

Standard Operating Procedure (SOP)

Stakeholder Consultation + Engagement

Verified Carbon Standard (VCS)

Sustainable Development Verified Impact Standard (SD VISTA)



GreenRaise

May 2022



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Introduction

Purpose

This Standard Operating Procedure (SOP) is intended to outline procedures relating to GreenRaise Consulting GmbH (GreenRaise) forest carbon projects and ensure that activities are carried out in compliance with Standard requirements. SOPs are designed to complement GreenRaise procedures and policies and specific project documents.

By implementing the safeguards within this SOP, Agriculture, Forestry and Other Land Use (AFOLU) and Sustainable Development Verified Impact Standard (SD VISTA) projects implemented by GreenRaise will not negatively impact the natural environment or local communities. The methods within this document will ensure any environmental and/ or socio-economic impacts are identified and addressed throughout the project development process.

Scope

Currently, this SOP applies to the GreenRaise projects carried out in accordance with AFOLU project types: Afforestation, Reforestation and Revegetation (ARR) and Improved Forest Management (IFM) under the Verified Carbon Standard (VCS). Additional procedures are also outlined within each section for projects verified to SD VISTA. The following SOP is intended to direct processes that will fulfill requirements listed under Section 3.16 – Safeguards of the VCS Standard (v4.2), Section 2.3.2 Community Engagement of the AFOLU Non-Permanence Risk Tool (v4.0) and Section 2.2 – Stakeholder Engagement of the SD VISTA Standard (v1.0).

AFOLU Project Exclusions

The processes described below exclude requirements related to the mandatory Public Comment Period (VCS Sections 3.16.5 – 3.16.7) which is conducted through the VCS Registration and Issuance Process.

Although this SOP covers general requirements for Safeguards under the VCS Standard and Stakeholder Engagement requirements related to SD VISTA, the current version does not include Life Cycle or Aspect analyses for the following AFOLU project types: Agricultural Land Management (ALM), Reduced Emissions from Deforestation and Degradation (REDD), Avoided Conversion of Grasslands and Shrublands (ACoGS), or Wetlands Restoration and Conservation (WRC). When necessary, this SOP will be updated to reflect additional analyses.

For AFOLU projects under the VCS Standard that do not impact local stakeholders, projects are not required to meet all requirements as set out within the SOP (refer to the most recent version of the VCS Standard), however the project proponent must provide evidence that project activities do not impact local stakeholders at validation and each verification audit. Additionally, for AFOLU projects where validation and verification to meet the Climate, Community & Biodiversity (CCB) program is completed at the same time as the VCS Program, stakeholder consultation will not be completed as described within this SOP, rather as they are outlined within the CCB requirements standards.



Principles

No Net Harm

For all projects developed under the VCS Standard (not just AFOLU projects exclusively), it is required that the project proponent shall demonstrate No Net Harm by identifying all potential negative environmental and socio-economic impacts and develop measures to mitigate them.

For the purposes of GreenRaise AFOLU specific projects, the concept of No Net Harm will be demonstrated utilizing an Aspects Analysis, as described under the *Risks to Local Stakeholders* section below.

Impacts for People, their Prosperity and the Planet

For all projects developed under SD VISta (not just AFOLU projects exclusively), it is additionally required that the project's outcomes and impacts (positive and negative, intended, and unintended) are described in relation to People, their Prosperity and the Planet.

These outcomes and impacts are analyzed via a causal chain assessment that maps the cause-and-effect relationships of the project activities as described under the *Risks to Local Stakeholders* section below.

Anti-Discrimination

Measures will be taken throughout the stakeholder consultation process to ensure that the project proponent and all other entities involved in project design and implementation are not involved or complicit in any form of discrimination¹ or sexual harassment with respect to the project.

Local Public Consultation

The purpose of the local public consultation process will be to inform interested parties of the AFOLU project (including design and implementation and project development process), to facilitate the evaluation of impacts (negative and positive), allow for the expression of concerns about potential negative impacts and provide input regarding the project.

