

Stakeholder Feedback and Grievance Redress Policy

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Overview

GreenCollar is Australia's largest environmental markets investor and project developer. We work across the carbon, water quality, biodiversity and plastic markets across both Australia and internationally.

This feedback and grievance redress mechanism (FGRM) is a resource developed by GreenCollar to receive and address feedback and concerns about the impact of projects on external stakeholders. FGRMs are intended to compliment a robust stakeholder engagement process, and do not replace, formal legal channels for managing grievances.

Purpose

GreenCollar aims to carry out all its projects to the highest social and environmental standards. This includes following the requirements of applicable environmental market standards along with GreenCollar's offset integrity requirements (see Annex 1).

Feedback builds and maintains strong communication with our stakeholders and is an important way for GreenCollar to improve and enhance the way we work.

The purpose of this policy is to set out GreenCollar's policy and procedures for recording, notifying and responding to any feedback, concerns or complaints from stakeholders that GreenCollar's projects are causing harm or not meeting standards.

Anyone who feels they are adversely affected by a GreenCollar project is encouraged to raise the issue with GreenCollar for resolution, but this policy is not intended to replace stakeholder's rights to seek redress through the courts, administrative law procedures, or other formal dispute resolution mechanisms that may be applicable. Depending on the nature of the issue, GreenCollar may also refer a complaint to the police or other formal dispute resolution.

How to notify GreenCollar of feedback, a concern or a complaint.

Anyone who would like to provide formal feedback or feels they are adversely affected by a GreenCollar project can notify GreenCollar in the following ways:

- Via email, sent to feedback@greencollar.com.au
- By mail sent to:
GreenCollar
Attention: Senior Compliance Officer
The ASN Co Building
3 Hickson Road
The Rocks
NSW 2000
Australia
- Via phone:
 - Callers in Australia should phone +61 02 9252 9828 (English)
 - International projects have their own local contact number to raise feedback, concerns or complaints. These numbers will be advertised locally during stakeholder consultation and available at project locations afterwards. A local GreenCollar representative will manage the local number and will receive and log complaints in local languages.

- In person with GreenCollar staff during stakeholder consultations, meetings, or site visits.

Access to the complaint handling process is provided free of charge.

Stakeholders may also (or alternatively) contact a regulatory body with feedback, concerns or complaints, including relevant environmental market standards. See Annex 1 for a list of environmental market standards that may be applicable. Each standard has their own regulatory body that may be contacted directly.

Nature of the Feedback, Concern or Complaint

This FGRM Policy will address feedback, concerns or complaints that:

1. indicate a GreenCollar project has caused a negative economic, social or environmental impact or has the potential to cause such an impact;
2. specify what type of impact has or may have occurred, and how it relates to the GreenCollar project;
3. are lodged by someone who is or may be impacted or is representing an impacted or potentially impacted stakeholder at the stakeholder's request; and
4. have sufficient information for GreenCollar to address the feedback or complaint based on the prior three points. Where insufficient information or detail is provided, GreenCollar may seek further information from the stakeholder(s).

Review Process

When a concern or complaint is made, GreenCollar will follow the process set out below:

Information Review and Contact

1. GreenCollar will send an email acknowledgement that the concern or complaint has been received.
2. GreenCollar Legal and Compliance team will review the concern or complaint and contact you to ensure we have all the necessary information and to discuss the process.

Investigation

3. GreenCollar will objectively investigate all concerns and complaints in a timely manner and will prioritise responses that allege serious harm, risk or rights violations. Complaint investigation may include consultations with the complainant, GreenCollar staff and contractors, and other parties involved in the project.

Discussion with complainant

GreenCollar will formally communicate to the complainant its findings from the investigation and its proposed resolution that reasonably and fairly addresses the feedback, concern or complaint.

Agreement and Resolution

4. If the complainant agrees with the proposed resolution, then GreenCollar will proceed with the proposed resolution.

Disagreement and Mediation

5. If a complainant disagrees with GreenCollar's proposed resolution, GreenCollar will continue engagement with the complainant and may revise the proposed resolution to try and come to a mutually agreed resolution.
6. If the complainant rejects all proposed resolutions by GreenCollar, GreenCollar may refer the issue to third party dispute resolution including mediation or arbitration. GreenCollar will work with the third party to try to come to an agreed resolution.
7. If a complainant does not want to participate further to resolve a complaint after it is lodged GreenCollar may conduct its own investigation of the complaint and close the complaint.
8. For sensitive or challenging cases, GreenCollar may seek agreement to use independent assessments, mediation, or adjudication to seek appropriate resolution of the issue.
9. If any stakeholder has feedback, concerns or complaints about this policy, the process of review and/or how GreenCollar has undertaken the process, GreenCollar will first attempt to resolve the issue directly with the stakeholder in accordance with this policy, and in the event that resolution is not achieved within a reasonable time may refer the matter to a third party or regulatory body to address the issue.

Complainants may also or alternatively submit a complaint to the Carbon Market Institute Code Administrator if they are not satisfied with GreenCollar's resolution of the matter:

<https://carbonmarketinstitute.org/app/uploads/2021/07/Complaints-Handling-and-Breaches-Procedure.pdf>

Transparency and integrity

GreenCollar respects the confidentiality of stakeholders and at the same time is committed to transparency in our projects and operations. GreenCollar will keep the details of specific complaints confidential and commits to protecting complainants from retribution.

However, with the consent of the complainant GreenCollar may disclose basic information about complaints and how they were resolved. GreenCollar will treat all personal information confidentially in accordance with the *Privacy Act 1988* (Cth) and any other applicable data and privacy protection laws.

GreenCollar is also committed to making publicly available aggregated statistics of the number and types of complaints received, actions taken to address the complaints and outcomes reached.

A record of all information relating to the complaint will be stored for 10 years with restricted access and labelled as confidential.

Annex 1: Environmental Market Standards and GreenCollar's Offset Integrity Requirements

Environmental market standards

Each environmental market project that GreenCollar implements must comply with the rules of the applicable standard. Details of the social and environmental requirements that GreenCollar follows under each standard are found within the rules for that standard. A selection of standards that may be applicable to specific GreenCollar projects are:

- Verified Carbon Standard (<https://verra.org/project/vcs-program/>)
- Jurisdictional and Nested REDD+ (<https://verra.org/project/jurisdictional-and-nested-redd-framework/>)
- Plastic Standard (<https://verra.org/project/plastic-program/>)
- Climate, Community & Biodiversity Standards (<https://verra.org/project/ccb-program/>)
- Gold Standard (<https://www.goldstandard.org/>)
- Reef Credit (<https://www.reefcredit.org/>)

GreenCollar's Offset Integrity Requirements

GreenCollar's offset integrity requirements encompass:

- Market-specific impacts (i.e. climate impact, plastic impact, water impact, or biodiversity impact)
- Broader environmental impacts (e.g. biodiversity, water or other environmental impacts of climate projects; or climate, biodiversity or water impacts of waste plastic projects)
- Social impacts, including respect for Indigenous Peoples, traditional owners, and local communities, labor, livelihoods, and gender and social inclusion.
- Law and policy, including following local laws, prohibitions against corruption, support for good governance, and respect of land and resource tenure
- Project implementation and reputation, including ensuring projects are implemented in accordance with GreenCollar's and market standards.