

# Grievances Management Procedure

## **Scope & Applicability**

The procedure details the steps for submission and receiving grievances or complaints by Kinyeti Venture Capital (KVC). The internal grievance procedure applies to all KVC staff whereas the external grievance procedure applies to portfolio companies and external stakeholders such as regulatory authorities, non-governmental organizations, local communities and the general public.

The procedure is applicable to grievances or complaints related to, but not limited to, environmental and social matters. This procedure will be available to new staff during induction and will be shared with staff via email or shared point (e.g. Dropbox).

The Chair of the Board or Board of Directors will be recipient of grievances such as fraud, governance complaints among others against KVC C.E.O

It is emphasized that no retaliation or reprisal will be meted on a grievant who applies this procedure.

## **INTERNAL (STAFF) GRIEVANCE PROCEDURE**

### **Informal Procedure**

If staff are aggrieved about any aspect of their work, they should discuss this with KVC C.E.O in the first instant, who will attempt to resolve the situation on an informal basis.

Where attempts to resolve the grievance informally do not work, it may be appropriate for staff to raise a formal grievance under this procedure.

### **Formal Procedure**

Staff with a formal grievance relating to their employment should put their grievance in writing (e-mail or letter) and address it to KVC C.E.O, making it clear that they wish to raise a formal grievance under the terms of this procedure. Written grievances can be submitted (anonymously if preferred) to KVC Chairman if the grievance is against KVC C.E.O.

KVC C.E.O or Chairman will convene a grievance meeting to discuss their grievance and staff has the right to be accompanied at this meeting by a fellow employee of their choice. The meeting will be convened within three working days after receipt of a formal grievance. The meeting will resolve the grievance and formally respond to the staff with the resolution in writing (e-mail or letter).

Staff will be informed in writing of KVC's decision on the grievance appeal. This will be final step in the process.

In the event that parties are no longer able to find constructive ways forward, third-party mediation (e.g. Labour Department, Lawyer, etc) may be used to facilitate the resolution if both parties agree to it.

Staff complaint or grievance related to their dissatisfaction with a disciplinary, dismissal decision or performance review, the grievance procedure should not be invoked but should instead appeal against the decision in accordance with appeal procedures in the disciplinary or performance review procedures.

In the event KVC discovers a grievance raised by staff is malicious, fabricated or falsified, it reserves the right to take disciplinary action including dismissal for gross misconduct.

## EXTERNAL GRIEVANCE PROCEDURE

External parties such as portfolio companies, NGOs, local communities, general public and other stakeholders, can submit their questions, concerns or grievances to KVC by:

- Sending an e-mail to **info@kinyeticapital.com**;
- Sending a letter to KVC physical address i.e. corporate office (Hai Malakal, Juba Finance South Sudan Office
- A phone call to KVC office via telephone number +211 910 030 800.

KVC CEO is the focal point for queries and periodically reports to Chairman on key queries. Relevant notifications from external stakeholders that can lead to a reputational risk should be reported to the Chairman.

In order to adequately respond to queries, writing up and formalization of queries is expected from external stakeholders. If not already provided by the sender, for each query these persons should provide the following information:

- Name and contact information of the sender.
- To whom the concern relates.
- Description of the concern and any supporting documentation.
- Date of the incident or action giving rise to the complaint (if applicable).
- Previous relevant communication with the party or parties
- Specific remedy sought (if applicable); and
- Any other information as deemed appropriate by the sender.

The following key steps or procedure will be followed when a grievance or a complaint is lodged:

### 1. Receive and record

Grievances or complaints received (letter, email or phone call) will be logged in the External Grievance Register (see Annex1) by an appointed KVC staff (Grievance Officer). The External Grievance Register will log and track all inquiries received by way of this procedure, including date received, date the response was sent, and issues raised.

### 2. Screen

The KVC CEO will review the content of the grievances or complaints submitted. The grievances will be screened depending on the level of severity in order to determine the nature of the grievance and the merit and next steps. The table below illustrate the categorizing of the different levels of grievances.

Category	Description
Level 1	A resolution can be provided immediately. The grievance was raised previously and KVC is working on a resolution.
Level 2	One off grievance that has no reputational risk to KVC.
Level 3	Repeated, widespread or high-profile grievance that may result in a negative and/or reputational risk.

For a portfolio-related complaint(s), KVC will assess the nature of the complaint(s) as per the criteria in the above table for the next steps.

### 3. Acknowledge

KVC CEO will provide a confirmation of receipt to the sender within 5 working days of receiving the grievance, question or concern and inform them that they will receive a response in writing within 15 working days from receipt.

### 4. Investigate

KVC will investigate all Level 3 grievances and credible Level 2 grievances or complaints. Investigation may entail site visit, consultation or interviews with the involved parties. Records of meetings and discussions must be maintained. Information gathered during the investigation will be analysed to assist in determining how the grievance will be resolved.

For portfolio-related grievances, KVC may choose to engage with the Client to provide resolution/redress or let the Client handle the grievance but KVC responds to the aggrieved party.

