

1. Policy Statement

ABH Partners is committed to operating in an accountable, transparent, and responsive manner. We recognize that effective grievance redress is a cornerstone of responsible project management, essential for identifying and addressing concerns early, maintaining positive stakeholder relationships, and ensuring our activities do not cause harm. This policy establishes a systematic framework for receiving, assessing, addressing, and learning from grievances related to donor-funded programs and projects.

The purpose of this policy is to provide accessible, fair, safe, and effective channels for all stakeholders, particularly affected communities and vulnerable groups, to raise concerns about the environmental, social, economic, or operational aspects of projects and programs designed or implemented by ABH Partners.

2. Objectives

- To provide a clear, accessible, and predictable procedure for ABH internal staff as well as project stakeholders to voice concerns.
- To resolve grievances promptly, fairly, transparently, and effectively at the earliest possible stage.
- To protect complainants from retaliation and ensure their safety and confidentiality.
- To identify systemic issues and enable corrective actions to prevent future grievances.
- To foster trust, accountability, and continuous improvement in our operations.

3. Perspectives

This Policy differs from Whistle-blower in that it is generally designed to facilitate ABH internal specific or project-specific grievances while Whistleblowing lies in the nature of the complaint, the impact of the issue, and the legal protections afforded to the reporter.

- Grievances are personal, internal complaints about an employee's own working conditions, such as pay, harassment, or contract disputes.
- Whistleblowing is the disclosure of information about wrongdoing, illegal activity, or serious risks that affect others, such as the public, clients, or the organization as a whole

Grievances are usually managed through internal ABH procedures.

4. Scope and Applicability

This policy applies to:

- **Complainants:** Any individual, group, or community (including project-affected people, workers, civil society organizations, and other stakeholders) who believe they are adversely affected by a GCF-related activity managed by ABH Partners.

- **Subject of Grievances:** Any real or perceived adverse impact arising from ABH Partners' donor-funded activities, including but not limited to:
 - Environmental or social impacts (e.g., pollution, land access, resource use).
 - Impacts on Indigenous Peoples or violation of FPIC principles.
 - Gender-based discrimination or exclusion.
 - Labor and working conditions.
 - Cultural heritage.
 - Procurement or contractual issues with local entities.

This policy covers both project-level mechanisms (Primary Avenue) and a corporate-level mechanism for escalation or for grievances related to institutional policies.

5. Guiding Principles

This policy is guided by the standards of the *UN standard* and aligned with the requirements of *UNDP*, the *Green Climate Fund (GCF) AML/CFT Policy* and *international good practice*.

The GRM Policy adheres to the following principles, consistent with the GCF ESP and the UN.

Guiding Principles on Business and Human Rights:

1. **Legitimate:** Trusted by stakeholders and accountable for its fair conduct.
2. **Accessible:** Publicized, easy to understand, and accommodating to all, including marginalized groups (e.g., through local languages, non-literacy formats, disability access).
3. **Predictable:** Clear, documented procedures with indicative timeframes for each step.
4. **Equitable:** Seeks fair outcomes through dialogue and mediation, with support available for vulnerable parties.
5. **Transparent:** Keeps complainants informed about progress, while respecting confidentiality.
6. **Rights-Compatible:** Ensures outcomes respect human rights and are in line with international standards.
7. **A Source of Continuous Learning:** Tracks trends to improve policies, projects, and practices.
8. **Safe & Protective:** Explicitly prohibits retaliation and ensures confidentiality for complainants.

6. Structure of the Grievance Redress System

6.1 Project-Level Grievance Redress Mechanism (P-GRM)

- **Primary Avenue:** Each donor-funded project with potential environmental or social risks will establish a dedicated P-GRM as part of its Environmental and Social Management Plan (ESMP).
- **Management:** The P-GRM will be managed by the Alliance Consulting division, **Project Implementation Unit**, with oversight from the Technical Director or Project Manager. The Project GRM (P-GRM) will provide:
 - (i) an accessible, predictable and transparent procedure for receiving and responding to complaints
 - (ii) direct engagement and dialogue with Complainants to clarify issues and interests and develop mutually acceptable responses
 - (iii) equitable and rights-compatible resolution of complaints, including contribution to remedy for environmental or social harm demonstrably caused or contributed to by the project
 - (iv) opportunity for learning from complaints and their resolution, in ways that contribute to improved management of environmental and social risks and ensure alignment with UN Social and Environmental Standards as well as applicable laws, regulations and policies.
- **Access Points:** Multiple, culturally appropriate access points will be established as needed for each project (e.g., local office, community liaison officers, toll-free number, suggestion box, email).

