

**ESG COMPLAINTS MANAGEMENT POLICY and PROCEDURE**  
**Extract for website**

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**1. Definitions and terms**

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| <b>AFM</b>              | The Netherlands Authority for the Financial Markets   |
| <b>AIF</b>              | Alternative Investment Fund; defined in the AIFMD as collective investment undertakings.  |
| <b>Client</b>           | A Fund or Mandate managed or advised by Triple Jump.  |
| <b>Complainant</b>      | An individual, group, community or other stakeholder submitting a complaint related to an alleged breach of the principles set out in the Triple Jump Responsible Investment Policy by Triple Jump or by an Investee. |
| <b>Complaint</b>        | A statement by a Complainant which alleges a breach of the principles set out in the Triple Jump Responsible Investment Policy by Triple Jump or by an Investee.  |
| <b>ESG</b>              | Environmental, Social and Governance  |
| <b>Fund</b>             | A Triple Jump managed AIF   |
| <b>Investee</b>         | A company or financial institution to which a Client lends money (debt) or invests in (equity).   |
| <b>Mandate</b>          | Contractual agreement between Triple Jump and a Professional Client to manage, or provide advice in relation to, a portfolio of investment products on a discretionary client-by-client basis.                        |
| <b>Management Board</b> | The management board of Triple Jump   |
| <b>SB</b>               | The supervisory board of Triple Jump  |
| <b>Staff</b>            | All Triple Jump employees with a fixed term or indefinite contract as well as temporary workers and freelancers (in Dutch: 'zzp-er').   |

**2. Objective and Scope of the Policy**

Triple Jump aims to achieve positive sustainable development impact. To pursue its mission, Triple Jump undertakes investments or financing for its Clients (**Investments**). In carrying out its mission, Triple Jump sets high standards on environmental, social and governance (ESG) issues. These standards are set out in [Triple Jump's Responsible Investment Policy \(RI Policy\)](#) and are based on international standards such as the IFC Performance Standards, the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights.

Triple Jump recognises, however, that Investments may have an unintended or unexpected negative impact on local communities or on the environment.

In order to efficiently and effectively address concerns and grievances about the environmental and social performance of the Investments, Triple Jump has established and implemented this ESG complaints management policy and procedure (**the Policy**).

It should be noted that:

- Triple Jump on behalf of its Clients requires Investees to have their own complaint management mechanism, aligned with international standards and through which individuals, groups, communities or other stakeholders (the **Complainant**) can submit their complaints directly to the Investee. This Policy constitutes another option for stakeholders to voice complaints and signal breaches of the RI Policy should the Complainant require such option/channel. Other options may be available to the Complainant such as ones provided by the judicial system in the country. This Policy and procedure will not impede access to alternative judicial or administrative remedies.
- Clients often have their own dedicated complaints mechanism (each a **Client Complaint Mechanism**) which have specific requirements that Triple Jump may have to comply with and/or through which Complainants can submit their complaints directly to the Client.

The process described herein intends to help Complainants to submit concerns or complaints concerning an alleged breach of the principles set out in the Responsible Investment Policy (RI Policy) by Triple Jump or by an Investee and facilitate addressing problems caused by such breach either through dialogue or conducting investigations as Triple Jump deems appropriate in a manner that is timely, fair and independent.

Complaints from Clients and from Triple Jump staff are not in scope of this Policy.

### 3. Complaint Handling Procedure

Complainants may submit their Complaints to Triple Jump as described below. Where there is a Client Complaint Mechanism in place, such Complaints received will be redirected to the Client in accordance to the applicable Client Complaint Mechanism.

#### a) How To Make the Complaint

Complaints can be submitted by email to (complaints@triplejump.eu ) or through a form on the Triple Jump website (<https://triplejump.eu/submit-a-complaint/>).

The Complainant can make the Complaint in English or in the local language of the Complainant (and if possible with an English translation). Triple Jump shall ensure that any communication, notification or correspondence regarding a Complaint is made in plain language that is easy to understand. Responses to Complaints will be in English unless otherwise specified in the Client Complaint Mechanism or, where the Complaint relates to Triple Jump directly, Triple Jump will attempt to respond in the language of the Complainant.

Triple Jump encourages the Complainant to include in its Complaint:

- The name and contact details of the Complainant (unless they want to remain anonymous)
- The name of the Triple Jump Investee to which the report relates (for example, the name of the relevant company, fund, fund manager or financial institution)
- Information regarding the misconduct or malpractice that is alleged to violate the Responsible Investment Policy
- Information regarding any harm caused by the alleged misconduct or malpractice, provided in as much detail as possible
- Any documents that support the allegation of misconduct or malpractice

- Information on any steps taken prior to submitting the report or complaint to address the alleged misconduct, malpractice or harm
- Information regarding any redress or resolution sought
- Any special request regarding confidentiality of the person or entity making the Complaint
- Although it is not mandatory for every Complaint to include the information set out above, it may be more difficult for Triple Jump to take action in response to Complaints that do not contain this information.

