

GRIPS ENERGY

Grievance and Feedback Policy



Latest approved version	Approved by:	Approval date:	Major changes:
v.1	Carsten Jung (Head of Investment and Legal)	21.12.2023	n/a

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Introduction

Grips Energy GmbH and its affiliates (GRIPS) provide Photovoltaic (PV) and hybrid PV Energy Storage System (PV-ESS) to businesses in Sub-Saharan Africa to support them in meeting their power and energy objectives. The equipment is owned and maintained by GRIPS during the duration of the contract and usage rights provided to its clients via PPA or Lease contracts. GRIPS contracts Engineering, Procurement and Construction Services (EPC) and Operation and Maintenance (OM) services.

GRIPS designs and builds power systems based on our customers' specific requirements. Our solutions are vendor neutral and technology agnostic, to satisfy our customers particular needs. GRIPS' goal is to foster economic growth and contribute to CO2 reduction worldwide.



GRIPS values the feedback received from all clients and stakeholders. GRIPS intends to utilise all opportunities available, through the development of strong policy and procedure, to identify areas for improvement and to share positive client and stakeholder feedback and experiences.

GRIPS instils good and ethical practice by setting out expectations in our *Code of Conduct*. To assure that stakeholders can report any infringement of GRIPS, its partners or clients with the Code of Conduct, there is a need for a grievance mechanism process.

Purpose and Scope

The purpose of this *Grievance and Feedback Policy* is to provide all of GRIPS' stakeholders with the opportunity to make grievances and offer feedback to GRIPS.

This Policy includes all details for filing grievances & providing feedback, the investigation and resolution process and the way the information will be shared and used by GRIPS to both correct and improve our services. Grievances and feedback are accepted from all of our stakeholders, including affected communities.

This policy does not include the internal grievances & complaints process where an employee may have a grievance. Such is governed by the *GRIPS PCO Policy*.

Definitions

- **Grievance:** Notification of non-compliance with the *Code of Conduct* by GRIPS staff, contractual partners or clients

A grievance can be submitted regarding negative environmental, social impacts or business ethics of GRIPS, its contractors or Clients, including but not limited to:

- Environment: Biodiversity conservation, land or air pollution, inadequate water use
- Social: Human rights breaches, labour rights breaches, Site Health & Safety breaches, road safety breaches, land rights & involuntary resettlement, damage to cultural heritage, etc.
- Business Ethics: Fraud, corruption, bribery, business collusions, law breaches, etc.

For further information on unethical or illegal conduct, please refer to our *Code of Conduct*

- **Feedback:** Information gathered from stakeholders that provides information that may be used for growth and improvement of the company but that is not a grievance

Grievance Submission Process

For any submission that is not a *Grievance*, it will be at the discretion of GRIPS if it considers this *Feedback* as a submission governed by this *Grievance Submission process*. Any stakeholder shall not make abusive or inappropriate use of this mechanism.

The following steps shall be undertaken by a stakeholder (complainant) to make a submission:

1. The stakeholder makes a grievance – complainants have the following options to file a grievance:

Table 1: Grievance Mechanism per Stakeholder

Stakeholders	Grievance Mechanism
Client	<ol style="list-style-type: none"> 1. GRIPS Asset Management Team; 2. GRIPS Website; or 3. GRIPS Whistle Blowing Center
EPC and O&M Contractor and workers	<ol style="list-style-type: none"> 1. GRIPS Implementation Team; 2. Contractor's EHS officer; 3. GRIPS Website; or 4. GRIPS Whistle Blowing Center
Sub-contractors/suppliers	<ol style="list-style-type: none"> 1. Contractor's EHS officer; 2. GRIPS Website; or 3. GRIPS Whistle Blowing Center
Client employees	<ol style="list-style-type: none"> 1. Client's EHS officer; 2. GRIPS Website; or 3. GRIPS Whistle Blowing Center
Affected Communities (adjacent to Site or affected via transport)	<ol style="list-style-type: none"> 1. Client's EHS officer; 2. Grievance of Affected Communities (transport) via contractor EHS officer based on telephone contact provided on transport vehicles; 3. GRIPS Website; or 4. GRIPS Whistle Blowing Center
Government agencies	<ol style="list-style-type: none"> 1. GRIPS Implementation Team; 2. GRIPS Website; or

	3. GRIPS Whistle Blowing Center
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2. If a complainant wishes to make a grievance, they are welcome to seek assistance from GRIPS in doing so by contacting GRIPS staff or writing via info@grips-energy.com
3. The submission will be sent to the *GRIPS ESG Manager* and *GRIPS Head of Legal & Investment* for investigation and consideration
4. If the complainant wishes to remain anonymous or where the complainant believes that *GRIPS ESG Manager* and/or *GRIPS Head of Investment & Legal* are conflicted or involved regarding the complaint, a submission shall be made via the [GRIPS Whistle Blowing Center](#). Submissions made anonymously will be treated in the same way as any other submission
5. The [GRIPS Whistle Blowing Center](#) is entirely managed by an independent entity: *WhistleB Whistleblowing Centre AB*. It allows anonymous communication between the complainant as well as the service provider. Once a grievance is filed with the [GRIPS Whistle Blowing Center](#), the service provider will manage the communication with the complainant as well as GRIPS
6. A grievance shall at least include: Place and Date of the incident, topic of the grievance, name of entities/individuals in breach. Furthermore, the complainant may include any evidence supporting the grievance

Grievance Review

1. When the grievance is submitted, GRIPS will acknowledge receipt and engage an investigation into the matter
2. The ESG Manager will respond to the complainant within a reasonable time of the progress of the submission. If a submission has been made via the [GRIPS Whistle Blowing Center](#), GRIPS will respond to its external Service Provider *WhistleB Whistleblowing Centre AB*, which will respond to the anonymous complainant via the [GRIPS Whistle Blowing Center](#)
3. GRIPS will ensure that all complainants who have made a grievance are treated with respect and information is shared between GRIPS and the complainant openly. GRIPS will take no adverse action against any complainant
4. The ESG Manager will provide the complainant with a resolution to any grievance, as long as permitted by law. This may involve further consideration

of steps GRIPS will take to resolve any grievance and any additional correspondence to this effect

5. GRIPS shall resolve the grievance within 1.5 months after receipt of the submission. Should the resolution take longer, an update on the procedure shall be sent to the complainant
6. Once the matter is finalised, the grievance will be recorded and maintained by GRIPS, including all correspondence and resolutions
7. All the information contained in the grievance will be kept confidential by GRIPS and it will only be disclosed if required by law
8. GRIPS will maintain the records of grievance for a period of 6 years

Respectful and Fair Treatment of Complainants

GRIPS will take no adverse action against any complainant. This includes legal action (unless the complainant is legally required to provide evidence in a court of law) or detrimental action.

Any stakeholder that perceives to be subjected to detrimental action is encouraged to submit a grievance via the [GRIPS Whistleblowing Center](#)

Policy Review Statement

This policy will be reviewed annually as a part of the ongoing review and continuous improvement of all of GRIPS' policies and procedures.