6.2 Corporate-Level Grievance Redress Mechanism (C-GRM)

Escalation Path: Acts as an escalation point if:

- A grievance is not resolved satisfactorily at the project level within a reasonable time.
- The grievance is about ABH Partners' institutional policies or senior staff conduct.
- The complainant fears raising the issue at the project level.

Management: The C-GRM is managed by Ethics and Compliance Officer, who reports directly to senior management and is independent from project implementation.

6.3 Linkage to donor

All stakeholders retain the right to bring unresolved, eligible grievances may reach directly to the donor's Independent Redress Mechanism (IRM) at any time.

7. Grievance Procedure

Step 1: Submission

Grievances can be submitted anonymously or in-person, verbally or in writing, through any established access point. A standard Grievance Intake Form will be available but is not mandatory.

Step 2: Acknowledgement & Registration

All grievances will be formally acknowledged (where contact details are provided) within 5 working days and assigned a unique tracking number.

Step 3: Initial Assessment & Triage

The GRM Manager (be corporate or project related) will assess the grievance for clarity, severity, and urgency. It will be categorized and assigned for resolution at the appropriate level (Project or Corporate).

Step 4: Investigation & Dialogue

An impartial review will be conducted, which may include fact-finding, consultation with relevant parties, and site visits. The preferred approach is dialogue and mediation to reach a mutually acceptable solution.

Step 5: Resolution & Agreement

A proposed resolution will be developed and discussed with the complainant. If accepted, a Resolution Agreement will be documented, outlining actions, responsibilities, and timelines.

Step 6: Implementation & Monitoring

The agreed corrective actions will be implemented and their progress monitored. The complainant will be updated on implementation status.

Step 7: Closure

Once actions are completed and the complainant confirms satisfaction, the grievance will be formally closed. If no resolution is reached, the complainant will be informed of options for escalation.

7. Roles and Responsibilities

- **Compliance Officer:** Overall guardian of the GRM policy; manages the C-GRM; provides oversight of all P-GRMs.
- **Project Manager:** Accountable for the effective operation of the P-GRM and implementation of resolved actions.
- **GRM Focal Point (Project & Corporate):** Designated staff responsible for the day-to-day administration of the grievance process is the Chief Operating Officer (COO).
- **All Staff:** Required to be aware of this policy, direct potential complainants to the GRM, and report any concerns or retaliation.

8. Specific Role of P-GRM

At Project Management level will:

- (i) Establish communications channels to receive complaints and identify staff responsible for documenting and responding to complaints.
- (ii) Establish procedures to engage with the complainant, seek resolution, and document all complaints and responses.
- (iii) Establish procedures to ensure that complaints related to sexual exploitation and abuse are treated in a survivor-centered manner and ensure referrals for safe and confidential survivor assistance
- (iv) When responding to complaints, engage directly with the complainant to clarify issues, identify options for resolution, and provide or support remedy for any environmental or social risks or impacts that are demonstrably associated with the project.
- (v) Inform potentially affected community members and other stakeholders (e.g. workers employed in project activities) how to make a complaint about the project (including the option to bring complaints to the Project Management level of the GRM, the Project Assurance function, or the UNDP Accountability Mechanism).
- (vi) Within 5 business days of receipt of a complaint, review the complaint and a. If further information is needed to determine eligibility, seek further information from the complainant and/or project staff to make the determination; OR b. If it is very clear that the complaint does not meet one or more of the eligibility criteria, refer the complainant to appropriate national or local institution(s) that may be able to respond to the complaint; OR c. If the complaint is determined eligible, respond to the complainant through direct, good faith engagement to clarify issues, develop and seek agreement on options for resolution, and address and remedy risks and harms that the project is

causing or contributing to (with the option to provide technical assistance to the complainant to support the complainant's effective engagement).

9. Confidentiality, Non-Retaliation, and Protection

Strict protocols will protect the identity of complainants. A clear Non-Retaliation Policy will be enforced. Any act of intimidation or retaliation against a complainant will be treated as a serious violation of ABH Partners' code of conduct.

