



COMPLAINTS MANAGEMENT POLICY VERSION 3 (ADOPTED 12 MAY 2022)

VERSION & REVIEW HISTORY

Version no.	Date:	Status:	Amendments made by:	Most important amendments:
1	14 Jul 2017	Adopted by BOD	N/A	N/A
2	24 April 2018	Adopted by BOD	Innpact	<ul style="list-style-type: none">• Emphasizing non-retaliation principle;• Clarifying difference between complaints policy and whistleblower policy.
3	12 May 2022	Adopted by BOD	Innpact & Sail Ventures	<ul style="list-style-type: none">• Clarified and distinguished between complaints register and report• Clarified Fund level and Borrowers grievance mechanism and wording• Alignment of definitions, general updates• Layout updated
<i>Next review</i>	<i>May 2024</i>			

The Stichting andgreen.fund is hereafter also referred to as the “**Fund**”.

1. DEFINITIONS

- 1.1. A “**complaint**” means any expression of dissatisfaction raised by a stakeholder.
- 1.2. A “**stakeholder**” means any grant (or redeemable grant) provider, lender, co-investor, borrower and/or any other stakeholder of the Fund.

2. RATIONALE

- 2.1. The Fund takes all reasonable precautions to conduct its operations in a manner that avoids complaints towards the Fund.
- 2.2. Effective complaint handling offers many practical benefits to the Fund and helps to improve the quality of services. Complaints provide evidence of poor decisions and/or poor service delivery.
- 2.3. Stakeholders should be ensured that their complaints are easy to report, are acknowledged and are dealt with quickly, fairly and sensitively. In order to preserve and enhance its reputation, the Fund should identify dissatisfied counterparties and work out methods of resolving their complaints.

3. POLICY

- 3.1. This document sets out the Fund's policy for ensuring that complaints are handled properly and resolved promptly (the "Policy") based on the following principles:
 - 3.1.1. All stakeholders are given the opportunity to raise their complaints;
 - 3.1.2. Complaints must be answered within three months from receipt; and
 - 3.1.3. All complaints must be documented and reported.
- 3.2. This Policy shall not impede access to other judicial or administrative remedies that might be available under local law, or substitute complaints mechanisms provided through specific agreements with the Fund.
- 3.3. No complainant who, in good faith, reports any complaint shall suffer any harassment, retaliation or adverse consequence. Any director, officer or service provider who retaliates against any complainant shall be subject to discipline, which process may result in termination of office or contract. (This protection from retaliation is not intended to prohibit governance bodies of the Fund from taking disciplinary action within their usual scope of duties based on valid performance-related factors.)

4. PROCEDURE

- 4.1. Submission of the complaint
 - 4.1.1. All complaints must be notified to the Fund in written form, following one of the following channels:
 - Communication sent by postal mail to :
&Green - Stichting andgreen.fund
Attn.: Complaints Officer - Stichting andgreen.fund
Basisweg 10, 1043AP
Amsterdam
The Netherlands

with copy to:
Innpact S.A. - &Green Board Advisor
5 rue Jean Bertels
L-1230 Luxembourg
Luxembourg
 - Communication sent via email to:
complaints@andgreen.fund
Subject: Attn: Complaints Officer - Stichting andgreen.fund

with copy to:
andgreen@innpact.com

4.1.2. The details of complaints notification channels must be easily available to stakeholders. This includes publishing them on the Fund's website.

4.1.3. For complaints received by a specific service provider of the Fund, that service provider shall ask the complainant to redirect their complaint to the Fund as per the channels specified in paragraph 4.1.1.

4.2. Acknowledgement of receipt of complaints

4.2.1. The designated person of contact in the Fund (the "**Contact Person**") shall consider the complaint and direct it to the Complaints Officer as defined below in paragraph 4.3.1.

4.2.2. Within 10 business days after receipt of the complaint by the Contact Person in accordance with paragraph 4.1.1, the Contact Person shall respond to the complainant with an acknowledgement and a description of the review action taken.

4.2.3. The Contact Person is responsible for the good management of the complaints procedure and is the main contact with the complainant throughout the whole process.

4.3. Complaints Officer

4.3.1. The Fund's board of directors (the "**Board**") shall designate one of its members (the "**Complaints Officer**") to ensure that complaints are treated as set out in this Policy, and are escalated, without undue delay, in accordance with the regulatory and contractual obligations of the Fund as the case may be.

