

ANNEX J: ACCOUNTABILITY AND GRIEVANCE MECHANISM

CI-GEF/GCF PROJECT AGENCY Accountability & Grievance Mechanism (AGM)

The CI-GEF/GCF Project Agency requires all projects to have an Accountability and Grievance Mechanism in place so that project-affected communities and other stakeholders may raise a grievance at all times to the Executing Agency/Entity, CI, the GEF or GCF on non-compliance with the ESMF. Affected communities should be informed about this possibility and contact information of the respective organizations at relevant levels should be made available publicly. Affected communities should also be assured that their grievances will be addressed in a timely manner, they will not face retaliation for submitting a grievance, and they have the option to request confidentiality.

SECTION I: Project Information

| | | | |
|---------------------------------------|---|-------------------|-----------|
| PROJECT TITLE: | Business Action and Advocacy for the Planet | | |
| GEF/GCF PROJECT ID: | | PROJECT DURATION: | 24 months |
| EXECUTING AGENCY/ENTITY: | Business for Nature, hosted at the World Business Council for Sustainable Development (WBCSD) | | |
| PROJECT START DATE: | 04/2022 | PROJECT END DATE: | 03/2024 |
| AGM PREPARED BY: | Business for Nature Sarah Lebel, Baastel | | |
| DATE OF (RE)SUBMISSION TO CI-GEF/GCF: | January 10, 2022, January 28, 2022 | | |
| AGM APPROVED BY: | Ian Kissoon, Director ESMS, CI-GEF/GCF Project Agency | | |
| DATE OF CI-GEF/GCF APPROVAL: | January 28, 2022 | | |

SECTION II: Introduction

Introduce your AGM by providing a short summary of your project and its main activities, any anticipated grievances, how you will ensure that stakeholders are aware of the mechanism, and what system will be put in place to ensure that the mechanism is working effectively and efficiently.

The project objective is Towards a nature positive, net zero emissions and equitable world by 2030 through businesses driving policy ambition and reducing negative corporate impact on nature. The project is supported by three complementary Components, as follow:

1. Component 1: Business engagement and influence in international nature-related policy agreements

2. Component 2: Business engagement to create a business/government dialogue in key geographies

3. Component 3: Business for Nature knowledge management and strategic communications

This Accountability and Grievance Mechanism (AGM) is designed to enable the receipt of complaints during all three of the project's components and throughout all related activities. Grievances may arise from Business for Nature employees and or partners, and any other stakeholder involved in or affected by project activities. The AGM is designed to address the concerns of any individual or group, identify the root causes of conflict, and identify opportunities to resolve grievances related to the Project.

An email (help@businessfornature.org) will be created and managed by the Project Strategist which will be based at Business for Nature. The email will field all grievances and will be posted on Conservation International's website, Business for Nature's website, and on other communication and project materials. The email will also be provided to all partners and project affiliates. The Project Strategist will screen grievances for eligibility and acknowledge all eligible grievances within 10 business days of receipt. If eligible, the Project Strategist will notify relevant Project Staff and Project Staff will work with the grievant to develop an action plan and timeframe and resolve the grievances that were identified.

If the project fails to address grievances through this initial process, the Project Strategist will work with the CI-GEF Project Agency to resolve the grievance. This may include filing a claim through Conservation International's Ethics Point Hotline <https://secure.ethicspoint.com> or with the Director of Compliance (DOC) who is responsible for the CI Accountability and Grievance Mechanism and who can be reached at: Director of Compliance, Conservation International 2011 Crystal Drive, Suite 500 Arlington, VA 22202, USA.

SECTION III: Scope

What grievances are eligible and would be received? Will the grievance be screened to ensure it is related to the GEF/GCF project?

Grievances will be screened for eligibility by the Project Strategist applying the following criteria:

1. Only grievances relating to the GEF project that BfN is executing will be processed;
2. Only grievances received in writing (letter or email) will be processed;
3. Submitted by or on behalf, of a person or people, affected by the project or program; and
4. Raises potential issues relating to compliance with the GEF's Minimum Standards on Environmental and Social Safeguards and Gender Policy.

