



# Complaints Policy and Procedures

Document No. **MPP-026**

Issued Date: **01 November 2021**

REV.	DATE	AUTHOR	CHECKED	APPROVED	MODIFICATION DETAILS	NEXT REVIEW DATE
A	01 Nov 2021	Legal and Compliance	InfraCo Asia ExCo	CEO, COO	Final	01 Nov 2022

Internal/Confidential

Public

<b>Contents</b>	<b>Page</b>
<b>1. BACKGROUND AND PURPOSE .....</b>	<b>3</b>
<b>2. FRAMEWORK AND APPLICABILITY .....</b>	<b>3</b>
<b>3. WHAT DOES THIS POLICY COVER?.....</b>	<b>3</b>
<b>4. WHO CAN MAKE A COMPLAINT? .....</b>	<b>3</b>
<b>5. WHAT IS A PERSONAL INTEREST COMPLAINT?.....</b>	<b>4</b>
<b>6. HOW TO MAKE A COMPLAINT?.....</b>	<b>4</b>
<b>7. HOW INFRA CO ASIA WILL DEAL WITH EACH COMPLAINT .....</b>	<b>4</b>
<b>8. REMEDIES .....</b>	<b>4</b>
<b>9. COMPLAINT NOT SATISFACTORILY RESOLVED .....</b>	<b>4</b>
<b>10. REVIEW AND CHANGES TO THIS POLICY .....</b>	<b>5</b>
<b>11. RESPONSIBILITY FOR THIS POLICY DOCUMENT .....</b>	<b>5</b>
<b>12. REFERENCE DOCUMENTS.....</b>	<b>5</b>
<b>13. APPENDICES.....</b>	<b>5</b>
<b>Appendix A: Are you a Complainant? .....</b>	<b>6</b>
<b>Appendix B: Safecall .....</b>	<b>7</b>
<b>Appendix C: Evaluation Process .....</b>	<b>8</b>
<b>Appendix D: Investigation Process .....</b>	<b>9</b>
<b>Appendix E: Complaints Form .....</b>	<b>10</b>

## 1. BACKGROUND AND PURPOSE

- (a) InfraCo Asia Development Pte. Ltd (IAD) and InfraCo Asia Investments Pte Ltd (IAI) (together, **InfraCo Asia**) were established by the Private Infrastructure Development Group (PIDG) to promote the development of private sector infrastructure in developing countries of South Asia and Southeast Asia. PIDG is funded by six governments (UK, Netherlands, Switzerland, Australia, Sweden, and Germany) and the International Finance Corporation.
- (b) The fundamental objective of the InfraCo Asia Complaints Policy and Procedures (**Policy**) is to provide appropriate facilities and mechanisms for raising a Complaint as this will ensure that Complaints relating to InfraCo Asia’s business can be raised quickly and reduces any negative impact on InfraCo Asia’s business and operations.

## 2. FRAMEWORK AND APPLICABILITY

- (a) This Policy provide the framework and requirements for enabling appropriate facilities and mechanisms for all **personal interest complaints** against InfraCo Asia.
- (b) Personal interest complaints against InfraCo Asia may include complaints against InfraCo Asia’s directors, officers, employees, executives and non-executive directors, committee members, agency workers, volunteers, interns, consultants, contractors, related companies and other projects), and may include Complaints against other participants and organizations (Participants) involved with the InfraCo Asia companies and/or projects.

## 3. WHAT DOES THIS POLICY COVER?

- (a) If a person external to InfraCo Asia or a Participant wishes to raise any personal concerns, expressions of dissatisfaction (**personal interest**) deriving from InfraCo Asia and/or Participants about anyone or anyone’s services or any outcomes affecting such person(s) (**Complaints**), this Policy would apply to them.
- (b) This Policy sets out InfraCo Asia’s Complaints procedures clearly so that Complaints relating to InfraCo Asia’s business may be raised, investigated and assessed accordingly.
- (c) This policy **does not** cover the processes for whistleblowing reports (concerns of a public interest/nature) and personal/internal grievances from employees/personnel of InfraCo Asia and Participants:
  - (i) **Personal/Internal Grievances:** If an employee/personnel of a Participant wishes to raise a personal/internal grievance about their employment/personnel circumstances or treatment (i.e., bullying, harassment, discrimination against them *personally*), or in relation to an *internal employee/personal matter*, then they should refer to the internal grievance mechanism in the relevant employment handbook or the appropriate internal grievance mechanism for the relevant project, as applicable.
  - (i) **Whistleblowing:** if anyone would like to report/alert to InfraCo Asia about an actual, suspected or anticipated conduct that is unfavourable to public interest and includes criminal offences like fraud, actions that cause someone’s health and safety to be in danger, risk or damage to the environment or if you sense that someone is covering up a wrongdoing, then they should refer to InfraCo Asia’s Whistleblowing Policy & Procedures. This should be a concern/issue of a public interest/nature and should not affect the person personally.

