

# GRIEVANCE MECHANISM GUIDELINES

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## A. INTRODUCTION

Sweef Capital Management Pte Ltd (“Sweef Capital” or the “Firm”) is committed to the highest standards of integrity, governance and transparency and regards compliance with local and international laws and strong ethics as fundamental. An important aspect of this is understanding the impact of Sweef Capital’s and its portfolio companies’ operations with their employees and other stakeholders through assessments and regular dialogue.

Sweef Capital is encouraging feedback from its employees and employees of its investees as well as other external stakeholders and business relationships related to Sweef Capital and its investees to raise a grievance if they identify or experience any irregularities with Sweef Capital’s commitments, policies and procedures or any other legal misconduct. At a firm level, compliance, risk management, responsible business practices and safeguarding requirements are embedded in the Sweef Capital’s Team Handbook, Compliance Manual, Risk Manual, and Investment Manual. The Team Handbook also forms the basis of expectations and monitoring for portfolio companies and incorporates gender related concerns and complaints relating to GBV, set out an understandable and transparent process that is gender sensitive, culturally appropriate and readily accessible to all affected people.

This Grievance Mechanism sets out procedures for stakeholder engagement to be undertaken in a systemic and manner and for Sweef Capital to respond promptly to the grievances and complaints.

In developing the stakeholder engagement and remediation procedures, Sweef Capital adopted the following principles in consideration of the United Nations Guiding Principles on Business and Human Rights:

- **Transparency and fairness:** The grievance resolution process shall be conducted in transparent and fair manner. Parties to a grievance will be informed about its progress and providing information about the mechanism’s performance to maintain integrity and effectiveness.
- **Accessibility:** Every stakeholder will have access to the grievance mechanism and providing adequate assistance for those who may face particular barriers to access.
- **Meaningful Information:** Meaningful information should be disclosed to all involved stakeholders including advice and expertise as necessary, to allow for fair, active and informed engagement.
- **Openness and regular communication:** There are multiple channels available for individuals and groups to choose their preferred method of lodging grievances. Each will be provided a clear and known procedures with an indicative time frame for each stage.
- **Channels of communication are kept open throughout the process of addressing each grievance, and up to 3 months after the situation has been resolved.**
- **Record keeping:** All grievances are registered on a Grievance Form and will be kept in the firm’s records for up to 5 years.
- **Dialogue and site visits:** All grievances and complaints are considered to warrant discussions with the complainant and a site visit, if required, to gain a first-hand understanding of the nature of the concern. The purpose of the visit is to verify the validity and severity of the grievance.

- Timely resolution: The firm will aim to resolve all grievances within 4 weeks preferably.
- Learning and feedback: The learning and feedback received to-date from the engagement and grievance reparation process shall be incorporated informing the grievance mechanism future investments, and the same shall be shared with stakeholder.

## B. GRIEVANCE PROCEDURE PROCESS

### 1. Who can report and where?

All employees and others with an affiliation to Sweef Capital and its portfolio companies, including customers, suppliers and other parties who may be adversely impacted by the conduct of Sweef Capital or its portfolio companies, may file a report under the Grievance Mechanism.

The Grievance may be addressed (anonymously if needed) by mail to the address of Sweef Capital at 20 McCallum Street, #19-01 Tokio Marine Centre, Singapore 069046 or by email to [contactus@sweefcapital.com](mailto:contactus@sweefcapital.com)

### 2. How to report in the event of grievance?

We understand that you may not wish to identify yourself, and if this is the case, we would appreciate receiving your report anonymously, as it is possible to be anonymous in the Grievance Mechanism System. In case you wish to remain anonymous, it is important that you do not state your name anywhere in your report. It is still possible for us to communicate with you in the Grievance Mechanism System even though you are anonymous. However, you should be aware that anonymity may complicate the investigation. Furthermore, you should be aware that even though you do not state your name, address, etc., it is not guaranteed that it will not be possible to determine your identity from the facts that you provide in your report.

