



## GRO Grievance Process

Version 1.0

### Summary

GRO Foundation is committed to the timely and effective resolution of grievances (i.e., complaints and appeals) concerning the Bright Future Africa- Vol.2 (Uganda) project. This GRO grievance process outlines the procedures for handling complaints and appeals to GRO Foundation by stakeholders.

2024

## 1. General

The GRO Foundation is committed to environmental restoration and community empowerment through carbon finance generated from sustainable reforestation projects. Our primary mission aligns with global climate goals, as outlined by international standards such as the Paris Agreement and the ISO 14064 series of standards. The project model adheres to the requirements of the International Carbon Registry (ICR) and the applied methodology.

The GRO Foundation's initiatives focus on restoring deforested public and institutional lands with indigenous trees to restore natural biodiversity. We implement the project in collaboration with local communities, ensuring their active involvement and benefit. Our model integrates community incentives and capacity building, fostering sustainable development and achieving higher GHG emissions removal. All these efforts are made possible through carbon finance.

## 2. Grievance

GRO is committed to the timely and effective resolution of grievances (i.e., complaints and appeals) concerning the Bright Future Africa- Vol.2 (Uganda) project. This GRO grievance process outlines the procedures for handling complaints and appeals to GRO Foundation by stakeholders.

## 3. Scope

The GRO grievance process applies to complaints and appeals. If the person submitting a complaint to GRO is already a party to an agreement with GRO. That agreement specifies a dispute resolution procedure. Then, the complainant shall follow that procedure. Disputes arising from a GRO agreement lie outside the scope of the GRO grievance process. Without limiting the preceding, any dispute between a project proponent, project developer, validation and verification body, or other entities shall be resolved according to relevant clauses of current agreements between the parties.

Where the complainant submits a complaint related to an agreement with a third party that it is complaining about, the complainant must first seek to resolve the complaint following the terms of that agreement and obtain an enforceable court judgment or arbitral award. GRO will not act as an intermediary concerning commercial disputes between parties.

GRO exclusively holds the authority to decide if a Complainant is qualified to submit a Complaint. GRO will examine the information provided by the complainant to aid in its decision-making process and, at its own discretion, may request additional information from the complainant.

The GRO grievance process is not intended to substitute, circumvent, or override the legal rights of any party within its local jurisdiction to use judicial mechanisms where available and appropriate.

## 4. Definitions

The following definitions apply:

**Appeal** means an objection to a decision made by GRO in response to a complaint submitted by the complainant.

**Complaint** means expressing dissatisfaction with a decision or operation of GRO, including concerns over the Bright Future Africa- Vol.2 (Uganda) project management. It covers situations where the program's rules result in unfair, accidental, or unintended negative impacts, as well as any disagreements or grievances that arise during the planning and execution of project activities.

**Complainant** means national authorities, local stakeholders, project proponents or developers, authorized representatives, Registry (ICR), registry users, validation and verification bodies, or unrelated parties.

## 5. Complaint process

Complainants are required to provide GRO with essential details when submitting a complaint:

- The complainant's complete name (unless submitting anonymously);
- The full name(s) of any relevant organization(s);
- Contact details of the complainant, including phone number and email address;
- A comprehensive explanation of the complaint, outlining the main concerns and who the complaints are related to.

Anonymous submissions are permitted. However, anonymity may limit GRO's ability to fully address the complaint's issues, as further clarification from the complainant might be necessary. If GRO determines that anonymity is being used to submit baseless complaints without merit for GRO's involvement, such complaints may be dismissed.

Complaints that lack sufficient detail to allow GRO to assess and address the issues presented may hinder GRO's ability to assist. GRO retains the authority to dismiss complaints that:

- Fail to provide adequate evidence supporting the claims or do not demonstrate a valid reason for action;
- Omit any of the required information listed above;
- Are deemed inappropriate or unmanageable through its complaints handling process, at GRO's sole discretion.

GRO may request additional information or documents from the complainant within a specific timeframe. GRO will keep the complainant informed about the progress of their case as deemed appropriate.

