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External Complaints Policy & Procedure

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HELIOS EXTERNAL COMPLIANTS POLICY & PROCEDURE**1. Our Firm**

Helios Investment Partners (Helios) is the leading Africa-focused investment firm led and predominantly staffed by African professionals. Helios leverages deep local expertise, language skills and cultural affinity to engage with local entrepreneurs, managers and intermediaries on the continent. The firm's extensive local and global networks enable it to identify businesses opportunities and structure proprietary transactions. With a profound understanding of Africa's operating environment, a steadfast commitment to the region and a proven capability to navigate complexity, Helios has built a portfolio of market-leading businesses. These strengths make it the partner of choice for multinational corporations. Helios is a signatory to the UN PRI and 2X Global, and through Helios Climate has a dedicated Impact strategy underscoring its commitment to responsible investment.

At Helios, we believe our greatest contribution to regional development comes from building profitable, value-creating, environmentally and socially responsible private enterprises. By investing capital in African businesses, we foster economic growth, create employment opportunities, and strengthen supply chains, amplifying our impact across industries.

Helios' commitment to sustainability and responsible business practices was recognized with B Corp certification in 2020 and again in 2023 by B Lab, a leading sustainability organization. This certification affirms that Helios upholds the highest standards of corporate governance, transparency, accountability, and social and environmental performance, including in its investment strategy and activities.

Helios and its portfolio companies (together "Helios") recognise their respective responsibilities to external stakeholders affected by their operations and the actions of their management and staff; particularly those with social and environment ramifications. Helios also recognises the importance of providing a channel for third parties if they have an inquiry, to raise concerns or a formal complaint.

2. Policy Objective and Scope

The objective of this policy and procedure is to outline and document how Helios handles External Communications complaints or grievances from third parties. It establishes a way for these third parties to openly or anonymously raise a complaint or grievance and describes how they can expect such a complaint or grievance to be handled in the strictest confidence.

Definition

Third parties within the context of this policy refer to individuals who do not have a contractual relationship with Helios or local communities that live and work in areas where Helios may be operating. Third parties may be affected by Helios actions in the following ways (list not exhaustive):

- environmental damage
- infringement of human rights;
- verbal abuse, personal injury and death; and
- excessive use of force; and
- damage to property and material or financial loss;

3. Our Commitments

In the event of an issue arising from a third-party complaint Helios will:

- process complaints and grievances in an effective, appropriate, transparent and fair manner, with due consideration for confidentiality and the rule of law;
- conduct an initial assessment and investigate further as needed;
- identify the root causes, remedy the impacts and take disciplinary action where appropriate;
- advise complainants of the outcome of investigations;
- develop remedial training and implement procedures to reduce the likelihood of future similar complaints;
- report complaints to the appropriate external authorities when the nature or severity of the complaint requires such action giving its full support to any external investigating authorities. Where a criminal act may have taken place Helios legal advisors will consider taking the matter to the appropriate authorities, providing information, documents or support as necessary; and
- publish the Third-Party Complaints/Grievance policy on its website.

4. Complaints Procedure

Those wishing to register a complaint can do so using the following mechanisms, which can also be found on the Helios website. Also allow for a complaint to be made anonymously:

- Web Intake Site URL: heliosinvestment.ethicspoint.com
- Mobile Intake Site URL: heliosinvestmentmobile.ethicspoint.com
- Hotline Phone Number: 0808 196 5772

The complaint can be made anonymously and as much information as possible of the circumstances surrounding the concern should be provided. Where third parties believe that their complaint has been handled inappropriately and prefer to seek independent redress, they are advised to refer the matter to an external body such as a regulatory ombudsman.

Investigation

On receipt of a third-party complaint Helios Compliance Officer will act as the point of contact depending on the nature of the complaint. The Compliance Officer will advise complainants of the process as outlined below, assist complainants in submitting complaints or grievances and ensure that complaints or grievances raised through Helios or the portfolio company's management are escalated to an appropriate level. Moreover, they will ensure that investigations are fully supported, notifying senior management. For more on the roles and responsibilities of the Compliance Officer see Appendix A:

The stages in the resolution process are as follows:

Step 1: Receive & Acknowledge Complaint

- Once Helios receives the complaint, it will be recorded in a register.
- Helios will acknowledge receipt of the within 5 working days of receipt.
- The acknowledgement will specify a contact person within the Helios (see registering complaint above) and a description of what the complainant can expect next, including a timeline.