If you file a report, the information listed below will generally be useful in connection with further investigation of the issue:

- Name and contact details of the person filing the report, if you do not wish to report anonymously
- Description of the issue in question, including date, place, the name(s) of the person(s) involved (including Sweef Capital personnel) and the number of occurrences
- Whether the issue is likely to be repeated and, in the affirmative, a description of where and when
- Whether other persons in or outside Sweef Capital know of the issue or are expected to know of the issue
- Any documentation or evidence concerning the violation or other information which may assist the investigation

### 3. How the issue will be handled?

#### 3.1 Lodging of grievance

The Grievance is received, logged in the system, treated as strictly confidential and acknowledged to the relevant stakeholder.

#### 3.2 Scope – applicability

The Compliance Officer will oversee the preliminary study of the Grievance, whether the Grievance relates to Sweef Capital's or investee company's operations, to their policies or

processes. If the Grievance is not in Sweef Capital's scope or if it is addressed pursuant to violations of the firm's Code of Ethics, it will be closed, and the relevant Stakeholder will be informed accordingly.

### **3.3 Procedures**

Otherwise, the process will continue to the next step (stage 3 hereunder).

#### **a. Investigation**

The Grievance will be undertaken by the Grievance Committee composed of the Managing Director, Chairman of the Board of Advisors, and a legal professional. Sweef Capital will use best endeavours to inform the relevant Stakeholder of the process and expected timeframe for considering the Grievance and where possible, its resolution. The Stakeholder will remain well informed about the progress of the procedure at each stage.

The investigation includes different dialogue-based actions including interviewing the Stakeholder from whom the Grievance emanates (if not anonymously filed), hearing the person against whom the Grievance is made (if feasible), and looking for any possible witnesses and questioning them.

There may be instances where it may be necessary to contact persons in or outside Sweef Capital or portfolio company as well as obtain relevant documentation and records. Any contact is confidential, and the persons involved are prohibited from disclosing such information and will be subject to a special duty of confidentiality, unless required by legislation.

Issues concerning members of Sweef Capital's executive management or members of the Grievance Committee are processed by the board of directors with assistance from a third party independent party. Issues concerning the chairman and the chief Investment officer of the Grievance Committee and the executive manager, will be investigated by the chairman of the board of directors.

#### **b. Report**

The Grievance Committee will be drawing up a report containing recommendations and/or actions for appropriate measures to be taken by Sweef Capital in accordance with international standards and norms. This report will be discussed with relevant Stakeholder and/or interested parties (where appropriate).

#### **c. Monitoring**

Based on the timeframe, the Compliance Officer will follow up on the different stages and monitor the procedure's progress. It will then close the case further to the complete implementation of (corrective) actions defined in stage 4.

When an issue is resolved, the parties involved will be informed. The subject of a report will only be informed of the relevant conclusion and recommended mitigating actions if the Grievance Committee determines it is relevant to the individual, or as legally required. If the result of the investigation shows that an irregularity has taken place,

information can be passed on to other departments for further processing, such as disciplinary sanctions or reporting to the police.

## C. DATA MANAGEMENT

### 1. Protection of the identity of the individual filing a report

Sweef Capital does not tolerate harassment, retaliation or other types of sanctions against any person who in good faith files a report or who assists Sweef Capital in connection with the processing and investigation of a case.

Sweef Capital will keep identities of individuals confidential to the extent possible even they have not made an anonymous report. However, it may be necessary to disclose information about the identity, for instance if the issue is reported to the police or if the case is taken to court.

Sweef Capital does not reveal the identity to the reported person unless this is specifically required by legislation. However, one should be aware that even though the information is not directly accessible to the reported person, he or she might be able to guess your identity based on the nature of the issue.

Persons who report in bad faith are not protected by this Grievance Mechanism Guidelines and may be subject to civil, criminal and employment law sanctions, including possible dismissal.

### 2. Deletion of personal data

Personal data processed in connection with Sweef Capital's Grievance Mechanism are kept for as long as deemed necessary for the purpose for which the data were collected.

If the result of a specific case presents no evidence of any irregularity, the personal data will be deleted immediately and as a main rule within two months after closing of the case.

In case evidence of irregularities is found, various storage periods apply, depending on further proceedings, including whether legal action or disciplinary steps are taken against the reported person or against the person who filed the report, in cases where the report is filed in bad faith.



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