

# Development Partners International



<b>Subject:</b>	Grievance Mechanism
<b>Date:</b>	29 July 2020

## DPI Grievance Mechanism

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### DPI Grievance Management Procedure

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#### Purpose and Scope

The grievance mechanism allows for an individual or group to raise concerns or complaints regarding Development Partners International LLP (“DPI”), African Development Partners I, LLC and ADP I L.P. (“ADP I”), African Development Partners II L.P. (“ADP II”), African Development Partners III L.P. and African Development Partners III Mauritius L.P. (“ADP III” and together with ADP I and ADP II, the “Funds”) and their underlying investment portfolios.

The purpose of the grievance mechanism is to identify and pro-actively solve any issues of non-compliance, dissatisfaction, feelings of injustice or feedback (herewithin referred to as “grievances”) from such stakeholders. Consequently, methods are provided to enable these stakeholders to have their grievances or concerns resolved in an effective manner and to do so as fairly and as quickly as reasonably practicable.

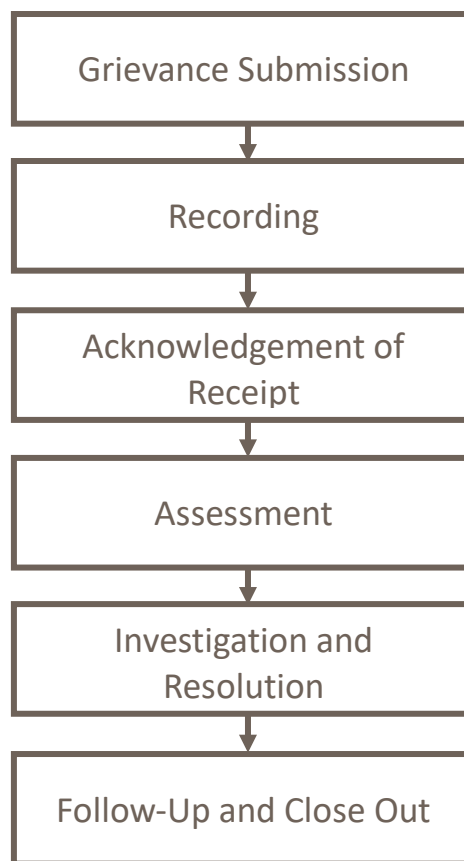
This procedural document provides transparency on how grievances will be managed internally by DPI. The grievance mechanism procedure applies to all internal and external stakeholders, including investee companies, employees, local communities and interest groups.

#### Grievance Mechanism

Stakeholders are encouraged to raise any issues, problems, complaints or suggestions with DPI representatives, including an explanation about the nature of the problem and the relief sought. For each grievance received, DPI shall assess the relevance of the external and / or internal communication submitted and determine the level of response necessary, if any, to achieve a resolution. DPI would like grievances to be resolved in an informal way, however where this is not possible, the following Formal Grievance Procedure set out below shall be adhered to (refer to **Figure 1**).

**Figure 1**

**DPI Formal Grievance Procedure**



## Step 1: Grievance Submission

DPI may receive a grievance from its stakeholders or stakeholders of the Funds through different means including

- a) submission of online form on the DPI website <https://www.dpi-llp.com/grievance/>
- b) a telephone conversation with a DPI representative on +44 (0)20 3926 7981
- c) via email to [grievance@dpi-llp.com](mailto:grievance@dpi-llp.com).

The complainant shall be encouraged to lodge grievances in writing, telephonically or verbally directly with DPI’s Administrative Partner. Where grievances are lodged telephonically or verbally, these should be transposed into the relevant format, as provided in Annex 1.

## Step 2: Recording Grievances

The DPI’s Administrative Partner shall receive grievance submissions and be responsible for logging grievances within the fund Grievance Register (Annex 2). If the grievance is about DPI’s Administrative Partner please send the grievance directly to DPI’s CEO at [ralam@dpi-llp.com](mailto:ralam@dpi-llp.com). The following shall be recorded for each grievance entered into the register as the information becomes available:

- Grievance reference number;
- Complainant’s name and contact details (if given);
- Date of grievance;
- Details of grievance;
- Reasons for rejecting a grievance (where applicable);
- Resolutions discussed and agreed with the party(ies) in question;
- Actions implemented (including dates);
- Grievance status (open, resolved, unresolved or abandoned); and
- Outcome of the actions implemented.

## Step 3: Acknowledging Receipt of Grievances

Receipt of grievances will be formally acknowledged in writing not more than fourteen (14) days from the date it was submitted. The initial response should inform the complainant regarding the timeframe in which a formal response can be expected. A full response should then be provided no later than one calendar month from receipt of the grievance. For level C and D grievances, response times may be longer, but this will be assessed on a case by case basis and communicated to complainant.

## Step 4: Assessing Grievances

Each grievance must be assessed to determine the type of response required. This will also determine the appropriate individual to manage the response. DPI has identified four (4) levels of risk associated with grievances which are used to assign responsibility and define the type of response required. The DPI Administrative Partner should consider these levels when assessing each grievance. Table 1 below outlines the four (4) levels and associated detail.

