



Central Africa Building Society (CABS)

GRIEVANCE REDRESS MECHANISM FOR FINANCED PROJECTS

As read with the following CABS ESG Policy, ESMS

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1. INTRODUCTION

1.1. Purpose of the Grievance Redress Mechanism

- 1.1.1. During implementation, financing and particularly construction phases of any project, a person or group of people can be adversely affected, directly or indirectly due to the project activities. The grievances that may arise can be related to social issues such as eligibility criteria and entitlements, disruption of services, and other social and cultural issues. Grievances may also be related to environmental issues such as excessive dust generation, damages to infrastructure due to construction related vibrations or transportation of raw material, noise, traffic congestions, decrease in quality or quantity of private/ public surface/ ground water resources during irrigation rehabilitation, damage to home gardens and agricultural lands, etc.
- 1.1.2. CABS has a suite of ESG policies, information disclosure and transparency; this includes ensuring that stakeholders who may be adversely affected by the project can communicate their concerns and grievances. The Grievance Redress Mechanism (GRM) is for people seeking resolution of their complaints on the environmental and social performance of Projects.
- 1.1.3. The GRM provides a process to ensure that: - the basic rights and interests of every person affected by poor environmental performance or social management of the project are protected; and concerns arising from the poor performance of the project during the phases of design, construction and operation activities are effectively and timely addressed.
- 1.1.4. While recognizing that many complaints may be resolved immediately, the Complaints Register and GRM encourages mutually acceptable resolution of issues as they arise.
- 1.1.5. It follows that, the Complaints Register and GRM has been designed:
 - 1.1.5.1. To be a legitimate process that allows for trust to be built between stakeholder groups and assures stakeholders that their concerns will be assessed in a fair and transparent manner;
 - 1.1.5.2. Allow simple and streamlined access to the Complaints Register and GRM for all stakeholders and provide adequate assistance for those that may have faced barriers in the past to be able to raise their concerns;
 - 1.1.5.3. Provide clear and known procedures for each stage of the GRM process, and provides clarity on the types of outcomes available to individuals and groups;
 - 1.1.5.4. Ensure equitable treatment to all concerned and aggrieved individuals and groups through a consistent, formal approach that, is fair, informed and respectful to a concern, complaints and/or grievances;
 - 1.1.5.5. To provide a transparent approach, by keeping any aggrieved individual/group informed of the progress of their complaint, the information

that was used when assessing their complaint and information about the mechanisms that will be used to address it; and

- 1.1.5.6. Enable continuous learning and improvements to the GRM. Through continued assessment, the learnings may reduce potential complaints and grievances.

1.2. **DISCLOSURE OF THE GRM**

- 1.2.1. Local communities and other stakeholders will be advised of the existence of the GRM and its operation. This shall be done via several mechanisms:
 - 1.2.1.1. During stakeholder meetings and workshops.
 - 1.2.1.2. Upon the Publication of Annual Sustainability Reports
 - 1.2.1.3. CABS Sustainability Website
- 1.2.2. The Disclosure of the GRM will clearly outline the existence of the GRM, the processes included and the contact details of CABS.

