



# COMPLAINTS POLICY

**PRIVILEGED AND CONFIDENTIAL**

Infra Zamin Pakistan Limited

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## 1. Definitions

- 1.1. Accountability means an obligation or willingness to accept responsibility or to account for one's actions
- 1.2. Complaint means expression of grief, pain, or dissatisfaction
- 1.3. Complainant means the party who makes the complaint in a legal action or proceeding
- 1.4. Dispute means to engage in an argument
- 1.5. Governance means the action or manner of governing an organization
- 1.6. Resolution means the elimination or termination of conflict
- 1.7. Transparency means the quality or state of being transparent

## 2. Corporate Mission Statement

- 2.1 InfraZamin, a for-profit credit enhancement facility, was established to enhance financial inclusion by being the catalyst in developing the financial markets in Pakistan, for long-term local currency financings of infrastructure.

## 3. Purpose and Scope

- 3.1 This policy shall be called the Complaints Policy ("the policy") of InfraZamin Pakistan Limited ("the Company"). The purpose of this policy is to lay down a mechanism for handling complaints in fair and consistent manner and to satisfactorily resolve such complaints.
- 3.2 This policy broadly covers anti-corruption and integrity, personal and corporate ethical conduct, risk management and internal control, procurement, tax, disclosure of information, suspicions of money laundering, bribery, corruption or other financial malpractice, environmental and social sustainability, recruitment, remuneration and travel and expense reimbursement.

## 4. Policy Statements

- 4.1. The Board and the Management of the Company shall promote an environment of transparency, accountability and good governance through its policies and everyday conduct.
- 4.2. No individual or entity shall be discouraged from reporting legitimate concerns to the appropriate authority in the Company as stated in this policy in any manner they choose including the reporting manner stated in this policy.
- 4.3. All steps shall be taken to protect confidentiality of the complainant and the person reported unless disclosure is required by law.
- 4.4. Reported incidents shall be investigated and communicated objectively and discreetly to avoid any existence or appearance of bias, conflict of interest or misuse of authority. All investigations, outsourced as deemed appropriate, shall be concluded with an appropriate remedy in line with the Company's policies and/ or with an appropriate legal action (where necessary).

## 5. Policy Governance

- 5.1. This Policy is duly approved by the Company's Board of Directors.

- 5.2. The Head of Internal Audit ("HIA")<sup>1</sup> shall be the custodian of this policy and any procedures prescribed under this policy (if necessary). He/ She shall be responsible for the review, recommendation, updating and distribution of this policy including answering any queries related to the policy.
- 5.3. The HIA shall keep this policy updated at all times for any regulatory, business or other changes. Policy changes may be notified through office circulars when necessary. This policy document shall be revised and updated for all changes no later than 2 years from the date of last approval.
- 5.4. Changes proposed to the policy shall be recommended by the HIA in consultation with the CEO and reviewed/endorsed by the GRC and approved by the Board.
- 5.5. Procedure Manual to implement this policy shall be developed by the HIA in consultation with CEO and endorsed by the FAC and GRC prior to submission to the Board of Directors for approval. Subsequent amendments to the Procedure Manual will be approved in line with Delegation of Authorities approved by the BoD.

## 6. Complaint handling

InfraZamin shall have in place a proper mechanism for complaint handling and redress. The HIA shall be responsible for handling complainants complaints and dispute resolution in consultation with the CEO. InfraZamin should ensure that the following mechanism is in place with respect to complaint handling and dispute resolution:

- 6.1. Filing and submitting a form given on the Company's website at this web site address: [infrazamin.com](http://infrazamin.com).
- 6.2. An acknowledgement of receipt of complaint shall be sent to complainant via intimation letter or call in 5 working days;
- 6.3. The HIA, in consultation with the CEO, shall review the eligibility of complaint for further investigation and shall inform the complainant of the decision (or if a longer period is required, the status) in 30 working days;
- 6.4. InfraZamin shall inform complainant of the name of one or more individuals appointed by InfraZamin to, who shall deal with the complaint until the complaint is resolved or to the point where the complaint cannot be resolved within the company;
- 6.5. A regular written update on the progress of the investigation of the complaint shall be provided to the complainant;
- 6.6. Complainant shall be informed in writing by the HIA regarding an outcome of the investigation;
- 6.7. HIA shall retain, in compliance with applicable laws, the record of the complainant, the nature of the complaint, channel used to register the complaint, a copy of the Company's response(s), channel used to a copy of all other relevant correspondence or records, the action taken to resolve the complaint and whether resolution was achieved and, if so, on what basis; and

If the complaint of one or more complainant is not resolved, a formal dispute settlement mechanism for its complainants shall also be in place, which includes:

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<sup>1</sup>Since the Internal Audit Function is currently outsourced, for the purpose of this document, this task will be performed by the designated Internal Audit liaison who reports to Chief Risk Officer

6.7.1. A process that allows complainants to seek affordable and efficient recourse, in case the customer is dissatisfied with the result of complaint.

6.7.2. InfraZamin may seek further information or clarification from the complainant.

6.7.3 InfraZamin will not investigate what it reasonably believes are

- 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;
- Issues which InfraZamin has:
  - previously reviewed ;
  - made a recommendation; or
  - reached a decision;

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 InfraZamin's own policies and procedures will be reported to the FAC and the FAC upon review may ask InfraZamin to revisit its policies and procedures in light of the complaint and revert.

Where there are cases that are not reviewed based on InfraZamin's evaluation, the matter shall be closed upon reporting of such to the FAC.