



Project-level Grievance Mechanism

01/09/2018

1 Introduction

1.1 General objective

Describe the way in which ECOTIERRA manages complaints, claims and possible conflicts raised by those who are linked to projects, in order to give them adequate answers and achieve satisfactory agreements.

1.2 Specific objectives

- Have a comprehensive strategy for the reception, identification, monitoring, monitoring and resolution of complaints and grievances that could arise in the area of intervention of the project.
- Clarify responsibilities for the resolution of complaints and claims
- Identify bottlenecks to be improved regarding the performance of the project, the generation of benefits and the measurement of impacts.

2 Grievance mechanism

Every project will establish a grievance mechanism. Implementation of the project-level grievance mechanism will follow the following steps:

2.1 Publicizing

ECOTIERRA and local partners will disseminate information on the mechanism via different media (workshops, meetings, visits, radio, ECOTIERRA and project website.). This broadcast will be repeated annually throughout the execution of the Project.

2.2 Reception and recording of grievances and/or suggestions

The Project will install mailboxes and books of grievances and suggestions at accessible locations including coops offices, ECOTIERRA offices and plant site. For each complaint, we will ask complainant name, email, address and phone number to be able to reach complainant. If complainant wishes to remain anonymous, he/she will have to say so from the outset. It will also be possible to submit grievances online through a form on the project's websites.

Once the complaints/suggestions are received, the local controller will monitor the mailboxes, books and website to record and evaluate validity of the claims made monthly. The controller must ensure that we collect complaints at least every 60 days. When a Café Selva Norte employee travels to the coops, he can pick up the complaints box and bring it to the controller, making sure to leave another box at the Project office. The controller will take photos of all complaints taken from the boxes, save them to Dropbox, and register them in the grievance log.

All received complaints will be tracked and recorded in a grievances and complaints log. Acknowledgement of receipt as well as judgment of admissibility will be sent within 60 days. The admissibility check makes no judgement on the merits of the complaint.

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Inadmissible complaints include:

- Those which clearly do not relate to company's operations or practices,
- Those that are excessive, repetitive, clearly frivolous or malicious in nature,
- Those which have already been lodged with or settled by other administrative or judicial review mechanisms (provided that they feature the same allegations and concern the same respondent),
- Those constituting criminal activity and violence – which will be referred to the formal justice system,
- Those seeking an unfair competitive economic advantage,
- Those that are commercial disputes which can be stipulated for in contractual agreements and issues should be resolved through a variety of commercial dispute resolution mechanisms or civil courts,
- Those that are related to governmental policy and government institutions.

In the event an anonymous complaint is submitted, ECOTIERRA will not be able to provide a response and may face difficulty in evaluating grievance if insufficient information is provided.

Nonetheless ECOTIERRA will take all complaints seriously whether submitted from a named source or anonymously. All complaints will then be shared with ECOTIERRA Sustainability (ESG) Director monthly.

2.3 Reviewing and investigating the claim

In case the claim is classified as valid by the controller, the complaint will be forwarded to the Sustainability Director (ESG) who will work with the project manager to analyze the complaint, seek additional information if necessary.

If the complaint is about the project manager, the Director of Sustainability (ESG) will work with the COO to analyze the complaint, seek additional information if necessary.

2.4 Developing resolution options and preparing a response

ECOTIERRA, with the Controller and local partners will identify the causes, corrective actions, deadlines and division of responsibilities for each claim case. Those involved will be registered in the grievance log.

If the complaint is straightforward – meaning a simple corrective measure can be identified or information supplied by ECOTIERRA staff - a written response will be issued to the complainant as quickly as possible or within 30 days.

If the complaint requires dialogue between stakeholders and negotiation of a solution, then a response will be issued within 100 days.

In the event, the grievance cannot be resolved between the parties directly, the complainant will have recourse to a source of resolution, such as a mediator. Each party can propose a mediator and both parties must agree on the mediator. If no agreement is reached on a mediator

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between the two parties, each party will propose a mediator and the two mediators together chose an independent mediator.

2.5 Monitoring and evaluating results

ECOTIERRA's ESG team will track statistics on the project grievance mechanisms to ensure that they are effectively used, that the complaints are effectively addressed, and integrate findings into its reports. If necessary, it will adapt the mechanism to correct inefficiencies.