#### **b) Confidentiality**

Triple Jump commits to protecting the identity of all Complainants. The relevant details of Complaint, as well as the identity of Complainant, will only be shared with the Triple Jump staff directly involved in the review of the Complaint, with the relevant Client and with their professional advisors if applicable.

It may be the case that details of the Complaint may also need to be shared with the Investee and/or with other third parties, including law enforcement authorities or regulators, pursuant to applicable law, which in these cases may make it difficult to protect the anonymity of the Complainant. In these circumstances, Triple Jump will seek to agree an appropriate way forward with the Complainant.

Anonymous complaints are investigated but a response will not be provided, unless contact details are received.

#### **c) How Triple Jump handles the initial Complaint**

The process of receiving, reviewing, and responding to complaints is managed by Triple Jump's Head of ESG.

Triple Jump strives to acknowledge the receipt of a Complaint within five (5) business days following its receipt. With this acknowledgment, the Complainant is also informed about this Policy or the Client Complaint Mechanism and the next steps in the process.

Where there is a Client Complaint Mechanism in place, such Complaints received will be redirected to the Client in accordance to the applicable Client Complaint Mechanism.

A complaint must be submitted within 2 years of the date that the Complainant became aware of the negative impacts of the relevant activity or within 2 years of the end of the business relationship between the Client and the Investee.

#### **d) Complaint Committee**

Upon receipt of the Complaint, the Head of ESG shall establish a Complaint Committee as soon as reasonably possible after a complaint has been received. The Committee is composed at the minimum of one representative of the Compliance team and one representative of the ESG & Impact team. For Complaints in relation to Triple Jump, the legal team should also be represented.

For Complaints in relation to Investees, a Complaint Committee may be established with Clients and their external professional advisors.

The description of the Complaint must be sufficient, in the opinion of the Complaint Committee so to enable a proper consideration and analysis of the facts and it has the right not to consider a Complaint

that has not been submitted in accordance with these requirements after repeated requests to the Complainant to do so.

#### **4. Complaints in relation to Triple Jump**

This section of the Policy focuses on the procedure for Complaints in relation to alleged breach of the RI Policy by Triple Jump. The procedure for Complaints that relate to the breach of the RI Policy by an Investee is described in section 4 below and in the Client Complaint Mechanism specific to the Client.

##### **a) Eligibility assessment for Complaints**

The Compliance Committee will determine the eligibility of the Complaint for investigation. If the Complaint relates to alleged misconduct or malpractice in breach of the principles set out in the applicable RI Policy in relation to Triple Jump, the Complaint is eligible (an “**Eligible Complaint**”). Complaints that do not relate to, or do not allege misconduct or malpractice in breach of the principles set out in the applicable RI Policy in relation to Triple Jump, will not be eligible.

Triple Jump aims to communicate the outcome of the assessment to the Complainant within twenty (20) business days of receiving the complaint.

##### **b) Handling Eligible Complaints**

All Eligible Complaints will be independently managed by the Complaint Committee.

The Complaint Committee will initiate an investigation of the Eligible Complaint, and coordinate with the relevant internal teams to gather facts, determine whether there may have been related to a breach of the RI Policy, and consider whether further action is required (“Investigative Process”). The duration of the Investigative Process will be determined on a case-by-case basis.

Throughout the Investigation Process, Triple Jump will endeavour to keep the Complainant informed and updated unless, in its reasonable opinion, this is inappropriate. In some cases, Triple Jump may need to consult an external adviser or investigator to assist with the Investigative Process.

##### **c) Addressing and remedying complaint**

Where the Complaint Committee through the Investigative Process concludes that further action is required the response plan may, depending on the specific circumstances, include among other things:

- Establishment of clear responsibilities between Triple Jump, the Client and the Investee
- Enhancement of Triple Jump processes to mitigate similar breaches occurring in the future.

##### **d) Closing the Complaint**

As soon as a decision has been made, Triple Jump will inform the Complainant in writing about the outcome of the Investigative Process and the reasoning for the outcome with regard to the Complaint. This written final response will:

- Summarise the relevant facts, findings, and conclusions, stating whether the case has been upheld;

- Outline the response plan, and state whether it is considered appropriate to include a remedial action or some form of redress, including details of how the redress has been calculated;
- where possible, provide details on any alternative dispute resolution (ADR mechanism) can be obtained.

**e) Record Keeping**

The Head of ESG keeps a record of the Complaints received and the measures taken for their resolution. All relevant details are included in a Complaint Register and saved in a folder with limited access.

**5. Complaint in relation to Investees**

Complaints in relations to Triple Jump's Investees will be dealt with as per the specific Client Complaint Mechanism.