Complainants should provide as much detail as possible to facilitate investigation of the complaint. To facilitate processing the grievance, the written complaint should preferably include the following information:

1. Complainant's name, address, telephone number, fax number and email address if available.
2. Description of the GEF project or program concerned;
3. The harm that is, or may be resulting from failures or omissions by the GEF project and/or the project executing organizations or subgrantees;
4. The names (if known) of relevant GEF policies or procedures that were/are being allegedly breached;
5. List actions taken to solve the issue at stake, including previous contacts with Business for Nature;
6. Reasonably detailed description of explanations received by and (if any) actions proposed to complainant(s), and why these are not considered satisfactory by the complainant(s);
7. List of supporting documents and attachments, as appropriate.

Other grievances will be considered ineligible if there is not a clear connection to the project (e.g. spam submissions), do not provide follow up or contact information, do not have the authority to represent the grievant, or do not articulate their grievances. If the initial grievance is missing the above information, the Project Strategist may follow up with the grievant to request it.

How will the mechanism ensure transparency and fairness?

All grievances will be treated equally and assigned a unique grievance ID number by the Project Strategist which will be used to refer to the grievance throughout the resolution process, and help ensure confidentiality. The Project Strategist will submit quarterly updates to the CI-GEF on grievance submissions that will include information on the number/type grievances and response to each submission. Complaints may be submitted in the grievant native language.

Will the mechanism receive anonymous grievance?

The AGM process is oriented to direct dialogue and resolution of grievances. The Project Strategist will record eligible anonymous grievances in a quarterly report to the CI-GEF, and will make reasonable efforts to take action to address the grievance. However, should anonymity preclude the PM from addressing the grievance, it shall be recorded in the quarterly report to CI-GEF but will not pursue a resolution process given the lack of contact information of the Afflicted Party.

How will the mechanism deal with confidentiality?

The source of the complaint is treated with confidentiality, unless the complainant waives confidentiality. Only the Project Strategist will see grievance submissions and will keep any personally identifiable information secure. The Project Strategist will assign a unique ID number to each grievance which will be used to refer to the grievance throughout the resolution process. Since this complaints process is oriented toward direct dialogue and engagement among all parties, there is a risk that confidentiality may limit efforts to resolve complaints. Complainants will be informed if confidentiality is impeding the process by the Project Strategist and will have the option to wave confidentiality. If the complainant refuses to share information and the Project Staff deems the grievance unsolvable without information, the grievance may be closed but will be included in the report to the CI-GEF.

How will the project protect grievants from retaliation for submitting a grievance?

While the AGM process is oriented to direct dialogue and resolution of grievances, the Project Strategist will record eligible anonymous grievances. Where the Afflicted Party is not anonymous, grievances will be addressed promptly and constructively. The Project Strategist will widely disseminate this AGM and raise awareness as to what is considered retaliation and the zero tolerance policy of the project towards retaliation, as well as actively foster a culture across the project whereby raising concerns is valued. How will the mechanism ensure that both women and men feel comfortable accessing it? How does the project cater for other vulnerable groups, such as youth or elderly, or those who speak a minority language?

A grievant form will be posted on the Business for Nature website, to ensure easy access to all project stakeholders, and ensure that required information for a grievance to be eligible is clearly identified. As stated earlier, an email (help@businessfornature.org) will be created and managed by the Project Strategist which will be based at Business for Nature. The email will field all grievances and will also be provided to all stakeholders engaged through the project. Complaints may be submitted in the grievant native language.

SECTION IV: Awareness and Accessibility

How and when will the project disseminate¹²⁰ the AGM to stakeholders? How would it be

The AGM will be posted on the project's website and will be presented to project stakeholders during the project's inception meeting. A summary of the AGM with key

¹²⁰ Approved safeguard plans are to be disclosed to stakeholders in a manner and form that they will understand and that is culturally appropriate. This may require translation of the document.

communicated to stakeholders that speak a different language, might be illiterate, are in hard to reach places or other vulnerable groups such as women?

