



# Grievance Management Procedure

## Document Control

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1	June 28, 2024	July 1, 2024

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## 1. Introduction and Purpose

The purpose of this Procedure is to manage E&S complaints and grievances from internal and external stakeholders in a systematic, fair, timely and transparent manner. For purposes of this Procedure, a Grievance is defined as: “A concern or complaint raised by a stakeholder in relation to Inside and/or its portfolio companies’ activities in relation to E&S (including environment, occupational hygiene, occupational safety, labour, communities’ safety and security, human rights, Gender-based Violence, Sexual Exploitation Abuse and Harassment, etc.) that an individual or community group wants addressed by the Company in a formal manner”. Concerns and complaints can result from both real or perceived matters. This Procedure allows for employees, clients, and stakeholders to submit grievances, receive feedback and have access to relevant information.

## 2. Procedure

For each complaint/ information request received, the Investment Team will assess the relevance of the external and/or internal communication received and will determine the level of response required, if any. Inside encourages complaints to be resolved informally, but where this is not possible, the following procedure set out below shall be adhered to.

There is no cost or fee associated with submitting a query, concern or complaint through this Procedure and this shall be clearly communicated to those presenting grievances to Inside. This Procedure is composed of the following steps and presented in further detail in subsequent sections:

1. Grievance submission
2. Registering grievances
3. Acknowledging receipt of grievances
4. Assessing grievances
5. Investigating grievances
6. Responding to grievances
7. Escalating grievances
8. Closure & periodic review

### 2.1 Grievance submission

#### **Internal Stakeholders**

Internal stakeholders are encouraged to discuss any problems, concerns, complaints or suggestions with their immediate supervisors or manager or Managing Partner. Internal stakeholders are further encouraged to submit in writing their concern or complaint explaining the nature of the grievance and the relief sought.

#### **External Stakeholders**

Inside shall provide its stakeholders and portfolio companies with forms for their stakeholders to fill in their grievances, queries or concerns. Grievances may also be lodged with any member of staff. As part of the grievance submission procedure, the external stakeholder is encouraged to use Inside Grievance Form in instances where the grievance is lodged in writing. Refer to ***Error! Reference source not found.*** In instances where the grievance is verbally lodged, the member of staff receiving the complaint/ concern should as far as possibly register the grievance by completing the Grievance Form on behalf of the complainant.

As a minimum requirement, the following information should be included for each grievance:

- The name of the complainant and the contact information (in instances where the complaint is not anonymous);
- Date and time of the incident or action giving rise to the complaint; and
- Details of grievance i.e. nature of the grievance and any supporting information to guide in the resolution of the grievance).

Inside will communicate this procedure to its internal and external stakeholders through raising awareness and offering transparency on how stakeholders can voice their grievances. Various channels for external stakeholders to submit their grievances formally include:

Channels	Detail
Telephone	Service desk number <a href="tel:+2304601244">+230 460 1244</a>
Email	Email address #1 Marie Polge, Principal <a href="mailto:mpolge@insidecapital.net">mpolge@insidecapital.net</a>
	Email address #2 Stephanie Charles, Administrative Executive <a href="mailto:scharles@insidecapital.net">scharles@insidecapital.net</a>
Face to face	<a href="#">Madagascar</a> c/o SmartOne, Atrium Building Ankorondrano, Antananarivo 101
	<a href="#">Mauritius</a> Suite 8D1, Block 8, Cascavelle Business Park, Rivière Noire Road Unicity, Bambous
	<a href="#">Zambia</a> 2nd Floor, Blue House, Plot 2374, Great East Road, Lusaka
Online Form	<a href="https://insidecapital.net/contact/">https://insidecapital.net/contact/</a>

## 2.2 Registering grievances

Grievances once received should be registered to facilitate in the follow-up and resolution process. Refer to **Error! Reference source not found.** The E&S Team is responsible for compiling all the grievances within Inside Grievance Register. The following information must be included/entered in the Grievance Register:

- Date the grievance is/was received;
- Category of the stakeholder (internal/ external);
- Name and contact information of the complainant (if non-anonymous);
- Description of the grievance;
- Level of grievance (see Assessing Grievances section below);
- Date the acknowledgement was sent;
- Department responsible for managing the grievance;
- Measures taken to resolve the grievance, including details of the resolution discussed and agreed with the complainant(s);
- Status of the grievance (open, resolved, unresolved, escalated or abandoned); and
- Follow-up monitoring requirements.

## 2.3 Acknowledging receipt of grievances

Receipt of grievances will be formally acknowledged in writing within 48 hours from the date of submission (except where adverse impacts are significant, when the acknowledgement should be made within 24 hours). The initial response should inform the complainant regarding the person dealing with the complaint or grievance, and the timeframe in which a formal response can be

expected. A full response should then be provided no later than five working days from receipt of the grievance.