4.3.2. The Complaints Officer may delegate the management of the complaints to another member of the Board.

4.3.3. The Complaints Officer remains responsible for the Fund's Complaints Register (as defined in paragraph 5.2 below), managing the investigation process, determining the knowledge and skills required to undertake the investigation, and hiring external experts, if needed, subject to the Board approval. The key considerations the Complaints Officer takes into account when hiring external experts for investigations are expertise, independence, and impartiality. Those experts will have specific confidentiality requirements.

4.3.4. If the complaint involves the Complaints Officer or a member of the Board of Directors, such individual(s) will not be permitted to participate in the consideration and investigation or determination of the redress of such a complaint.

4.3.5. The Complaints Officer shall ensure that systemic or recurring complaints are identified, and that the cause of those complaints is identified and remedied. The Complaints Officer will also present any lessons learned as well as the actions put in place to avoid/limit complaints in the future on a regular basis to the Board.

4.4. Investigation of the complaint(s)

- 4.4.1. The Complaints Officer shall (or delegate to an appropriate party to) investigate the complaint.
- 4.4.2. The investigation will analyse the reasons behind each complaint through a fair and independent view on the complaint raised by the complainant aiming to reach an objective assessment of the issue with an account of all the known facts and an assessment of how the matter should be followed up, including whether criminal prosecution or other sanctions are considered appropriate.
- 4.4.3. If the Board determines it to be necessary, the Fund shall initiate prosecution and/or apply other sanctions against persons or entities suspected of financial irregularities.

4.5. Answer to the complaint

- 4.5.1. The Contact Person shall respond to the complainant in writing no later than two months from the receipt of the complaint in accordance with paragraph 4.1.1.
- 4.5.2. The answer shall contain any required information or opinion determined by the Complaints Officer to be useful in addressing the complaint. The content of the answer shall be in accordance with the Articles of Association of the Fund and the general principle of information transparency.
- 4.5.3. If the complainant does not receive an answer or receives an unsatisfactory answer from the Contact Person, the complainant is entitled to request an answer, or a more detailed answer, from the Complaints Officer by submitting that request in the same manner set out in paragraph 4.1.1.
- 4.5.4. The Complaints Officer will respond to the request set out in paragraph 4.5.3 within one month from the receipt thereof. If the complainant does not receive an answer or receives an unsatisfactory answer from the Complaints Officer, the complainant may refer the request directly for the attention of the Board, in the same manner set out in paragraph 4.1.1. In this case, the Contact Person will be responsible for ensuring that the complaint is received by the Board.
- 4.5.5. Complainants who have disclosed their identities when lodging their complaints have given their express consent:
 - to receive notifications regarding the status of investigations;
 - to be contacted by the Contact Person, the Complaints Officer and/or any members of the Board, in case further information is required; and
 - to receive an answer to the complaint.

5. REPORTING AND RECORD KEEPING

- 5.1. The Complaints Officer shall report any complaint received to the Board at the next Board meeting.
- 5.2. All records of complaints shall be maintained by the Complaints Officer in the Fund's complaints register (the "**Complaints Register**"), anonymised to the extent necessary, and will be kept for a minimum period of 5 years. Any information received and related reports shall be kept confidential to the extent possible. Confidentiality interests will be balanced with the need to conduct an adequate investigation. Sharing of the Complaints Register and/or information in relation to complaints with persons not involved in the investigation or management of the complaints' procedure is forbidden.
- 5.3. The Complaints Officer is responsible for maintaining the Complaints Register and the complaints reports of the Fund, which are to be prepared using the template attached as (each, a "**Complaints Report**"). The purpose of the Complaints Register and Complaints Report (please refer to the report template set out in Schedule 1) is to keep a record of all useful information in order to achieve good tracking of complaints.
- 5.4. At the first meeting of the Board each calendar year, the Complaints Officer shall present a Complaints Report to the Board of Directors with an analysis of the complaints activity of the previous year. The Complaints Officer shall present to the Board the details (or any updates) on any complaints received since the previous Board meeting. A nil Complaints Report shall be presented if no complaints have been received by the Fund during the previous year.