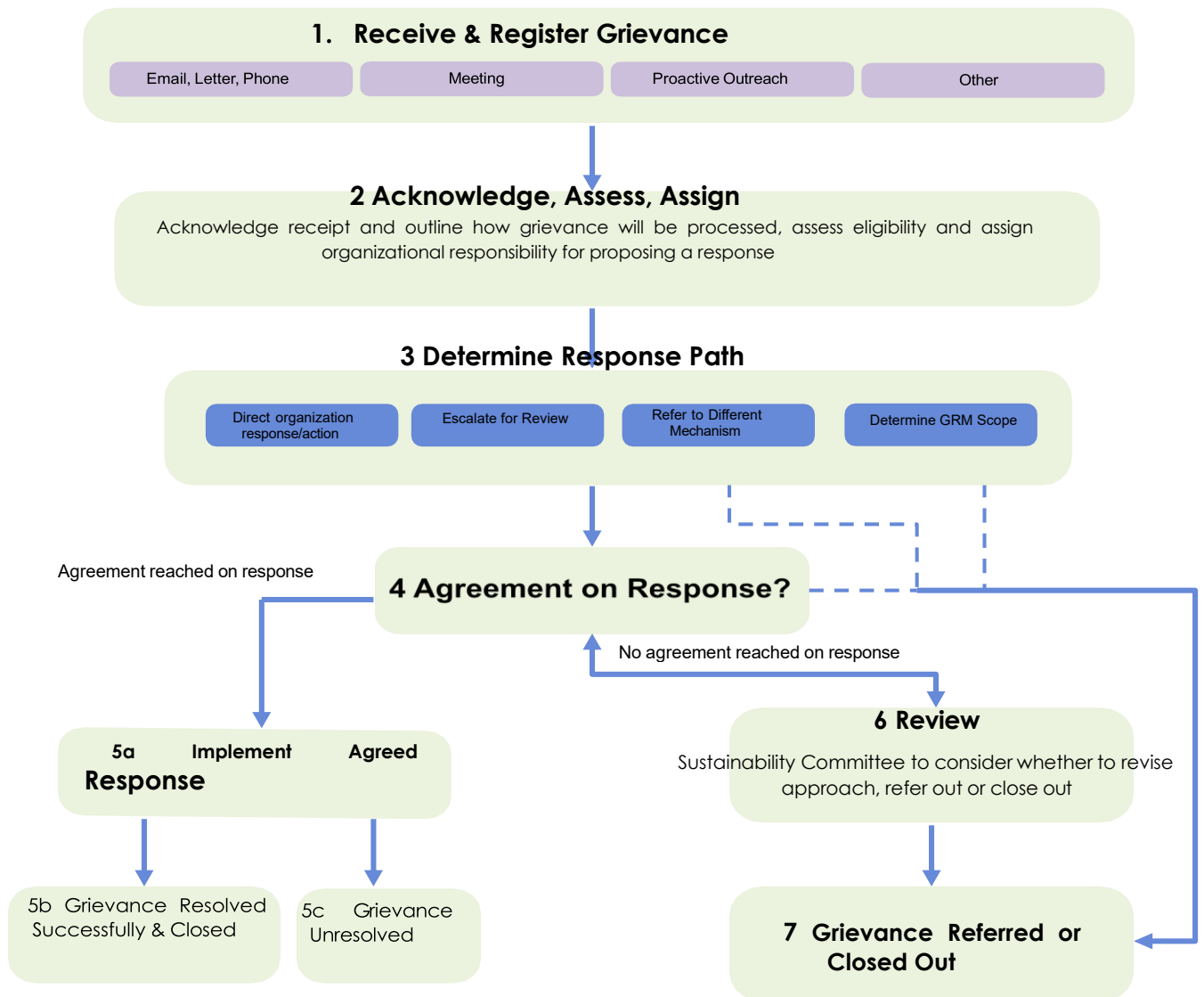
1.3. **STRUCTURE OF THE GRM**

- 1.3.1. A two-tier GRM structure is adopted: tier one is for issues that can be resolved at the site or project level; while tier two is for more complex issues that cannot be readily resolved at the site or project level and therefore require escalating.
- 1.3.2. This is because it is anticipated that many complaints will be able to be readily resolved at the contractor/project level e.g., noise or dust complaints discussions between contractor and stakeholders. More complex or significant grievances, including those with material environmental, social, legal, financial, or reputational implications, will be escalated to the Sustainability and Climate Resilience Steering Committee for review and determination. Matters requiring policy decisions, significant financial commitments, material reputational risk management, or Board approval will be escalated to the Board for final consideration and resolution.
- 1.3.3. The designated Project Implementing Partner will perform the following core functions:
 - 1.3.3.1. Publicize the existence of the GRM and the procedure for using it on site.
 - 1.3.3.2. Adopt Corrective measures or actions as guided by CABS.

2. **COMPLAINTS PROCESS**

- 2.1. The Complaints Process is for people seeking resolution of their complaints on the environmental and social performance of the Project.
- 2.2. This Process is consistent with the Society's Social and Environmental Standards (SES).
- 2.3. For the purpose of this procedure, a community grievance or complaint is a notification provided to the project by a community member or group that they have suffered some form of offence, detriment, impairment or loss because of financed project activities by CABS and/or employee or contractor behaviour.