## 4. WHO CAN MAKE A COMPLAINT?

- (a) If a person external to InfraCo Asia or a Participant wishes to raise any personal concerns, expressions of dissatisfaction (personal interest) deriving from InfraCo Asia and/or Participants about anyone or anyone’s services or any outcomes affecting such person(s), this Policy would apply to them.
- (b) Any person external to InfraCo Asia or a Participant. can raise a Complaint if they have a report on a personal interest, it does not impact the wider public and they are willing to provide evidence to substantiate their Complaint (“**Complainant**”).
- (c) For more clarity on who to contact, please refer to **Appendix A: Are you a Complainant?**

## 5. WHAT IS A PERSONAL INTEREST COMPLAINT?

A personal interest Complaint may be about:

- (i) the standard of service provided by InfraCo Asia and its Participants that affects the Complainant personally;
- (ii) the conduct and / or behaviour of the staff in delivering a service that affects the Complainant personally;
- (iii) any action or lack of action by staff that affects the Complainant personally; and/or
- (iv) breach of applicable laws (e.g., data protection laws) or InfraCo Asia policies and procedures that affects the Complainant personally.

## 6. HOW TO MAKE A COMPLAINT?

- (a) A Complainant with a personal interest Complaint<sup>1</sup> should make a report in writing (**Appendix E: Complaints form**) to email address 'complaints@infra.coasia.com' or they can use InfraCo Asia's outsourced, external, confidential and independent compliance hotline called "Safecall". The telephone numbers are in **Appendix B: Safecall**.
- (b) InfraCo Asia will use its best endeavours to ensure that reports received and accepted would be dealt with in accordance with **Appendix C: Evaluation Process**).

## 7. HOW INFRA CO ASIA WILL DEAL WITH EACH COMPLAINT

- (a) All reports will be accepted and evaluated, irrespective of their source, including reports from anonymous or confidential sources and an acknowledge of receipt would be sent to the Complainant within seven (7) business days of receipt (**Appendix C: Evaluation Process**).
- (b) The investigation of the Complaint would be conducted in an independent, fair, confidential and unbiased manner with respect to all parties involved. The InfraCo Asia Compliance Function (ICF) will endeavour to provide a report of the outcome of the investigation within three (3) months from the acknowledgement of receipt of the Complaint (**Appendix D: Investigation Process**).

## 8. REMEDIES

- (a) If and when InfraCo Asia has been assessed to be in the wrong, InfraCo Asia will endeavour to seek to remediate in a manner that is proportionate and appropriate in respect of the Complaint and the wrong suffered by the Complainant. This may include:
  - (i) accepting responsibility and offering a sincere and meaningful apology;
  - (ii) explaining what went wrong and why;
  - (iii) putting things right by making any changes required (e.g., reviewing or changing a decision which gave rise to the Complaint or making changes to processes, policies and procedures where proportionate and sensible to do so to prevent future difficulties of a similar nature); and
  - (i) providing training to the staff of InfraCo Asia and its Participants on the changes made.
- (b) The action taken to put matters right, where warranted in response to a Complaint, may include any combination of the above remedies.

## 9. COMPLAINT NOT SATISFACTORILY RESOLVED

- (a) In the event that the Complainant is not satisfied with the conclusion of the investigation, they can bring their Complaint to the CEO of InfraCo Asia, within three (3) months:

Chief Executive Officer (CEO)

InfraCo Asia Development Pte. Ltd.

Manulife Tower, #23-04/05, 8 Cross Street, Singapore 048424

Tel: +65 6321 6666

<sup>1</sup> See section 3a for what constitutes a personal interest complaint. For personnel issues/whistleblowing, see section 3c.

