



Ecosystem Certification Organisation Natural Forest Standard

Grievance Policy

v1.0

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Policy Document

Grievance Policy

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1 Purpose

1.1 Ecosystem Certification Organisation (ECO) and the Natural Forest Standard (NFS) is committed to open, transparent and fair resolution of all allegations and complaints received against its procedures, functioning and organisation.

1.2 This document outlines the procedures to be followed for the effective, timely and impartial handling of grievances in relation to the Natural Forest Standard program, procedures and Ecosystem Certification Organisation and/or the Natural Forest Standard itself, as well as NFS approved VVBs.

2 Scope

2.1 The term "grievance" refers to "complaint," "dispute," "challenge," "conflict," and any other expressions of dissatisfaction with the operations or procedures of Ecosystem Certification Organisation and/or the Natural Forest Standard. The NFS Grievance Procedure aims to provide a formal mechanism for addressing grievances related to:

- ECO NFS program, policies, procedures, or personnel
- Substantive complaints regarding the rules, requirements, content of the standard documents
- Non-compliance of standard requirements as applicable to a project, including but not limited to, stakeholder consultations, dispute resolution, benefit distribution mechanism, social and environmental safeguards, registry matters or monitoring activities
- Non-compliance with any requirement of the Standard and accompanying documents
- VVB audits

- 2.2 ECO NFS will not act as an intermediary in relation to commercial disputes between counterparties.
- 2.3 Any other comments, enquiries or feedback from stakeholders is welcomed at any time, using the Contact Us page on the NFS website.

3 Eligibility

- 3.1 Any Stakeholder who directly or indirectly interacts with the NFS may submit a grievance to ECO NFS following the procedure outlined in this document. By submitting a grievance, the complainant agrees to the provisions of this grievance procedure.
- 3.2 Complainants are encouraged to identify themselves. Anonymous complaints may restrict ECO NFS's ability to understand or assist with a grievance. ECO NFS reserves the right to reject grievance submissions that are anonymous if they do not include justification for anonymity and substantive evidence to support the allegations. However, a complainant can be kept anonymous upon written request.

3.3 Grievance Types

There are two (2) types of grievance:

1. **Standard Grievance:** when a grievance is submitted against ECO NFS
2. **Project Grievance:** when a grievance is submitted against a project developer

3.4 Evidence

All grievance claims must be supported by evidence and include the date and time of their occurrence, a detailed description, and their consequences (if any).

4 Grievance Procedure

- 4.1 Any stakeholder involved with NFS may submit a grievance using the designated grievance submission page on the NFS website. The working language of ECO NFS is English, however a complaint may be submitted in any language.
- 4.2 To ensure a comprehensive review, the following information must be provided:
- Name, organisation and contact details (including email and a phone number as a minimum).
 - Any request for confidentiality or anonymity with specified reasons
 - Description of the grievance including:
 - Name of organisation(s) involved, where relevant
 - Timing of the grievance
 - Nature of grievance and perceived impact (key issues)
 - Supporting evidence and documentation. Examples may include correspondence, research studies or letters of support from other stakeholders
 - Declaration of any potential or perceived conflict of interest
 - Declaration that the information being provided is true, accurate and made in good faith.

- 4.3 This procedure ensures that all grievances are handled with the utmost seriousness and transparency, reflecting ECO NFS's commitment to integrity and accountability in all its activities.
- 4.4 Grievance submissions must be accompanied with a document with evidence and additional comments about the grievance (i.e. if the complainant would like to be anonymity).
- 4.5 Grievances should be submitted via email to grievance@ecosystemcertification.org with the word "Grievance" in the subject line.
- 4.6 ECO NFS will conduct an initial review and reply to the complainant within 20 calendar days to confirm whether the grievance is deemed to be complete (i.e. that the complaint is in scope and that the supporting evidence and documentation is sufficient). If the grievance is found to be incomplete, ECO NFS will provide an explanation and a recommendation on how to address the grievance correctly, if possible.
- 4.7 If the complaint is deemed complete, ECO NFS shall conduct an assessment within a further 30 calendar days to decide if an investigation is required, and if so will produce a written investigation plan. ECO NFS, at its discretion may appoint an external agency to conduct the investigation and manage the grievance, if the complexity of the grievance requires it. ECO NFS reserves the right to extend the assessment deadlines, if required. The complainant shall be informed about the revised timeline.
- 4.8 Following initial review, ECO NFS may reach out to the complainant and/or parties involved to attempt to resolve the issue in an informal manner, unless such an attempt is reasonably considered an unnecessary exercise.
- 4.9 If the grievance cannot be resolved through informal discussion or mediation, ECO NFS will follow the process summarised below to resolve the grievance, within the indicative timelines.
- 4.10 ECO NFS, or the appointed external agency, shall conduct the investigation within 90 days after the initial review. ECO NFS reserves the right to extend the investigation deadlines, if required. The complainant shall be informed about the revised timeline.
- 4.11 During the review and/or investigation ECO NFS may request additional information from complainant. If complainant is nonresponsive for more than 30 days during initial review or investigation, ECO NFS reserves the right to close the grievance. Extended periods of slow or non-responsiveness will affect the overall timelines for the investigation.
- 4.12 ECO NFS shall communicate the decision regarding the resolution, including the reasons for the decisions, if applicable, any follow up actions and/or corrective measures to complainant and parties involved in the grievance.
- 4.13 If the complainant is not satisfied with the resolution, the complainant has the right to appeal the outcome of an investigation by notifying ECO NFS that it would like to do so within 30

days of receiving the investigation findings. Their request will only be considered if they can present evidence of material information that has not been accounted for in the investigation.

5 Records and Publication

- 5.1 Within 30 days of the receipt of a complete grievance, ECO NFS will the grievance and any associated supporting evidence or documentation on the Grievances page of the NFS website, unless the stakeholder has requested confidentiality.
- 5.2 ECO NFS will update information on the status of the investigation on an ongoing basis and make any additional documentation available (subject to confidentiality requirements), including but not limited to ECO NFS’s written response to the grievance, investigation plan and resolution.
- 5.3 Upon resolution of the complaint, the decision shall be made public on the Grievances page of the NFS website.

6 Confidentiality and Data Privacy

- 6.1 Any information provided by the complainant in connection with its grievance may be used throughout the investigation and reporting processes (in particular, it may be disclosed to other entities in connection with required support related to legal, regulatory, or other types of advice and proceedings).
- 6.2 Such information will not be treated as confidential, and may be made publicly available, unless specifically requested by the complainant.
- 6.3 Applicable data protection legislation and relevant ECO NFS Privacy Policies shall be followed in relation to grievances.

7 Legal Disclaimer

The ECO NFS Grievance Procedure is not intended to be used to substitute, circumvent, or override the legal rights of any party to use judicial mechanisms, where available and appropriate.

8 Approval and Review

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