Step 2: Evaluate, Assign Owner, and Investigate

- Helios will assess the complaint to determine how it should be managed and, in most instances, will assign an owner with the substantive expertise to resolve it. Helios has

defined complaint owners across different functions for issue types.

- The complaint owner will work to understand and investigate. This may involve seeking information from different departments within the Helios or from contractors. Helios aims to complete this step within 30 days.
- Helios will work with the complainant to understand the cause of the issue and will need to contact the complainant during the investigation.

Step 3: Consult on and Implement Resolution

- Once the complaint has been investigated, in consultation with the complainant, Helios will discuss the results and proposed resolution with the complainant, including a timeline for implementation.
- Helios will implement the resolution either directly or through a third party, which will be done in consultation with the complainant.
- Helios will review complaints regularly to ensure progress is being made towards resolution. If no progress is being made, Helios may decide to escalate the complaint to Helios' Exco or senior management. In such circumstances, the complainant will be updated on progress.

Step 4: Close and Monitor

- After the complaint has been fully investigated, the resolution has been implemented and monitored, and no further action is deemed necessary to resolve the issue, Helios will close the complaint.
- Helios will ask the complainant to acknowledge resolution. Acknowledging the resolution does not preclude the complainant from raising the issue again, or seeking other avenues for redress should the resolution not result in a permanent fix or the issue recurs.
- If the complainant does not agree with the resolution offered, Helios will close the complaint. The complainant may choose to appeal the decision to close the complaint or seek other recourse.
- Helios may re-open the complaint if the complainant provides new information.
- Helios may contact the complainant after closure to ensure no other problems have arisen.

Throughout the process outlined above, Helios will liaise with all relevant parties, provide progress updates and report on the outcome. If there is evidence that a criminal or serious disciplinary offence may have been committed, the matter will be referred immediately to Helios' legal advisors, and the relevant governmental or regulatory body if required.

5. Policy Ownership

The maintenance of this policy falls under the responsibility of the Helios Compliance Officer. This policy is reviewed by the Helios Compliance Officer on an annual basis.

Disclaimer: This policy will be implemented on a commercially reasonable basis and in accordance with applicable in-country regulations. In cases where local laws or regulations prevent full implementation, adjustments shall be made to ensure compliance while maintaining the policy's intent to the extent possible.

APPENDIX A

Terms of Reference for a Compliance Officer

The **Compliance Officer** serves as the focal point for the grievance mechanism. The Grievance Officer's key roles are to capture community complaints and concerns systematically, address issues that can be readily resolved, refer issues to a complaint owner within the operation/company when substantive expertise is necessary, and follow up with both the complaint owner and community member(s) to ensure that the issue is resolved in a fair and timely manner.

Roles and Responsibilities

- Manage the grievance mechanism
 - Receive community complaints and concerns and record them in a database.
 - Resolve complaints and concerns as appropriate.
 - Assign complaints that cannot be resolved by the Grievance Officer to a complaint owner within the operation.
 - Follow up with complaint owners to ensure complaint resolution is advancing in a timely manner and using a fair process.
 - Update complaint information in the database regularly.
 - Review complaints regularly and close them out when appropriate.
 - Monitor any resolutions to grievances to ensure they are implemented.
- Engage with stakeholders
 - Provide information about the grievance mechanism to community stakeholders.
 - Inform management of concerns and complaints received by the grievance mechanism.
 - Work with operations staff to notify community members of activities that may lead to community concerns or complaints before the company undertakes the activities.
 - Work with staff tasked with community engagement to understand community issues before, during, and after community engagement events.

Experience and Qualifications

- Knowledge of the basic elements of the business operations
- Strong customer service focus
- Excellent communication skills
- Ability to work independently and with teams
- Ability to work on issues that may lead to conflict or be emotionally charged
- Mastery of computer skills sufficient to maintain a database of community complaints, and prepare reports and presentation of results