



# ORMEX

## GRIEVANCE MECHANISM

### TABLE OF CONTENTS

1	SCOPE	4
2	COMPLAINTS SUBMISSION, ELIGIBILITY AND TIMELINE	5
3	COMPLAINT INVESTIGATION	6
4	STANDARD EXECUTIVE COMMITTEE DECISION	7
5	APPEAL PROCEDURE	8
6	COMPLAINT AND APPEAL REGISTRATION	8
7	CONTINUOUS LEARNING AND QUALITY IMPROVEMENT	9

## LIST OF ACRONYMS

Acronyms	Definitions
SAC	Standard Advisory Council
SEC	Standard Executive Committee
V-ACORs	Verified Agriculture Carbon Offset Registered
VCM	Voluntary Carbon Market
VVB	Validation and Verification Body

## LIST OF REFERENCED DOCUMENTS

Document Id	Title
ORM/OPR/GLO	PROGRAM GLOSSARY
ORM/OPR/PROG	ORMEX PROGRAM
ORM/OPR /SAC_BL	STANDARD ADVISORY COUNCIL BYLAWS
ORM/OPR/COI	CONFLICT OF INTEREST & IMPARTIALITY POLICY

## DEFINITIONS

With regard to the definitions and the drafting rule of this document, the following applies:

- ✓ All terms with a capital used in this document have their meanings set out in the PROGRAM GLOSSARY
- ✓ References to articles, sections, and appendices are, unless otherwise provided, references to the articles, sections, and appendices to this document.
- ✓ Terms in *italics* are citations.
- ✓ Terms in CAPITAL refer to a document of the ORMEX Program and Standard and the references of the relevant sections of this document are specified. If the document concerned is not specified, the section reference refers to a section of this document.

In addition, in this document:

- The verbs “shall” and “must” are used to express mandatory commitments or obligations it must be complied with.
- The verb “should” is used to indicate a recognized means of meeting the requirements and

obligations, most of the time referring to the usual best practices pursuant to the VCM practices. In some circumstances, it can also express a best effort obligation, meaning that the requirements or obligations can be met in an equivalent way, but still in connection with ORMEX Program and Standard principles, VCM practices and professional behaviors that must be demonstrated.

- The verb “may” is used to express that the means of implementation of the requirements or obligations is left up to be decided, with no recommendation coming from ORMEX STANDARD. In some circumstances, it can also express no commitment or obligation, but a possibility to do so left up to the sole discretion of the stakeholder.

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## PREAMBLE

ORMEX has established this Grievance Mechanism to be aware and be able to respond to any claims, complaints and disputes arising out by any stakeholders in relation with ORMEX PROGRAM, STANDARD, Methodology, Certified Projects (non-conformity), V-ACORs issuances and Transfers. The proposed Grievance Mechanism is not applicable for any concern that is not in ORMEX Program and/or Standard scope and possible of actions, like any complaints with regard to local regulation or applicable law. Same for any allegation with regard to ORMEX's internal organization, except if it is related to its services quality.

ORMEX Grievance Mechanism is publicly available through [www.ormex.io](http://www.ormex.io) on the Grievance dedicated page.

To permit full accessibility to everybody to the Grievance Mechanism, ORMEX standard may propose adequate assistance, if necessary, in the event of the complainant facing some barriers for the completion of the processus.

## 1 SCOPE

The Standard Executive Committee (SEC) is responsible for handling the Complaint submission, evaluating its eligibility to the Grievance Mechanism, dealing with all the process (particularly in relation with the investigation), making final decisions or initiating escalation to ORMEX's directory, and taking the appropriate actions. The SEC is also responsible for keeping all appropriate records.

ORMEX applies the Grievance Mechanism on fair, transparent, equitable, non-discriminatory and confidentiality principles, and promote amical settlements. Any reprisal against the complainant is prohibited.

When a Complaint is deemed to be eligible according to [Section 2](#), the information about the project being under a grievance procedure and its topic is mentioned on [www.ormex.io](http://www.ormex.io) on the dedicated Grievance page and on ORMEX PUBLIC REGISTRY. All information about ongoing Grievance does not give information about the accuracy of the Complaint, neither prejudice any non-conformities or decisions that may be taken.

The Grievance Mechanism does not limit the rights of any stakeholders to initiate any judicial claim, neither to initiate contractual dispute resolution provisions.

## 2 COMPLAINTS SUBMISSION, ELIGIBILITY AND TIMELINE

A submission of a Complaint can be done through the “*Compliant Form*” button or any other form, like emails or letters. The complainant is made aware that through submitting a Complaint, he/she acknowledges of being informed about the grievance procedure and agrees to the provisions of this grievance procedure.

Any Complaint received is registered by the SEC to a dedicated registry with the date, the topic(s) and the complainant identification, and its resolution status. The complainant receives a notification, acknowledging the date of the reception by ORMEX of the Complaint within 3 working days. If necessary, the complainant is requested to complete a Complain Form to provide further information.

ORMEX reserves the rights to initiate a Complaint against stakeholders and clients if ORMEX is being aware of any concern and may open any necessary investigations.

The SEC (as the case may be, after receiving the Complaint Form duly filled) initiate an executive meeting to analyze the Complaint and, at the first step to determine its eligibility.

The SEC may ask for additional information or documents, if any.

The SEC evaluates the eligibility of the Complaint against the below criteria:

- Identity of the complainant is well defined and verified. Anonymous complaints may be eligible to the Grievance procedure, in case the SEC considers having received sufficient and appropriate information. The SEC reserves the rights to reject anonymous allegations that do not include strong justification. ORMEX encourages the complainants to identify themselves, and to make a request that its identity stays confidential. Anonymous Complaints prevent for obtaining further information, limiting the investigation and initiating improper actions. Nevertheless, the complainant is allowed not to fill its contact information when initiating the Complaint.
- Identity the affected stakeholder(s).
- The topic is related to ORMEX PROGRAM, STANDARD, Methodology, Certified Projects (non-Conformity), VVB concerns, V-ACORs issuances and Transfers. The SEC analyzes if the Complaint (either submitted by the same complainant or not) has already been answered. If it is the case, the SEC must identify if any new information is provided or if actions decided were not implemented by the involved stakeholders. If no new evidences or concerns related to the actions, the Complaints may not be eligible.
- The Complaint is clearly exposed (appropriate facts) with sufficient information and/or documentation.

- Initiate an analysis of conflict of interests<sup>1</sup>.

The complainant is notified about the eligibility decision within 15 working days. In the event of additional information or documentation is deemed necessary, the eligibility decision is postponed until appropriate additional information is obtained. In the event of decision to reject the Complaint and the Complainant does not agree about the decision, it may initiate an appeal against the SEC decision (Section 5).

If ORMEX received too many complaints in relation with a Project, this may indicate a problem with its implementation, and/or related project's assessment, ORMEX reserves the right to initiate its own investigation, and/or its audit right toward the VVB according to the VVB REQUIREMENTS.

### 3 COMPLAINT INVESTIGATION

Following the evaluation of the Complaint eligibility:

- ✓ the SEC notifies the complainant with the information of the following steps and its decision about the Complaint panel. The name of the persons, appointed as members of the Complaint panel are mentioned to the complainant through this email, and
- ✓ if the Complaint is related to a Certified Project, the information of an ongoing Grievance Mechanism is mentioned in ORMEX PUBLIC REGISTRY. Consequently, ORMEX may apply the escrow procedure as stated in the Contract signed with the Project Holder, and if applicable with any subsequent Buyers.

The Complaint panel is constituted by 3 members, chosen on a case by case for every Complaint among the SEC' members and/or external people appointed in consideration with the topics (It may be members of the Standard Advisory Council (SAC)). While selecting the members of the Complaint Panel, the SEC must verify that the foreseen member has no conflict of interest with the Complaint matter and is engaged by a confidentiality obligation.

The Complaint panel investigates the Complaint based on the information and document made available to the panel, and any other evidences getting from the complainant.

The purpose of the investigation is to determine the validity of the Complaint, assess the risks and implications of the investigation, verify the facts put forward, and a report ("the

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<sup>1</sup> Refer to the CONFLICT OF INTEREST AND IMPARTIALITY POLICY document for more details

Complaint Report”) with proposal of solution. If necessary, this may involve a site visit, interviews with the complainant, the respondents, witnesses and any other experts.