10. Reporting, Record-Keeping, and Learning

- All grievances, from intake to closure, will be recorded in a secure ****GRM Registry****.
- Aggregated, anonymized data on grievance trends, resolution rates, and response times will be reported regularly to senior management and the GCF as required.
- Annual reviews of the GRM's effectiveness will be conducted, and lessons learned will inform improvements to projects and policies.

Annexes:

- **Annex 1: Grievance Redress Process Flowchart**
- **Annex 2: Grievance Intake Form**
- **Annex 3: Grievance Receipt Form**
- **Annex 4: GRM Monitoring Form**
- **Annex 5: Acknowledgement, Resolution Agreement, and Closure Letters**



Acknowledgement of Receipt and Understanding of Grievance Redress Mechanism

This is to confirm that I have received a copy of the Grievance Redress Mechanism of ABH Partners.

I acknowledge that I have read, understood, and agree to comply with the principles, policies, standards, and guidelines outlined above. I understand that Grievance Redress Mechanism (GRM) represents the organization's expectations regarding professional conduct, integrity, accountability, confidentiality, compliance with applicable laws and regulations, and ethical behavior in all business dealings.

I further acknowledge that:

- I am responsible for adhering to the GRM guideline at all times while representing or performing duties on behalf of the Company.
- I will seek clarification from Management or the Human Resources Department if I have any questions regarding the interpretation or application of this Policy.
- I am obligated to report any known or suspected violations of this Guideline in accordance with the Company's reporting procedures.
- Failure to comply with GRM may result in disciplinary action, up to and including termination of employment or contract.

This acknowledgement does not constitute a contract of employment nor does it alter the terms of my employment agreement.

I understand that ABH may amend, modify, or rescind any policy or practice, described in this Guideline, with or without notice, and it is my responsibility to stay informed of such changes.

By signing below, I confirm my commitment to uphold the ethical standards and values of the Company.