2.4. The overall process is summarized below:



3. LODGING A COMPLAINT

- 3.1. Any affected persons/community groups can make/raise a complaint or grievance, on **material social and environmental issues** related to projects financed or funded by CABS. The various ways to get in touch are by:
 - 3.1.1. By email
 - 3.1.2. In person
 - 3.1.3. Via the CABS Sustainability website
 - 3.1.4. Through verbal submissions in local languages, which will be documented by the designated representative
 - 3.1.5. Through assisted submissions for complainants who are illiterate, have disabilities, or require support in lodging a complaint
- 3.2. **Information to be included in a Grievance:**
 - 3.2.1. Name of the individual or individuals making the Complaint (the "Claimant")
 - 3.2.2. A means for contacting the Claimant (email, phone, address, other)

- 3.2.3. If the submission is on behalf of those alleging a potential or actual harm, the identity of those on whose behalf the Grievance is made, and written confirmation by those represented of the Claimant's authority to lodge the Grievance on their behalf
- 3.2.4. The description of the potential or actual harm
- 3.2.5. Claimant's statement of the risk of harm or actual harm (description of the risk/harm and those affected)
- 3.2.6. The individual(s) or institutions responsible for the risk/harm, the location(s) and date(s) of harmful activity)
- 3.2.7. Whether the Claimant wishes that their identity is kept confidential; and the specific help requested from the GRM.
- 3.2.8. However, complainants are not required to provide all of the information listed above. Initially, the complainant need only provide enough information to determine eligibility. If insufficient information is provided, the project has an obligation to make a substantial, good faith effort to contact the complainant to request whatever additional information is needed to determine eligibility, and if eligible, to develop a proposed response.

3.3. **ELIGIBILITY CRITERIA FOR GRM**

- 3.3.1. There is a procedural step for the assessment of eligibility for the GRM to ensure that the issue being raised is **relevant to financed projects only**. Eligibility will be determined based on the following sequential four requirements:
- 3.3.2. Does the complaint indicate that the project has caused a negative economic, social, or environmental impact on the complainant, or has the potential to cause such an impact?
- 3.3.3. Does the complaint specify what kind of impact has occurred or may occur, and how the project has caused or may cause that impact?
- 3.3.4. Does the complaint indicate that those filing the complaint are the ones who have been impacted, or are at risk of being impacted; or that those filing the complaint are representing the impacted or potentially impacted stakeholders at their request?
- 3.3.5. Does the complaint provide enough information for CABS to decide on the first three questions?

3.4. **MANAGEMENT OF COMPLAINTS**

- 3.4.1. The key to the successful management of community complaints is to act promptly and avoiding inordinate delays. Proactively resolving complaints and disputes early is preferable rather than allowing community issues to escalate. Most complaints can be resolved quickly and satisfactorily by:
 - 3.4.1.1. Dealing with complaints in a timely manner.
 - 3.4.1.2. Apologizing for inadvertent breaches
 - 3.4.1.3. Rectifying root causes
 - 3.4.1.4. Assuring complainants of future preventative action.

3.5. **COMPLAINTS REGISTER**

- 3.5.1. All complaints or grievances are entered into a register to enable tracking of each complaint/grievance. When a complaint is received the following information is to be recorded:
 - 3.5.1.1. Complaint number/identifier
 - 3.5.1.2. Date complaint received
 - 3.5.1.3. Complainants contact details (name, address, phone / fax, email)
 - 3.5.1.4. Details of complaint
 - 3.5.1.5. Receiving medium (letter, email, verbal).

- 3.5.1.6. Complaint records (letter, email, record of conversation) are stored together, electronically or in hard copy.

3.6. **PROCESS FOR MANAGING COMPLAINTS**

- 3.6.1. The complaints and GRM process, including durations of each step are set out in annexure 1 of this document:
- 3.6.2. When a complaint is received, the recipient of the complaint will ensure accurate recording of the Complaint. Complaints received are reported and shared on a monthly basis to Management Committees (Sustainability & Climate Resilience Steering Committee and the CABS Executive Committee.
- 3.6.3. Each complaint will be acknowledged so that complainant is aware that complaint has been received.
- 3.6.4. Complaints will be assessed for eligibility. If a complaint is found not be related to the project's operations, then the complainant will be informed accordingly in writing, and the complaint will be considered as closed
- 3.6.5. Each complaint or grievance will have an action for addressing and closing out.

