

## **Phi Capital Growth Fund -1.6**

### **Procedure for Addressing External Stakeholder Queries and Concerns**

**31 July 2024**

1. The Fund's ECM procedure is intended to provide a means for the public to submit queries or concerns related to the Fund's Environmental & Social Policy and/or portfolio investments financed by the Fund, and have these inquiries responded to by the Fund in a timely manner. This process of receiving, reviewing, and responding to communications from external stakeholders is managed by designated E&S Officer.
2. A person, community or other external stakeholder, such as a civil society organization, can submit their questions or concerns to the E&S Officer either by sending an e-mail to the following e-mail address: [ak@phicapital.in](mailto:ak@phicapital.in) with a copy to [sp@phicapital.in](mailto:sp@phicapital.in) or by sending a mail to the following address: [Phi Capital, C-98, Ground floor, Anand Niketan, New Delhi - 110021](#)
3. Where the question or concern relates to a portfolio investment financed by the Fund, the interested or affected person(s) are first encouraged to discuss the matter directly with the portfolio company. In cases where the question or concern was not addressed sufficiently at the portfolio company level, interested parties may submit their query to the Fund, in writing, providing the following information:
  - a. Name and Contact Information of the sender;
  - b. Name of the company to which the concern relates;
  - c. Description of the concern and any supporting documentation;
  - d. Date of the incident or action giving rise to the complaint (if applicable);
  - e. Specific remedy sought (if applicable);
  - f. Any other information as deemed appropriate by the sender.
4. The E&S Officer will provide a confirmation of receipt to the sender within 48 hours of receiving the written question or concern and inform them that they will receive a response in writing within 30 business days.
5. The E&S Officer will review the content of the communication and will draft a response, with involvement from the relevant relationship officer responsible for the portfolio client. A draft response will be submitted within [21] business days for internal approval [Senior management/board/approving authority]. Once the draft of response is approved, the E&S Officer will forward the response to the interested parties. Any change to the draft response proposed by [approving authority] will be consulted with the relevant relationship officer, and its final version will be sent to the interested parties no later than [30] days from the initial receipt of the communication.
6. In case the approving authority, following point 5 of this procedure, and in consultation with relevant relationship officer, considers that the communication from the interested parties raises serious Environmental and/or Social issue(s) for a portfolio client, the relevant relationship officer will immediately contact the portfolio client to seek any relevant information, and may carry out additional investigation. If such investigation leads the relationship team to conclude that the portfolio client is not meeting the Fund's E&S Policy, the relationship officer will inform the approving authority about this fact. The relationship officer together with E&S officer [and if required, a consultant] will prepare a Supplemental Corrective Action Plan (SCAP) to be discussed with and implemented by the portfolio client.
7. The E&S Officer will then send a second, follow up response to the interested parties about any steps requested from the portfolio client once the corrective action plan is ready and accepted by the portfolio client, but not later than [90] working days from the receipt of the original communication.

8. Information about this procedure will be available on the Fund's website. There will be no cost or fee associated with submitting a question or concern through this procedure. Interested and affected parties may submit queries or concerns without fear of retribution and may request that the Fund not disclose the names of individuals to the portfolio clients without prior explicit permission of the interested parties.
9. The E&S Officer will log and track all public inquiries received by way of this procedure including date received; date the response was sent; and issues raised.