Employee Name: _____

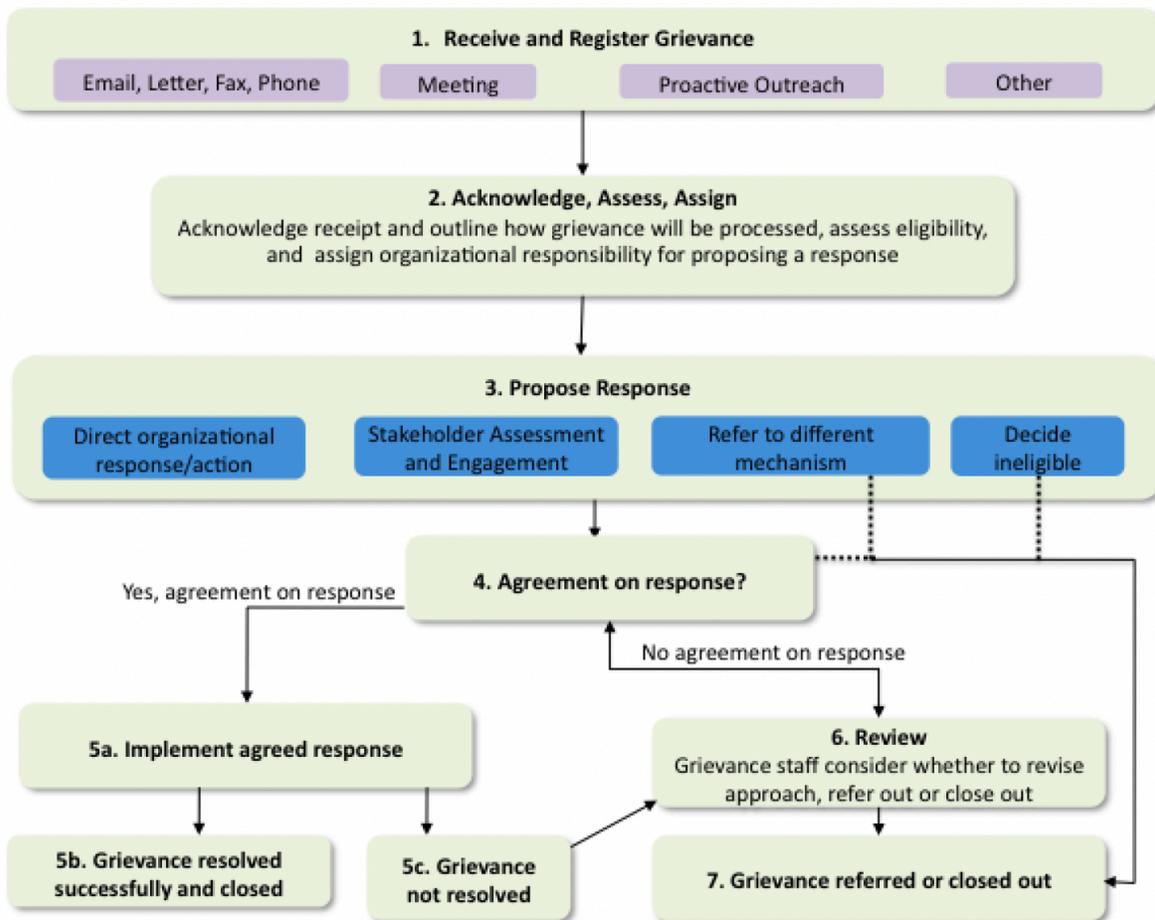
Employee Signature: _____

Position/Title: _____

Department: _____

Date: _____

Annex 1: Grievance Redress Process Flowchart



Annex 2: Grievance Intake Form

Complainant Information (Person Reporting)						
Name:	Enter text		Gender:			
Address:	Enter text		Telephone:	Enter text		
National ID:	Enter text		Email:	Enter text		
Type of Complaint						
Affected person/s	Intermediary (on behalf of the AP)	Civil organization	Service organization	Service organization		
Enter text	Enter text	Enter text	Enter text	Enter text	Enter text	
Registration (assigned):			Enter text			
Complaint Details						
Mode of receiving the grievance:						
Letter	Phone call	Fax	Email	Verbal complaint	Suggestion box	Others (specify)
Enter text	Enter text	Enter text	Enter text	Enter text	Enter text	Enter text
Location of the problem/issue specified in the complaint:						
Enter text						
Type of the problem/grievance						
Construction	Compensation / Payment	Revegetation	Access	Social nuisance	Other (specify)	
Enter text	Enter text	Enter text	Enter text	Enter text	Enter text	
Short description of the problem:						
Enter text						
Short description of the factors causing the problem:						
Enter text						
Person / agency responsible for causing the problem:						
Project	Affected parties	Service delivery agencies	Local political authority	Civil organizations	Funding agencies	Others (specify)
Enter text	Enter text	Enter text	Enter text	Enter text	Enter text	Enter text
Past action/s taken by the complainant (if any):						
Enter text						
Details of the focal point that received the complaint:						
Name of the person who received the complaint	Enter text		Position	Enter text		
Name of the receiving office	Enter text		Date:	Click for date		

Annex 3: Grievance Receipt Form

Grievance Receipt Form	
Grievance Number:	
Date Submitted:	
Target Date for initial meeting to address grievance:	
Name:	
Address and Contact Details:	
Grievance Received by:	
Name of Grievance Coordinator	
Contact Details of Grievance Coordinator	Telephone: Email: Address:

Annex 4: GRM Monitoring Form

Attached Previous form			
Details of the focal point that received the complaint:			
Name of the person who received the complaint	Enter text	Position	Enter text
Name of the receiving office	Enter text	Date:	Click for date
Actions taken by the receiving office			
	Short Description	Name of Action-taking officer	Date
Action 1	Enter text	Enter text	Click for date
Action 2	Enter text	Enter text	Click for date
Action 3	Enter text	Enter text	Click for date
Final Resolution	Enter text		
Signature		Date:	Click for date

Annex 5: Acknowledgement, Resolution Agreement, and Closure Letters

[Address]

Date: (insert date)

RE: RESOLUTION OF GRIEVANCE RELATED TO THE [INSERT NAME OF PROJECT]

Dear [insert name of complainant/s here],

In response to your complaint of (insert date of complaint registration) regarding (insert subject of complaint and GRM registration reference) we wish to confirm that the following actions were undertaken:

- (Insert summary of the actions taken and the outcomes achieved)
- (provide as much information as required to demonstrate that resolution has been achieved)

To close out this matter, we request that you sign and return the acknowledgement below. We thank you for your participation and continued interest in the project.

Regards,

[Project Name]
Project Manager/
Technical Director

Acknowledgement

I, the undersigned, acknowledge that the above actions have been undertaken and that all reasonable efforts have been made to address my complaint.

Name: Signature: Date: