



Galápagos
life fund

GRIEVANCE MECHANISM

Table of Contents

EXECUTIVE SUMMARY	3
1. INTRODUCTION	5
1.1 OBJECTIVES AND SCOPE	5
1.2 OPERATIVE PRINCIPLES	6
2 GRIEVANCE MECHANISM	6
2.1 LEVELS AT WHICH GRIEVANCES CAN BE SUBMITTED.....	6
2.2 ELIGIBILITY FOR SUBMITTING A GRIEVANCE.....	7
2.3 ACCESS	7
2.4 STRUCTURE.....	8
2.4.1 <i>Grievance management overview</i>	9
3 GRIEVANCE PROCESS.....	10
3.1 SUBMITTING A GRIEVANCE	11
3.2 REGISTERING A GRIEVANCE.....	12
3.3 ACKNOWLEDGMENT OF A GRIEVANCE	13
3.4 ASSESSMENT OF ELIGIBILITY	13
3.5 RESPONSE	14
3.5.1 <i>Direct Grievances to GLF</i>	14
3.5.2 <i>Escalated Grievances from Grantees</i>	15
3.5.3 <i>Special Procedures for Complex Cases</i>	15
3.6 CLOSURE	16
4 GRIEVANCE MECHANISM REPORTING.....	17
5 GLF ETHICS HOTLINE.....	18
ANNEXES.....	19
ANNEX 1 TEMPLATE FOR GRIEVANCE MECHANISM FORM	19

EXECUTIVE SUMMARY

The Galápagos Life Fund (GLF) is committed to transparent, fair, and responsive interactions with all stakeholders, emphasizing the importance of addressing grievances constructively. To this end, GLF has implemented its own Grievance Mechanism, which is integral to its commitment to uphold high environmental and social standards.

The primary objectives of the GLF Grievance Mechanism are to provide a reliable and accessible platform for stakeholders impacted by GLF's decisions to express grievances and suggestions, facilitate prompt and fair resolution of complaints, and enhance operational transparency and accountability. The Grievance Mechanism is structured to handle grievances at two levels: directly related to GLF-funded projects at the project level and broader operational or administrative concerns at the GLF level. This ensures comprehensive management of issues with higher oversight and resolution for systemic or strategic concerns.

Eligibility for submitting a grievance extends to any community, organization, or group feeling adversely affected by GLF operations or projects. Direct submissions and those lodged through representatives are accommodated to ensure inclusivity and effective articulation of concerns. The mechanism prioritizes confidentiality and does not consider anonymous complaints to maintain accountability.

Access to the grievance procedures is widely disseminated through physical locations at GLF offices, online platforms, and engagement activities, ensuring stakeholders are well-informed of their rights and the processes available to them.

The grievance process is structured to manage concerns and complaints effectively. This begins with the submission phase, where grievances can be filed through multiple accessible channels, including online forms and direct communication methods like email and WhatsApp. Each grievance is registered in a central Grievance Register, ensuring transparency and accountability throughout the process. Acknowledgment is provided within 10 working days, with further clarity and completeness assessed promptly. Grievances undergo an eligibility assessment to ensure they meet defined criteria before a detailed response process is initiated, which is tailored to address simple through to complex issues effectively. Grievances are categorized and handled based on their complexity to ensure effective resolution. Simple grievances are promptly addressed by the Grievance Management Committee with the aim of quick resolution, typically within 10 working days, to avoid escalation. Complex grievances, involving more significant policy or operational implications, undergo a thorough investigation, potentially with the involvement of third-party experts, and may be escalated to the GLF Board of Directors for a higher level of scrutiny.

To maintain rigorous oversight and effectiveness, GLF conducts quarterly reviews and annual audits of the grievance process. Performance reports and an annual Environmental and Social (E&S) Monitoring

report are compiled to evaluate the fairness and effectiveness of the system, integrating data from both direct and grantee-managed grievances.

Additionally, GLF offers an Ethics Hotline as an alternative reporting mechanism for violations of its Code of Conduct and sensitive grievances, providing a confidential avenue for stakeholders to report issues anonymously if preferred. This hotline is part of GLF's commitment to a "do no harm" approach, prioritizing the rights and well-being of all complainants and maintaining the integrity of the grievance process.

1. INTRODUCTION

The Galápagos Life Fund (GLF) recognizes the importance of maintaining transparent, fair, and responsive interactions with all stakeholders, which includes addressing their grievances and feedback constructively. To this end, GLF has established its own Grievance Mechanism tailored to manage and resolve concerns and complaints and general feedback from individuals and groups directly affected by its operations or administrative actions. This mechanism is an integral part of GLF's commitment to uphold high standards of environmental and social responsibility, ensuring that its activities foster positive relationships and deliver beneficial outcomes for the Galápagos Islands and its inhabitants.

The GLF Grievance Mechanism operates independently of, but in coordination with, mechanisms established by Grantees for project-specific issues. It is structured to handle grievances that are broader in scope, encompassing organizational and strategic concerns that extend beyond individual projects. By providing a central platform for addressing such issues, the mechanism plays a crucial role in enhancing the overall accountability and transparency of GLF's operations.