For complaints and appeals, we establish communication through email. The complainant will receive a reply and updates by email throughout the process.

By submitting a complaint, the complainant automatically consents to all terms outlined. Additionally, the complainant acknowledges that failing to adhere to the specified procedure for filing the complaint could lead to its dismissal by GRO.

GRO systematically records and monitors all lodged complaints. Upon submission, the complainant will be sent an email confirming receipt of the complaint. The complainant will be kept informed about the progress of the complaint at every step of the process.

Once the complaint process is concluded, the complainant will be invited to share feedback on their experience with GRO's complaint handling process.

GRO keeps records of all complaints to evaluate and enhance the customer experience.

## 5.1 Timeline

### Reception

- GRO receives the complaint.
- Within 30 business days of receiving it, GRO will send an email to the complainant to acknowledge the complaint's receipt. This email will include the complaint's the contact information of the GRO personnel and, if applicable, other outsourced experts who will oversee the complaint's resolution process.
- For complaints related to legal disputes, GRO may indicate the complaint on the applicable project's page on the registry website.

### Process

- An GRO personnel will review the complaint.
- GRO may inform any parties known to be affected by the complaint as deemed necessary. GRO will protect the confidentiality of any complainants wishing to remain anonymous and will not share their identity with external parties.
- GRO may request input from the affected parties.
- GRO commits to making every reasonable effort to formulate a preliminary response to the complaint within 60 business days from the date of its receipt.
- GRO may share a preliminary response with the complainant and any impacted parties to gather their input.

### Decision

- GRO will consider any feedback received (if any) and finalize its response.
- After determining the most suitable resolution to the complaint at its discretion, GRO will deliver the final written response to the complainant by email.
- GRO aims to issue a final written reply to the complaint within 90 business days of receiving it.
- The final response may be posted on the GRO specific project's page on the ICR registry website (Bright Future Africa- Vol.2 (Uganda); ID: 093. To safeguard the anonymity of complainants, GRO may choose not to publish responses to anonymous complaints.

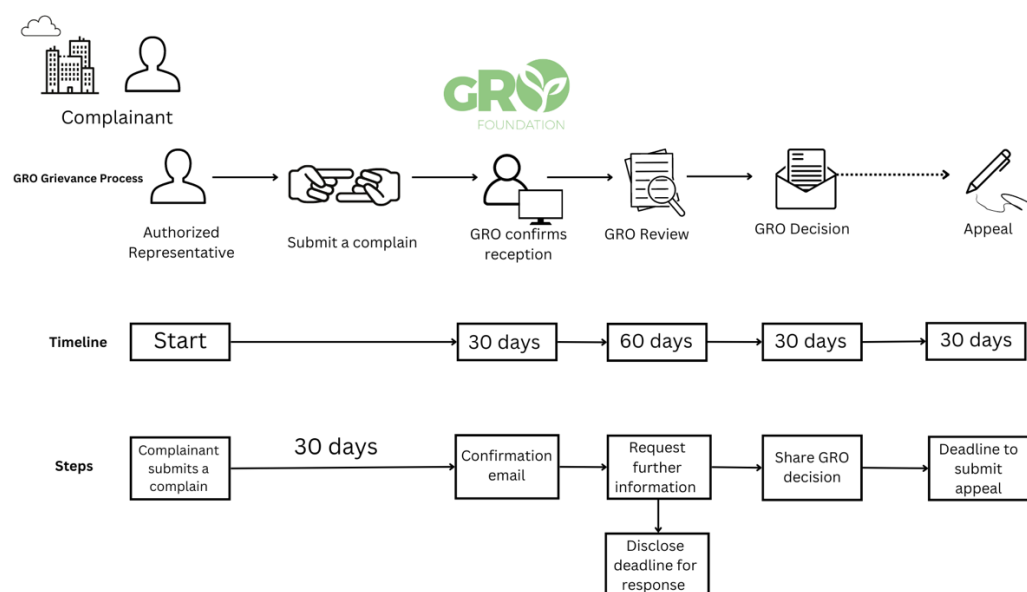


Figure 1: Grievance process - complaints

## 6. Appeals

If a complaint is not resolved to the complainant's satisfaction, they can initiate an appeal process, thereby becoming an “appellant” through the following steps:

- a. The appellant must submit a written appeal to GRO, including:
  - appellant's name,
  - updated contact information,
  - the grounds for the appeal, highlighting any new evidence or information not previously submitted with the original complaint, and
  - the reference to the initial complaint.
- b. The appeal should be sent to GRO with "Appeal" clearly indicated in the email's subject line. GRO will confirm the receipt of the appeal within 30 days.
- c. The appeals committee will examine the appeal, comprising at least two GRO personnel and potentially including external advisors at GRO's discretion within 60 business days from receipt.
- d. GRO will issue a written decision to the appellant, which will stand as the definitive, conclusive decision on the issue raised, with no option for further appeal or complaint. GRO commits to delivering this final written response within three months of the appeal's submission.

If the complainant has not appealed within 30 business days from receipt of GRO's decision, ICR considers the issue resolved.

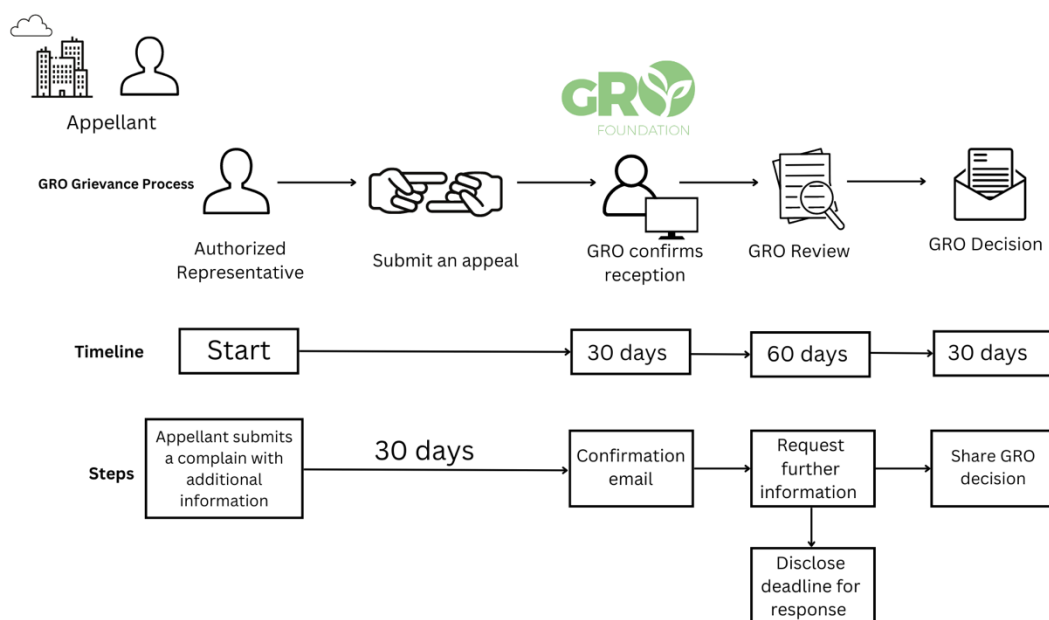


Figure 2: Grievance process - Appeals

## **7. Confidentiality**

GRO will maintain the confidentiality of all information the complainant provides regarding the complaint and any subsequent appeal, should the complainant or appellant specifically request confidentiality. However, this confidentiality does not extend to information provided by the complainant or appellant that:

- Is already lawfully available in the public domain;
- shall be disclosed under any applicable law, according to the GRO Foundation company rules, or any other terms and conditions applicable to the Bright Future Africa- Vol.2 (Uganda) project;
- needs to be shared with GRO advisor to facilitate the assessment of a complaint or appeal under this process, on the condition that such sharing is critical for the assessment and the advisor agrees to confidentiality obligations.