



# Grievance Mechanism

12 November 2024

## Grievance Mechanism

To assist in investigating your concerns and to enable us to provide you with an appropriate response, we kindly request you to provide the following information for:

- Name of complainant (and name of representative(s), if applicable);
- Name of company/project financed by Clifford Capital or its affiliates;
- Name and full address, telephone number and, if possible, email address;
- Description of the grievance (including location, if applicable) and the harm suffered, or likely to be suffered;
- A clear description of the name and the location of the operation to which the grievance is related;
- A copy of information related to - or relevant to - the grievance, e.g. documents, photographs, etc.; and
- Indication of whether the grievance has been lodged with any operation financed by Clifford Capital or its affiliates.

We encourage you to provide your name when lodging a complaint. If you wish to remain anonymous, please note that our ability to investigate could potentially be impaired and we may not have the ability to follow up with you.

### Our Grievance Redress Process

Upon receipt of the grievance, we will provide a grievance acknowledgement and an initial response to the complainant(s) and/or his/her representative(s). All grievances received will be screened in accordance with our grievance admissibility criteria with the following considerations:

- The complainant must be affected or likely to be affected by an operation financed by us;
- In the event that an external party is representing other external stakeholders, it must identify such external stakeholders that it represents and provide explicit evidence of the representative's authority to represent the external stakeholders;
- We must have, or will have, an active financial relationship with the operation(s). For the purposes of this mechanism, "active financial relationship" means we have outstanding loan balances available to be disbursed to the operation. Note that grievances will not be entertained if they are about an operation financed by us for which two or more years have passed since full disbursement of our participation in the loan;
- There must be an indication of a relationship between the operation(s) financed by us and the issue raised; and
- The grievance must contain allegations of (potentially) substantial (in)direct and adverse E&S impacts or risks.

Our representative(s) shall endeavour to respond to the complaint as soon as practicable, normally within three business days of receipt. Upon investigation of the grievance, we will liaise with the complainant to propose a resolution to the grievance, if the grievance is admissible. In the event that a resolution is not found within a reasonable timeframe, regular updates will be provided to the complainant on the progress of any investigation. The overall aim is to identify a proposed resolution in as short a timeframe as practicable, although recognising that in certain instances, detailed investigation and liaison with other parties is required and may not be straightforward.