

## General Statement

Our complaints and grievance mechanism set forth a formal, legal or non-legal (or judicial/non-judicial) complaint process that can be used by individuals, workers, communities and/or non-governmental sectors that are negatively affected by commercial activities where ADM Capital might be engaged.

Our Grievance mechanism builds on our Complaints Policy and also the Stewardship commitments contained in ADM Capital's Stewardship & Engagement Policy. These are an integral part of our approach to our investment activities and contribute to our ability to deliver returns for our clients. ADM Capital believes that we can help foster better investment and practices through our own operations and also through our influence on the companies we finance.

A grievance is a notification that a legitimate stakeholder (an individual, group or community with an interest in or affected by a 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 grievance that has not been accepted as valid by one party or the other and has escalated into disagreement between the parties. In creating a grievance mechanism, we aim to avoid dispute and provide stakeholders with a means of notification and redress.

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 and Grievance Management 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.

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

When relevant, ADM Capital requires 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 ADM Capital is involved, it is expected that the affected stakeholder will make all reasonable efforts to contact and make concerns known to the borrower or counterparty ahead of following ADM Capital's procedure.

Our grievances are handled following the following **principles**:

1. All stakeholders are given the opportunity to raise their complaints
2. Grievances must be answered within three months from receipt; and
3. All complaints must be documented and reported.

4. This Policy shall not impede access to other judicial or administrative remedies that might be available under local law, or substitute complaints mechanisms provided through specific agreements with ADM Capital.
5. No complainant who, in good faith, reports any complaint in respect of ADM Capital shall suffer any harassment, retaliation or adverse consequence. Any director, officer or service provider who retaliates against any complainant to the Fund shall be subject to discipline, which process may result in termination of office or contract.

### **Submission of Grievances**

All Grievances must be sent in written form through one of the following sources:

- 1) Communication sent by postal mail:
  - Attn.: ADM Capital Complaints Officer –
  - ADM Capital
  - 1008 ICBC Tower
  - 3 Garden Road
  - Hong Kong
- 2) Communication sent via email to:
  - Alex.Shaik@admcapital.com
  - Subject: Attn: ADM Capital Complaints Officer – ADM Capital
- 3) There are instances in which grievances might be presented verbally when a member of the ADM Capital team is in the field at project site and in that instance, the ADM Capital team will write up the grievance and submit it according to internal channels to the same team within the investment advisor.

Our ADM Capital website (<https://www.admcapital.com>) includes a sustainability-focused section, which contains our relevant policies, our exclusion list and details our approach to ESG integration. We are open to discussion, feedback, comments or grievances, whether issued directly to our ADM Capital team members or via our website.