

Grievance Management Plan Framework
Circon Energy LLC
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Subject to the project-specific Environmental and Social Management Plan (ESMP) &
Equator Principal Finance Institution (EPFI) Lender requirements.

Circon Energy ESMS - Grievance Management Plan Framework Forward

The Circon Grievance Management Plan Framework (GMPF) is a structured approach to be used by Circon Special Purpose Vehicles (SPV's) to address and manage complaints, disputes, or grievances raised by employees, customers, stakeholders, subcontractors, or any other parties involved. Once developed, the SPV Grievance Management Plan (GMP) aims to handle grievances in a fair, transparent, and timely manner while also identifying opportunities for continuous improvement. Below is a framework that is to be used in creating the Grievance Management Plan for a given SPV:

Circon's SPVs may utilize relevant sections or segments of this document as deemed appropriate and necessary. The utilization of these sections will be based on an assessment of their relevance, appropriateness, and necessity in the given context or situation and/or as required by an Equator Principles Financial Institution (EPFI).



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Purpose

Circon Energy SPVs will establish a grievance management plan that promotes fairness, resolution, compliance, and continuous improvement, ultimately fostering a healthy and productive work environment.

1. Conflict Resolution: A GMP provides a structured approach for addressing conflicts and disputes within an organization. It establishes clear procedures for employees to voice their concerns and have them resolved in a fair and timely manner. This helps prevent conflicts from escalating and promotes a harmonious work environment.

2. Employee Satisfaction and Engagement: When employees feel that their grievances are taken seriously and addressed appropriately, it can contribute to their overall satisfaction and engagement at work. Knowing that there is a mechanism in place to address their concerns fosters a sense of trust and support within the organization.

3. Compliance with Laws and Regulations: Many jurisdictions have laws and regulations that require employers to have processes in place for handling employee grievances, particularly related to issues such as discrimination, harassment, or unfair treatment. Having a GMP ensures compliance with legal requirements and helps protect both employees and the organization from potential legal consequences.

4. Organizational Improvement: GMPs can provide valuable feedback and insights into organizational issues and areas for improvement. By addressing employee grievances, organizations have an opportunity to identify patterns or systemic problems that need attention. This can lead to implementing changes, policies, or training programs that improve work conditions and prevent future grievances.

Objectives

1. Fairness: The grievance process aims to provide a fair and impartial platform for all stakeholders, as defined in the Circon “*Stakeholder Engagement Plan*”, to raise their concerns or complaints without fear of retaliation. It ensures all parties involved are given an opportunity to present their perspectives and evidence.

2. Resolution: The primary objective of the grievance process is to resolve disputes and conflicts effectively. It seeks to address the underlying issues and provide a satisfactory resolution that addresses the concerns raised.

3. Compliance: The grievance process aims to ensure compliance with relevant laws, regulations, and organizational policies. It ensures that the process adheres to legal requirements, such as anti-discrimination laws or labor regulations, and respects the rights of all individuals involved.

4. Transparency: The process endeavors to be transparent, with clear communication and documentation of the steps taken and the outcomes reached. Transparency helps build trust among stakeholders, as they can understand how their grievances are being handled.

5. Timeliness: Timeliness is an important objective of the grievance process. It aims to address grievances promptly and avoid unnecessary delays, ensuring that stakeholders' concerns are handled in a timely manner.

6. Confidentiality: The process looks to maintain confidentiality and privacy to the extent possible, respecting the sensitive nature of grievances and protecting the rights and privacy of the individuals involved.

7. Prevention and Improvement: Another objective of the grievance process is to identify systemic issues, patterns, or recurring problems within the organization. By analyzing and addressing these issues, the process aims to prevent similar grievances in the future and drive continuous improvement.

8. Stakeholder Satisfaction and Engagement: The grievance process seeks to promote stakeholder satisfaction, engagement, and a positive work environment. By addressing and resolving grievances, it contributes to morale, trust, and overall well-being.

9. Learning and Development: The process aims to provide a learning opportunity for the organization by identifying areas for improvement, gaps in policies or procedures, and training needs. It allows the organization to continually refine its practices and enhance stakeholder relations.

