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Contact:
Equitable Earth
info@eq-earth.com

Programme

Grievance Mechanism Requirements and Procedures

Summary

This document establishes the requirements and procedures governing the project-level and Equitable Earth grievance mechanisms. It defines the two-tier structure through which grievances may be raised, managed, and resolved, outlining the respective roles and responsibilities of developers and Equitable Earth. The document specifies the procedural steps, timelines, and reporting requirements applicable to both tiers. These requirements apply to all projects certified under the Equitable Earth Programme and must be followed in conjunction with the [Equitable Earth Standard](#) and [Programme Manual](#).



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1 General Principles

1.1.1 Equitable Earth employs a two-tier grievance mechanism to ensure accessibility, cultural appropriateness, and accountability. The tiers are as follows:

- 1) **Project-Level Grievance Mechanism:** each project must maintain a locally accessible and culturally appropriate process for receiving, recording, and resolving grievances. Refer to the *Project-Level Grievance Mechanism* section below for more details.
- 2) **Equitable Earth Grievance Mechanism:** the Equitable Earth Secretariat manages a centralised mechanism that monitors project-level grievance mechanisms, receives grievances directly from stakeholders when complainants are uncomfortable approaching developers directly, and addresses complex, unresolved, or escalated cases. Refer to the *Equitable Earth Grievance Mechanism* section below for more details.

1.1.2 **Grievance types.** Equitable Earth defines three types of grievances:

- 1) **Procedural:** a grievance issued against Equitable Earth for not conforming to Programme Manual, Standard, and/or methodology-specific procedures.
- 2) **Project:** a grievance issued against a developer for not fulfilling their obligations related to the project.
- 3) **Suspicious activity:** a grievance that reports suspected violations of the law or any regulation, regardless of the stakeholder involved.

1.1.3 **Grievance complainant.** Any stakeholder who directly or indirectly interacts with Equitable Earth may use either or both grievance mechanisms. Stakeholders include but are not limited to Equitable Earth team members, Validation and Verification Bodies (VVBs), buyers, developers, Technical Advisory Board (TAB) and Fiduciary Board members, project stakeholders, and other relevant third parties.

1.1.4 **Communication.** Developers must ensure that all relevant stakeholders are informed about both grievance mechanisms, know how to use them, and can access them without barriers. Specifically, developers must:

- 1.1.4.1 Provide training to all Indigenous Peoples (IPs) and Local Communities (LCs) identified as project stakeholders to ensure understanding of the purpose of the grievance mechanisms, how to submit a grievance, their rights related to use of the mechanisms, and the systems in place to



protect their security and identity, including provisions for ensuring anonymity if requested.

- 1.1.4.2 Demonstrate that information about the grievance mechanisms is documented and accessible to all project stakeholders in appropriate languages.
- 1.1.5 Equitable Earth team members are not required to use the established channels under the Equitable Earth grievance mechanism to raise grievances.
- 1.1.6 **Scope.** Stakeholders must use the grievance mechanisms to report issues related to:
 - 1) Non-conformance to any requirement of the Equitable Earth Programme and its affiliated documents, provided that a deviation has not been granted by Equitable Earth. Special attention must be paid to:
 - The mistreatment of any stakeholder
 - The breach of signed agreements with any IPs and LCs identified as project stakeholders, where applicable
 - Non-observance of the free, prior and informed consent (FPIC) process, where applicable
 - The violation of any environmental and social safeguards
 - Fraud
 - Corruption
 - Deviation from any information disclosed in the Project Design Document
 - Non-compliance with the Anti-Fraud Policy and Code of Ethics and Business Conduct, especially with provisions regarding conflicts of interest, anti-corruption and Anti-Money Laundering, Countering the Financing of Terrorism (AML/CTF)
 - Information that is missing from the Equitable Earth website and/or Equitable Earth [Registry](#)
- 1.1.7 **Format.** The grievance complainant must strive to include the following elements:
 - 1) Name, organisation, and contact details of the complainant (unless submitted anonymously)



- 2) The project ID as indicated on the Equitable Earth Registry, if applicable
 - 3) Full description of the grievance, including:
 - A written description of the issue at stake
 - Timing of the grievance, where applicable
 - The type and scope of the grievance as stipulated above
 - Any stakeholders involved that the Equitable Earth Secretariat must be aware of
 - The perceived impact and implications of the grievance
 - Any supporting evidence and relevant documentation, including the date and time of their occurrence, a detailed description, and their consequences, if applicable
 - A declaration of any potential or perceived conflict of interest
 - A declaration that the information provided is true, accurate, and made in good faith
- 1.1.8 If submitted anonymously, the complainant must provide the reason and justification for remaining anonymous.
- 1.1.9 **Effective dates.** Unless otherwise specified, the version of this document that applies to a grievance is the version in effect at the time the grievance is submitted.
- 1.1.9.1 Equitable Earth reserves the right to require all stakeholders involved in an ongoing grievance assessment to follow any updated procedures introduced after submission.
- 1.1.10 **Data protection.** Any personal data collected will be anonymised and must respect [GDPR requirements](#).
- 1.1.10.1 The complainant's identity must remain confidential and cannot, under any circumstances, be disclosed publicly unless explicitly authorised.
- 1.1.11 **Non-Retaliation and Confidentiality.** Equitable Earth strictly prohibits any form of retaliation, intimidation, or adverse action against any individual who submits a grievance, provides information, or participates in an investigation in good faith. Developers and Equitable Earth must ensure that their internal procedures explicitly protect reporters, witnesses, and those assisting in the grievance process from retaliation.