Accessible through multiple channels, including a dedicated email address, a WhatsApp number, an online submission form on the GLF website, and a physical drop box at the GLF headquarters in Puerto Ayora, the mechanism ensures that all stakeholders, irrespective of their location or access to digital tools, can communicate their grievances and suggestions effectively and without cost.

1.1 OBJECTIVES AND SCOPE

The primary objectives of the GLF Grievance Mechanism are to:

- Provide a reliable and accessible platform for all stakeholders, particularly those impacted by GLF's decisions or activities, to express their grievances and suggestions.
- Facilitate prompt and fair resolution of complaints, thereby preventing escalations and fostering a positive organizational climate.
- Enhance GLF's operational transparency and accountability through meticulous documentation and responsive action on stakeholder feedback.
- Strengthen trust and cooperation between GLF and the communities, partners, and stakeholders it engages with, ensuring that all voices are heard and considered in the governance and management of the Fund.

The scope of the GLF Grievance Mechanism includes:

- Handling grievances related to the strategic decisions and administrative actions of GLF that affect its stakeholders.
- Addressing concerns regarding GLF's overarching policies and procedures, especially those that may impact the environmental and social fabric of the Galápagos Islands.
- Managing feedback and suggestions that pertain to GLF's role and performance as a funding and governing body, rather than specific project-related issues handled by Grantees.

- Providing a supplementary avenue for addressing grievances that cannot be resolved at the project level, ensuring that more complex or sensitive issues receive the appropriate level of oversight.

This mechanism does not replace but rather complements legal and administrative dispute resolution processes available at the national or local level. It is designed to offer an immediate, culturally sensitive, and accessible means to address grievances directly connected to GLF's activities, ensuring stakeholders have a voice in the Fund's operational and strategic endeavors.

1.2 OPERATIVE PRINCIPLES

- **Proportionality:** is proportional to GLF-funded projects and should be proportional to the risks and potential impacts of the project in question.
- **Accessibility:** is widely accessible to stakeholders. It is free of charge for individuals and communities.
- **Objectivity and fairness:** objectively manages complaints with fairness to all people.
- **Transparency and accountability:** manages grievances transparently. All complaints are processed, and all complainants receive a response within an established timeframe.
- **Cultural appropriateness:** is appropriate to the culture and context of Ecuadorian communities, especially the Galapagos communities.
- **Problem-solving and learning-oriented:** favours dialogue and consensus to solve the issues that cause the complaints and the learning derived from both the complaint and its solution.

2 GRIEVANCE MECHANISM

2.1 LEVELS AT WHICH GRIEVANCES CAN BE SUBMITTED

The GLF Grievance Mechanism offers two primary levels for the submission and resolution of grievances to ensure thorough and context-specific handling:

- **At the Project Level:** Grievances related to the implementation of GLF-funded projects must first be filed with the implementing organization. This initial level deals directly with issues as they arise on the ground, facilitating prompt and local resolutions. It allows stakeholders to address their concerns quickly and within the operational context of the specific project, promoting effective and immediate problem-solving. If a project's grievance mechanism (GM) is found to be ineffective, inaccessible, or if the complainant specifically wishes to ensure GLF is informed directly, GLF will accept such grievances. In instances where a grievance is submitted directly to GLF but is deemed initially ineligible because it was not first addressed at the project level, GLF will actively guide the complainant. GLF will notify the individual of the correct procedure, explaining the importance of following the established process to ensure efficient handling. GLF will provide the complainant with the necessary contact information and support to redirect their grievance to the appropriate project-level GM.

- **At Galápagos Life Fund:** If grievances are not resolved at the project level or are related directly to GLF's broader operations, they should be escalated to the GLF itself. This includes concerns over GLF's overarching policies, strategic decisions, or any systemic issues within the organization. Stakeholders can bring their grievances to this level to ensure a higher oversight and resolution from the top management of GLF, ensuring that all concerns are treated with the necessary seriousness and attention.

2.2 ELIGIBILITY FOR SUBMITTING A GRIEVANCE

The GLF Grievance Mechanism is open to any community, organization, project stakeholder, or group that believes they may be negatively affected by a GLF-funded project or by GLF operations.

This mechanism welcomes submissions from any community, organization, project stakeholder, or affected group—which includes groups of two or more individuals—who believe they have been negatively impacted due to failures in adhering to established environmental and social management standards or GLF procedures.

In addition to direct submissions, grievances can also be lodged through representatives¹. This provision is particularly important for community groups or stakeholders who may require assistance to articulate their concerns effectively. To maintain clarity and accountability, these representatives must provide clear evidence of their authority to act on behalf of others, and the identities of the individuals they represent must be disclosed.

While the mechanism does not consider anonymous complaints to maintain accountability and the integrity of the grievance process, it places a high emphasis on confidentiality. Complainants can request that their identities be kept confidential, ensuring their safety and protecting their privacy².