ORMEX reserves the right to close the Grievance at any time by written notice, if the complainant fails to answer (or to appropriately answer) within 8 calendar days following the receipt of a remind notification.

If necessary to the complexity of the Complaint, the Complaint Panel may decide at its sole discretion but with previous approval of the SEC:

- ✓ to appoint an external agency, being engaged with strict confidentiality commitments, to conduct the investigation. If such decided, the Complainant is informed,
- ✓ to require opinion of the SAC on some topics.

Eligible Complaints are investigated within 30 calendar days of their receiving date. In the event of necessity to have more time, the SEC notifies to the complaining a new appropriate time.

At the end of the investigation, the Complaint Panel will draw up the Complaint Report that brings together all the information collected, the facts observed, and propose measures envisaged to resolve the claim. The Complaint panel submits its Complaint Report to the Legal & Standard department for its review. Based on this Complaint Report, the Legal & Standard department makes proposal of action and Complainant response to the SEC for decision.

Meetings with involved stakeholders may be proposed by the SEC.

## 4 STANDARD EXECUTIVE COMMITTEE DECISION

The SEC notifies the complainant of its outcome of the investigation and response in the appropriate form with regard to the Complaint concern.

The proposed response may be:

- A proposal of one or more measures to resolve the Complaint.
- A mediation proposal between the various parties.
- A necessity to do an in-depth investigation using additional external expertise, thereby extending the time taken to process the Complaint.
- A decision of a judicial claim by ORMEX (when appropriate).
- Inform the complainant of the administrative or legal remedies available to him or her outside the Grievance Mechanism.

- The ineligibility of the Complaint under the Grievance Mechanism and inform the complainant accordingly.

For any dispute involving directly ORMEX pursuant to a Contract, the complainant is informed about the response in accordance of the dispute resolution specified in the GTCUS-PH or GTCUS-B, considering the Client.

If the complainant accepts the handling and settlement of the Complaint, as well as the proposed measures, the Complaint is resolved. Minutes of the Complaint resolution are issued and signed by the complainant.

## 5 APPEAL PROCEDURE

The appeal procedure applies when a complainant disagrees with a SEC's decision (non-eligibility, response or action). The complainant may initiate the appeal procedure within 15 working days of the receipt of SEC's decision, through the email address specified in the SEC's decision. The appeal is notified to ORMEX directory. To be eligible, the complainant must give justification about its decision to initiate the appeal procedure and transmit additional information and documents.

The purpose of the appeal procedure is to re-examine the investigation already carried out and to determine whether the first decision should be maintained or whether a new decision should be taken on the basis of the findings of this re-examination.

ORMEX's directory informs the complainant about its final decision within 30 calendar days of the receipt of the appeal.

With regard to a dispute in relation to a Contract signed by ORMEX, the dispute provision is applicable and can be enforceable by the Parties of the Contract.

## 6 COMPLAINT AND APPEAL REGISTRATION

Any Complaint Form, eligibility decision, SEC decision, action and appeals are registered and recorded appropriately by the SEC in a dedicated registry. A new registry is opened every year where pending Grievance procedures are mentioned.

All information received during the Grievance Mechanism is treated internally by the SEC' members, the Complaint panel, and the Legal&Standard department as confidential information and shall not be disclosed to third party to the extent permitted by the applicable law.



In addition, ORMEX maintains record of all pending and past judicial processes.

## 7 CONTINUOUS LEARNING AND QUALITY IMPROVEMENT

According to the continuous learning and improvement of quality principles, any Complaint situation is analyzed to identify lessons for improvement of the Grievance Mechanism or ORMEX Program, and take any action to prevent as much as possible the risk of occurrence of the same concern.

**DOCUMENT HISTORY**

Please check this table to ensure you are using the latest version of this document. The document, as updated below, is effective at the edited date.

Document reference	ORM/OPR/GM_EN
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Reference/Version	Date	Updates	Status
ORM/OPR/GM_EN v0.1	2023_04_14	Initial Draft Version	Internal review
ORM/OPR/GM_EN v1.0	2023_06_02	Final Version	SEC Approval
<b>ORM/OPR/GM_EN v1.0</b>	<b>2023_06_19</b>	<b>Final Version</b>	<b>Edited</b>