2 Project-Level Grievance Mechanism

2.1 Principles

- 2.1.1 Developers must establish and maintain a grievance mechanism that is culturally appropriate, gender-sensitive, and accessible to all project stakeholders. The procedure must be documented in the Project Design Document.
- 2.1.2 The project-level grievance mechanism must, at a minimum, conform to the overarching principles and requirements of the Equitable Earth grievance mechanism, while allowing for adaptations to local context, culture, and governance structures.
- 2.1.3 Developers must:
 - 2.1.3.1 Record all grievances received, including anonymous submissions, and document the resolution process and outcome.
 - 2.1.3.2 Report all grievances annually to Equitable Earth.
 - 2.1.3.3 Inform the relevant project stakeholders of:
 - 1) The existence and purpose of the project-level grievance mechanism.
 - 2) Their right to access the Equitable Earth grievance mechanism if they are not satisfied or feel unsafe using the project-level grievance mechanism.
- 2.1.4 Developers must ensure that all individuals responsible for receiving, assessing, and resolving grievances are selected through a transparent process. Selection must involve consultation with core and direct project stakeholders, where feasible.
- 2.1.5 Developers must provide training for all grievance handlers before they assume their role. Training must cover cultural sensitivity, confidentiality, gender considerations, and grievance procedures, and be documented for review by Equitable Earth.



2.2 Classification

- 2.2.1 Upon receipt, developers must assess the grievance(s) to determine whether they should be addressed under the project-level grievance mechanism or deferred to Equitable Earth.
- 2.2.2 Equitable Earth may exercise observation rights for any grievance managed under the project-level mechanism, which include:
 - 1) Reviewing all relevant grievance documentation associated with the case, including evidence submitted, meeting notes, and proposed resolutions
 - 2) Attending or joining grievance hearings or meetings with the complainant and grievance handlers to ensure that procedures are followed
 - 3) Providing guidance or requesting clarifications if non-compliance with Standard-level or methodology-level requirements is observed
 - 4) Documenting observations for internal tracking

2.3 Investigation

- 2.3.1 Once a grievance is classified and an assessment begins, developers must:
 - 2.3.1.1 Investigate the grievance, gathering all necessary information from complainants and other relevant stakeholders.
 - 2.3.1.2 Strive to resolve the issue using a documented procedure that is appropriate to the grievance type.
 - 2.3.1.3 Record the resolution process, including actions taken, dates, and final outcome.
 - 2.3.1.4 Notify Equitable Earth of the result of the assessment.
- 2.3.2 Developers must establish a set timeline for responding to grievances, including key steps and deadlines for acknowledgement, assessment, and resolution. The proposed timeline, along with a justification of its appropriateness, must be provided in the Project Design Document and reviewed by Equitable Earth.
- 2.3.3 If additional time is required to resolve a grievance, developers must notify Equitable Earth in writing and provide a documented justification before the original deadline expires.



- 2.3.4 If a grievance is not resolved within established timelines, which includes any extensions, or if the complainant requests escalation, the grievance must be transferred to Equitable Earth for assessment.



3 Equitable Earth Grievance Mechanism

3.1 Channels & Accessibility

- 3.1.1 Stakeholders may raise grievances to Equitable Earth directly through the following channels:
- 1) Email: grievance@eq-earth.com
 - 2) WhatsApp: +33 7 56 89 18 56
- 3.1.2 Equitable Earth must strive to ensure stakeholders can access the mechanism without obstacles due to language, technology, literacy, and geographic location.
- 3.1.3 When a grievance is received, Equitable Earth must acknowledge receipt of a grievance to the complainant within two working days.
- 3.1.4 Grievances are reviewed by the Equitable Earth Secretariat. To ensure impartiality, the following applies:
- 3.1.4.1 If a grievance is directed at one or several Equitable Earth Secretariat team members, the implicated team member(s) must be excluded from participating in its resolution.
 - 3.1.4.2 In cases where the entire Secretariat team is suspected of wrongdoing or if the claim relates to fraudulent Registry operations, Equitable Earth must engage a third-party auditor to investigate the claim.
 - 3.1.4.3 In the event of suspicious activity grievances, the Director of the Secretariat is responsible for addressing the claim. If the suspicious activity is reported against Equitable Earth or any of its affiliated Agents, a third-party auditor must be engaged to investigate the claim.
- 3.1.5 **Third-party mandate.** In cases where a third party must be mandated, the Director of the Secretariat must contract the service within 20 business days of the date the claim was received. After contracting, the third party must report directly and exclusively to the Equitable Earth Leadership team.