Grievance Policy

1. Scope:

A grievance policy should ensure that all comments, enquiries and complaints concerning a project from internal and external stakeholders will be examined, and that appropriate corrective actions will be taken.

2. Definition of Grievance:

A grievance is defined as any complaint, concern, or disagreement related to the project.

3. Filing a Grievance:

A grievance policy should include a process for filing and resolving a complaint.

3.1. Individuals with a grievance should submit a written complaint to their immediate supervisor or the designated Grievance Officer within 10 business days of becoming aware of the issue.

3.2. If the grievance involves the immediate supervisor or the Grievance Officer, the individual should report the grievance directly to the next level of management or an alternative designated contact.

4. Grievance Process:

4.1. Acknowledgment: Upon receiving a grievance, the Grievance Officer or designated contact will acknowledge receipt of the complaint within 5 business days and inform their director supervisor.

4.2. Investigation: The Grievance Officer or designated contact will initiate a prompt, impartial, and thorough investigation of the grievance. This may involve gathering relevant information, interviewing involved parties, and conducting any necessary fact-finding.

4.3. Resolution: After completing the investigation, the Grievance Officer or designated contact will determine appropriate actions to address the grievance. This may include mediation, disciplinary measures, policy changes, training programs, or other remedial actions as deemed necessary.

4.4. Communication: The Grievance Officer or designated contact will communicate the outcome of the grievance process to the parties involved. They will provide a clear explanation of the decision, any actions taken, and the reasoning supporting their actions.

4.5. Appeals: If the individual filing the grievance is not satisfied with the outcome, they may have the right to appeal the decision. The appeal process and designated authority for appeals should be clearly outlined in the policy.

5. Confidentiality and Non-Retaliation:

Confidentiality will be maintained to the extent possible during the grievance process, except where disclosure is necessary for conducting an investigation or taking appropriate actions or required by law. Retaliation against any individual for filing a grievance in good faith is strictly prohibited and will be subject to disciplinary action.

6. Review and Modification:

This policy will be reviewed periodically to ensure its effectiveness. Any necessary modifications will be made to improve the process and address changing needs and legal requirements.

Grievance Categories

1. Workplace Harassment and Discrimination: Grievances related to harassment or discrimination based on factors such as race, gender, age, religion, disability, or any other protected characteristic.

2. Retaliation: Grievances alleging retaliation for reporting misconduct, participating in investigations, or exercising legal rights.

3. Work Environment and Conditions: Grievances regarding unsafe working conditions, inadequate facilities, excessive workload, lack of resources, or any other factors affecting the work environment.

4. Employment Policies and Practices: Grievances concerning issues related to hiring, promotions, performance evaluations, compensation, benefits, or any other employment policies or practices.

5. Work Schedule and Leave: Grievances related to scheduling conflicts, denial of leave requests, issues with time off, or any other matters concerning work schedules and leave policies.

6. Conflict with Colleagues or Management: Grievances arising from interpersonal conflicts, bullying, unprofessional behavior, or concerns regarding management decisions and actions.

7. Violation of Company Policies: Grievances involving the violation of organizational policies, including code of conduct, ethics policies, Information Technology (IT) usage policies, or any other relevant policies.

8. Misconduct or Unethical Behavior: Grievances reporting instances of fraud, theft, dishonesty, or any other unethical behavior within the organization.

9. Performance Management: Grievances concerning performance evaluations, feedback, disciplinary actions, or any other matters related to employee performance management.

Potential Channels for Filing Grievances

1. Direct Supervisor or Manager: Employees can report grievances directly to their immediate supervisor or manager. This channel allows for a direct and immediate resolution at the local level.

2. Human Resources Department: Consider designating a specific individual or department within your organization's Human Resources (HR) team to receive and address grievances. This provides employees with a dedicated resource for handling complaints.

3. Grievance Officer or Ombudsman: Consider appointing a Grievance Officer or Ombudsman who serves as an impartial and confidential resource for individuals to report their grievances. This independent role can help ensure fairness and transparency in the grievance process.