Information about grievances, including redresses if any, will be available to public upon request.

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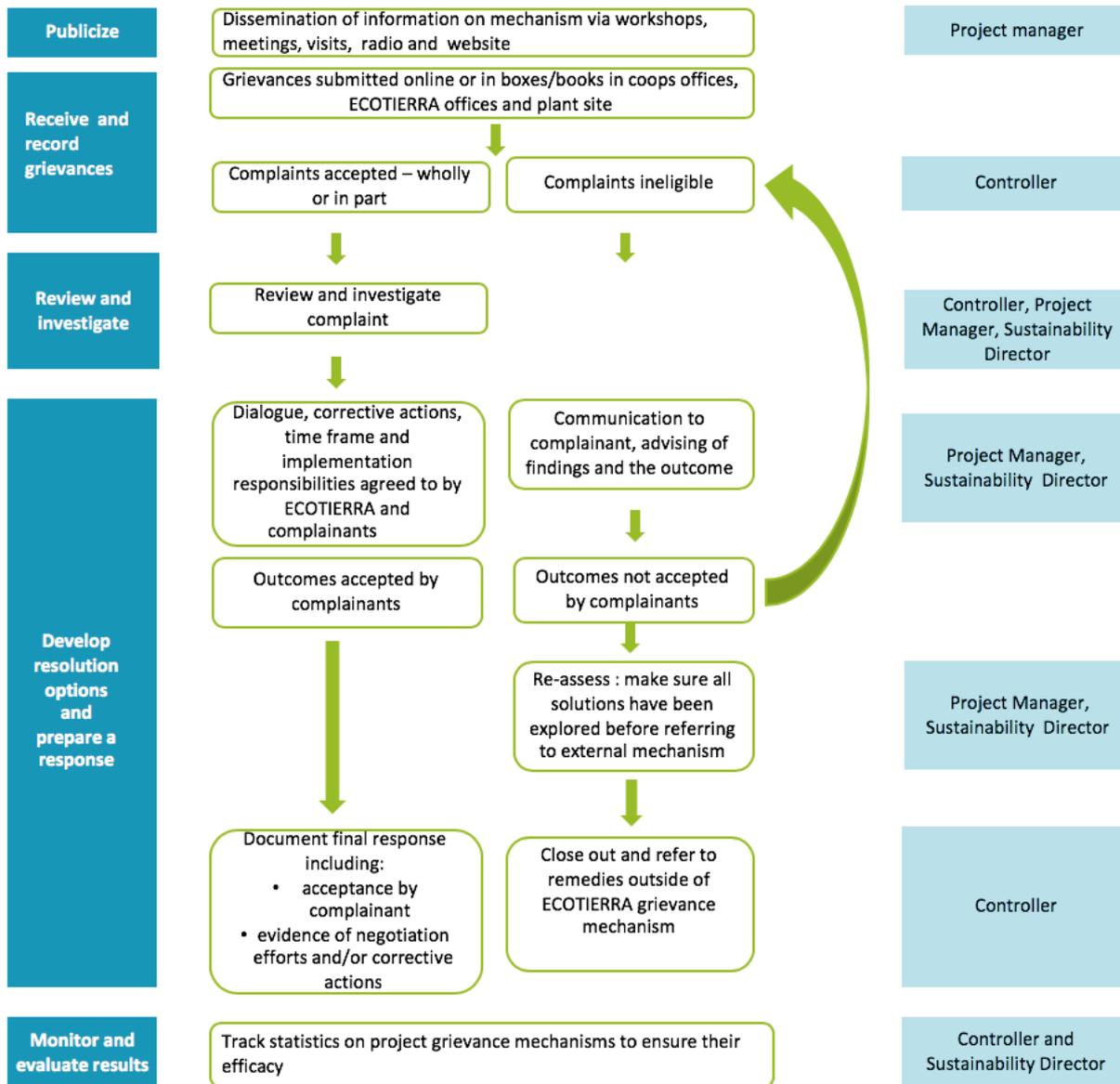
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(adapted from IFC 2009 Good Practice Note - Addressing Grievances from Project Affected Communities)