2.3 ACCESS

Detailed information about how to access the grievance procedures, including contact points, necessary forms, and guidance, is readily available. This information is disseminated through multiple channels to enhance accessibility:

- **Physical Locations:** Information is displayed at strategic sites within both GLF offices and locations associated with each GLF-funded project.
- **Online Platforms:** The GLF hosts comprehensive details about its Grievance Mechanism on the official GLF website, alongside dedicated sections for each funded project.
- **Engagement Activities:** During stakeholder engagement and consultation processes, GLF distributes additional materials related to the Grievance Mechanism.

¹ Individuals or entities that submit grievances on behalf of others who may feel they've been negatively impacted by GLF-funded projects or GLF operations but are unable or unsure how to express their issues directly. These representatives can be lawyers, community leaders, non-governmental organizations (NGOs), or any other authorized party.

²anonymous complaints will be managed through Ethics Hotline <https://glf.lineaconfidencial.com/>

2.4 STRUCTURE

The GLF employs a comprehensive and systematic approach to managing grievances that arise directly from its operations or those escalated from the grievance mechanisms of its funded projects.

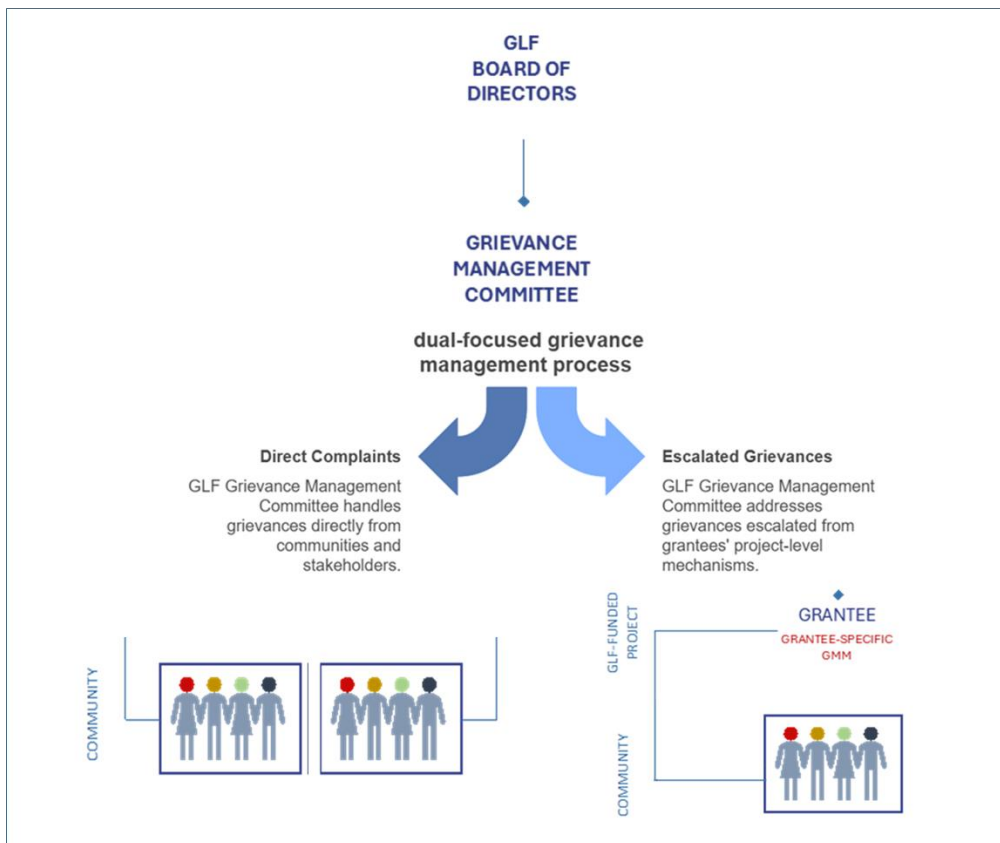
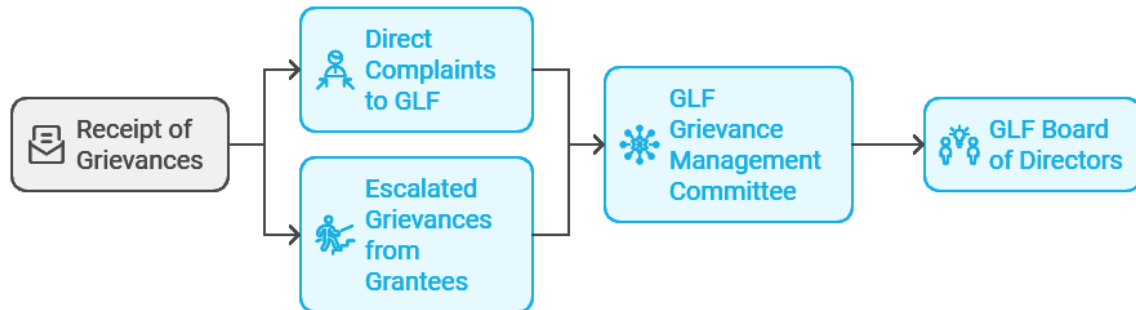


