

UC Impower Grievance Mechanism

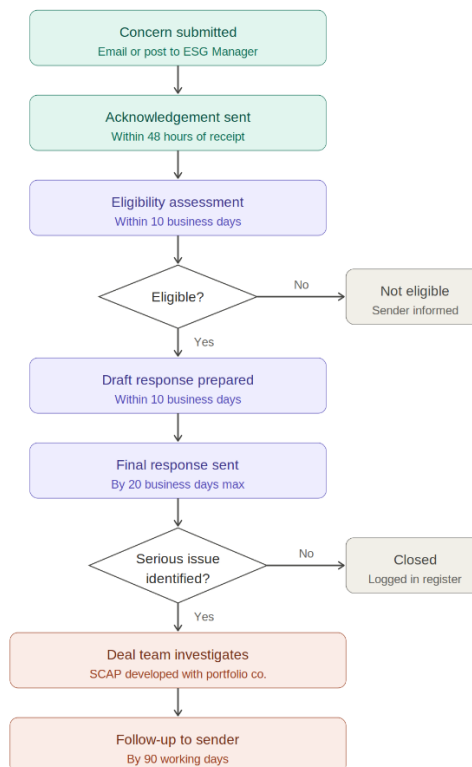
- UC Impower's procedure is intended to provide a means for interested parties to submit queries or concerns related to the Fund's Environmental, Social & Governance Policy and/or portfolio companies invested by the Fund, and have these inquiries responded to by UC Impower in a timely manner. The queries or concerns may relate to actual or potential Environmental, Social, and Governance (ESG) impacts associated with UC Impower and/or its portfolio companies, including concerns regarding ethical conduct, business integrity, or other forms of misconduct. This process of receiving, reviewing, and responding to communications from external stakeholders is managed by the designated ESG Manager and ESG Officer for the Fund.
- A person, or other external stakeholder, such as a portfolio company, can submit their questions or concerns to the ESG Manager of the Fund either by sending an e-mail to the following e-mail address: grievance@ucimpower.com or by sending a grievance letter to the following address: 99/100, Prestige Towers, Second Floor, Residency Rd, Shanthala Nagar, Bengaluru, Karnataka 560025. All personal information will be handled in accordance with applicable data protection laws. We encourage submissions in local languages of the complainant and will address these with the same procedure and efficacy.
- Where the question or concern relates to a portfolio company invested by UC Impower, complainants are encouraged to also engage with the portfolio company's own grievance redressal mechanism, as it may enable faster resolution. However, UC Impower accepts the concern into its mechanism and remains accountable for ensuring it is adequately addressed. Where direct engagement with the portfolio company has not resulted in a satisfactory outcome, or where the complainant prefers not to engage directly, UC Impower will facilitate the resolution process. Interested parties may submit their query to UC Impower, in writing, providing the following information:
 - Name and Contact Information of the sender;
 - Name of the portfolio company and the business/operation to which the concern relates;
 - Description of the concern and any supporting documentation;
 - Date of the incident or action giving rise to the complaint (if applicable);
 - Specific remedy sought (if applicable); and
 - Any other information as deemed appropriate by the sender.
- The ESG Manager will provide 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 15 business days.

The ESG Manager will conduct an initial assessment of each concern to determine whether it is eligible for the mechanism within 10 business days of receipt. Communications received under this mechanism are categorized into three types, each of which is handled as follows:

- Query: a request for information or clarification. Queries will be responded to within 10 business days and do not require a full eligibility assessment.
- Complaint: an expression of dissatisfaction regarding conduct or adherence to the ESG Policy, not involving direct harm. Complaints are subject to the standard eligibility assessment and response process outlined in this policy.
- Impact-related grievance: a concern raised by a person or community directly or potentially adversely affected by the operations of UC Impower or a portfolio company. Impact-related grievances are treated with priority and, where substantiated, trigger the escalation and corrective action process described below.

When conducting the initial eligibility assessment, the ESG Manager will categorize the communication accordingly and confirm the category to the sender in the acknowledgement.