- (b) If the Complainant is still not satisfied having contacted and having considered the responses of the CEO of InfraCo Asia with respect to the Complaint, they can bring their Complaint to the Chief Risk Officer of PIDG, within three (3) months:

PIDG Chief Risk Officer (CRO)

The Private Infrastructure Development Group Ltd

6 Bevis Marks, London EC3A 7BA

Tel: +44(0) 203 848 6742

- (c) Communications will generally come from only the ICF or Safecall, as applicable.

## **10. REVIEW AND CHANGES TO THIS POLICY**

- (a) The content of this Policy shall be reviewed regularly by the InfraCo Asia Compliance Function.
- (b) In particular, the InfraCo Asia Compliance Function may have regard to changes to PIDG requirements, applicable laws, complaints, reports and recommendations made regarding compliance with this Policy, including investigations undertaken and any potential or actual breaches identified.
- (c) InfraCo Asia will take reasonable steps to inform the Participants to whom this Policy applies of changes to this Policy. However, each Participant is responsible for ensuring that it is aware of, and complies with, the current version of InfraCo Asia's Code, Policies and Procedures.

## **11. RESPONSIBILITY FOR THIS POLICY DOCUMENT**

- (a) Preparation : InfraCo Asia Legal & Compliance Function
- (b) Review : InfraCo Asia Executive Committee
- (c) Approval : Chief Operating Officer & Chief Executive Officer of InfraCo Asia