4. Anonymous Reporting : Establish an anonymous reporting mechanism where individuals can submit their grievances without revealing their identity. This option encourages individuals who may be hesitant or fearful to come forward due to concerns about retaliation.

5. Email or Online Complaint Forms: Consider providing an email address or an online complaint form on your organization's intranet or website, allowing individuals to submit their grievances in writing. This channel offers convenience and a documented record of the complaint.

6. Open Door Policy: Promote an open-door policy where employees can approach any level of management, including senior leaders, to voice their grievances directly. This channel fosters a culture of transparency and accessibility.

Grievance Policy Communication & Awareness

1. Employee Handbook or Policies: During the onboarding process, communicate to an employee the available grievance channel and the process for filing grievances.

2. Training and Orientation: When a process change to the grievance process is made, the revisions will be communicated. This ensures employees have access to the most current processes and procedures and are aware of their rights and understand how to raise concerns or complaints.

3. Internal Communications: Internal communication channels, such as emails, newsletters, intranet portals, or bulletin boards, may be utilized to regularly remind employees and stakeholders about the available grievance channels. Success stories or case studies that demonstrate the effective resolution of grievances may be shared through these channels as appropriate.

4. Meetings and Town Halls: Discussions about the grievance process and channels may be incorporated into team meetings, departmental meetings, and

company-wide town hall sessions to provide opportunities for employees to ask questions and seek clarifications.

5. Posters and Visual Aids: Posters or other visual aids shall be prominently displayed, as required by law, in common areas such as break rooms, cafeterias, and near notice boards that highlight the grievance channels. Contact information and instructions for filing grievances shall be clearly visible.

6. Online Platforms and Portals: When organizational online platforms or portals, such as intranet sites or employee self-service systems are established, the grievance channels and relevant contact information shall be prominently featured with links to complaint forms or anonymous reporting mechanisms.

Evaluation of Grievances and Investigation Process

1. Receipt of the Grievance: Once a grievance is received through any of the designated channels, the receiver will promptly acknowledge its receipt to the individual who filed the complaint and confirm it will be reviewed and investigated. They will then notify their direct supervisor.

2. Assign an Investigator: A designated impartial and qualified person or team responsible for investigating the grievance shall be assigned if the Company does not have a designated Grievance Officer in place. The investigator shall have the necessary skills, knowledge, and authority to conduct a fair assessment.

3. Gathering Information: The investigator shall gather all relevant information related to the grievance. This can include interviewing the individual filing the complaint, any witnesses, and individuals involved in the situation. Documentation such as emails, records, or other evidence shall also be collected.

4. Maintaining Confidentiality: All information related to the grievance shall be treated confidentially. Access to the details of the complaint shall be limited to only those directly involved in the investigation. Importance of confidentiality to all parties involved in the process shall be emphasized.

5. Impartial Evaluation: The investigator shall assess the credibility and validity of the grievance based on the information gathered. They shall consider multiple perspectives and exercise objectivity throughout the evaluation process.

6. Collaboration and Fact-Finding: If necessary, the investigator may collaborate with other departments or seek expert advice to gather additional information or clarify certain aspects of the grievance.

7. Documentation: Circon shall maintain comprehensive records of the investigation, including all relevant details, interviews conducted, evidence gathered, and the conclusions drawn. The rationale behind decisions made during the investigation shall be documented.

8. Decision and Resolution: Based on the investigation's findings, the investigator shall determine an appropriate course of action. This may involve resolution through mediation, disciplinary measures, policy changes, or other remedies. Decisions shall be fair, consistent, and aligned with relevant laws, policies, and organizational guidelines.

9. Communication of Outcomes: The investigation's outcome shall be communicated to the individual who filed the grievance, as well as any other relevant parties. A clear and concise explanation of the decision, any actions taken, and the rationale behind the conclusion shall be provided. Confidentiality shall be maintained while providing necessary information to address concerns and promote transparency.

