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## **PEMBA**

### **GRIEVANCE RESOLUTION POLICY**



For the purposes of this document “Pemba” refers to the Pemba Group and applies to Pemba Capital Partners Pty Ltd (“Pemba”) and any Related Body Corporate or Associate of Pemba Capital Partners (each as defined under the Corporations Act 2001 (Cth)) (but excluding, for the avoidance of doubt, any investee entity) and any partnership or trust of which Pemba (or any of its Related Bodies Corporate or Associates) is the manager, general partner or trustee (as applicable) (together, the Pemba Group).

## COMMITMENT

Pemba Capital Partners (“**Pemba**”) is committed to ensuring that it treats seriously all grievances and complaints made by internal and external stakeholders, and that all persons raising complaints or grievances are treated with respect and sensitivity. We take concerns raised by clients and stakeholders seriously and aim to resolve issues as quickly as possible.

Each complaint will be addressed in an equitable, fair and objective manner and without actual or perceived bias. Where possible, a complaint will be investigated by staff not involved in the subject matter of the complaint.

Each complaint will be managed in an equitable manner, including those lodged by complainants who display unreasonable or challenging behaviour.

## SCOPE

This Policy applies to:

- All Pemba employees, contractors, officers and representatives;
- Portfolio company stakeholders where relevant; and
- External stakeholders who wish to raise a concern related to Pemba’s services, conduct, workplace practices, or impact on people or the environment.

“Grievance” and “complaint” include any expression of dissatisfaction or concern where a response is expected.

A complaint is an expression of dissatisfaction made to Pemba about our products, services, or complaint handling process, where a response is expected.

## PRINCIPLES

Pemba’s grievance and complaint handling is guided by the following principles

- **Fairness & Objectivity:** Issues will be investigated in an equitable, impartial and unbiased manner.
- **Respect & Sensitivity:** All complainants will be treated with empathy, respect and courtesy.
- **Accessibility:** Complaints may be raised verbally or in writing, in person, via telephone or email, and Pemba will provide assistance (e.g. interpreters or alternative formats) where required.
- **Responsiveness:** Complaints are acknowledged promptly and resolved as efficiently as possible, with regular status updates provided.
- **Confidentiality:** Personal information will be kept confidential except where required for the purpose of addressing the complaint or by law.
- **Continual Improvement:** Complaint data will be monitored to identify trends, recurring issues and opportunities to improve systems and processes.

## HOW TO RAISE A GRIEVANCE OR MAKE A COMPLAINT

You may lodge a complaint in any of the following ways:

- **Verbally:** by speaking with a manager, People & Culture, or the Complaints Officer
- **Email:** info@pemba.com.au
- **Phone:** (02) 9256 6300
- **Mail:** Pemba Capital Partners, Level 45, Gateway, 1 Macquarie Place, Sydney NSW 2000
- **In person:** By appointment

If you require assistance - for example, language support or accessibility support - we will help you access the process.

## RESPONSIBILITIES

Pemba's designated Complaints Officer is responsible for coordinating investigations and ensuring complaints are handled genuinely, promptly and consistently, in line with Pemba's Complaints Handling Procedures

### Managers and Senior Staff

Managers who receive grievances must:

- treat the matter seriously and sensitively;
- document the concern; and
- escalate it to the Complaints Officer.

### All Employees

All employees must cooperate with grievance processes and uphold Pemba's commitment to fair and respectful treatment.

## COMPLAINTS HANDLING PROCESS

Once we receive your complaint:

1. **Acknowledgement**  
We will acknowledge receipt within **one business day**, or as soon as practicable
2. **Assessment & Investigation**
  - Complaints are assessed for urgency and complexity.
  - The Complaints Officer or a delegate will investigate the matter, seeking further information where required.
3. **Updates**  
We will keep you informed of progress during the investigation.
4. **Response**  
We aim to provide a final written response within **30 calendar days** unless:
  - the matter is more complex or requires information from third parties, we will advise you of the reason for the delay and expected timeframe.
  - Circumstances beyond Pemba Capital's control are causing complaint management delays

## RESOLUTION AND REMEDIES

Depending on the nature of the complaint, outcomes may include:

- an explanation of the circumstances
- correction of errors or records
- an apology
- changes to internal processes
- financial remediation where appropriate

A written outcome will be shared. If grievance is not accepted, a clear explanation will be provided.

Pemba is committed to reaching a fair and reasonable outcome.

## IF YOU ARE NOT SATISFIED

If you remain dissatisfied after receiving our final response, you may choose to pursue your complaint through other avenues, including legal avenues.

For privacy-related complaints, you may contact the Office of the Australian Information Commissioner (OAIC) if you are not satisfied with our response

- Website: [www.oaic.gov.au](http://www.oaic.gov.au)
- Phone: 1300 363 992

## CONFIDENTIALITY AND NON-RETALIATION

Personally identifiable information concerning the complaint will be kept confidential and not disclosed unless needed for the purpose of addressing the complaint or if the client's consent is obtained, or as otherwise required by law. Pemba Capital may disclose statistical non-personally identifiable complaints data within the organisation, or externally, at its discretion.

Pemba prohibits victimisation, retaliation or disadvantage to any person who raises a grievance or complaint in good faith. All information will be kept confidential except where disclosure is required for proper investigation, remedy or by law.

## CONTINUOUS IMPROVEMENT

We use feedback and complaint data to help improve our services and client experience. Pemba is committed to maintaining a culture that values feedback and the opportunity it provides to strengthen our operations.

Pemba reviews this Policy and related procedures regularly to ensure they remain effective, accessible and aligned with its commitment to continual improvement.