited's Grievance Mechanism allows for any individual or group to raise any concerns or complaints (hereafter referred to as "grievances") regarding the activities of **Apis Partners Group (UK) Limited** ("Apis" or "Apis Partners"), **Apis Growth Fund I** ("AGF I"), **Apis Growth Fund II** ("AGF II"), **Apis Growth Fund III** ("AGF III"), and **Apis Global Growth Fund III** ("AGGF III" which together with AGF I, AGF II, and AGF III, are together known as the "Apis Funds"), and their **underlying investment portfolios** ("Apis Portfolio Companies").

The purpose of this Grievance Mechanism is for Apis to hear about any concerns or complaints that any potentially affected stakeholders may have in relation to Apis' investment or operational activities, so that any issues can be identified and, where necessary, duly addressed.

This Grievance Mechanism procedure applies to all external stakeholders, including Apis Portfolio Companies and their employees, local communities (local to Apis Portfolio Company operations), and other interest groups. This document also provides details on how grievances will be managed by Apis Partners, as well as the methods to enable any affected stakeholders to have their grievances resolved in an effective and efficient manner.

Examples of grievances (which are encouraged to be reported through this mechanism) in relation to Apis, Apis Funds, or Apis Portfolio Companies, include, but are not limited to:

- Improper business practices, including financial irregularities, bribery, corruption and / or money laundering;
- Inappropriate treatment of customers, clients, borrowers, and / or investees;
- Practices or technologies that endanger health, safety, and security;
- Cyber security-related matters;
- Any "Safeguarding Violations"<sup>1</sup> and / or "Forced Labour Indicators"<sup>2</sup>;
- Inappropriate, hurtful, derogatory and / or discriminatory comments or actions;
- Environmental damage resulting from operational activities and / or construction;
- Physical damage to private and / or public assets;
- Negative impacts on local residents (such as excessive noise, traffic, and other types of disturbance); and
- Incidents or disputes with local communities which has or would have a negative effect on social and / or cultural contexts.

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<sup>1</sup> "Safeguarding Violation" means any action or series of actions that (i) involves any work or service which is exacted from any person under the menace of any penalty and for which that person has not offered themselves voluntarily, or that otherwise contravenes the requirements of the ILO Core Labour Standards; (ii) contravenes the requirements of the Gender-Based Violence Convention (ILO Convention 190 (Violence and Harassment)), or that otherwise involves the exploitation, abuse or harassment (being any form of unwanted verbal, non-verbal or physical conduct, whether by force or under unequal or coercive conditions) of any person that is directed at such person because of their perceived or real sex or gender, or that disproportionately affects people of a particular sex or gender; or (iii) involves the exploitation or abuse of a child.

<sup>2</sup> "Forced Labour Indicator" means any indicator set out in the "ILO Indicators of Forced Labour" publication available at: <https://www.ilo.org/publications/ilo-indicators-forced-labour>.



## 2. Grievance submission procedure

Apis accepts submission of grievances via email submitted to: [grievance@apis.pe](mailto:grievance@apis.pe)

For any party submitting a grievance, the following information should be included within the grievance submission:

- Name of the person and/or company / entity / group submitting the grievance (optional);
- Information for contacting the person / group submitting the grievance (optional);
- Date of the submission;
- Whether the person / group submitting the grievance requires anonymity;
- Description of the grievance;
- Whether the grievance has been raised previously and if yes, how and when it was raised; and
- Description of the desired solution.

## 3. Grievance handling procedure

Apis will complete the following steps for handling any received grievances:

### Step 1 - Acknowledgement

A receipt of any received grievances will be formally acknowledged in writing no more than fourteen (14) days from the date it was submitted (unless the complainant(s) have refrained from providing contact details).

This response will also include details of Apis' further actions to be taken based on the nature of the grievance, as well as whether Apis requires any further information from the complainant(s).

Any received grievances will be received and initially reviewed by Apis' Compliance Manager, General Counsel, and Senior Legal Counsel, and Head of Responsible Investment (ESG / Impact) collectively the ("Apis grievance team").

### Step 2 - Investigation and assessment

The Apis grievance team will then set up an investigation into the grievance. Where the complainant has submitted contact details, Apis will contact them should any further information be required.

The specific nature of the grievance will also be assessed to determine the type of response required, as well as the appropriate individual(s) from within Apis to manage the investigation, response, and eventual resolution.

### Step 3 - Resolution

When resolving any grievance, records of all correspondence will be kept. Any follow up monitoring required and any resolution plan will also be documented.

Where necessary, the Apis grievance team as well as the appropriate individual(s) from within Apis that are handling the grievance will arrange for a meeting to take place (either in person or via call or video call) to discuss the grievance further.

In preparing for such a meeting, Apis will ensure all relevant personnel are made fully aware of all facts in the specific case of the grievance, and will consider how similar grievances have been previously resolved. Apis will also consider:



- Whether it is necessary to have an independent representative in attendance to witness and record the meeting; and
- Whether an interpreter may be needed to ensure efficient communication.