6. WHISTLE BLOWING

The provisions relating to whistle-blowing by stakeholders, including civil society organizations, are set out in the Fund's Code of Conduct. In choosing whether to report under the whistle-blower provisions or this Policy, the following should be considered:

- 6.1. The whistle-blower provisions are generally for the benefit of any concerned party who may or may not be directly affected by the issue that they are raising.
- 6.2. Whistleblower reports are generally anonymous by default, unless the whistleblower volunteers the disclosure of their identity. Anonymity of whistleblowers also signifies that the whistle-blowers will not receive any notice of acknowledgement by the Fund or any other follow-up investigation queries or reports related to the issue.
- 6.3. This Policy is generally for the benefit of persons who, themselves, have been treated incorrectly or who have otherwise been treated in a sub-standard way.
- 6.4. Complainants under this Policy may choose to remain anonymous when reporting under this Policy, or to request the deletion of their personal data at any time. Please note that if the complainant chooses to remain or to become anonymous, such complainant will not, or will no longer be able to receive any notice of acknowledgement by the Fund or any other follow-up investigation queries or reports related to the issue in question.

7. GRIEVANCE MANAGEMENT AND REMEDIATION BY THE FUND'S BORROWERS

- 7.1. Notwithstanding the provisions set out in this Policy, the Fund also requires its borrowers (each, a **"Borrower"**) to design and implement effective grievance mechanisms and remediation processes to safeguard vulnerable groups and to receive, and facilitate the resolution of, the concerns and grievances of the stakeholders of the Borrower, which could also be stakeholders of the Fund.
- 7.2. The grievance mechanism, process or procedure of each Borrower should address concerns promptly and effectively, using an understandable and transparent process that is culturally appropriate and readily accessible to all segments of the affected communities, at no cost and without retribution.
- 7.3. The mechanism should not impede access to other judicial or administrative remedies that might be available under law or through existing arbitration procedures, nor should it substitute for grievance mechanisms provided through collective agreements.
- 7.4. Grievances should be acknowledged and recorded by the relevant Borrower regardless of whether they were received in writing or verbally. The complainant should receive an acknowledgement of the receipt of the complaint within a prescribed and reasonable timeframe, preferably in writing. Lodging a grievance should not incur any cost to the complainant.
- 7.5. Generally, the Borrower should allow for flexibility and make sure that grievances are not dismissed on grounds of an administrative formality and/or procedure.
- 7.6. Each Borrower should keep a simple database as a useful register to manage and monitor grievances. Good practice is to log all grievances, including recurrent ones and grievances that will eventually be dismissed as unreasonable.
- 7.7. Regardless of the actual establishment of such a database, typically Borrower documentation on grievances should keep track of:
 - 7.7.1. the name and contact details of the complainant, if appropriate;
 - 7.7.2. the date and nature of the grievance;
 - 7.7.3. the name of the technical staff or entity charged with addressing the complaint, if appropriate;
 - 7.7.4. any follow up actions taken;
 - 7.7.5. the proposed resolution of the grievance;
 - 7.7.6. how and when relevant project decisions were communicated to the complainant;
 - 7.7.7. whether longer-term management actions have been taken to avoid the recurrence of similar grievances in the future, if applicable
- 7.8. The following indicative timeframe can be used as a guideline for most projects, both for workers' and communities' grievances:

- 7.8.1. written acknowledgement of receipt of the grievance within 7 days of receipt; and
 - 7.8.2. proposed resolution within 30 days of receipt.
- 7.9. The Borrowers will inform the Fund of any stakeholders' concerns related to a specific project/Borrower in a timely manner.
- 7.10. If the complainant does not receive an answer, or receives an unsatisfactory answer from a Borrower within the period set out in paragraph 7.8, the complainant is entitled to direct the grievance to the Complaints Officer in the same manner set out in paragraph 4.1.1, and the procedure set out in paragraph 4 will apply.



Schedule 1

COMPLAINTS REPORT TEMPLATE

Stichting andgreen.fund – COMPLAINTS REPORT						
Reference period: from _____ to _____				Total number of Complaints received during period:		
COMPLAINT NO.	SUBMISSION DATE	RESOLUTION DATE	COMPLAINANT	ISSUE	SOLUTION / PROCESS IMPROVEMENT	PERSON IN CHARGE

Date of Report:

Signed by:

Title: Complaints Officer