

LDN Fund's Policy on Stakeholder Complaints and Suggestions

Hearing our stakeholders' opinions, concerns, complaints and suggestions for improvement is important to successful operation and we aim for a reputation for effective stakeholder engagement at the global and local, corporate and project levels. The information gathered from or given by stakeholders acts as an early warning for emergent issues and allows us to respond in a timely fashion and to manage reputation and operational risks effectively.

A complaint is a notification that a legitimate stakeholder (an individual, group or community that has an interest in or affects or is affected by the project) has suffered some form of offence, detriment, impairment or loss as a result of project activity and/or employee or contractor behaviour. A dispute is a complaint that has not been accepted as valid by one party or the other and has escalated into disagreement between the parties.

Any individual, group, community, or other party can make a complaint or a suggestion to us if they believe they are, or may be, affected by a project in which the firm has invested or any other activity of the firm. Complaints or suggestions may also be made on behalf of an affected party.

The Environmental, Social and Governance (ESG) Policy related to the LDN initiative requires all projects in which we invest to have, implement and maintain a project-level complaints and grievance mechanism. For concerns and complaints related to specific events, activities or behaviour at a project in which we are involved, it is expected that the affected stakeholder will make all reasonable efforts to contact and make his concerns known to the project manager first, before contacting us. In cases where there is a possible cause for dispute it is expected that the stakeholder and the project manager will have made all reasonable efforts to find a resolution before contacting us. The ESG policy related to the LDN initiative dictates that our investee projects will report quarterly to us all material complaints arising at the project and on the status of resolution of any disputes.

Any complaint or suggestion made directly to us will be attended to swiftly. We will acknowledge receipt of a complaint or suggestion within 5 working days and respond fully within 2 months (not counting time needed to translate the documentation received). If this deadline cannot be met, we will keep the counterparty informed of the status and progress of the complaint or suggestion and explain the special circumstances that justify the fact that this deadline cannot be met. We will acknowledge receipt of a complaint or suggestion in the language in which it was submitted and make all reasonable efforts to use the same language in our full response. If we consider that further action is required beyond our full response to the complaint or suggestion, such action will be described in our response and, if appropriate, one of our staff will contact the complainant or author directly to discuss the matter.

In the unlikely event that a remedy to a complaint or dispute cannot be reached between us and a stakeholder, the stakeholder and us are free to seek independent counsel and, if judged to be an appropriate course of action to find resolution, appoint a mediator.

We will log and maintain a register of all complaints and suggestion that it receives.

Although we welcome all comments from our stakeholders, we ask that when making a complaint or a suggestion, that they conform to the following guideline criteria:

- Complaint or suggestion is written in any language and submitted through our web site
- Complaint or suggestion relates to a project in which we have invested (including those under consideration) or any activity in which we are involved;

- Complaint or suggestion relates to social, environmental and/or governance issues associated with that project(s) or activity;
- Complainant or author is a legitimate stakeholder of the project or in the activity;
- Complainant or author believes they are, or may be, affected by the social, environmental and/or governance issues raised;
- Complaint or suggestion is accompanied by materials, descriptions or testimonials that support the critical points the author wishes to make.

We will not acknowledge receipt or respond to complaints or suggestions that are malicious, trivial, or generated to gain competitive advantage.

In all cases, confidentiality of a complainant or the author of a suggestion submitted to us will be respected if requested. We will not, if requested, reveal the identity of complainants or release materials submitted on a confidential basis by the complainant without their consent.

If a complainant wishes to remain anonymous, we will retain the services of a law firm to act as an independent party acting under complete professional confidentiality. The process for which the complaint or suggestion will be resolved or processes in such cases will be agreed between the law firm and the complainant or author.

Contact

If you have a concern you would like to share with us then please contact us at: ldn@mirova.com