



A.P. Møller Capital Grievance Mechanism

A.P. Møller Capital is committed to conducting transparent and ethical business practices, proactive stakeholder engagement, and effective management of Environmental and Social (E&S) risks and impacts. Central to this commitment is a robust grievance mechanism which enables stakeholders affected by A.P. Møller Capital's business activities, including those of our portfolio companies, to have their grievances addressed in a transparent and timely manner. A.P. Møller Capital requires the portfolio companies in which it invests to establish a procedure to handle grievances (complaints and concerns) from those who may be adversely affected by the company's activities. Portfolio companies are required to establish an Internal Grievance Mechanism for managing employee grievances and an External Grievance Mechanism to receive, analyse, record and respond to concerns, complaints and requests for information from third parties or affected communities. Grievances related to A.P. Møller Capital's portfolio companies are to be first reported, investigated, managed, and addressed by the portfolio company's grievance mechanism. Where such grievances are not resolved, affected individuals, communities, and stakeholders may use A.P. Møller Capital's Grievance Mechanism. In addition to the Grievance Mechanisms of the portfolio companies and A.P. Møller Capital's own Grievance Mechanism, stakeholders can also make use of the Grievance Mechanisms of three of A.P. Møller Capital's investors¹.

Any person(s) or their representative(s), who have real or perceived concerns or complaints, can lodge a grievance via grievances@apmollercapital.com.

For an effective grievance mechanism and investigation, kindly provide the following information while lodging the grievance:

- Details of complainant or name of representative (name, address, telephone, email).
- Anonymous grievances are also accepted. If desired the anonymous complainant can indicate how they wish to be notified on the outcome of the investigation.
- Date of grievance.
- Individuals impacted and how they are impacted (if it risks anonymity, this information does not need to be included).
- The portfolio company to which the grievance is related (if applicable), including company address or specific areas where the impact is taking place.
- Description of the grievance including when and where the incident occurred, how it occurred, who was involved, complainant's story and expectation from the grievance mechanism.
- If the grievance is against a person or a group of persons from the portfolio companies, please provide details.
- Overview of actions (e.g. legal, contacts with the company, local authorities) that have already been taken to address the issue (if any).
- Any supporting documents and evidence related to the grievance.

¹ Stakeholders may also make use of the [Project-affected People's Mechanism](#) of the Asian Infrastructure Investment Bank (AIIB); the [Independent Complaints Mechanism](#) from German Investment Corporation (DEG), and the [Stakeholder Grievance Mechanisms](#) of the International Finance Corporation (IFC).



Grievance Redressal Process

Our grievance mechanism is owned by the Head of Compliance and the Head of ESG.

Upon receiving your grievance, the Compliance department evaluates the nature of the grievance and determines whether it should be directed to the Head of ESG. For ESG-related grievances, we review the admissibility of the grievance based on the following criteria:

- The grievances must be related to A.P. Møller Capital or its portfolio companies.
- The E&S related grievance should have caused adverse impact or have caused likely adverse impact.
- If the grievance is related to one of A.P. Møller Capital's portfolio company, then there must be evidence that the grievance was first lodged with the company using their grievance mechanism or an explanation on why the complainant chose not to use the portfolio company's grievance mechanism.
- Evidence that the grievance was caused by A.P. Møller Capital or its portfolio company's business activities.
- Evidence of the adverse or likely adverse E&S impact of the activity.

Upon receiving the grievance, our team will send an acknowledgment of receipt of the grievance within **seven (7) business days** of receiving the grievance. The acknowledgment of receipt includes an identifier number and expected timeframe for addressing the grievance.

A.P. Møller Capital reviews the issue(s) raised and determines whether a grievance is admissible. In case the grievance is not admissible, then an acknowledgement letter is sent to the complainant with reasons for dismissal of grievance.

If the grievance is related to a portfolio company's activities and has not been filed with the companies, such grievances may be forwarded to the related portfolio company unless the complainant has explicitly requested this not be done.

A.P. Møller Capital makes best effort to resolve the grievances within **45 days** of receiving the grievance. If it is not resolved in 45 days, the complainant will be informed about the extended timeline.

A.P. Møller Capital's Risk, Environmental, Social and Governance Committee is responsible for determine the most appropriate course of action. The final conclusion and proposed recommendations, including (if applicable) corrective actions will be communicated to the complainant.

Non ESG-related grievances will be handled by our compliance department. Additionally, A.P. Møller Capital has implemented a [whistle-blower system](#) for reporting significant matters relating to financial crimes (e.g. money laundering, terrorist financing, bribery, extortion, embezzlement, theft, accounting irregularities, etc.) and other significant matters (e.g. significant work safety violations, significant violations of environmental regulations, environmental pollution, physical violence, sexual assaults or harassment, etc.), and/or which may constitute a breach of the law and regulations applicable to A.P. Møller Capital and its operations. Please use this system, available on our website, for grievances of this nature.



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Confidentiality and Anonymity

Without prejudice, any person(s) or their representatives lodging a grievance will be treated confidentially. If a grievance is deemed admissible, it will typically be necessary for A.P. Møller Capital to contact the relevant portfolio company. The identity of the person(s) or their representatives will be kept confidential unless these person(s) allow A.P. Møller Capital to disclose their identity. There will be no retribution against a person registering a grievance.