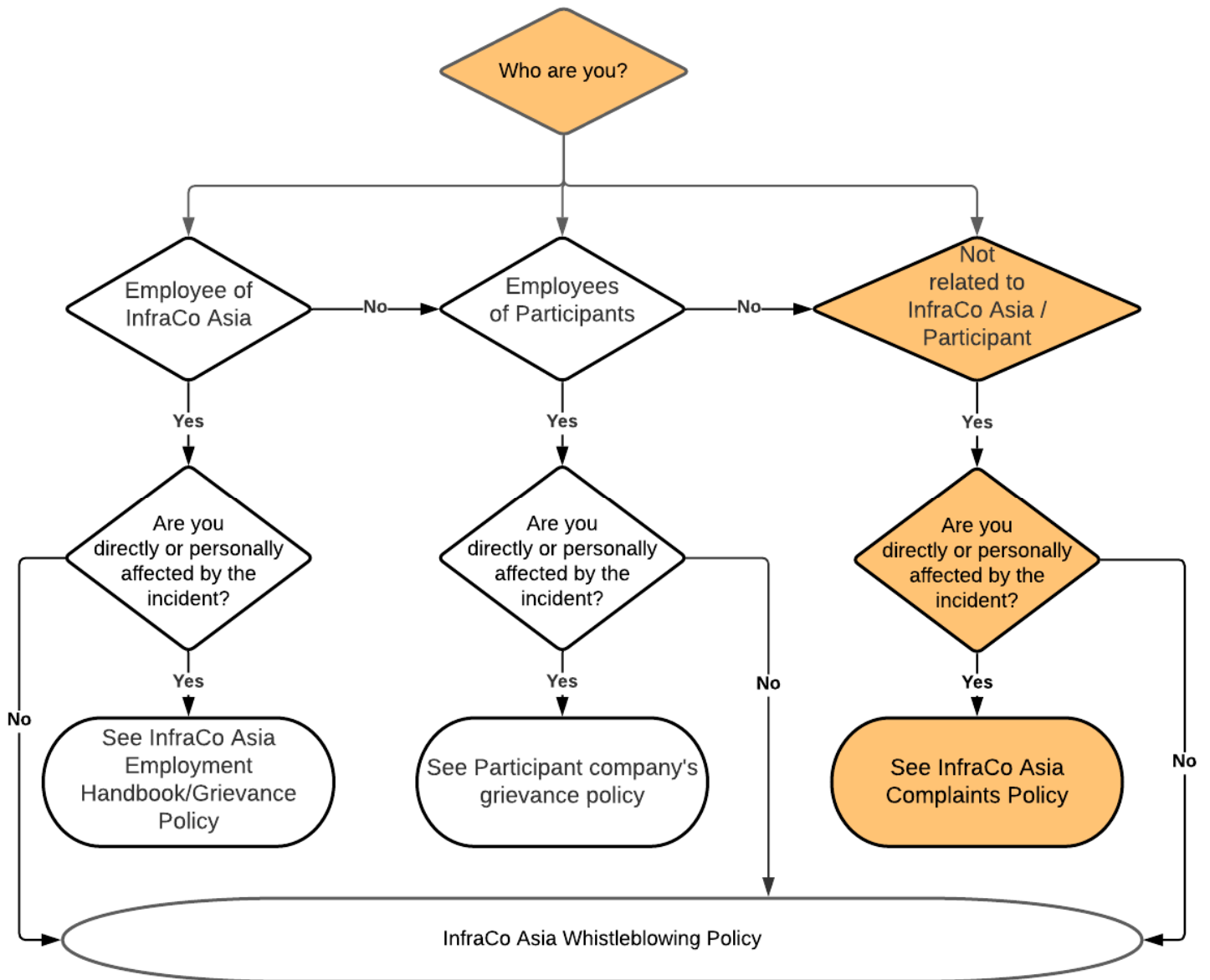
## **12. REFERENCE DOCUMENTS**

- (a) PIDG Complaints and Whistleblowing Operating Policy
- (a) PIDG Complaints Management Procedures
- (b) PIDG Whistleblowing Procedures
- (c) PIDG Investment Policy which governs InfraCo Asia's investments (also referred to as InfraCo Asia Operating Policies and Procedures (OPP)
- (d) InfraCo Asia Code of Conduct (Code)
- (e) InfraCo Asia Employee Handbook
- (f) InfraCo Asia Privacy and Data Protection Policy
- (g) InfraCo Asia Whistleblowing Policy and Procedures

## **13. APPENDICES**

- (a) Appendix A: Are you a Complainant?
- (b) Appendix B: Safecall
- (c) Appendix C: Evaluation Process
- (d) Appendix D: Investigation Process
- (e) Appendix E: Complaints Form