Figure 1 illustrates the relationship between the Grievance Mechanisms of GLF-funded projects and the role played by GLF in grievance resolution

- Direct Complaints to GLF:** GLF receives grievances directly from communities, organizations, or individuals who might be affected by its broader operational activities or policies. These direct grievances are handled first-hand by the GLF Grievance Management Committee, ensuring that issues pertaining to GLF’s overarching practices are addressed promptly and efficiently. The committee, which includes key personnel such as the Sustainability Officer,

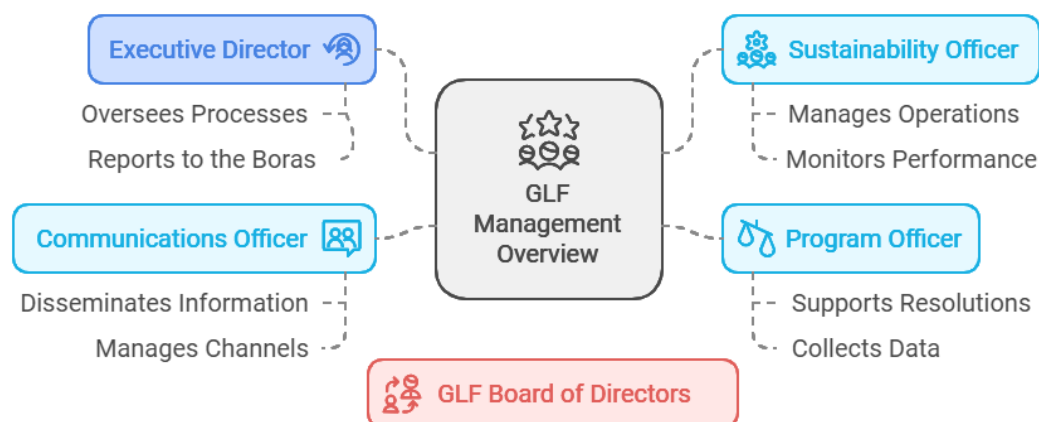
Communications Officer, Program Officers, and a GLF Executive Director, assesses each grievance to determine the most appropriate response and action.

- **Escalated Grievances from Grantees:** In addition to handling direct grievances, the GLF Grievance Management Committee also addresses complaints that are escalated from the grievance mechanisms established at the project level by GLF grantees. This typically happens when project-level resolutions are deemed unsatisfactory by the complainants or when the issues are too complex and require higher-level intervention. The committee reviews these escalated grievances to provide a secondary level of scrutiny and ensure that the grievances are resolved in accordance with GLF’s standards and expectations.

In managing both direct and escalated grievances, the GLF Grievance Management Committee follows a structured protocol to ensure that every complaint is logged, assessed, and addressed in a timely and effective manner. This includes documenting the grievance, undertaking a thorough investigation, engaging with relevant stakeholders, and deciding on appropriate remedial actions. Decisions and actions are communicated back to the complainants, ensuring clarity and closure on the issue.

2.4.1 GRIEVANCE MANAGEMENT OVERVIEW

The GLF **Grievance Management Committee** plays a pivotal role in the operational framework of the Galápagos Life Fund, tasked with handling both direct and escalated grievances.



1. **GLF Executive Director or their Designated Representative** ensures that the grievance management process is aligned with GLF’s strategic objectives and that serious or complex issues receive the necessary executive attention. Provides ultimate oversight for handling GBVH complaints, making final decisions on actions and resolutions based on recommendations from HR and the investigative team.
2. **Sustainability Officer:** leads the committee, focusing on integrating the grievance process to ensure that all complaints are accurately handled. Oversees the implementation of GBVH policies and ensures that all actions taken align with GLF’s commitment to safety and respect in the workplace.

3. **Communications Officer:** Responsible for managing all communications related to grievances, from the initial responses to complainants, ongoing communication during the grievance resolution process, and the final communication of decisions.
4. **Program Officers:** bring specific insights from their respective areas of expertise within GLF-funded projects. They provide contextual knowledge about the projects, for understanding the nuances of each grievance that relates to project impacts or operations. Ensure that GBVH policies and procedures are integrated and adhered to in all GLF-funded projects,

3 GRIEVANCE PROCESS

The GLF has established a structured grievance process designed to handle concerns and complaints from communities, organizations, or individuals affected by GLF-funded projects or GLF operations themselves.

