



Grievance Redress Mechanism (GRM)

1. Purpose and Scope

Persistent is committed to upholding the highest standards of integrity and requires its employees, partners, and portfolio companies to uphold the same standards. Persistent recognises, however, that concerns may arise in the course of its activities or those of its portfolio companies and it may need to address issues raised by its stakeholders. Through this Grievance Redress Mechanism (the “**GRM**”), Persistent aims to provide a mechanism for individuals, communities, and organizations to raise grievances about any issues or concerns related to its activities, conduct or impacts of Persistent or any of its portfolio companies.

The GRM is available to all stakeholders of Persistent, Persistent’s subsidiaries, funds managed and significantly advised by Persistent, and portfolio companies of Persistent. Stakeholders may include, Persistent employees, employees of portfolio companies of Persistent, contractors and sub-contractors of Persistent and its Portfolio as well as any communities around them who may be affected by any of the activities of Persistent or any of its portfolio companies and other relevant third parties.

Grievances may be submitted on a named or anonymous basis.

Document Owner: The CLO and the ESG Officer.

Review: This GRM shall be reviewed every 2 years. Reviews will be carried out by the ESG Officer and the CLO. Any changes should be approved by the Partners of Persistent.

Publication: This GRM shall be published on our website (www.persistent.energy).

Contacts: Any information or queries relating to this GRM should be addressed to: tipoffs@persistent.energy.

Date: 03 April 2026

Wairimu Karanja

Partner & Chief Legal Officer



Definitions

In this GRM, the following words shall have the following meanings:

“Complainant” means any individual, group, or organisation that raises a grievance or concern under this GRM, on a named or anonymous basis, regarding any actual or potential adverse impacts, misconduct or harm arising from the activities of Persistent or any of its portfolio companies.

“CLO” means the person at Persistent holding the position of Chief Legal Officer, or the person in charge of legal matters at Persistent.

“Grievance” means any Stakeholder complaint on any matter relating to Persistent or any portfolio investment company, including matters related but not limited to:

- i. environmental, social, community health, safety, and security;
- ii. gender-based violence and harassment, including sexual harassment, sexual exploitation and abuse, gender bias and other forms of gender-based misconduct
- iii. labour, compensation, and any issues that may arise due to interactions between the labour workforce and host communities; or
- iv. resettlement-related grievances, such as the valuation of assets, amount of compensation paid, level of consultation, non-fulfilment of contracts, and timing of compensation, amongst others.

“Grievance Appeal Committee” means a Grievance appeal committee established by Persistent, whose members are two (2) external Board members of Persistent, including the Grievance Responsible Board Member.

“Grievance Redress Committee” means a grievance redress committee established by Persistent, whose current members are the Partners of Persistent.

“Grievance Register” means a register, in the form set out in the Appendix to this GRM, for the record of all Grievances, decisions and remedial actions, and which shall be maintained by the CLO and the ESG Officer.

“Grievance Responsible Board Member” means an external Board Member at Persistent responsible for grievance matters at Persistent.

“Partner” means a Partner of Persistent and “Partners” shall be construed accordingly.

“Persistent” means Persistent Energy Capital LLC.

“Sensitive Grievances” means any Grievance:

- (a) which could result in a conflict of interest. For example, where the Grievance Responsible Board Member, CLO, a Partner or other personnel responsible for



investigating a grievance may have a conflict of interest that could affect the objectivity or impartiality of the investigation.

- (b) involving serious actual or potential harm, such as gender-based violence, sexual harassment, or other human rights risks, and independent expertise is required to ensure a thorough, impartial, and gender-sensitive investigation.
- (c) which has been initially investigated by a portfolio company was not adequately addressed.

“Stakeholder” means all stakeholders of Persistent as well as the portfolio companies, including employees, portfolio companies, employees of portfolio companies, their contractors and sub-contractors as well as any communities who may be affected by any of the activities of Persistent or any of its portfolio companies and other relevant third parties.

2. The Objectives and Principles

2.1. The objectives of this GRM and the grievance mechanism are to:

- i. provide accessible avenues for all Stakeholders to contact Persistent;
- ii. provide a mechanism for all concerns of Stakeholders to be addressed effectively, in a timely manner and by the most appropriate department; and
- iii. identify and monitor Stakeholder concerns to support effective stakeholder and risk management.