# Appendix A: Are you a Complainant?



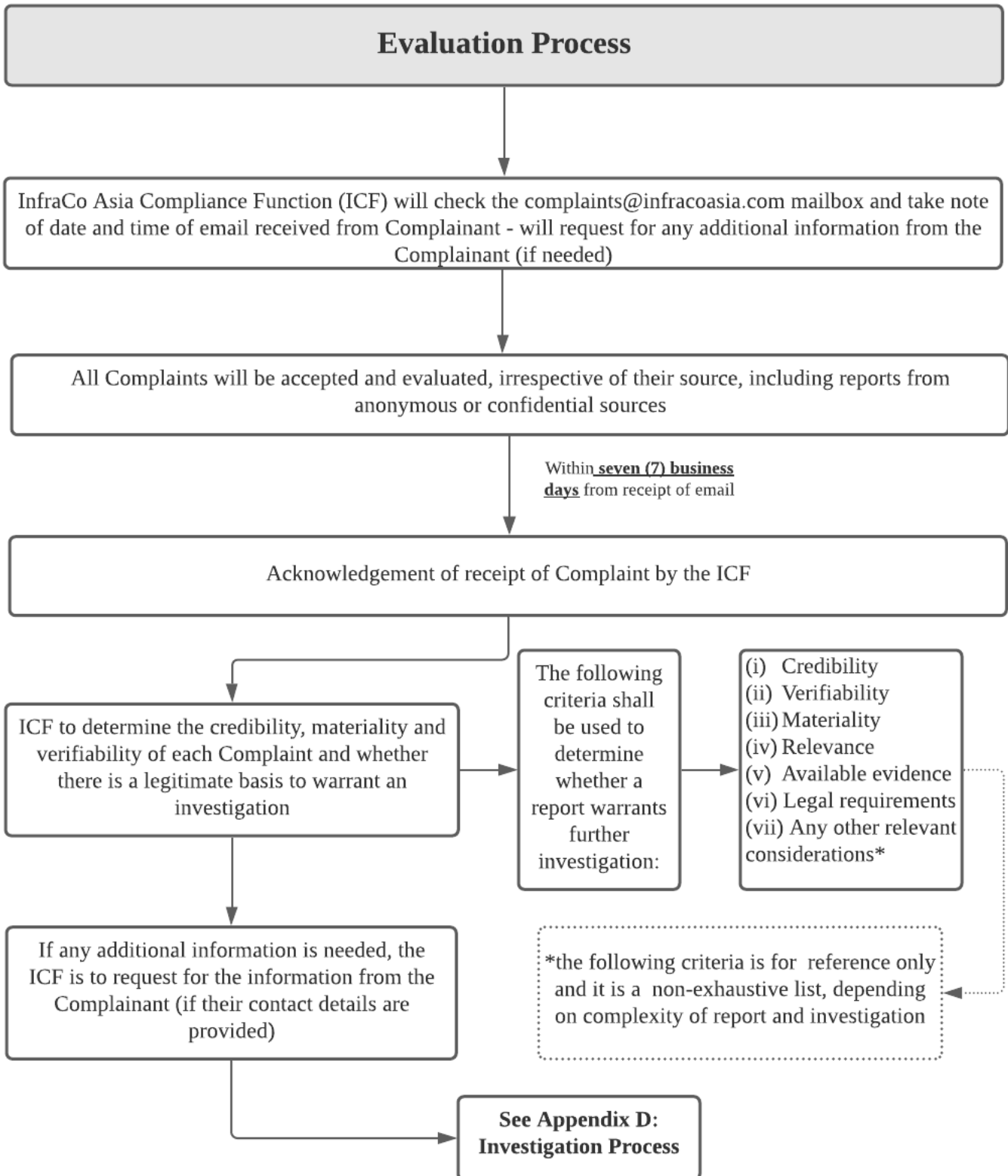
## Appendix B: Safecall

Safecall is a service provided 24 hours a day and 7 days a week. When contacting Safecall, Complainant will be put in touch with skilled and trained professional call operators who can make required arrangements regarding language and mode of reporting so as to allow the Complainant the most convenient and comfortable channel through which to make a report. All calls received through Safecall will be treated confidentially and anonymously, should the Complainant prefer.

The telephone numbers are listed here:

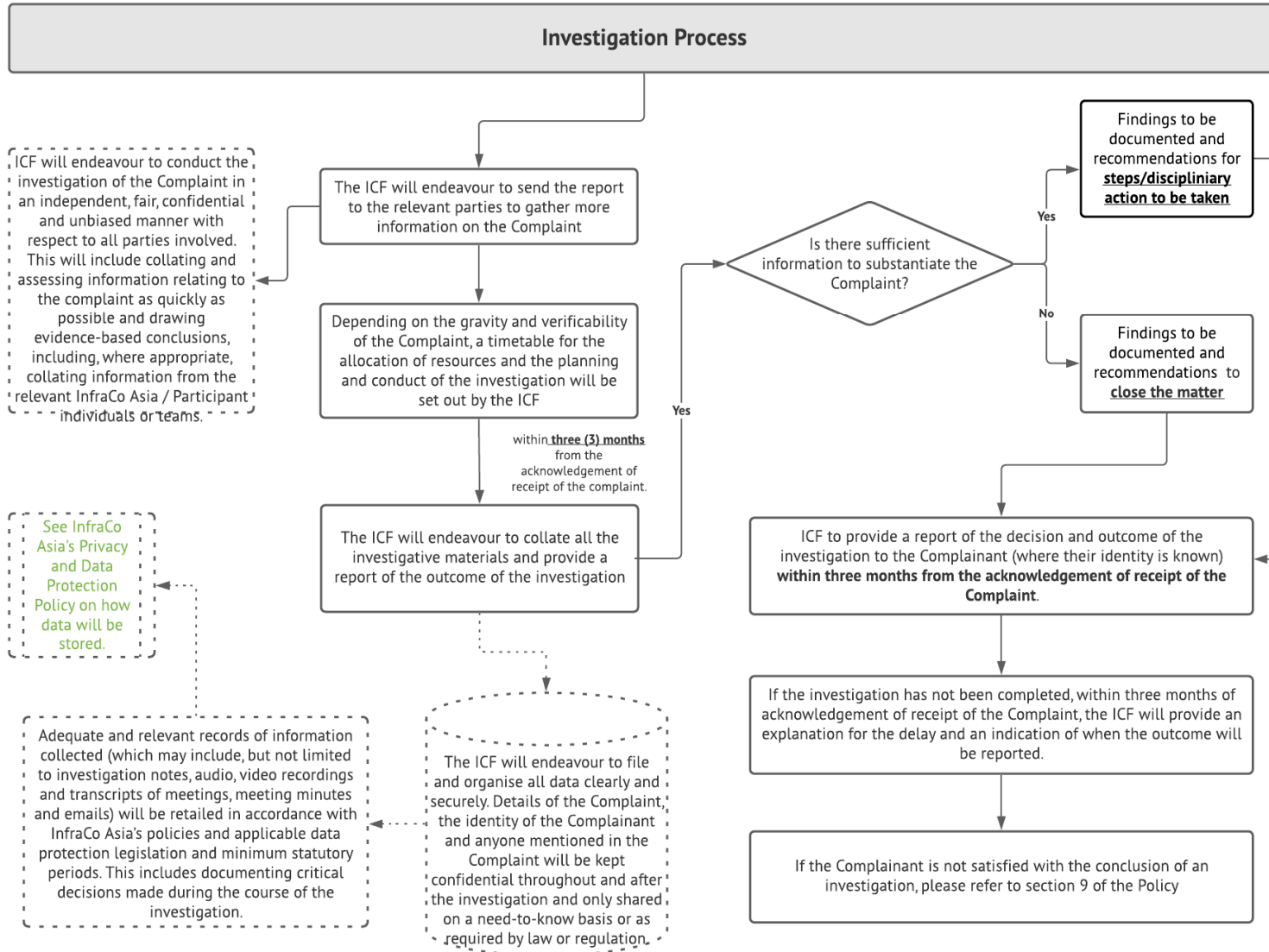
Country	Number to be Dialed
Bangladesh	+44 191 516 7756
Bhutan	+44 191 516 7759
Cambodia	1800 209 761
India	000 800 440 1256
Indonesia	PT Telekom: 007 803 440884
	Other: 001 803 440 884
Lao PDR	+44 191 516 7754
Myanmar	+44 191 516 7761
Nepal	+44 191 516 7761
Pakistan	00800 900 44036
Philippines	1800 14410499
Singapore	800 4481773
Sri Lanka	2423109 (if calling from outside Colombo prefix with 011)
Vietnam	Mobifone: 121 020036
	VNPT: 120 11157
	Viettel: 122 80725

## Appendix C: Evaluation Process





# Appendix D: Investigation Process



## Appendix E: Complaints Form

**COMPLAINTS FORM**  
**STRICTLY PRIVATE & CONFIDENTIAL**

<b>BACKGROUND of Complaint</b> <i>(Please provide details of entity, project, individuals (if any and if known))</i>	
Project name:	
Project number:	
Entity Name:	
Names of anyone else involved or anyone with relevant information (with identification details):	
<b>DETAILS of the Complaint</b>	
Date:	
Place:	
Time:	
When the problem started:	
Details:	
<b>ACTIONS taken (if any)</b>	
Has any action(s) been taken (by you/anyone to attempt to resolve the problem)?:	
If none, please provide reasons why:	
<b>DESIRED OUTCOME</b>	
What is the desired outcome that you are seeking?	

EVIDENCE of the Complaint		
What evidence, supporting documentation and related relevant information, can you provide to support the above?  (please attach or provide scanned copies of documents)		
COMPLAINANT INFORMATION (details of person submitting Complaint)		
<i>(please note that if you wish to be anonymous and do not provide your contact details, we would not be able to respond to you)</i>		
Do you wish to be anonymous?	Choose an item.	
If no, please provide your contact details:	Name:	
	Company:	
	Department:	
	Position/role/capacity:	
	Contact no:	
	Email address:	
	Physical Address:	

I confirm that: (1) this report is made genuinely and in good faith, (2) the above details are true, complete and correct and (3) that I shall notify InfraCo Asia of any additions and/or changes in the information given at the time that they arise. I also certify that I have no personal conflict of interest or stand to gain financially from this matter.

Please return this form in confidence to:

**Legal and Compliance Function**  
**InfraCo Asia Development Pte. Ltd.**  
 Manulife Tower, #23-04/05  
 8 Cross Street  
 Singapore 048424  
 Email: [Complaints@infracoasia.com](mailto:Complaints@infracoasia.com)