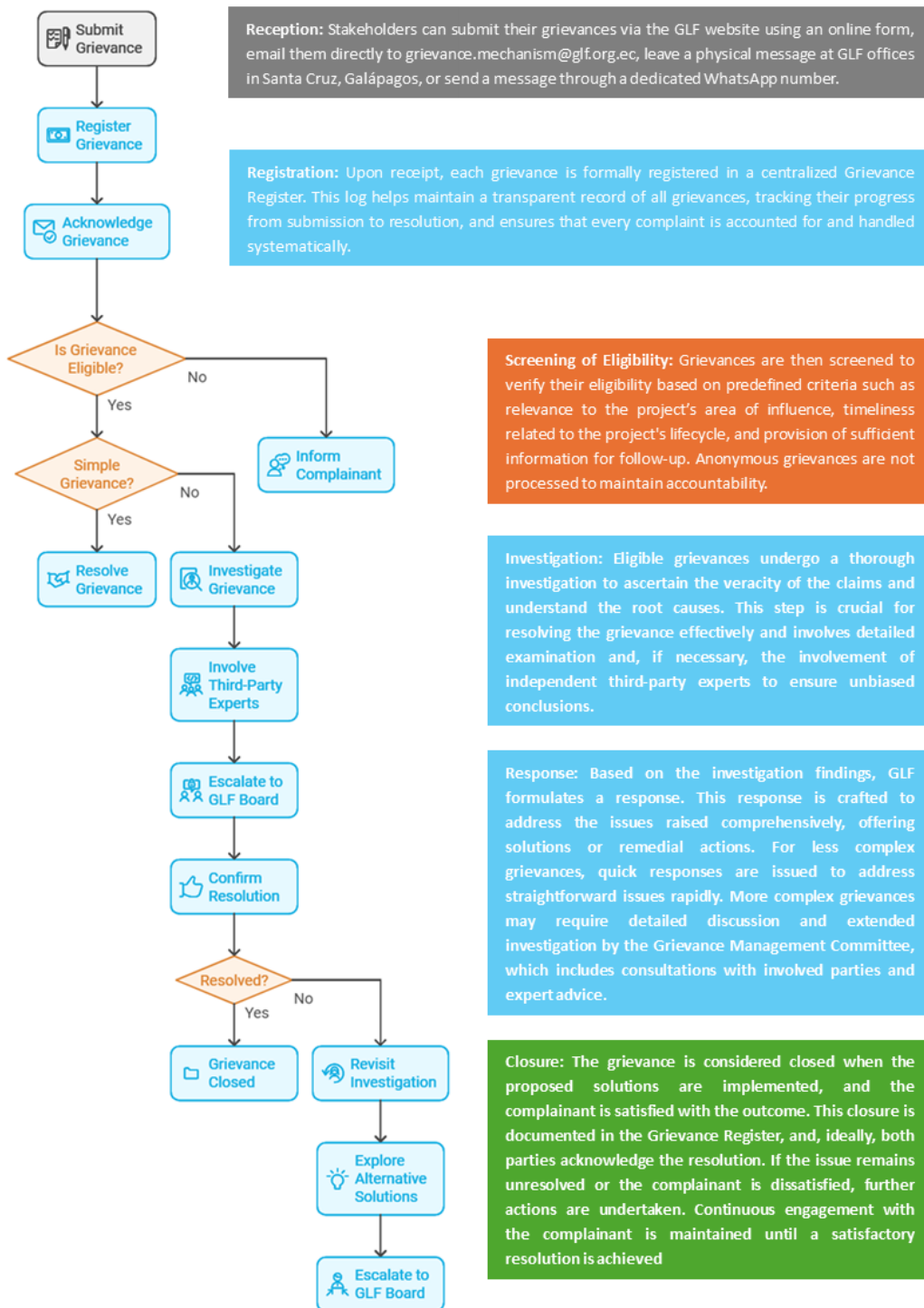


Figure Grievance process

3.1 SUBMITTING A GRIEVANCE

This initial step is critical as it establishes the foundation for the entire grievance resolution process. The aim is to make this entry point as user-friendly and inclusive as possible, ensuring all stakeholders can easily voice their concerns regarding GLF-funded projects or GLF’s operations.

- **Online Submission:** Stakeholders can fill out a Grievance Form available on both the GLF's main website and the specific pages dedicated to GLF-funded projects. This digital form is designed to capture all necessary information systematically, ensuring no critical details are missed.
- **Physical Mailbox:** For those who prefer or require offline methods, physical mailboxes are located at GLF offices in Santa Cruz, Galápagos. This method ensures that stakeholders without internet access or those who prefer a more tangible submission method can still file their grievances.
- **Email:** Grievances can be sent directly to the dedicated email address, grievance.mechanism@glf.org.ec, which is monitored regularly by the GLF Grievance Management Committee.
- **WhatsApp Communication:** Recognizing the widespread use of instant messaging for quick and easy communication, GLF has also provided a WhatsApp number where stakeholders can send their grievances. This method is particularly useful for quick updates and follow-up communications.
- **Documentation and Templates:** To facilitate the grievance submission process, GLF provides a standardized template which can be found in Annex 1. This template is designed to guide stakeholders through providing the necessary information to ensure their grievances are thoroughly understood and adequately addressed.

In cases of GBVH, GLF may involve external experts or counselors who specialize in handling such issues. This ensures that the grievances are assessed and addressed by professionals with the necessary expertise to provide the appropriate support and resolutions. Grievances that involve sensitive issues can be escalated directly to upper management, including the GLF Executive Director, bypassing standard procedural channels to ensure immediate and high-level attention.