2.2. The GRM on Grievances management is based on following stakeholder protection principles:

- i. all Complainants shall be treated fairly and in good faith at all times;
- ii. all Grievances shall be dealt with courtesy and in a timely manner;
- iii. All Complainants are fully informed of the avenues to escalate their Grievances within the organization and their rights to alternative remedy, if they are not fully satisfied with Persistent’s response to their Grievances.

2.3. Persistent will administer the Grievance mechanism by providing resources to handle correspondence, coordinate internal resolutions, manage a log/register and report.

3. Grievances

There are no restrictions on the type of issue a Stakeholder can raise under this GRM. However, when a Grievance is received that would be more appropriately handled under a separate Persistent process established for that purpose (such as employment or business integrity related issues), it will be re-directed so as to prevent parallel processes from being followed.

4. Data Protection and Privacy



4.1. In order to ensure that all Complainants are protected against inappropriate behaviour or actions, such as retaliation, all submissions and information shall be treated as confidential, as far as reasonably practicable.

4.2. There may be circumstances whereby, due to the nature of the investigation or disclosure, it will be necessary to disclose the identity of the Complainant. In such circumstances every effort will be made to inform such Complainant(s) before such disclosure or submission is made.

4.3. If it is necessary for a Complainant to be involved in an investigation (for example by providing evidence), the fact that the Complainant made the original disclosure or submission will so far as reasonably practicable, be kept confidential and all reasonable steps will be taken to protect the Complainant from any victimization or detriment as a result of having made a disclosure or submission.

5. Grievance Management Process

Persistent shall apply the Grievance management process set out below (the “**Grievance Management Process**”).

5.1. Submission of Grievances

- (a) Grievances may be submitted on a named or anonymous basis. Although anonymous submissions may be harder to resolve, they will be treated in the same way as named complaints to the extent reasonably possible.
- (b) Stakeholders can submit Grievances as follows:
 - (i) An Anonymous Grievance - our anonymous website [Grievance and Whistleblowing page](#) - this goes to the Grievance Responsible Board Member, or
 - (ii) An Identified Grievance - if you wish to be identified in an email that goes to the CLO, sending an email to: tipoffs@persistent.energy.

5.2. Investigation of Anonymous Grievances:

- (a) Anonymous Grievances submitted through our website page will be recorded by the Grievance Responsible Board Member, and referred to the Grievance Redress Committee for action as follows:
 - (i) Where the Grievance does not qualify as a Sensitive Grievance, the Grievance shall be investigated by the CLO.
 - (ii) Where the Grievance qualifies as a Sensitive Grievance, the Grievance Responsible Board Member shall investigate the Grievance.



- (b) Investigations shall ensure confidentiality, data protection and reasonable diligence, and include interviews with the accused persons, the Complainants and members of their respective organisations as determined in the discretion of the investigator.
- (c) As determined in the reasonable discretion of the investigator, and with the consent of the Grievance Redress Committee or the Board, as the case may be, third party investigators may be engaged to assist in the investigation of an Anonymous Grievance. The findings of such independent investigation shall be reported to the investigator, and then to the Grievance Redress Committee or the Board as the case may be.
- (d) All investigations of Anonymous Grievances, whether by the CLO or by the Grievance Responsible Board Member, shall be summarised in a report, which will be referred to the Grievance Redress Committee for a decision on the measures and actions to be taken.
- (e) Each Anonymous Grievance, decision and action shall be recorded in the Grievance Register by the CLO or the ESG Officer.
- (f) Due to the anonymous nature of the submission of an Anonymous Grievance, the Complainant will not receive confirmation of receipt or updates on the investigation process and will not be subject to an appeal process.

5.3. Investigation of Identified Grievances:

- (a) Confirmation of Receipt of Grievances. All Grievances from identified Complainants will be properly recorded by the CLO or the ESG Officer in the Grievance Register. Upon commencement of the investigation, the Complainant shall receive an acknowledgement via email, or their preferred mode of communication indicated in their respective Grievances Reporting Form, confirming that an investigation has commenced and an estimated timeline for when to expect a formal response in respect of the Grievance submission.
- (b) Investigation
 - (i) The CLO shall investigate the Grievance and may request further information from the Complainant where required for the investigation. Grievance investigations shall be objective, impartial and always performed with respect to the Complainant, be gender-responsive, and considerate of local culture.
 - (ii) The Grievance investigations could include collecting relevant documents, making site visits, consulting appropriate staff, contacting external stakeholders and other activities which provide more information and evidence related to the Grievance reported.