**Table 1** Grievance Levels

Level	Detail
Level A	<ul style="list-style-type: none"> <li>• Positive feedback requiring acknowledgement and thanks.</li> <li>• Feedback that is not related to DPI or its Funds or their underlying portfolio companies and needs to be directed elsewhere.</li> </ul>
Level B	<ul style="list-style-type: none"> <li>• Question or request for information only.</li> </ul>
Level C	<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 breach of DPI or the Fund’s internal policies.</li> <li>• Grievance, but does not pose significant financial, reputational or operational risk for DPI or its Funds.</li> </ul>

Level D	<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 ADP III’s internal policies.</li> <li>• Grievance that could pose significant financial, reputational or operational risk for DPI or its investment portfolio (i.e. human rights breaches, major environmental pollution incidents, etc.).</li> </ul>
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All grievance submission will be discussed with the DPI CEO unless the grievance is about the DPI CEO. Level C and D grievances require the involvement of the senior management of the entity that received the grievance (i.e. the DPI Partners and portfolio company management).

**Step 5: Investigation and Resolution**

Once responsibility of a grievance has been assigned to an individual, it should be investigated and resolved. Where necessary the investigation may require others to be involved.

When resolving any grievance, records of all correspondence must be kept. Any follow up monitoring required must be documented and an implementation plan developed and actioned.

If relevant, DPI management can arrange for a meeting to take place (either in person or via conference call) to discuss the matter further.

In preparing for such a meeting, DPI management is to consider the following:

- Having an independent representative in attendance to witness and record the meeting;
- Ensuring all relevant personnel are made fully aware of all facts in the case;
- Being aware of how similar grievances may have been resolved in the past; and
- Whether an interpreter may be needed to ensure efficient communication.

The complainant has the right to be accompanied by a colleague or acquaintance, whom may be allowed to address the meeting on their behalf.

Upon completion of the grievance investigation process, DPI management shall conclude and present a decision in writing. Shortly after a decision has been made, the appropriate DPI representative shall inform the complainant of the outcome in writing and explain verbally if required. Should the grievance be of level C or D, the response or update may need to be provided directly by senior management and should provide clear information on the proposed final corrective action and detail any related commitments made by both parties.

If the complainant is not happy with the proposal, they are free to seek resolution through a formal external dispute resolution mechanism.

**Step 6: Follow-up and Close Out**

A grievance is closed out when no further action can be or needs to be taken. When closing out a grievance, it is important to ensure that there is fully documented evidence of the resolution process. This includes:

- Written internal records (with the date and time close out took place and sign off by responsible staff);
- Photographs, if relevant to documenting the resolution; and
- Written confirmation of the complainant’s agreement with the resolution (as relevant).

The grievance will be assigned a close out status e.g., open (under investigation), resolved (resolution has been agreed), unresolved (not possible to reach an agreed resolution and case has gone to external dispute resolution), abandoned (complaints where the complainant is not contactable after a certain period and complaint becomes null and void), which shall be recorded in the Grievance Register (refer to Annex 2).

**Matters to be Aware of when Handling Grievances**

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

- Hold any grievance interviews in private and without interruptions;
- If the grievance relates to a stakeholder’s direct manager, ensure that the aggrieved party can raise the grievance with someone else;
- Listen carefully to the aggrieved party’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 DPI, its Funds or other stakeholders;
- Inform all concerned parties of the decision made; and

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- Keep the grievance resolution process as confidential as possible.

### Non-Retaliation

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DPI shall protect any stakeholder that raises a grievance. Any form of retaliation, victimisation or threats will not be tolerated.

### Confidentiality

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All the reporting on the grievance process is to be kept confidential. This means that the information shall only be shared with a limited number of people on a strictly need to know basis. DPI will carry out the investigation and take the necessary action(s).

### Publication

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This Grievance Management Procedure must be available and accessible to all stakeholders, both internal and external. Therefore, once established, will need to be appropriately communicated and publicised through employee induction and internal meetings as well as placed on DPI's website. Evidence of this must be documented.

### Approval and Version Control

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Approval:

	Date	Name	Position
<b>Created:</b>	09/07/2020	Vincent Lecat	ESG Specialist
<b>Reviewed:</b>	20/07/2020	Sarah Shackleton	Administrative Partner
<b>Approved:</b>	29/07/2020	Runa Alam	CEO

Revision History:

Revision no.	Revision Date	Name	Description

Annex 1: Grievance Form

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<b>Grievance Form</b>		
<b>Aggrieved Party Details</b>		
<b>Name (optional)</b>		
<b>Company / Entity (optional)</b>		
<b>Contact Details (optional; if no details are provided, it will not be possible to provide acknowledgment or details of the resolution)</b>		
<b>Anonymity</b>	<i>Yes / No</i>	
<b>Date</b>		
<b>Grievance Details</b>		
<b>Description of Grievance / Feedback:</b>		
<b>Has this Grievance Been Raised Previously?</b>	<input type="checkbox"/> Yes	<input type="checkbox"/> No
	Date:	Place:
<b>Desired Solution / Information:</b>		

## Annex 2: Grievance Register

Grievance Register												
Details of Grievance						Details of Response						
Ref No.	Date Received	Stakeholder/ Entity	Contact Details	Grievance Description	Accepted / Rejected (providing reasons)	Acknowledgment of Receipt	Date	Actions Taken to Collect Information	Action Taken to Resolve Grievance	Responsibility	Current Status	Closure Date
...	...	...	...	...	...	...	...	...	...	...	...	...