Name and designation of person(s) where grievances can be addressed to:

Email:

Website/software application:

Radio Frequency, if applicable:

Other¹²¹:

references, including email created to field all grievances, will be translated in local languages for the four key project geographies.

Moreover, contact information of Business for Nature, CI, and the GEF will be made publicly available to all involved stakeholders.

Eva Zabey, Project Strategist

help@businessfornature.org

N/A

N/A

Some grievants in the project areas may not be able to write. However, for the Accountability & Grievance Mechanism to function properly it is essential that there can be a formal record of any grievance made. For this reason, grievances submitted on behalf of others are acceptable under this Accountability & Grievance Mechanism.

SECTION V: Acknowledgment and Follow-up

How will your mechanism acknowledge receipt of the grievance? How long will it take for this receipt to be given to the grievant?

The Project Strategist will acknowledge receipt and—within 10 business days—assess the eligibility of the complaint and provide a response as to whether or not it is eligible, in accordance with the above criteria.

How long will your mechanism take to provide a resolution to the grievant?

If the complaint is eligible, the Project Strategist will notify relevant Project Staff and request a response. The Project Staff will provide a response within 10 business days with information on how it plans to look into the complaint and a time frame for this process. The Project Staff will then begin investigating the matter, with technical support as needed, for example, through investigation of the issues raised and dialogue with the grievant (unless confidentiality is requested) and other concerned parties.

Based on the results, the Project Staff will work with concerned parties to develop an action plan and time frame of steps required to resolve any issues identified. A summary of the concerns raised, actions taken, conclusions reached, follow-up plan, and time frame for completion will be documented and communicated as agreed to by the parties and provided to the Project Strategist. (If confidentiality has been requested, the Project Strategist will then communicate the response to the grievant.)

Do you plan to provide periodic updates throughout the process to the grievant?

Agreed-upon action plans should establish time frames for regular process monitoring toward resolution of the complaint. The Project Strategist will coordinate the monitoring by organizing periodic checks—bringing together the concerned parties and relevant technical advisors for calls, meetings, or other communication on the status of action plans, until they are completed.

SECTION VI: Processing

Describe how your mechanism will process the grievance.

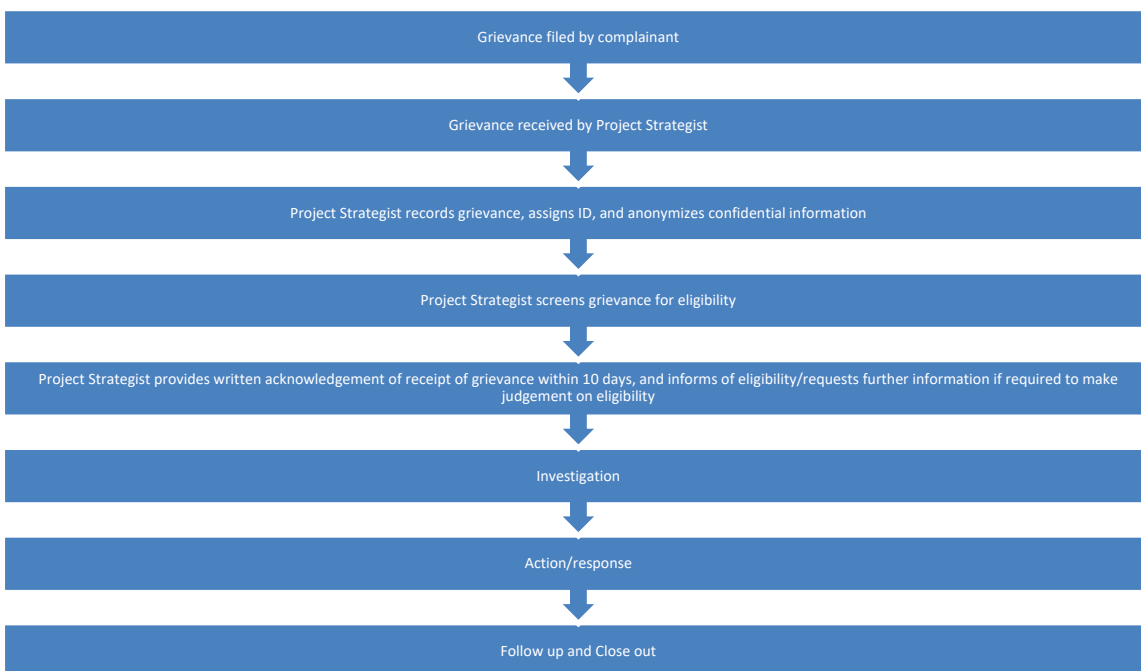
¹²¹ A grievant may not be able to write or have access to telephone/email services, or even travel to your office. Indicate how you plan to accommodate such circumstances.

