



URAPI Grievance mechanism

28/03/2019

URAPI is committed to the highest ethical standards as detailed in its ESG policy. This commitment includes careful revision of received complaints and grievances.

Complaints and grievances can be submitted online at <https://www.urapi.co/grievance> in all languages. In the event a complaint is submitted in a language other than Spanish, English, or French, URAPI will seek a translator to understand the complaint or grievance.

If the complaint or grievance concerns a specific project funded by URAPI, we encourage complainant to file the complaint or grievance via the project-specific grievance mechanism first where possible. If the grievance cannot be resolved at the project level, then the complaint should be filed via the URAPI grievance mechanism.

All received complaints will be tracked and recorded in a grievances and complaints log by the Administrative Officer and shared with the Sustainability Director. Acknowledgement of receipt as well as judgment of admissibility will be sent within 30 days. The admissibility check makes no judgement on the merits of the complaint.

Inadmissible complaints include:

- Those which clearly do not relate to company's operations or practices
- Those from anonymous parties;
- Those that are excessive, repetitive, clearly frivolous or malicious in nature.
- Those which have already been lodged with or settled by other administrative or judicial review mechanisms (provided that they feature the same allegations and concern the same respondent);
- Those constituting criminal activity and violence – which will be referred to the formal justice system
- Those seeking an unfair competitive economic advantage
- Those that are commercial disputes which can be stipulated for in contractual agreements and issues should be resolved through a variety of commercial dispute resolution mechanisms or civil courts.
- Those that are related to governmental policy and government institutions.

If the complaint is admissible, complainants will be informed that the complaint has been registered, that an inquiry is initiated and the date by which they may expect a response (60 days). If a complaint is not admissible, the complainants will be informed of the reasons why.

If they contain key words such as "child", "children", "harassment", "fraud", "corruption", "death", they will be immediately shared with the COO and relevant project manager.

For admissible complaints, the evaluation and resolution process will be as follows:

- Minor, straightforward issues will be addressed by the concerned staff member who the grievance/complaint falls under. A proposed answer or resolution will be sent to complainant. If there is any possibility that deeper underlying issues may exist, we will always take time to look into the complaint further.

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- For less clear, more problematic, or repetitive issues, or group complaints that require more detailed review, an internal committee might be set up to provide recommendations on resolution options.
- If necessary, an external review by a third party will be commissioned
- In the event, grievances cannot be resolved between the parties directly, the complainant will have recourse to a source of resolution, such as a mediator. Each party can propose a mediator and both parties must agree on the mediator. If no agreement is reached on a mediator between the two parties, each party proposes a mediator and the two mediators together chose an independent mediator.
- Collect proof that agreed-upon corrective actions have taken place, including:
 - o a record of resolution internally, with the date and time it took place, and have responsible staff sign off.
 - o if the issue was resolved to the satisfaction of the complainants, a confirmation filed along with the case documentation.
 - o photos or other documentary evidence to form a comprehensive record of the grievance and how it was resolved.

Information about grievances, including redresses if any, will be available to public upon request. Should a complainant wish to remain anonymous, he/she should make that clear in the initial complaint or grievance.

Use of this grievance mechanism does not preclude complainants from following other avenues for recourse.

URAPI will monitor its grievance mechanism in order to (i) ensure its effectiveness and (ii) identify common or recurrent claims that may require structural solutions or a policy change. Monitoring of grievances will also allow ECOTIERRA to adapt the mechanism should there be any inefficiencies. This will be the responsibility of the Sustainability Director, who will submit in collaboration with the Administrative Officer, submit a quarterly report to Investment Committee.

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