The initial public consultation period will be completed over 30 calendar days and will be completed prior to project validation. It will be conducted by the project proponent, or an authorized representative of the project proponent. Additional on-going communication and consultation will take place throughout the lifetime of the project.

¹ Discrimination may include but is not limited to that based on gender, race, religion, sexual orientation or other habits.



All communication and consultation will be performed in a culturally appropriate manner, including language and gender sensitivity and will be conducted directly with the public, local stakeholders or their legitimate representatives as appropriate

The following sections outline the mechanisms and procedures that will be utilized to maximize public participation and facilitate the stakeholder consultation process.

Local Stakeholder Identification and Background

A stakeholder (excluding an interested stakeholder) is designated as any person who can potentially be affected by the project.

With the intention to meet the VCS Non-Permanence Risk Tool requirements for Community Engagement (CE)², stakeholders will be identified within a minimum of a 20km radius of the project area boundary.

Potential stakeholders will be identified by the project proponent. The proponent will provide a categorized description of peoples potentially impacted by the project. Stakeholder contacts will be chosen to:

- Cover national, state/provincial, and smaller scale levels,
- Provide a range of stakeholder organization sizes, from larger institutions through to small organizations and individuals,
- Provide a range in geographic coverage, with a focus on areas where forest management is likely a priority (i.e., where appropriate, focus on forested regions).

Information will be collected with the goal to:

- Identify digital contact information (i.e., email addresses), as the primary point of contact (to maximize the duration of consultation, to speed up the response process, and to facilitate responses and information sharing (refer to the *Stakeholder Communication* section for a description of how information will be presented in culturally appropriate manner, where required), and
- Provide a sufficient number of contacts, commensurate within available information and the size of the project areas.

Once potential stakeholders have been identified, they will be categorized as follows to ensure adequate representation has been achieved across the following groups:

1. Economic
 - Other Forest Owners (adjacent to the project area)
 - Forest Contractors
 - Representatives of Forestry Workers/Industry

² Section 2.3.2 of the VCS AFOLU Non-Permanence Risk Tool



2. Social

- Non-government organizations
- Households (as defined by the VCS AFOLU Non-Permanence Risk Tool v4.0)
- Labour/ Trade Unions
- Community Representatives
- Recreation Representatives
- Indigenous Representatives

3. Environmental

- Non-government organizations
- Local Communities

4. Forest Agencies

- National/Federal
- State/Provincial

5. Research Institutes and Universities

Further analysis is completed to identify stakeholders that could be impacted by the project via the Aspect Analysis for VCS projects and Causal Chain Analysis for SD VISta projects (refer to Risk Ranking and Mitigation section). Any stakeholders identified through the risk ranking process will be classified as “impacted” and will be designated as a stakeholder by the project proponent. All stakeholders will be included in all public outreach activities.

Stakeholder Groups

As required under SD VISta, stakeholders must be further categorized into stakeholder groups based on similar income, livelihood, well-being and/or cultural values and whose values are different from those of other groups. Stakeholder groups will be comprised of all stakeholders, excluding “interested stakeholders”. Interested stakeholders are designated as any person, group or persons, or entity that has shown an interest, or is known to have an interest, in the activities of the project, but that will not be materially affected by those activities (e.g., local or international NGOs).

Stakeholder groups will often be segments of the population, not officially designated assemblages. These groups will differ between projects and therefore will be defined within each Project Description Document.

