

sg capital

Dispute and Complaint Handling Procedure

Version 2.0 – 19 May 2026



SG Capital Partners Sustainable Forest and Land
Fund I, KS

Reg. No.: 40203333070

1. Abbreviations and definitions

- 1.1. **Manager** – SIA SG Capital Partners AIFP.
- 1.2. **Forest Fund/Fund** – The closed-end alternative investment fund managed by the Manager, SG Capital Partners Sustainable Forest and Land Fund I, KS.
- 1.3. **Procedure** – The procedure of SG Capital Partners Sustainable Forest and Land Fund I, KS regarding the resolution of disputes and complaints.
- 1.4. **FSC® Standard** – FSC Interim National Forest Stewardship Standard for Latvia FSC-STD-LVA-01-2023 LV.
- 1.5. **Stakeholder** – any person, group of persons, organisation or company that has expressed an interest, or is known to have an interest, in activities taking place within the Fund's managed area, such as the local community – local authorities and their residents, associations/foundations formed by local residents, neighbours of the land managed by the Fund, service providers or suppliers, local processing companies, hunting groups, etc.
- 1.6. **Affected stakeholder** – any stakeholder who is or may be subject to the impact of activities carried out within the area managed by the Fund.

2. General provisions

- 2.1. The Fund carries out forest management in accordance with the requirements of the FSC® (FSC-C182247) standard, the requirements set out in the regulatory acts of the Republic of Latvia, including environmental requirements, as well as the requirements set out in the internal regulatory documents of the Fund and/or the Manager.
- 2.2. The procedure has been developed in accordance with the requirements of the FSC® standard regarding the dispute resolution procedure in relation to compliance with legislation, the FSC® standard and other relevant FSC® requirements, the impact of management activities, and respect for the legitimate rights of local communities.
- 2.3. In planning and carrying out forestry operations, the Fund makes every effort to avoid influencing interested parties.

- 2.4. Any affected stakeholder may, in accordance with the procedure set out in the Procedure, lodge a complaint regarding the forestry or forest management activities carried out by the Fund, if the Fund breaches the requirements set out in the FSC® standard, or fails to comply with, or breaches, any other binding regulations or laws, or infringes upon or breaches the lawful rights of local communities.
- 2.5. The Fund documents and records all such complaints in the Complaints Register, specifying all actions taken to resolve the complaint, as well as the date of closure of the complaint.
- 2.6. The Fund resolves any conflict situations in a timely manner, with the utmost responsibility and mutual respect, endeavouring to reach a solution out of court.
- 2.7. The Fund shall suspend all activities in forest areas owned by the Fund where the following disputes exist:
 - 2.8. significant disputes as defined by the FSC® standard;
 - 2.9. disputes that have dragged on for a considerable time; or
 - 2.10. disputes affecting a significant number of stakeholders.
- 2.11. Information for interested parties regarding the complaints procedure is available on the Fund's website, <https://sgcapital.lv/lv/>, under the 'About the Fund' section.
- 2.12. The Manager has also drawn up a Whistleblowing Procedure, which is available on the Manager's website at <https://sgcapital.lv/lv/korporativa-parvaldiba/>.

3. COMPLAINT HANDLING PROCEDURE

- 3.1. Affected stakeholders may submit complaints to the Fund in writing – by delivering them to the Fund's registered office at Skanstes iela 50, Riga, LV-1013, or by post to the registered office, or by email to info@sgcapital.lv.
- 3.2. The Fund accepts and responds to complaints in Latvian or English. The complaint (submission) must be signed with a handwritten or secure electronic signature.
- 3.3. When submitting a complaint, the following information must be provided:

- 3.3.1. for a natural person – the complainant’s first name, surname and contact details;
 - 3.3.2. for a legal person – the name and registration number, address, the representative’s first name and surname, position, and contact details;
 - 3.3.3. a clear and comprehensible description of the substance of the complaint and the circumstances justifying the claim;
 - 3.3.4. copies of documents and materials, if the complainant has referred to them (for electronic documents, the following file formats must be used: txt, ods, odt, docx, xlsx, doc, xls, pdf, jpg, jpeg, tiff, png);
 - 3.3.5. the manner in which the complainant wishes to receive a response to the complaint (application): if by post, the postal address must be provided; if by email, the email address must be provided.
- 3.4. The Fund shall examine the complaint and provide a response regarding the plan of action for addressing the complaint or, in the event of a resolution, within 30 days of the date of receipt of the complaint. If, due to objective circumstances, it is not possible to meet this deadline, the Fund is entitled to extend it, notifying the complainant in writing, stating the reasons for the delay and the planned deadline for examining the complaint.
- 3.5. The person responsible for examining complaints addressed to the Fund is the Head of the Forestry and Agricultural Assets Management Department. If necessary, the Management Board is involved.
- 3.6. If the complaint submitted is justified, an action plan is adopted to address the cause of the complaint or the conflict situation that has arisen. If deficiencies are identified in the Fund’s procedures that affect compliance with the FSC® standard requirements, appropriate actions are taken to address these deficiencies.
- 3.7. Where necessary, the complainant or affected stakeholders may be involved in the investigation and/or resolution of the complaint.
- 3.8. If a complaint has not been submitted in accordance with the requirements of the Procedure, or if the complaint submitted lacks

objective evidence, or is not related to the Fund's activities or functions, the Fund shall inform the complainant, stating the reasons, that the complaint will not be considered.

- 3.9. In cases where the complainant is not satisfied with the decision taken or the actions taken to resolve the complaint, they have the right to submit a repeat complaint.
- 3.10. All information and documents received during the complaint resolution process are retained and are available to the parties involved in the dispute, competent state and/or local government authorities (the State Forest Service, the State Police, the courts of the Republic of Latvia, etc.) and FSC® auditors. Information is not disclosed to third parties.

4. ENTRY INTO FORCE AND REVIEW

- 4.1. The procedure comes into force following its approval at a meeting of the Manager's Board.
- 4.2. The procedure is regularly reviewed and updated as necessary in the event of significant changes in the regulatory environment or in the activities of the Manager or the Fund.

5. Document version history

Version No.	Date	Type	Details of changes
1.0	23 July 2023	Initial version	The initial version of the document has been published.
2.0	19 May 2026	New version of the document	The policy has been updated in line with current practice and the Fund's organisational structure.