3.2 REGISTERING A GRIEVANCE

Upon receipt of a grievance, the GLF ensures that each issue is recorded in a central Grievance Register. This register is an essential component of GLF's governance framework, ensuring transparency and accountability throughout the grievance handling process. Each entry in the register includes comprehensive details of the grievance such as the date of submission, the nature of the grievance, the identity of the complainant (), and the initial classification of the grievance based on its nature and urgency. The Grievance Register is dynamically updated throughout the grievance process to reflect any actions taken, decisions made, and responses provided. The register is managed with strict adherence to confidentiality principles. Access to the register is restricted to authorized members of the Grievance Management Committee to protect the information, ensure confidentiality and prevent unauthorized disclosure.

3.3 ACKNOWLEDGMENT OF A GRIEVANCE

Upon the receipt of a grievance, GLF is committed to **formally acknowledging it within 10 working days**³. This acknowledgment is made in writing to ensure that the complainant receives a tangible confirmation that their concern is being processed. During the acknowledgment phase, the grievance is initially assessed for clarity and completeness. If the information provided in the grievance is unclear or incomplete, GLF will reach out to the complainant to request additional details or clarification. Every acknowledgment, along with any correspondence made during this phase, is recorded in the Grievance Register. This includes the date the grievance was acknowledged, any requests for further information, and the complainant's response.

3.4 ASSESSMENT OF ELIGIBILITY

Received grievances and complaints must be screened to determine their eligibility. For a grievance to be eligible for consideration within the GLF Grievance Mechanism, it must meet the following criteria:

- The grievance must be directly related to the operations of GLF or any of its funded projects within the scope of GLF's influence⁴ and responsibility.
- The grievance must clearly specify the negative effects or harm or the perception of these effects/harm caused by the operations or activities of GLF or its funded projects.
- There must be a demonstrable link between GLF's actions, or the actions of a project funded by GLF and the grounds for the complaint to ascertain the accountability and responsibility for the issue raised.
- The grievance must include contact information so that the complainant can be reached for follow-up, clarification, or to communicate the outcome of the grievance process. Anonymous complaints are not accepted to maintain accountability and ensure the integrity of the grievance process.
- The grievance should be submitted within a reasonable timeframe from when the complainant became aware of the issue to ensure timely investigation and response.

³ Both digital and physical mailbox submissions are daily monitored and promptly registered and processed in the same manner.

⁴ Any project receiving financial support from GLF is considered under its influence, especially when such funding is conditional upon adherence to specific environmental and social guidelines set forth by GLF. This ensures that all projects, whether directly managed or supported, adhere to GLF's rigorous environmental and social standards, with GLF actively engaging in regular assessments to confirm compliance and initiating corrective actions when deviations occur.

3.5 RESPONSE

The process is designed to be dynamic, addressing grievances of varying complexities, whether arising directly at the GLF level or escalated from GLF-funded projects. It provides both direct resolution paths and mechanisms for escalated concerns, ensuring all grievances are managed with due diligence.

Once a grievance is registered and acknowledged, the GLF Grievance Management Committee takes the initial steps to respond. This includes a preliminary assessment to classify the grievance as either simple or complex:

- **Simple Grievances:** These are issues that can be resolved quickly and are typically localized or involve straightforward solutions. The Committee addresses these directly within 10 working days.
- **Complex Grievances:** More intricate issues that require detailed investigation or involve significant policy or operational implications are categorized as complex. These grievances undergo a thorough review process, which may involve discussions within the Grievance Management Committee or consultations with external experts to ensure an unbiased and comprehensive understanding of the issues at hand. Throughout this process, the complainant is kept informed, particularly if the investigation extends the response timeframe.

If a grievance escalates beyond the management committee or involves significant policy implications, it is forwarded to the GLF Board of Directors. This board acts as the final arbiter for grievances requiring executive-level intervention, ensuring that the most critical issues receive the highest level of scrutiny. In cases where a grievance implicates an institution or organization represented by a board member, or where a board member has personal or professional ties to the parties involved, the GLF governance structure mandates the recusal of that member from the deliberation and decision-making process.

Every step, from the initial receipt through to resolution, is meticulously documented in the Grievance Register, including details of the grievance, actions taken, outcomes, and any follow-up measures.

Upon resolving a grievance, whether direct or escalated, a detailed response is issued to the complainant, outlining the resolution, rationale, and any future preventive measures. The process begins by documenting the agreed-upon actions and timelines in the Grievance Register, which serves as an official record. Feedback from the complainant is encouraged to ensure closure is mutually acknowledged and satisfactory, reinforcing trust and accountability between GLF and its stakeholders.

3.5.1 DIRECT GRIEVANCES TO GLF

Direct grievances are those lodged by communities, organizations, or individuals directly affected by GLF's overarching operational activities or decisions. These grievances are:

- **Received and initially assessed** by the GLF Grievance Management Committee to determine their nature and urgency.
- **Quickly resolved** if they are simple, localized issues that do not require extensive investigation.
- **Further investigated** if complex, involving in-depth reviews and potentially the engagement of third-party experts to ensure an unbiased outcome.