- A draft response will be prepared and finalized by the ESG Manager within 10 business days of receipt, and the final response will be forwarded to the sender no later than 20 business days from receipt of the original communication. If additional time is required to investigate or consult internally, the ESG Manager will inform the sender of the delay, reasons for the delay, and the expected timeline for resolution or remedy.
- If, following the initial review, the ESG Manager considers that the communication raises serious environmental and/or social and/or governance issue(s) in relation to a portfolio company's operations, the Deal Team / Investment Team responsible for that investment will be notified immediately and will:
 - Contact the relevant portfolio company to request information and clarification (if applicable); and
 - Initiate any additional investigation reasonably necessary to verify facts and determine impacts.
- If such an investigation leads the Deal Team / Investment Team to conclude that the portfolio company's operations are not consistent with UC Impower's ESG Policy, UC Impower (through the ESG Manager and Investment Team) will develop a Supplemental Corrective Action Plan (SCAP) to be discussed with and implemented by the portfolio company. Aggregated, anonymized grievance data will be reported in the Fund's annual ESG/impact report.
- Post the investigation of a serious environmental and/or social and/or governance issue(s) of the respective portfolio company following point 6, the ESG Manager will send a second, follow up response to the sender about any steps requested from the portfolio company once the corrective action plan is ready and accepted by the portfolio company, but not later than [90] working days from the receipt of the original communication. Please see the process diagram below for complete reference of the procedure outlined.



- UC Impower may facilitate a structured dialogue between the complainant and the portfolio company as part of the resolution process as needed. The proposed resolution will be shared with the complainant for their feedback before being finalized. UC Impower may, at its discretion, assist complainants in structuring their concern if needed and based on the seriousness of the grievance to facilitate a just outcome. For serious investigations, an independent review is available, and the complainant will be kept informed throughout the process.
- The following categories of concern, if received through this mechanism, will be referred to the appropriate dedicated process:
 - Whistleblower complaints: Concerns relating to financial misconduct, fraud, bribery, or commercial disputes will be referred to UC Impower's whistleblower framework and handled under that policy with appropriate confidentiality protections.
 - GBVH / POSH complaints: Concerns relating to sexual harassment, gender-based violence, or hostile work environment — whether involving UC Impower employees or portfolio company employees — will be referred to the relevant Internal Committee constituted under the Prevention of Sexual Harassment Act, 2013, or equivalent body.
 - Employment disputes: Individual employment grievances between an employee and a portfolio company will be referred to the portfolio company's internal HR mechanism.
- UC Impower applies the following principles to the closure of concerns submitted under this mechanism. A concern will not be considered closed until: (i) the sender has received a substantive written response addressing the findings and any actions taken; (ii) the sender has been given a reasonable opportunity to comment on the proposed resolution; and (iii) all relevant documentation has been recorded in the grievance register. UC Impower reserves the right to close a concern where a reasonable resolution has been offered.
- UC Impower recognizes that certain concerns may require assessment by parties with expertise or independence beyond what the Fund can provide internally. Independent external expertise may be sought at the discretion of the ESG Manager in consultation with senior leadership, particularly where: (i) the concern involves technical environmental or social impacts requiring specialist knowledge; (ii) there is a conflict of interest, perceived or actual, between the Fund and the portfolio company under review; or (iii) the severity or reputational significance of the concern warrants an independent view. The cost of engaging independent expertise will be borne by the Fund and will not be passed on to the complainant.
- There is 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 companies without prior permission.
- A person, or other external stakeholder, such as a portfolio company, can submit their questions or concerns to the ESG Manager anonymously. It must, however, be noted that the Fund will not be able to apprise the sender on the status of actions taken.
- This Grievance Mechanism shall be communicated to stakeholders and remain accessible by publishing the mechanism detailing approach, procedure, and process on the website, along with circulation to relevant stakeholders for their reference.
- The ESG Manager will log and track all public inquiries received by way of this procedure in a grievance/whistleblower register, including date of receipt, date the response was sent, and issues raised.

- UC Impower is committed to ensuring that this mechanism functions effectively and that insights drawn from grievances lodged contribute to continuous improvement across the Fund's ESG practices:
 - Periodic internal review: The ESG Manager will conduct a review of all grievance records no less than annually. The review will assess the volume, nature, and resolution of concerns received, identify any recurring patterns or systemic issues, and evaluate whether the mechanism is functioning in accordance with its stated principles. Findings from the review will be used to inform any necessary updates to this policy.
 - Reporting to LPs and ESG governance bodies: UC Impower reports grievances lodged, if any, and their resolutions in its annual ESG/Impact Report. This report will include anonymized, aggregated data on concerns received during the reporting period. No personally identifiable information will be disclosed without the prior consent of the sender. Where legally required, additional reporting may be provided to relevant oversight bodies.
 - Learning and policy integration: UC Impower recognizes that grievances are a source of insight into the ESG performance of the Fund and its portfolio companies. Patterns and learnings identified through grievance records will be used to inform: (a) periodic review and updates to this policy and the Fund's broader ESG Policy; (b) ESG training for the investment team and portfolio company management; and (c) portfolio monitoring priorities and engagement plans with portfolio companies.