4. GRIEVANCE REDRESS MECHANISM CONFIDENTIALITY

- 4.1. All grievances shall be handled in a confidential and safe manner, with access to grievance-related information limited to authorized GRM actors on a need-to-know basis.
- 4.2. The complainant may access information related to their own grievance, subject to appropriate redaction of personal or sensitive information relating to others. Disclosure of grievance records to any other stakeholder or third party shall occur only where strictly necessary, with the prior informed consent of the complainant, unless required by law or applicable CABS policies.
- 4.3. Personal data shall be collected and processed in a proportionate manner and protected against unauthorized access or misuse. Where confidentiality is requested, or where there is a risk of retaliation or harm, additional protective measures, including anonymization shall be applied, without prejudice to the complainant's right to seek judicial or administrative remedies at any time.
- 4.4. CABS applies a zero-tolerance approach to retaliation, intimidation, or reprisals against any individual who submits a grievance, provides information, or otherwise participates in the grievance redress process.
- 4.5. Grievances may be submitted anonymously where there is a fear of retaliation or harm. As part of grievance intake, potential risks of retaliation shall be assessed, and appropriate protective measures applied, including confidentiality safeguards, restricted access to information.
- 4.6. These protections shall apply throughout the grievance process and shall not limit the complainant's right to seek judicial or administrative remedies at any time.
- 4.7. The project will provide periodic updates to the Claimant regarding the status and current actions to resolve the Grievance. Not including the acknowledgment of receipt of the Grievance, such updates will occur within reasonable intervals (not greater than every thirty (30) days).
- 4.8. The Sustainability Steering Committee is not a statutory body, nor has it authority to make project decisions that would require Board approval. The GRC is a mediating body that will make recommendations for the resolution of complaints – these recommendations will be presented to the Project Board and/or appropriate authority for agreement and implementation.
- 4.9. The objectivity, transparency and credibility of the GRM is of paramount importance to the success of the GRM process, and to maintaining good relations among stakeholders.

5. GRIEVANCE MANAGEMENT, MONITORING AND RECORDKEEPING

5.1. Complaint Handling Timeframes

Table 1: Timeframe for handling and processing complaints

Step	Process	Duration
1	Affected Person (AP) makes complaint to the Project	Anytime
2	Complaint is logged in Complaint Register	48 hours
3	Review of the received complaint testing eligibility and directing/assigns complaint to responsible person.	48 hours
4	Complainant notified of complaint registration and commencement of resolution process.	3-5 working days
5	Project owner reports back to Affected Persons	1-3 months
6	Agreed actions are implemented and confirmation of satisfactory outcome obtained.	1-3 months
If unresolved		
	If unresolved or if at any stage Affected Persons is not satisfied Affected Persons can take the matter to appropriate national / administrative court	As per the judicial system

5.2. GRIEVANCE REDRESS REGISTERING AND MONITORING FORM

Complainant Information (Person Reporting)						
Name:	Enter text		Gender:			
Address:	Enter text		Telephone:	Enter text		
National ID:	Enter text		Email:	Enter text		
Type of Complaint						
Affected person/s	Intermediary (on behalf of the AP)	Civil organization	Service organization	Service organization		
Enter text	Enter text	Enter text	Enter text	Enter text		
Registration (assigned):			Enter text			
Complaint Details						
Mode of receiving the grievance:						
Letter	Phone call	Fax	Email	Verbal complaint	Suggestion Box	Others (specify)
Enter text	Enter text	Enter text	Enter text	Enter text	Enter text	Enter text
Location of the problem/issue specified in the complaint:						
Enter text						
Type of the problem/grievance						
Construction	Compensation / Payment	Revegetation	Access	Social Nuisance	Other (specify)	
Enter text	Enter text	Enter text	Enter text	Enter text	Enter text	
Short description of the problem:						
Enter text						
Short description of the factors causing the problem:						
Enter text						
Person / agency responsible for causing the problem:						
Project	Affected parties	Service delivery agencies	Local political authority	Civil organizations	Funding agencies	Others (specify)
Enter text	Enter text	Enter text	Enter text	Enter text	Enter text	Enter text
Past action/s taken by the complainant (if any):						

Enter text			
Details of the focal point that received the complaint:			
Name of the person who received the complaint	Enter text	Position	Enter text
Name of the receiving Office	Enter text	Date:	Click for date
Actions taken by the receiving office			
	Short Description	Name of Action-taking officer	Date
Action 1	Enter text	Enter text	Click for date
Action 2	Enter text	Enter text	Click for date
Action 3	Enter text	Enter text	Click for date
Final Resolution	Enter text		
Signature		Date:	Click for date