The following information shall be included with the Project Description Document (to represent the project’s baseline scenario for People and their Prosperity) for each stakeholder group identified:

1. Conditions at the project start date with respect to social, economic and cultural diversity within and between the stakeholder groups and the interactions between stakeholder groups
2. Significant changes in these elements in the past



Information Gathering

In order to complete a thorough assessment of local stakeholders that may be impacted by the project, the following information will be collected on local stakeholders throughout the stakeholder consultation process:

1. Any legal or customary tenure/access rights to territories or resources, including any collective and/or conflicting rights held by local stakeholders
2. A description of the social, economic, and cultural diversity within local stakeholder groups and the differences and interactions between stakeholder groups
3. Significant changes to the makeup of stakeholder groups throughout the duration of the project
4. Expected changes in stakeholder well being and other stakeholder characteristics under the baseline scenario, including changes to ecosystem services identified as important to the stakeholders
5. The location of communities and stakeholder areas outside the project area which are predicted to be impacted by the project
6. The location of territories and resources which stakeholders own or have customary access

Initial Local Stakeholder Consultation Process

In line with VCS Standards, the project proponent shall take all appropriate measures to communicate and consult with all stakeholders. Project communications will be completed using in person, and online correspondence, to maximize communication during the consultation period, allow for faster response times to comments and concerns, and facilitate information sharing.

During the consultation process, ongoing opportunities for self-identification of stakeholder groups that are vulnerable (i.e., lacking ability to anticipate, cope with, resist and recover from stresses or shocks due to physical, social, economic and environmental processes) and/or marginalized (i.e., unable to participate fully in economic, social, political and cultural life) will be provided by the project proponent.

Information shared through communications will focus on the following:

1. Project design and implementation processes including the results of project monitoring
2. All risks, costs and benefits the project may bring to stakeholders
3. All relevant laws and regulations related to worker's rights within the project host country
4. The process of VCS validation and verification

The following describes the process that will be utilized by GreenRaise to complete initial local stakeholder consultation prior to project validation:

1. The project proponent will develop a project information document to provide stakeholders an overview of the project. Distribution of information will be completed through in person presentations, as well as physical and/or electronic documents.
 - a. Stakeholders will be encouraged to evaluate potential implications of the project and provide input on the project design



2. Stakeholders will be able to provide initial feedback on the project for a period of 30 calendar days following the commencement of the initial stakeholder consultation period.
 - a. Stakeholder comments will be collected via an online Stakeholder Feedback form submitted to GreenRaise.
 - i. Where utilizing online platforms is not conducive to local stakeholder customs, alternate forms of comment collection will be utilized (paper forms, collection of verbal responses, etc.).
 - b. Responses will be collected and maintained by GreenRaise within a confidential Consultation Database.
3. The project proponent will address all project comments, updating the project design where practicable or demonstrating the insignificance/irrelevance of the comment to the project design.
 - a. All actions relating to comments received will be documented within the Consultation Database and will be made available to the Validation/Verification Body (VVB) during validation.

Ongoing Communication

Refer to the methods described below within *Communication and Consultation*.



Risks to Local Stakeholders

Risk Ranking & Mitigation – Verified Carbon Standard

For all AFOLU VCS projects, likely natural and human-induced risks to local stakeholder well-being throughout the project lifetime will be identified by the project proponent. Risks generated by AFOLU projects will be identified utilizing an Aspects Analysis³ (Appendix 2).

Resulting from the Aspects Analysis, general Risk Categories have been identified as having the potential to cause risks to local stakeholders of AFOLU – ARR & IFM projects:

Table 1 Risk Categories related to AFOLU – ARR & IFM Projects

| Risk Category |
|---------------------------|
| Legal |
| Traditional/ Human Rights |
| Environmental |
| Social/ Socio-Economic |

Additionally, via the Aspect Analysis, specific risks and impacts were compiled that could be applicable to AFOLU - ARR & IFM projects. Risks were developed with the intention of being applicable to all AFOLU – ARR & IFM projects, however they are not intended to be all inclusive. Where necessary, additional Aspects may be required on a project to project basis.

Stakeholders (categories) that could potentially be affected by each risk identified has been included in the risk analysis.