3.2 Investigation

- 3.2.1 **Methods.** The Equitable Earth Secretariat must open a dedicated case file for each grievance received, assess the grievance, and determine the appropriate course of action. The investigation method must be selected, depending on the content, evidence, and potential implications of the grievance.
 - 3.2.1.1 Third-party auditors must determine their own methods of investigation, where applicable. Equitable Earth is not allowed to challenge this decision.
- 3.2.2 **Investigation.** The Secretariat must thoroughly investigate grievances, assessing all evidence submitted and requesting further evidence from parties if necessary.
 - 3.2.2.1 Suspicious activity claims follow a specific procedure. Upon receipt, the Secretariat must prepare a Suspicious Activity Report outlining the nature, timing, parties involved, and potential impacts of the violation. The procedure is as follows:
 - 3.2.2.1.1 The Director of Secretariat must review and approve the Suspicious Activity Report to ensure its completeness and accuracy.
 - 3.2.2.1.2 The approved Suspicious Activity Report is shared by the Director of Secretariat with the appropriate local, regional, or national authorities via a secure channel, ensuring its confidentiality and integrity.
 - 3.2.2.1.3 Equitable Earth must fully cooperate with the investigation and provide any further evidence or documentation as required.
 - 3.2.2.1.4 Any Equitable Earth staff failure to report suspected violations and adhere to this protocol may result in disciplinary action(s), which may extend to contract termination and legal action. Third parties involved in suspicious activities may also be subjected to legal proceedings and termination of engagement with Equitable Earth.
- 3.2.3 **Urgent issues.** If a grievance raises an issue that calls for an immediate response, the Secretariat may take immediate action without waiting for the final resolution of the investigation. Urgent matters include, but are not limited to:



- 1) An immediate threat to the integrity of a person.
- 2) The disruption of effective project execution or the compromise of its intended outcomes. In such cases, Equitable Earth may suspend the project until the grievance is resolved.

3.2.3.1 In such cases, the Secretariat must:

- 3.2.3.1.1 Notify the developer, where relevant.
- 3.2.3.1.2 Notify the relevant authorities, as appropriate.
- 3.2.3.1.3 Take interim protective measures (e.g., temporary suspension of project activities, withdrawal of personnel, or referral to protection agencies).
- 3.2.3.1.4 Record all urgent actions taken and the rationale behind each.
- 3.2.3.1.5 Ensure the complainant is informed of the action within 48 hours.

3.2.3.2 Equitable Earth may suspend or restrict project operations until the issue qualified as 'urgent' has been resolved or verified as no longer posing a risk.

3.2.4 **Decision.** The Secretariat, and the third-party auditor when applicable, have 60 calendar days to report the official decision on the grievance. The report must include the:

- 1) Name of the investigator(s) involved
- 2) Identification number associated with the grievance
- 3) Content of the grievance
- 4) Relevant evidence used to reach the final decision
- 5) Written justification of the decision on the grievance, which can lead to:
 - a) Closing and archiving the grievance without follow-up
 - b) Disciplinary and/or legal proceedings against the suspected person(s), before archiving the grievance

3.2.5 **Delay.** If Equitable Earth or the third-party auditor cannot provide an official decision within 60 calendar days, Equitable Earth must notify the complainant of the delay and/or the extension needed to resolve the grievance.



- 3.2.6 **Information.** Equitable Earth must notify the concerned parties of the decision within one working day of the decision being taken. Equitable Earth must also inform the complainant when the grievance is closed and archived.
- 3.2.7 **Appeal.** A complainant may appeal the decision within 30 calendar days of receiving the decision and must do so via email at grievance@eq-earth.com. If the decision is appealed, it is brought to the Equitable Earth Leadership team, which decides whether or not to uphold the initial decision. The Director of Secretariat must not be involved in the decision-making process related to an appeal.
- 3.2.7.1 **Reporting.** Equitable Earth must maintain a database of all grievances received and all Grievance Reports.
- 3.2.7.2 Equitable Earth must publish an annual anonymised summary that includes:
- 1) The total number of grievances from all grievance mechanisms received in the last calendar year, categorised by type and source
 - 2) General outcomes or resolutions, without disclosing personally identifying information or sensitive project data
 - 3) Any patterns or lessons learned relevant to improving grievance handling

3.3 External Audit

- 3.3.1 **Third-party audit.** Equitable Earth is audited regularly by an external and independent auditing firm. Equitable Earth must submit to the auditor all grievances received since the last audit. If the auditing body provides a justified rationale for disagreeing with a decision, another investigator must re-evaluate the file. The auditor must review and validate the new decision.
- 3.3.2 **Notification.** In such a case, the complainant is notified that the grievance has been reopened and given the expected timeline for its resolution. Once the investigator reaches a resolution and validates it with the auditing body, the complainant is notified of the final decision. The auditor cannot reopen a claim more than once.



Appendix A: Documentation History

<i>Version</i>	<i>Date</i>	<i>Comment</i>
v1.0	13/11/2025	Public release of v1.0 of this document alongside v1.3 of the Equitable Earth Standard and Programme Manual. Note that the General Principles and Section 3 were moved from the Programme Manual into this new document.



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