

COMPLAINTS PROCEDURE

Overview

Takura Capital, in recognition of its shared responsibility in facilitating sustainable economic development, has committed to adopting responsible investment practices. Takura expects high standards from the companies in which it invests. These standards are detailed in Takura's Code of Responsible Investing (the "Code"). All Takura portfolio companies are required to undertake to operate their business in line with the Code.

If you have evidence of or believe that you have been negatively affected by a breach of Takura's Code, please tell us. Broadly speaking, Takura's Code covers management of environmental, social and governance ("ESG") issues by a company in which Takura's capital is invested (see below) or by Takura. Anti-bribery and corruption measures are included in the Code, and we welcome the reporting of any suspicions of money laundering, bribery, corruption or other financial malpractice.

Concerns should be flagged to us via our Complaints Form and will be treated confidentially if this is requested. We will promptly investigate your complaint and, if we deem it eligible (please see below), seek a solution that addresses the complaint as quickly as possible.

Who can make a complaint?

Complaints can be submitted by an individual or a group directly and materially affected, or potentially directly and materially affected, by:

- The operations of a company in which Takura's capital is invested; or
- The operations of Takura Capital itself.

Complaints can also be submitted by:

- An individual or group authorised to act on behalf of the complainant(s); or
- Individuals or registered non-governmental organisations ("NGOs") with evidence of an apparent breach of Takura's Code or specific expertise in the topic to which the complaint refers. This may be particularly relevant in the case of environmental issues where the impact may primarily be on biodiversity rather than on people.

What types of complaint will Takura not accept?

Takura will not investigate [1]:

- Frivolous or malicious complaints;
- Complaints motivated by an intention to obtain commercial, financial, personal, political or other advantage, not directly related to the nature of the complaint;
- Complaints filed after Takura's capital is no longer invested in the business, company or project to which the complaint relates [2];
- Issues which Takura has:
 - previously reviewed [3];
 - made a recommendation;

- reached a decision on, unless justified by clear and compelling new evidence or circumstances not known at the time; or
- complaints or queries relating to the adequacy or suitability of Takura’s own policies and procedures.

[1] As determined by Takura in its absolute discretion.

[2] If we are no longer invested in a company, our ability to resolve a situation is likely to be very limited. However, if we are able to contact the new owners to inform them that an issue has been raised, we will endeavour to do so and consider what other steps could be taken.

[3] In the context of a complaint under this complaints procedure or otherwise.

What can you expect from Takura?

Takura takes all complaints seriously. We will acknowledge receipt of your complaint within 5 working days and then review whether your complaint is, in our view, eligible for further investigation. We commit to informing you of our decision regarding eligibility within 30 working days. Once a complaint has been accepted as eligible for investigation, Takura may contact the company management to begin a process of investigation. Takura may encourage the company management to work with the complainant, if the complainant agrees, as part of a process of finding an appropriate resolution to the problem.

Takura will contact the complainant to inform him/her of the steps it intends to undertake (if any) to progress the complaint. Once any investigation by Takura is concluded, the complainant will be provided with a summary of the outcome. Takura’s decisions will be final, but may be reviewed if new evidence is brought to the attention of Takura.

Takura’s Managing Partner will have ultimate responsibility for all complaints.

An anonymous summary of any complaints received by Takura and the manner in which they have been addressed will be provided to investors annually upon request.

How do I make a complaint?

You have two options:

1. **Online** – You can submit a complaint by using the online form on Takura’s website. Please follow the instructions and describe the complaint as clearly as possible. We will confirm receipt of your complaint within 5 working days.
2. **Correspondence** – You can also submit your complaint to us by letter or by email.

a. By email: complaints@takuracapital.com

b. By letter to either of the addresses below:

- i. Complaints Desk, Takura Capital
P.O. Box 3758
Harare
Zimbabwe

Complaints Desk, Takura Capital
10 Birchenough Road
Alex Park
Harare
Zimbabwe

We would ask you to provide as much information as you can in order to help us establish whether a complaint is eligible for further investigation. The following information will help us:

- **Contact Details.** The name, address and contact details of the complainant. If you wish for your identity or any other information you are providing to us to remain confidential, please state this very clearly in your communications with us. Takura will use its best efforts to respect requests for confidentiality, subject to any legal requirements to disclose information;
- **Role of Complainant.** If you are directly affected, please state in what capacity – employee, local resident etc. If you are submitting a complaint as a representative of an affected person or community, please provide the identity of those on whose behalf the complaint is made. If the complaint is being submitted by an NGO, please state the relevant expertise of that organisation;
- **Company Information.** The name and details of the operations of the company concerned, including location;
- **Nature of Complaint.** Details of the way in which the complainant believes that Takura’s Code has been breached, including the nature of the breach, when the problem started, the scale of the issue (area or number of people affected and severity) and evidence, where possible;
- **Actions Taken.** Where available, information regarding what has been done by the complainant or affected parties to attempt to resolve the problem, including any contact with the company, the fund manager or the local authorities and the results of such contact, or if no contact has been made, the reasons why; and
- **Other Relevant Information.** Any other relevant facts, context or supporting documents that will help us to deal with your complaint effectively and quickly, such as details of any other organisations that might have useful information directly relating to the complaint.

If the initial complaint is unclear, Takura may seek further information or clarification from the complainant.

When you submit a complaint, you agree that you will not publicly disclose information directly relating to the complaints process.

Confidentiality

Takura understands and respects requests for confidentiality and will make every effort to protect the identity of those who have requested that their details remain confidential. However, Takura may face a legal obligation to disclose the details of a complaint. If you wish for your identity or any other information you are providing to us to remain confidential, please state this clearly in your communications with us. Unfortunately, Takura is unable to accept anonymous complaints as this would prevent us from adequately following up an on issue or obtaining the necessary information to pursue our investigations.