For each specific AFOLU project developed by GreenRaise, the identified risks will be ranked as either high, moderate or low risk based on the following risk matrix, unless they are determined to be not applicable to the project:

³ Methodologies based on Section 6.1.2 of ISO 14001:2015: *Environmental management systems – requirements with guidance for use standard* (Third Edition; 2015-09-15).



| | | | |
|------------|------|------------------------------|----------|
| Likelihood | High | Moderate | High |
| | Low | Low | Moderate |
| | | Low | High |
| | | Consequence of Impact | |

Figure 1 - Risk Matrix

*A designation of Not Applicable (N/A) may be utilized if sufficient evidence can determine the risk does not apply to the project activity

Figure 2 Risk to local stakeholders ranking matrix

For all high and moderate risks, mitigation measures will be developed and documented within the Project Description Document (PDD). Measures will be required to be implemented for the duration of the project lifetime, where applicable.

For all low risks, no mitigation measures will be developed.

The PDD will be assessed to identify potential adverse implications to ecological and socio-economic values following plan implementation. Mitigation measures will be re-assessed and adjusted, if required, on an on-going basis commensurate with communication and consultation (refer to *Communication and Consultation*).

Impacts to the People, their Prosperity and the Planet – SD VISTA

Risks to stakeholders defined under SD VISTA will be determined via a causal chain analysis. This analysis will identify the outputs, outcomes and resulting impacts on the planet and people and their prosperity from the project activities. Any stakeholders that are determined to be at risk of negative impacts (as a result of the causal chain analysis), will identified as a stakeholder under the SD VISTA requirements.



Local Stakeholder Participation Risks

Risks relating to stakeholder participation in project implementation, project design and consultation will vary from project to project. Stakeholder participation risk has been integrated into the Aspect Analysis and causal chain analysis (see *Risks to Local Stakeholders*) and therefore will be assessed, risk ranked and mitigated for on a project to the project basis.

Universal mitigation measures for local stakeholder participation risks will be applied to all projects as follows:

1. All stakeholder contact information will remain confidential.
2. All stakeholder responses will be numerically coded to maintain the anonymity of publicly available stakeholder responses.

Additionally, all stakeholder consultation completed by GreenRaise or its affiliate companies, will be completed in a manner free of discrimination or sexual harassment which is a mandatory requirement of all personnel employed by or affiliated with GreenRaise.

Respect for Local Stakeholder Resources

AFOLU projects designed and implemented by GreenRaise will be done in a manner to avoid negative impacts to local stakeholders, including stakeholder resources such as property rights. Through the same process described to evaluate risks to local stakeholder (Aspect Analysis), impacts to local stakeholder property rights will be evaluated (Appendix 2).

Where impacts are unavoidable, mitigation measures will be implemented.

In addition to evaluating impacts to local stakeholder property rights, the following measures will be implemented for each project to avoid damage to local ecosystems:

Project proponents will not introduce invasive species or allow invasive species to thrive through project implementation.

If required, the project proponent will justify the use of non-native species over native species.

If required, the project proponent will justify and describe the possible adverse effects of the use of fertilizers, chemical pesticides, biological control agents and other inputs.

If required, justifications will be outlined within project specific PDDs.

Property Rights

In all cases, project proponents shall recognize, respect and support local stakeholders' property rights. Where feasible, the project proponent will also take measures to help secure local stakeholder property rights. In the event there are ongoing or unresolved conflicts over property rights, usage or resources, the project shall undertake no activity that could exacerbate the conflict or influence the outcome of an unresolved dispute.



At no time, will a project encroach on private, stakeholder, or government property. A project will not relocate people off their lands without consent. If required, the project proponent may affect property rights if free, prior and informed consent is obtained and a transparent agreement is reached that includes provisions for just and fair compensation.

Worker Relations

For projects under SD VISta, any workers or individuals involved in carrying out project activities shall receive orientation and training with an objective of building locally useful skills and knowledge to increase local participation in project implementation. Special attention shall be given to marginalized and/or vulnerable people.