3.5.2 ESCALATED GRIEVANCES FROM GRANTEES

Escalated grievances are those that originate from stakeholders of GLF-funded projects and are referred to GLF due to unresolved issues at the project level or due to the severity and complexity of the issues. These grievances are handled through:

- **Secondary Review:** Upon escalation, the grievance undergoes a secondary review by the GLF Grievance Management Committee to reassess the initial findings and the rationale for escalation.
- **Discussion and Investigation:** Similar to direct complex grievances, escalated issues may require detailed investigation to ascertain deeper insights into the root causes and broader implications.
- **Resolution and Follow-Up:** Actions are decided based on the investigations' findings, with an emphasis on aligning outcomes with GLF's strategic objectives and ensuring compliance with environmental and social governance standards.

3.5.3 SPECIAL PROCEDURES FOR COMPLEX CASES

For both direct and escalated complex grievances, a detailed investigation is conducted to ascertain the facts, identify the root causes, and understand the implications of the grievance:

- **Special Sessions:** The committee may convene special sessions to focus exclusively on complex grievances, ensuring dedicated time and resources to address them.
- **Extended Investigations:** When necessary, investigations may extend beyond typical protocols, involving external audits, stakeholder interviews, and on-site inspections.
- **Consultation with External Experts:** To maintain impartiality and to leverage specialized knowledge, external experts might be consulted, especially for technical environmental issues or legal implications. For cases involving GBVH, this team includes legal professionals to align with legal standards, psychosocial experts for victim support, and gender specialists to address gender-specific nuances.

In cases where the grievance involves significant strategic, ethical, or reputational implications for GLF, or if the proposed resolution by the Grievance Management Committee is deemed unsatisfactory by the complainant, the grievance may be escalated to the GLF Board of Directors. The Board acts as the highest decision-making body in the grievance process:

- **Review by the Board:** The Board reviews the grievance, considering the recommendations and findings of the Grievance Management Committee. This review is focused on ensuring that the grievance is handled in accordance with GLF's strategic objectives and governance standards.
- **Final Decision:** The Board may endorse the Committee's response, suggest modifications, or decide on a different course of action. Their decision is final and aims to resolve the grievance comprehensively, balancing the interests of all parties involved and maintaining the integrity and reputation of GLF.

When a grievance is classified as complex and requires thorough investigation, GLF ensures to communicate this situation to the complainant. As soon as it is determined that the grievance warrants extended evaluation, GLF, through the Program Officer will notify the complainant in writing. This communication will explain that due to the nature of the grievance, a deeper investigation is necessary to adequately resolve the issues raised. The communication will include a description of the investigation process, the types of analysis or assessments that will be conducted, and the experts or third parties that might be involved in the process. A new time estimate for the resolution of the grievance will be provided, highlighting that the original response timeframe of 60 working days may be extended due to the complexity of the grievance. A specific date or a time range in which the complainant can expect a response will be specified. Details on how the complainant can follow the progress of the investigation and who to contact for updates will be offered.

Once the investigation and internal discussions are complete, the GLF Grievance Management Committee formulates a formal response. This response is communicated to the complainant in writing, outlining the findings and the actions GLF intends to take.

3.6 CLOSURE

Once the Grievance Management Committee has implemented the necessary actions to address the issue, this phase involves several key activities to ensure comprehensive resolution and satisfaction for all parties involved.

Communication with the complainant is a priority during the closure phase. The Officer Program engages directly with the complainant to explain the actions taken and to confirm their understanding and satisfaction with the resolution. The response of the complainant is recorded to help assess whether the grievance is closed or whether further action is needed. Ideally, both parties should sign off the grievance to confirm closure. Or, alternatively, the Grievance Management Committee will determine that the issue has been addressed to the full extent possible.

If the complaint is not closed, additional required actions are implemented and further engagement with the complainant is undertaken to address the issue until the complaint is closed. The committee reviews the feedback provided by the complainant to understand the specifics of their dissatisfaction. This may involve revisiting the investigation findings, reassessing the actions taken, or considering alternative solutions that might better meet the needs and expectations of the complainant.

In some instances, the complexity of the grievance might necessitate further discussions or even the convening of a special session by the committee to delve deeper into the issues raised. During such sessions, experts or additional evidence may be consulted to provide a more comprehensive understanding of the problem and to explore new avenues for resolution.

The committee remains in active communication with the complainant throughout this extended process. If after further attempts the grievance still cannot be resolved to the complainant's satisfaction, the committee might escalate the issue to the GLF Board of Directors for a final review. The board could provide a different perspective or authorize additional resources to address the complaint.

The final decision made after these exhaustive efforts is documented thoroughly, and the complainant is informed of the outcome. Whether the grievance is resolved to their satisfaction or not, the completion of these steps is recorded in the Grievance Register as a closed case, noting that all possible measures were taken to address the complaint.

4 GRIEVANCE MECHANISM REPORTING

To ensure comprehensive oversight and effectiveness of the grievance management processes, both direct grievances managed by GLF and all grievances handled by grantees are subject to rigorous monitoring and reporting standards.