- (iii) Where a Grievance relates primarily to the activities or impacts of a portfolio company, the relevant portfolio company shall be required to investigate the Grievance and ensure access to appropriate remedy, with oversight by Persistent.
- (c) Sensitive Identified Grievance. Where any Identified Grievance qualifies as a Sensitive Grievance, the CLO shall transfer the investigation to the Grievance Responsible Board Member, who shall report to the Board.
- (d) Independent Investigation. As determined in the reasonable discretion of the investigator, and with the consent of the Grievance Redress Committee or the Board, as the case may be, third party investigators may be engaged to assist in the investigation of an Identified Grievance. The findings of such independent investigation shall be reported to the investigator, and then to the Grievance Redress Committee or the Board as the case may be.
- (e) Progress Update. Where an investigation is not completed within sixty (60) days of receipt of the Identified Grievance, a progress update shall be provided to the Complainant, including an updated indicative timeline.
- (f) Response. Upon a completion of the investigation of an Identified Grievance, the CLO shall submit a report on the finding of the investigations on the Grievance submission to the Grievance Redress Committee. The Grievance Redress Committee shall then make a decision on how to address the Identified Grievance submission. This decision shall be formally notified to the Complainant by the CLO or other Partner, as the formal response of Persistent to the Grievance submission.
- (g) Appeal. If Complainant is not satisfied with the decision of the Grievance Redress Committee, the Complainant may, within seven (7) days of receipt of the decision of the Grievance Redress Committee, write to the CLO or other Partner, requesting for an escalation of the Identified Grievance to the Grievance Appeal Committee for review and final decision. The Grievance Appeal Committee will communicate its final decision as soon as reasonably practicable.
- (h) Closure. An Identified Grievance shall be considered closed once it has been resolved in accordance with the provisions set out above.



- (i) Updating Grievance Register. The Grievance Register shall only be updated after the Identified Grievance has been fully resolved and the outcome recorded for such Grievance.

6. Reservation of rights

- 6.1 Persistent reserves the right to NOT address a Grievance which, after consideration, by the Grievance Redress Committee, is not eligible due to being too general, insufficiently substantiated, is otherwise malicious or vexatious in nature, or concerns a matter for which Persistent has no formal responsibility (for example, a matter which is under the exclusive control of government authorities).
- 6.2 Such decision shall be communicated to the Complainant and the Complaint may within seven (7) days of receipt of the decision of the Grievance Redress Committee, write to the CLO or other Partner, requesting for an escalation of the Grievance to the Grievance Appeal Committee for review and final decision. The Grievance Appeal Committee will communicate its final decision as soon as reasonably practicable.

7. Reference to Government Authorities

The Grievance Redress Committee or the Grievance Appeal Committee as the case may be, may, as part of a decision that relates to a Grievance which in their reasonable discretion requires government authority reporting or investigation, inform the Complainant of the same, and refer the matter to the relevant government authority for investigation and further action.

8. Non-Retaliation

Persistent commits to a strict policy of non-retaliation. No individual or group shall be subject to retaliation, reprisal, intimidation, or adverse treatment for raising a grievance in good faith, participating in a grievance process, or supporting another party in doing so. Any retaliation constitutes a material breach of this GRM and will result in appropriate corrective and disciplinary action.

9. Communication and Stakeholder Awareness

Persistent will ensure that this GRM is effectively communicated to relevant Stakeholders. This includes:

- (a) requiring its portfolio companies to establish and maintain sound grievance mechanisms and to communicate these mechanisms to their Stakeholders including their employees, contractors, sub-contractors and host communities;
- (b) a copy of this GRM will also be placed on Persistent's official website and shall be accessible to all its Stakeholders.



10. Monitoring and Continuous Improvement

Persistent will monitor the implementation and effectiveness of this GRM, including grievance resolution outcomes and systemic issues identified. Lessons learned will inform continuous improvement of the mechanism and the Persistent's approach to managing environmental and social risks and impacts.



PERSISTENT

Appendix: Grievances Register Template

Grievances Register								
No	Date	Stakeholder/ Complainant	Contact	Grievances	Method of Receipt	Risk	Resolution/Act ion(s) Taken	Closure Date
1.						L		
2.						M		
3.						H		

Notes:

Risk Assessment:

L = Low risk and is also represented by the colour yellow.

M = Medium risk and is also represented by the colour orange.

H = High risk and is also represented by the colour red.