All stakeholders shall be given an equal opportunity to fill all work positions (including management) where the job criteria are met.

Communication and Consultation

Ongoing Communication and Consultation

Throughout the lifetime of the project, the project proponent will continue to communicate and consult with local stakeholders in an on-going process. GreenRaise will maintain access to the online Stakeholder Feedback form (created during the Initial Stakeholder Consultation Process) through our website (www.green-raise.com/projects) to allow for on-going communication.

All comments received throughout the lifetime of the project will be recorded within the Consultation Database with corresponding actions or justification for inaction. The Database will be provided to the VVB during verification.

All information provided during the initial stakeholder consultation process, as well as any additional relevant information relating to project design or implementation will be provided through the GreenRaise website.

Documentation relating to results of monitoring and the process of the VCS Program validation and verification will be made available via the Verra Registry.

Communication of Site Visits

For all projects validated and verified under SD VISta, the project proponent must provide timely information about the validation and verification body's (VVB) site visit before the site visit occurs. The project proponent shall facilitate direct and independent communication between them or their representatives and assessor.



Grievance Redress Procedure

As it relates to project developed under the Verified Carbon Standard (VCS), the Grievance Redress Procedure outlines methods that will be implemented to address disputes that may arise with local stakeholders and project proponents during project planning and implementation. Refer to Appendix 3 for the GreenRaise Grievance Redress Procedure.



Appendix 1 – Life Cycle Analysis

A Life Cycle Perspective was utilized to consider impacts throughout the entire supply chain, and lifetime of an AFOLU project, considering the extent of control or influence that the project proponent may have on these impacts (Appendix 1).

Considering a Life Cycle Perspective for AFOLU projects is complex due to the long rotation period of trees (i.e., products) and the benefits that forests provide (e.g., biodiversity, soil and water, job opportunities, etc.). Moreover, one cannot just consider a single product (i.e., logs). The life cycle of forest products can vary significantly depending on the type. By-products and wastes generated during the manufacturing process can also be used as inputs to other forest products or may be used as energy/ fuel sources.

AFOLU projects incorporating forests, are a renewable resource, are recyclable, represent an important renewable raw material, and provide areas for hunting, foraging and recreational activities leading to socio and economic wellbeing of local communities. All these aspects of the life cycle of a forest have been considered during the Aspect Analysis.

As stated within the SOP Scope, currently only AFOLU – ARR & IFM projects have been considered for the Life Cycle Perspective and Aspects Analysis.