### 5. Act

After concluding investigation, the findings will be used to create an action plan outlining steps to be taken to resolve the grievance. Grievance Officer will be responsible for assigning actions, monitoring actions undertaken and making sure deadlines are adhered to. Once all action has been finalised and the grievance has been resolved, the external stakeholder will be informed via the preferred method of communication (phone call, email or letter).

If investigation leads to conclusion(s) that the portfolio company did not comply with KVC Sustainability Policy (or legally mandated requirements) in any respect, KVC Chairman will be informed in writing and a Corrective Action Plan will be prepared for discussion and implementation by the portfolio company.

If the resolution is acceptable to both parties, the grievance will be closed upon agreement of both parties.

#### 6. Follow up and close-out.

Grievance Officer will make contact with the complainant two weeks after the grievance is resolved. When contacting the complainant, the KVC will verify that the outcome was satisfactory and also gather any feedback on the grievance process.

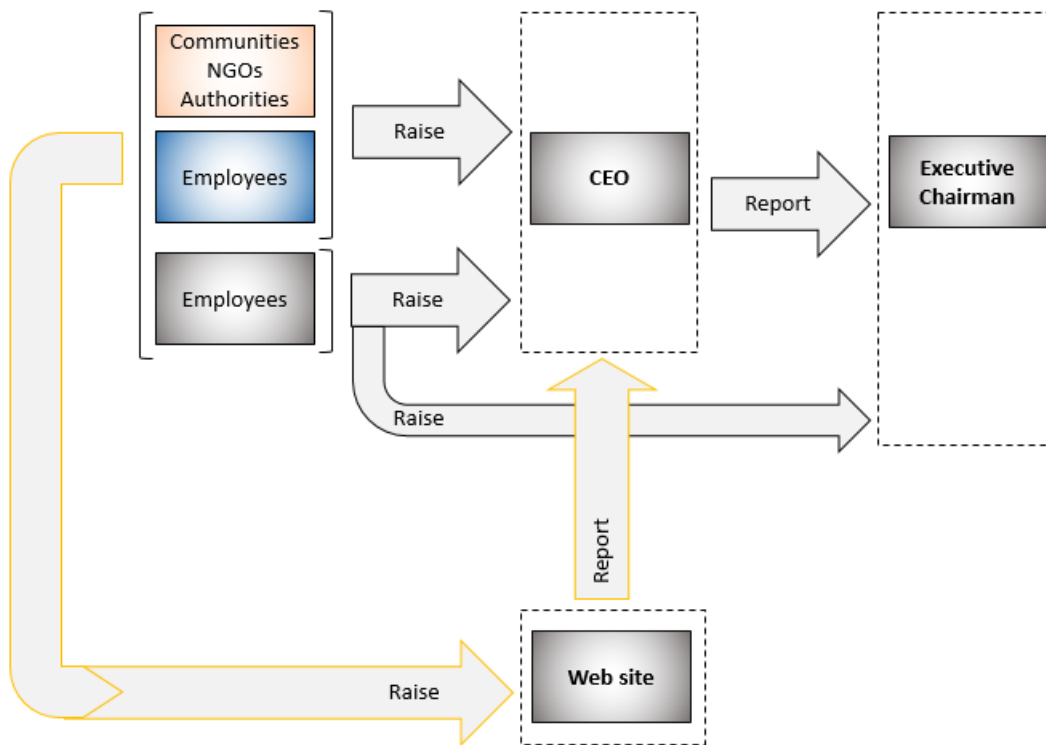
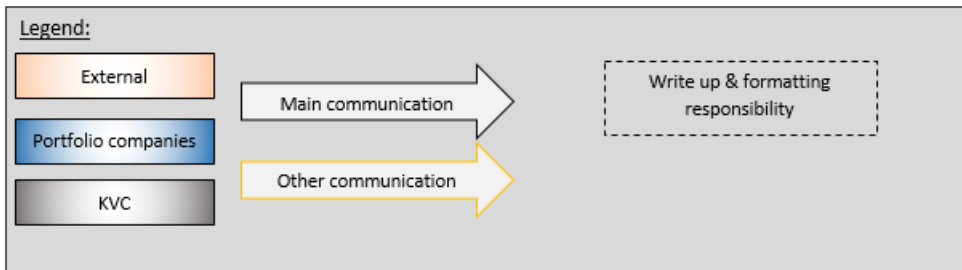
#### 7. Appeal and escalation

If the aggrieved party is dissatisfied with the solution provided, KVC will provide an appeals options including arbitration and judicial remedies available in the country's legislations. The approaches will include arbitrators and mediators.

#### 8. Record keeping

All records including investigation notes, interviews and minutes of meetings will be securely filed (intranet) to ensure privacy and confidentiality is maintained for all parties involved. This record will be made available to KVC LPs when requested.

Approved by the Board of Directors on 25 May 2021





## DOCUMENT CONTROL

### Revision History

<b>Revision No.</b>	<b>Revision Date</b>	<b>Name</b>	<b>Description</b>
001	27/08/2020	Alfrick Murunga	The procedure is updated to include separate internal and external procedure