At the heart of this process is the Grievance Register, which must be maintained by GLF and all grievance process escalated from grantees. All grievances from their inception through to their resolution, documenting the steps taken and the outcomes achieved will be documented in the register. It serves as a live document, reflecting the current status of all grievances, ensuring that any changes or updates are immediately recorded.

Grantees are required to keep this register up-to-date and must make it available to the GLF upon request. This accessibility allows GLF to monitor the efficacy of the grievance mechanisms and ensure that grantees are compliant with established guidelines.

1. **Implementation Frequency:** GLF undertakes a quarterly review of all grievance reports and conducts an annual audit of the entire grievance process to ensure compliance and efficacy. This routine assessment helps maintain a consistent and proactive approach to grievance management.
2. **Monitoring Indicators:** Key metrics monitored include the number of grievances received, the average time taken to respond and resolve these issues, and the levels of stakeholder satisfaction following the resolution. These indicators are critical for assessing the efficiency and effectiveness of the grievance handling processes.
3. **Reporting Methods:** GLF compiles detailed quarterly performance reports that document the operational aspects of the grievance mechanism and an annual audit report further evaluates the fairness and thoroughness of the grievance procedures.
 - **Quarterly Reports:** These integrate data from GLF's direct grievance management activities with reports from grantees regarding their project-level grievance mechanisms.
 - **Annual E&S Monitoring Report:** Compiled annually, this report synthesizes data from all engagement activities throughout the year. It offers a thorough analysis of the grievance mechanism's effectiveness, detailing areas of success and challenges encountered.

5 GLF ETHICS HOTLINE

GLF has established an anonymous online and phone mechanism accessible to employees, consultants, independent experts, organizational and external workers, interns, volunteers, partners, communities, and other stakeholders. This platform allows for reporting violations of GLF's Code of Ethics and related Policies (e.g., Human Rights, SEAH, GBVH), as well as sensitive grievances including rights-related issues outlined in GLF's Policy Framework and GLF's Environmental and Social Management System (ESMS).

Reports can be submitted anonymously or confidentially, in Spanish or English, either online or by phone. Third-party reporting is also accepted.

Any violations of GLF's code of ethics or any sensitive or illegal or unethical conduct should be reported to GLF through its Ethics Hotline at:

<https://glf.lineaconfidencial.com/>

Concerns and grievances can be reported online in written format or verbally by phone. This mechanism allows for anonymous reporting of all serious misconduct or unethical behavior, including sexual harassment and fraud.

Grievances submitted through GLF's Ethics Hotline are handled securely and confidentially by an independent third-party service provider. All reports are investigated immediately before being submitted anonymously or the GLF Board of Directors for resolution or, if deemed necessary and expressed desire, to the Authorities.

GLF Prioritizes Survivor-Centered Approach: GLF is committed to a "do no harm" approach, prioritizing the rights, needs, and well-being of victims. We will strive to protect the privacy of all complainants, reporters, and subjects of complaints, offering options for confidential or anonymous reporting at both project and organizational levels. All concerns, reports, and investigations will be handled with discretion, and records will be kept securely. Communications regarding these matters will remain confidential.

The GLF Ethics Hotline will be widely promoted through appropriate media and will be published on all GM related media as an alternative mechanism to report sensitive incidents of unethical or illegal conduct.

ANNEXES

ANNEX 1 TEMPLATE FOR GRIEVANCE MECHANISM FORM

TEMPLATE TO SUBMIT A GRIEVANCE TO THE GRIEVANCE MECHANISM		
<p>Please enter your contact information and grievance. This information will be dealt with confidentially. Please note: If you wish to remain anonymous, please enter your comment/grievance in the box below without indicating any contact information – your comments will still be considered.</p>		
1	FULL NAME	
2	ANONYMOUS COMPLAINT <input type="checkbox"/> I prefer that my complaint remains anonymous	
3	CONTACT INFORMATION * * Choose at least one	<input type="checkbox"/> Email:
		<input type="checkbox"/> Telephone:
		<input type="checkbox"/> Postal address:
4	DATE OF SUBMISSION OF THIS INFORMATION YYYY-MM-DD	
5	PREFERRED LANGUAGE FOR COMMUNICATION <input type="checkbox"/> Spanish <input type="checkbox"/> English <input type="checkbox"/> Other, please specify:	
ABOUT THE GRIEVANCE		
6	LOCATION WHERE INCIDENT OR GRIEVANCE TOOK PLACE Be as specific as possible	
7	DATE OF OCCURRENCE The date on which the events took place. If you do not know the exact date, give an approximate date.	
	Year: 202? Month Day	
	<input type="checkbox"/> Only once <input type="checkbox"/> More than once <input type="checkbox"/> It is still happening	
8	DESCRIPTION OF EVENTS Describe what happened? Where did it happen? Who did it happen to? What is the result of the problem?	

TEMPLATE TO SUBMIT A GRIEVANCE TO THE GRIEVANCE MECHANISM		
9	WHAT WOULD YOU LIKE TO SEE HAPPEN?	Explain how you would like to see this resolved?