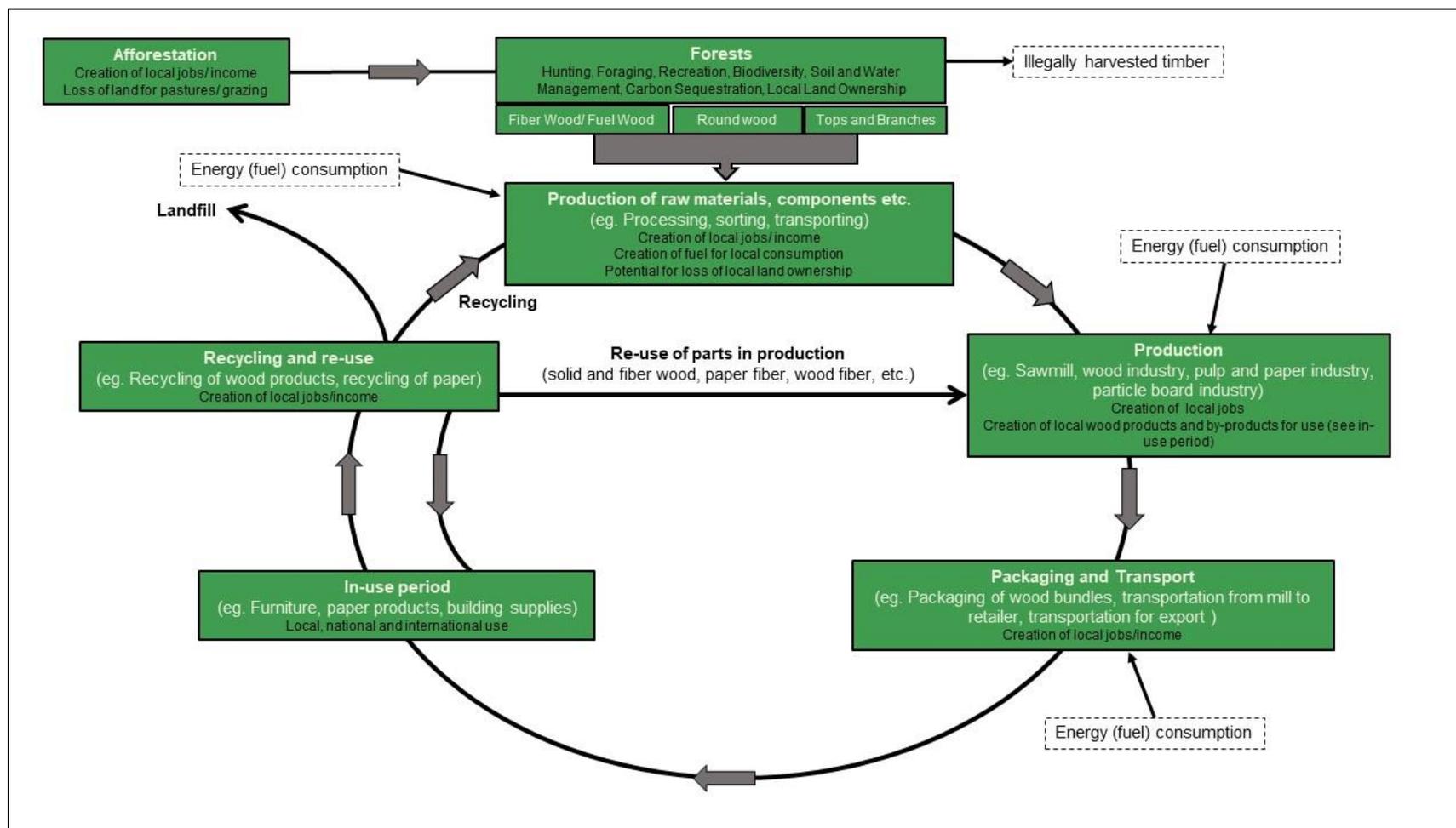


Figure 3 Life cycle analysis for AFOLU - ARR and IFM Projects



Appendix 2 – Aspects Analysis



Table 2 AFOLU Project Aspect Analysis for IFM Projects

| Activity | Aspect | Impact | Potential Risk to local Stakeholders (Stakeholder Category) | Mitigation Measures (implemented by project proponent)* | Risk Category |
|---|---|--|---|---|---|
| Halting/ reduction of harvesting activities: Reduced Impact Logging (RIL), Logged to Protected Forest (LTPF), Extended Rotation Age / Cutting Cycle (ERA) | Reduced/ no requirement for harvesting labour | Loss of income/ livelihood | Loss of income to local communities could result in the degradation of local communities (i.e., reduction in community resources, loss of community members due to moving, etc.). (Social, Economic) | All VCS Projects will be required to adhere to the Standard requirement of "No Net Harm". | Social/ Socio economic |
| | Reduction/ no requirement for energy (fuel) consumption | Loss of income/ livelihood | Loss of income to local economy due to reduced need for fuel. (Social, Economic) | | Social/ Socio economic |
| | Reduction of fuelwood produced | Loss of wood for heating/ fuel purposes | Loss of access to fuel source for home heating (Social) | | Social/ Socio economic |
| | Public Access reduced or denied | Public recreation opportunities reduced or denied | Increase in illegal trespass instances. Reduced public health (mental and physical) due to reduced access to recreation (Social, Economic) | | Social/ Socio economic Traditional/ Human Rights |
| | | Public access for foraging/ hunting purposes reduced or denied | Increase in illegal trespass instances. Reduced access to food sources (Social, Economic) | | |
| | Reduction in harvesting/ controlled burns for purposes of fire prevention | Increase risk of forest fire | Local communities exposed to higher risk of forest fire. Adjacent forest owners at risk of commodity loss due to forest fire spread. (Social, Economic, Environmental, Forest Agencies) | Environmental | |