An email (help@businessfornature.org) will be created and managed by the Project Strategist which will be based at Business for Nature. The Project Strategist will screen grievances for eligibility and acknowledge all grievances within 10 business days of receipt. The Project Strategist will notify relevant Project Staff, requesting a response within 10 business days. Project Staff will work with the Project Strategist to develop an action plan and timeframe to resolve any issues that were identified. The Project Strategist will update the grievant on the planned response and timeline (if applicable) via the grievant's preferred form of communication (in person meeting if local, videoconference, phone call or email) until resolved

How will the grievance be verified? Will there be site visits, face-to-face meeting, etc.
Verification will be done remotely by the Project Strategist.

How will the mechanism deal with grievances that are ineligible?
Complainants with ineligible grievances will be informed of the outcome, and will be either directed to provide further information to further assess eligibility or to other resources as relevant. For instance, it is anticipated that some grievances received through the Accountability & Grievance Mechanism will be expressions of opinions, or requests for support. The Accountability & Grievance Mechanism will attempt to respond to any ineligible grievances by directing them to the appropriate organizations, authorities or other institutions that are better able to respond, but no further action will be taken under the grievance mechanism.

Below is a description of the grievance process:



if the process does not result in resolution of the grievance, or if the grievant prefers, s/he may choose to file a claim through CI's EthicsPoint Hotline at <https://secure.ethicspoint.com>. Alternatively, the grievant may file a claim with the Director of Compliance (DOC) who is responsible for the CI Accountability and Grievance Mechanism and who can be reached at: Director of Compliance, Conservation International 2011 Crystal Drive, Suite 600 Arlington, VA 22202, USA. This information must be contained in the AGM and disseminated to all project stakeholders.

SECTION VII: Documentation

How will grievance be recorded? Will there be a grievant form? Will there be a log book of the grievances received?

How and where would these records be stored? And for how long will they be kept?

How will the personal identifiable information of the grievant be kept secure, and who within the team will have access to it?

As stated above, all grievances will be recorded by the Project Strategist, assigned a unique ID, and reported on a quarterly basis to CI-GEF. Only the Project Strategist will have access to identifiable information from the grievant, unless confidentiality has been waived.

Grievances will be kept for the project duration, or until resolution has been achieved.

SECTION VIII: Monitoring and Reporting

Describe how will you track and ensure that the mechanism is working. It is important to recognize that lack of grievances does not mean that there are none, it may indicate that the mechanism is not working properly. Describe how you will account for this possibility.

The project is expected to report on a quarterly basis (using the CI-GEF Quarterly Reporting template), progress made towards the implementation of the grievance mechanism, including the number of grievances received and the outcome of the grievance process.

On an annual basis and using the CI-GEF Project Implementation Report (PIR) template, the following CI-GEF's minimum indicators are to be reported. The project can include other appropriate accountability and grievance indicators in addition to the CI-GEF's indicators.

| Indicator | Baseline | Target |
|---|----------|--------|
| Number of conflict and complaint cases reported to the project's Accountability and Grievance Mechanism | 0 | 2 |
| Percentage of conflict and complaint cases reported to the project's Accountability and Grievance Mechanism that have been resolved | 0 | 100 |

Person responsible for implementing and monitoring the AGM:

Eva Zabey, Project Strategist

Budget/Resources required:

No additional resources needed
