Pemba
Capital Partners

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PEMBA

GRIEVANCE RESOLUTION POLICY

For the purposes of this document "Pemba" refers to Pemba Capital Partners Pty Ltd and Pemba Capital Nominees Pty Ltd. For complaints concerning financial services provided under an Australian financial services licence, references to Pemba mean the relevant AFS licensee and its representatives.

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.

For complaints concerning licensed financial services, Pemba also uses this Policy as an internal governance control supporting the obligation to ensure those services are provided efficiently, honestly and fairly.

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.

A "grievance" includes a concern raised by an internal or external stakeholder where a response is expected. Grievances must be triaged to determine whether they are also a Complaint, employment or workplace matter, protected disclosure, privacy complaint, data breach, safety matter or other regulated issue.

A "Complaint" is any expression of dissatisfaction made to or about Pemba, its products, services, staff, representatives or complaint-handling process where a response or resolution is expressly or implicitly expected or legally required. A Complaint need not be in writing and need not use the word "complaint".

For a financial-services Complaint to be managed on the confirmed wholesale-client pathway, Pemba must verify and record the basis on which the relevant product or service is provided to the complainant as a wholesale client under section 761G or 761GA of the Corporations Act 2001 (Cth). If that status is not verified, or the Complaint may involve a retail client, it must be escalated immediately to Compliance and managed conservatively under any applicable retail-client IDR and external dispute resolution requirements until status is determined.

Employment, work health and safety, discrimination, protected disclosure, privacy or data-breach matters must be promptly referred to the relevant policy and responsible officer. This Policy does not limit any statutory protection, contractual right, legal privilege or right to contact a regulator or obtain independent advice.

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:** Information will be handled on a need-to-know basis and in accordance with applicable privacy, whistleblower, employment and legal obligations. Confidentiality cannot be promised where disclosure is reasonably necessary to investigate, respond, obtain advice, notify an insurer or regulator, prevent harm or comply with 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:** complaints@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.
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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

The final response will identify the issues considered, findings and material reasons, outcome and any remedy, information reasonably relied on, implementation steps and timing, and any available review or escalation rights.

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
- 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.