| Activity | Aspect | Impact | Potential Risk to local Stakeholders (Stakeholder Category) | Mitigation Measures (implemented by project proponent)* | Risk Category |
|--|--|------------------------------|--|--|------------------------------|
| | Complete termination of project area maintenance | Road failure | Increased landslide risk to local communities. Watershed/ water quality degradation due to landslides and lack of sediment control. Loss of access to adjacent forest lands due to road failure. (Social, Economic, Environmental, Forest Agencies) | | Environmental |
| | | Pest or Disease Outbreak | Spread of disease to local community forests/ adjacent forest lands. Watershed/ water quality degradation due to transition to low productivity stands (Social, Economic, Environmental, Forest Agencies) | | |
| | | Public safety | Increase in accident or injury within project area accessible to public (Social) | | |
| | Property rights are undefined/ disputed | Loss of property rights | Project encroaches on private property Project encroaches on government property Project relocates people off their lands (Social, Economic) | Additional measures: refer to <i>Respect for Local Stakeholder Resources: Property Rights</i> | Legal Social/ Socio economic |
| | Participation in project design, implementation, and/or consultation | Safety of local stakeholders | Increased risk to stakeholder safety due to opposing opinions, cultural/ religious differences, land holder grievances or disputes, government or local oppression of freedom of expression. (Social, Research Institutes and Universities) | Universal Control = All stakeholder contact information (Name, Address, etc.) will be kept confidential. Stakeholder responses will be number coded as to keep public record of responses anonymous. | Social/ Socio economic |
| * Controls to be implemented by the project proponent based on project requirements. | | | | | |



Table 3 AFOLU Project Aspect Analysis for ARR Projects

| Activity | Aspect | Impact | Potential Risk to local Stakeholders (Stakeholder Category) | Mitigation Measures (implemented by project proponent)* | Risk Category |
|---|---|---|--|---|--|
| Increasing or restoring vegetation cover: Afforestation, Reforestation and Revegetation (ARR) Low – Productive to High – Productive Forest (LtHP) | Land obtained legally for replanting | Loss of grazing leasing opportunities | Local grazing land reduced leading to potential for loss of food source for local communities (Social, Economic) | All VCS Projects will be required to adhere to the Standard requirement of “No Net Harm”. | Legal Socio Economic |
| | | Loss of public access for foraging/ hunting purposes | Increase in illegal trespass instances. Reduced access to food sources (Social, Economic) | | |
| | Changes in landscape physical composition | Changes to hydrological characteristics and volumes. | Decrease in overall flow from landscape could result in reduced access for water sources (e.g. irrigation) for local communities. (Social, Environmental) | | Socio Economic Environmental Traditional/ Human Rights |
| | | Shift in species composition | Shifts in species composition could threaten possible food/ foraging sources for local communities Increase in predator abundance. (Social, Environmental) | | |
| | Property rights are undefined/ disputed | Loss of property rights | Project encroaches on private property Project encroaches on government property Project relocates people off their lands (Social, Forest Agencies) | | Legal Social/ Socio economic |
| Participation in project design, implementation, and/or consultation | Safety of local stakeholders | Increased risk to stakeholder safety due to opposing opinions, cultural/ religious differences, land holder grievances or disputes, government or local oppression of freedom of expression. (Social, Forest Agencies, Research Institutes and Universities) | Additional measures: refer to <i>Respect for Local Stakeholder Resources: Property Rights</i> | Social/ Socio economic | |
| * Controls to be implemented by the project proponent based on project requirements. | | | | | |



Appendix 3 – Grievance Redress

Procedure

This Grievance Redress Procedure is intended as a supplement to the GreenRaise Standard Operating Procedures – Stakeholder Consultation + Engagement under the Verified Carbon Standard (VCS) and the Sustainable Development Verified Impact Standard (SD VISta) of the same date as indicated on this document.

