A.P. Moller Capital External Grievance Mechanism

A.P. Moller 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. Moller Capital's business activities, including those of our portfolio companies, to have their grievances addressed in a transparent and timely manner.

A.P. Moller 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. Moller Capital's portfolio companies are generally to be first reported, investigated, managed, and addressed by the portfolio company's grievance mechanism. Where such grievances are not resolved, or where a complainant does not feel comfortable raising the matter directly with the portfolio company, affected individuals, communities, and stakeholders may use A.P. Moller Capital's External Grievance Mechanism. If a grievance is submitted to A.P. Moller Capital without first being raised with the portfolio company, it may be forwarded to the relevant portfolio company, unless the complainant has requested otherwise.

In addition to the grievance mechanisms of the portfolio companies and A.P. Moller Capital's own External Grievance Mechanism, stakeholders can also make use of the grievance mechanisms of three of A.P. Moller Capital's investors[1].

Please note that this mechanism does not constitute a judicial or administrative remedy and does not limit any person's right to pursue such remedies. Lodging a grievance will not incur any cost to the complainant.

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

[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 Mechanism of the International Finance Corporation (IFC).

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

- Details of complainant or representative (name, address, telephone, email), or an indication that the grievance is submitted anonymously.
- If submitted anonymously, the complainant may indicate how they wish to be notified of the investigation's outcome.
- 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.

Grievance Redressal Process

Our External Grievance Mechanism is owned by the Head of ESG.

Upon receiving the grievance, the Head of ESG, with support from the ESG team, reviews the admissibility of the grievance based on the following criteria:

- The grievance is related to, and caused by, the business activities of A.P. Moller Capital or a portfolio company.
- The grievance concerns the impact of those activities on people, communities, or the environment (for example, pollution, safety incidents, or impacts on land, livelihoods, or cultural heritage).
- The grievance has caused, or is likely to cause, adverse impact.
- If the grievance is related to a portfolio company, then there must be evidence that the grievance was first lodged with the company using their grievance mechanism, or an explanation of why the complainant chose not to use the portfolio company's grievance mechanism.

Upon receiving the grievance, the ESG 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. Moller 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 expressed a desire that this not be done.

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

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

Non-E&S-related grievances are to be addressed through A.P. Moller Capital's Whistleblower System, which includes a whistleblower channel and a grievances channel. The whistleblower channel is 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. Moller Capital and its operations. Less serious or ordinary matters, including those relating to an individual's employment, can be reported through the grievances channel of the same system. Please use this system, available on our website, for grievances of this nature.

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. Moller 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. Moller Capital to disclose their identity, or where disclosure is required by law or regulation. There will be no retribution against a person registering a grievance.