The complainant has the right to be accompanied by a colleague or acquaintance also. In such cases notice should be given to Apis prior to any meeting taking place with details of the colleague provided.

When Apis has completed the investigation of the grievance, Apis will contact the complainant(s) with findings from the investigation, as well as the proposed response / outcome (including any related commitments made by both parties) in writing via email, and verbally also if required.

If Apis' investigation finds that the grievance raised does not relate to the activities of Apis, Apis Funds, or Apis Portfolio Companies, or that the activities in relation to these entities are being conducted within Apis' policies, Apis' operating guidelines, or the relevant and applicable International Standards, then this will be explained to the complainant(s) in writing via email.

In all other cases, Apis will propose a response to grievance raised to the extent that Apis is able to do so. If the complainant(s) consider Apis' response and its implementation to be satisfactory, the complainant(s) will be asked to sign a statement of satisfaction (if they are happy to do so).

If the complainant(s) are not satisfied with Apis' response, then Apis will have further discussions to consider whether there are any other possible steps which can be taken to resolve the grievance.

If the complainant(s) continue to be unhappy with the Apis' proposal or any subsequent actions taken, the complainant(s) are free to seek resolution through a formal external dispute resolution mechanism.

#### **Step 4 - Follow up / Close out**

Each grievance received will be assigned a status as per Apis grievance recording procedure, as set out below, and this may be a final assigned status as part of the close out. The full spectrum of grievance statuses to be assigned are:

- *Open*, i.e. under investigation
- *Resolved*, i.e. resolution has been agreed
- *Unresolved*, i.e. not possible to reach an agreed resolution and case has gone to external dispute resolution
- *Abandoned*, i.e. complaints where the complainant is not contactable after a certain period and complaint becomes null and void
- *Rejected*, i.e. complaints where the nature of grievance was deemed null and void, due to being found to be false or erroneous for example, as determined by the Apis grievance team

A grievance is closed out when no further action can be or needs to be taken. When closing out a grievance, Apis will ensure that there is fully documented evidence of the resolution process. This includes (but is not limited to):

- Written internal records (with the date and time close out took place and sign off by responsible staff);
- Photographs, if relevant to documenting the resolution; and
- Confirmation of the complainant's agreement with the resolution (as available / relevant).

The Apis grievance team may contact the complainant(s) at a later stage to confirm that the grievance remains resolved / closed out.



### Grievance recording procedure

Apis Partners will log any received grievances within its grievance register, where the following items shall be recorded for each grievance, as information becomes available:

- Grievance reference number;
- Complainant's name and contact details (where provided);
- Date of grievance;
- Details of grievance;
- Grievance status (open, resolved, unresolved, abandoned, or rejected);
- Resolutions discussed and agreed with the complainant(s);
- Actions implemented (including dates);
- Reasons for rejecting a grievance (where applicable); and
- Outcome of the actions implemented.

### 4. Other considerations

Apis will adhere to the following principles when handling grievances:

- *Openness*: Apis will listen carefully to any complainant(s) explanation of the problem (including any conflicting points of view), and consider whether there is a deeper issue, which might be the root cause of the grievance;
- *Efficiency*: Apis will handle all grievances in an efficient and time-sensitive manner, and will inform all concerned parties of any decision made and of any subsequent actions taken;
- *Privacy*: Apis will hold any grievance related interviews in private and without interruptions;
- *Fairness*: Apis will consider all available evidence to determine the main concern that needs to be addressed and any appropriate action to take, trying to balance fairness to the complainant(s), without compromising Apis, the Apis Funds, Apis Portfolio Companies, and / or any other stakeholders;
- *Non-retaliation*: Apis will seek to protect any stakeholder / complainant(s) that raises a grievance - any form of retaliation, victimisation, or threats towards any complainant(s) will not be tolerated;
- *Confidentiality*: Apis will keep the grievance resolution process as confidential as possible - any complainant(s) names and contact details will not be disclosed without their consent, and only the Apis grievance team working on the investigation of the grievance will have access to such information. Where necessary however, the Apis grievance team may disclose information to the senior management of Apis, and other members of the Apis team as necessary to resolve the grievance. If it is not possible for the Apis grievance team to fully investigate or resolve the grievance without revealing any identity related to the inquiry, Apis' grievance team will have prior discussions with complainant(s) on how they would prefer to proceed. Similarly, all internal Apis reporting related to the grievance process is to be kept confidential, meaning all information will only be shared with a limited number of people, on a strictly need to know basis; and
- *Transparency of procedure*: Apis will keep this grievance mechanism available and accessible to all stakeholders, both internal and external. As such, this will be appropriately communicated and publicised through Apis internal employee induction and HR meetings, as well as being placed on Apis' website.