As it relates to project developed under the VCS and SD VISta, the following Grievance Redress Procedure outlines methods that will be implemented to address disputes that may arise between local stakeholders and project proponents during project planning and implementation.

The following processes are intend to facilitate receiving, hearing, responding to and attempting to resolve grievances, within a reasonable time period related to VCS and SD VISta projects developed by GreenRaise.

These procedures are to be applied to all GreenRaise VCS and SD VISta projects, however where appropriate, these procedures will be amended to take into account culturally-appropriate conflict resolution methods.

These documented procedures, and documentation of disputes resolved through this procedure will be made publicly available on the GreenRaise website (<https://green-raise.com/projects/>).

Contact Information

All grievances are requested to be submitted through the Grievance Submission form located on the GreenRaise website. Where local customs or circumstances do not allow for electronic submission, a paper version of the Grievance Submission Form can be provided. Please contact GreenRaise using the information provided on [contact page](#) of our website if you or someone you are representing requires an alternate form of submission.

Grievance Process

Stage 1 – Receive, Respond and Resolve

When GreenRaise receives a grievance related to a VCS Project, either directly or via a project proponent, GreenRaise will:

1. Acknowledge the grievance to the grievor, if not already done so by the project proponent and provide an initial response to the grievor within two weeks of the original grievance. GreenRaise will request the grievor complete the GreenRaise Grievance Submission Form if they have not already and including relevant evidence to support their concern. General information grievances received will be tracked within the GreenRaise Grievance Record Database and made publicly available.



2. Conduct a preliminary assessment to determine whether evidence provided in a grievance is or is not substantial, by assessing the evidence provided.
3. Dialogue with grievor with the aim to solve grievances assessed as substantial, before further actions are taken.
4. While substantial grievances are pending, a precautionary approach towards the continued implementation of the project will be taken, which may include:
 - a. Temporarily halting the sale of VCUs generated by the project, or
 - b. Developing interim mitigation measures to effectively mitigate the grievance, until the grievance is resolved.
5. Where further investigation is required to resolve a substantial grievance, a desk or field review (as applicable) will be conducted within two months of the initial grievance.
6. Where a grievance is assessed as being substantial, mitigation measures will be developed, as applicable (e.g., mitigation measure revision or development, changes to project design or implementation). Mitigation measures may include steps to be taken by stakeholders, as well as the project proponent, to resolve the issue.
7. If a mitigation measure cannot be determined and/or enforced, *Stage 2 – Mediation*, shall be considered and managed accordingly.
8. Upon conclusion of the grievance review and mitigation process, the Grievance Record Database will be updated with relevant results of the grievance and any actions taken towards its resolution.
9. A separate grievance file will be maintained by GreenRaise to record detailed records of grievances received, correspondence, and actions taken.

Stage 2 – Mediation

If a grievance cannot be resolved by utilizing the procedure outlined within Stage 1, the grievance will be referred for a neutral third-party⁴ for mediation.

Procedures for mediation will be developed and outlined by the neutral third-party.

Stage 3 – Arbitration or Adjudication

Any grievances that are not resolved through mediation will:

1. Be referred to arbitration, to the extent allowed by the laws of the relevant jurisdiction, or,
2. Be referred to competent courts in the relevant jurisdiction, without prejudice to a party's ability to submit the grievance to a competent supranational adjudicatory body, if any.

⁴ The neutral third-party will be contracted by GreenRaise, however will be required to be agreed upon by both the project proponent and the griever.