10. Follow-Up: The implementation of any actions or remedies resulting from the investigation shall be periodically monitored to ensure that the resolution is effective and satisfactory.

Grievance Corrective Action Plan

1. Determine Appropriate Actions:

Based on the evaluation, determine the corrective actions needed to address the grievance effectively. These actions may include, but are not limited to:

- Mediation or conflict resolution processes to facilitate dialogue and resolution between parties.
- Disciplinary actions if misconduct or policy violations are found.
- Policy or procedural changes to prevent similar grievances in the future.
- Training programs or workshops to educate employees on relevant policies, behavior expectations, or communication skills.

- Supportive measures to assist affected individuals, such as counseling or mentoring.

2. Develop an Action Plan:

Create a detailed plan that outlines the specific steps, responsible parties, and timelines for implementing the corrective actions. Clearly communicate the plan to all relevant stakeholders.

3. Communication and Transparency:

Effectively communicate the outcomes of the grievance process and the action plan to the individual who filed the grievance, as well as other affected parties. Provide a clear explanation of the decisions made, the actions to be taken, and the reasoning behind them. Ensure confidentiality is maintained while still addressing concerns and promoting transparency.

4. Implementation and Monitoring:

Execute the action plan, ensuring that each step is carried out as intended and within the established timelines. Assign responsibilities to individuals or teams who will be accountable for implementing the actions. Regularly monitor progress and evaluate the effectiveness of the corrective measures.

5. Follow-Up and Feedback:

Engage in ongoing communication with the affected parties to gauge their satisfaction with the implemented corrective actions. Encourage feedback to identify any areas for improvement or additional support needed.

6. Documentation and Record-Keeping:

Maintain thorough documentation of the entire grievance process, including the grievance itself, the investigation, the action plan, and the outcomes. This documentation serves as a historical record and may be required for future reference or legal purposes.

Communicate Outcomes

1. Timely Communication: Share the outcomes of the grievance process as soon as possible after a decision has been reached with the goal being to demonstrate Circon's commitment to addressing concerns promptly.

2. Clear and Concise Explanation: Provide a clear and concise explanation of the decision reached, any actions taken, and the reasoning behind them. Use plain language and avoid technical jargon to ensure that the message is easily understood by all parties involved.

3. Respect Privacy and Confidentiality: While communicating the outcomes, be mindful of privacy and confidentiality. Only disclose information necessary for the affected parties to understand the decision and any related actions. Maintain confidentiality as required to protect the privacy and rights of individuals involved.

4. Direct Communication: Whenever possible, communicate the outcomes of the grievance process directly to the individual who filed the grievance. This ensures that they receive the information firsthand and have an opportunity to seek clarification or ask questions.

5. Provide Written Documentation: Offer written documentation of the outcomes, such as a formal letter or email. This documentation serves as a reference and can be helpful for future discussions or reference points. Include key details, decisions, and any next steps or actions to be taken.

6. Offer Channels for Questions and Clarification: Provide a means for the affected parties to seek further clarification or ask questions about the outcomes. This could be through a designated contact person, an open-door policy, or a dedicated email address for follow-up inquiries. Respond promptly and ensure that concerns are addressed appropriately.

7. Respectful and Professional Tone: Maintain a respectful and professional tone throughout the communication process. Emphasize that the grievance was taken seriously, and the decision was reached through a fair and impartial process.

8. Reiterate Non-Retaliation Policy: Remind all parties involved that retaliation against any individual for filing a grievance or participating in the process is strictly prohibited. Reinforce the commitment to maintaining a safe and respectful work environment.

9. Employee Support Resources: Provide information about available support resources, such as counseling services, employee assistance programs, or alternative dispute resolution mechanisms. This ensures that individuals have access to additional help if needed.

10. Consistent Communication: Ensure consistent communication across all affected parties. This includes supervisors, managers, teams, or departments who may need to be aware of the outcomes or any resulting actions to facilitate a smooth transition and ongoing collaboration.

Review & Improvement

In order to ensure the assessment of the grievance management plan's efficiency and effectiveness, audits of the implementation thereof may be carried out periodically.