## 2.4 Assessing Grievances

Each grievance must be assessed to determine the type of response required. This will also determine the appropriate individual or Committee to manage the response. The ES Team will assess each grievance based on the three levels below:

- Level A: Grievances with potentially significant adverse impacts, including reputational risk
- Level B: Grievances with medium impacts
- Level C: Grievances with no or minimal impacts

Level	Detail
Level A Grievances with potentially significant adverse impacts, including reputational risk	<ul style="list-style-type: none"> <li>• Repeated or widespread grievance</li> <li>• Grievance that is a regulatory breach</li> <li>• Grievance that is a breach of Inside and/or portfolio company policy</li> <li>• Direct accusation of breach of human rights or GBVH or SEAH</li> <li>• Grievance related to death or serious illness or pollution</li> </ul>
Level B Grievances with medium impacts	<ul style="list-style-type: none"> <li>• Grievance, but it is not related to a recurrent question /request for information</li> <li>• Grievance, but there has been no regulatory breach</li> <li>• Grievance, but there has been no Inside and/or portfolio company policy breach</li> <li>• Grievance, but it is not related to death or serious illness or pollution</li> </ul>
Level C Grievances with no or minimal impacts	<ul style="list-style-type: none"> <li>• Grievance, but can be easily resolved through adequate corrective actions or measures.</li> <li>• Grievance, but outside of Inside or its portfolio company's area of influence and needs to be directed elsewhere</li> <li>• Grievance, but not related to Inside or its portfolio company</li> </ul>

All Level 'A' grievances require the involvement of the Executive Management of Inside and should be reported within **half (0.5) day** to Inside E&S Officer, when verbally received by other staff member (Internal Stakeholders supervisor or manager, or by any other staff member for External Stakeholders complaints). Level 'B' and 'C' grievances should be reported within **one (1) day** to Inside E&S Officer. The E&S Officer will thereafter assign responsibility for investigation and responding to the grievance. If the grievance relates to the E&S Officer himself / herself, Inside will ensure that an independent person is appointed to provide oversight and assignment of roles and responsibilities.

## 2.5 Investigating grievances

Once responsibility has been assigned to an individual, grievances should be investigated and resolved. Where necessary the investigation may require other parties to be involved, as appropriate, i.e. local administration, security agencies, health facilities, etc. When resolving any grievance, a record of all correspondence must be kept. Any follow-up monitoring required must be documented and an implementation plan developed and actioned.

## 2.6 Responding to grievances

A response should be provided to the complainant in ALL cases explaining the action taken or not taken to resolve the complaint. The response will be shared within **five working days** following the completion of an investigation. Responses must be provided to the complainant in written form and explained verbally if required.

If the complainant is not satisfied with the response, it should be clearly stated that they are free to seek resolution through a formal external dispute resolution mechanism, with no risk of retribution.

## 2.7 Escalating grievances

Where a grievance is not closed out satisfactorily, a complainant may choose to escalate their complaint to the Committee or Executive Management. An acknowledgement will be made of the complaint within 48 hours of receipt, which will state who will deal with the complaint and the timeframe in which a formal response can be expected. The response will be shared within ten working days following the completion of an investigation.

If the complainant is not satisfied with the response, it should be clearly stated that they are free to seek resolution through a formal external dispute resolution mechanism, with no risk of retribution.

## 2.8 Closure and periodic review

A grievance is closed out when no further action can be or needs to be taken. When closing out any grievance, the following should be ensured:

- The Grievance Register is complete; and
- All documented evidence including written confirmation of the complainants' agreement with the resolution is filed appropriately.

To drive continual improvement and lessons learnt, complaints shall be reviewed annually to identify trends and point out areas for improvement, as part of E&S Monitoring. Where practical and acceptable to the concerned parties, stakeholder-driven monitoring and evaluation exercises may be facilitated by Inside to drive further learning.

## 3. Roles and responsibilities

Grievances shall be reported to the E&S Officer and/or the Investment Officer. Responsibility will be assigned to an individual or the Grievance Management Committee, depending on the nature and severity of the grievance received.

## 4. Matters to be aware of when handling grievances

When dealing with a grievance, Inside should be aware of and practice the following:

- Hold any grievance interviews in private without interruptions;



- Where a grievance relates to a stakeholder's direct manager, ensure that the person can raise the grievance with someone else;
- Listen carefully to the person's explanation of the problem and consider whether there is a deeper issue, which might be the root cause of the grievance;
- Listen to any conflicting points of view;
- Weigh up all evidence to determine the main concern that needs to be addressed and the appropriate action/s to take;
- Decide what action to take by trying to balance fairness to the aggrieved person without compromising the company or other stakeholders;
- Inform all concerned parties of the decision; and
- Keep the process as confidential as possible.

Inside will protect any stakeholder that raises a complaint or grievance. Any form of retaliation, victimization or threats will not be tolerated.

**The tools for implementation of this Procedure include:**

- Inside External Grievance Form
- Inside Grievance Register