

Agreena Grievance and Complaints Procedure

Background and purpose

This procedure (“Agreena Grievance and Complaints Procedure” or “Procedure”) aims to ensure that concerns, complaints, and grievances related to AgreenaCarbon (“Grievances”) are acknowledged, heard, and addressed in a timely and effective manner, ultimately contributing to the successful execution and sustainability of the program and the satisfaction of all stakeholders.

The purpose of this Procedure is to establish a fair, transparent, and culturally appropriate process for addressing and resolving disputes that may arise between Agreena and any individual, community, or group potentially affected by the planning, implementation, and ongoing operation of AgreenaCarbon (“Local Stakeholders”).

This Procedure aims to promote accountability, maintain open communication, and foster trust and collaboration among all involved stakeholders.

Our organisation is committed to ensuring that all Grievances are handled fairly, promptly, and in a culturally appropriate manner.

Grievance Procedure

1. Scope

This Procedure is limited to Grievances specifically related to AgreenaCarbon. Any complain or concern that is unrelated to AgreenaCarbon, such as e.g., complaints about behaviour or business conduct by Agreena’s officers, employees or Agreena’s business partners are not admissible under this Procedure unless they relate specifically to AgreenaCarbon.

No companies in the Agreena Group are restricted by this Procedure from bringing legal action against any individual or any legal person at any time, including but not limited to Local Stakeholders, to exercise its legal rights in any court of law or arbitration tribunal. Furthermore, no companies in the Agreena Group are restricted by this Procedure from exercising its legal rights in relation to public authorities, private parties, corporations, or other legal entities.

Agreena reserves the right to stop answering communications from Local Stakeholders, and to stop all procedural steps under this Procedure, if Agreena, in its sole and reasonable discretion, determines that a Grievance and/or communication from a Local Stakeholder, or its representative, constitutes harassment or is malice or spiteful.

Please see our [Privacy Policy](#) on how to exercise of your rights as a registered data subject in relation to Agreena’s processing of personal data. Exercise of your rights and complaints about Agreena’s processing of personal data are not admissible under this Procedure and shall be sent to Agreena in accordance with our [Privacy Policy](#).

2. Filing of a Grievance

A Local Stakeholder may file a Grievance to Agreeena at any time via email to grievance@agreeena.com. Grievances must be submitted in any language available on www.agreeena.com to ensure clear and consistent understanding of the Grievances and to facilitate an effective resolution process. However, Agreeena reserves the right to request Grievances be translated into English for further processing and to provide responses in English.

Grievances must include the following information:

- Name, organisation, and contact details (email and phone) of the Local Stakeholder
- Details of the Grievance including:
 - Timing of Grievance
 - Nature of Grievance and perceived impact
 - Supporting evidence and documentation
- Declaration of any potential or perceived conflict of interest
- Any request for confidentiality/anonymity of complainant with reasons
- Declaration that information being provided is true, accurate and made in good faith.

Access to the Grievance handling process is provided free of charge.

Please see our Privacy Policy on how Agreeena processes your personal data.

3. Receipt of Grievance

Agreeena shall acknowledge receipt of a Grievance within 10 working days.

This acknowledgement will serve to inform the Local Stakeholder that their Grievance has been received and will be processed and considered in compliance with this Procedure.

4. Grievance Register

Following the acknowledgement of receipt, Agreeena shall promptly register the Grievance in its internal designated grievance register (“Grievance Register”).

5. Investigation of the Grievance

Following the receipt of a Grievance, Agreeena shall appoint an appropriate officer or employee of Agreeena, who has not been involved with the issues addressed in the Grievance (“Investigating Officer”). If no employed officer or employee of Agreeena is sufficiently independent to handle the Grievance, Agreeena may appoint an independent third party as the Investigating Officer. The Investigating Officer shall research and further investigate the Grievance.

The Investigating Officer shall first determine whether the Grievance is in scope of this Procedure, valid, and contains the information required under step 0 above. If any information is found to be missing, unclear, or incomplete Agreeena will contact the Local Stakeholder to obtain the required information. If it is not possible to obtain this information, Agreeena will make its best effort to address and resolve the dispute based on the available information provided.

Upon confirmation of the Grievance's validity and completeness, The Investigating Officer will organize an analysis (involving external experts, as required) and determine any appropriate action required.

Grievance investigation may include consultations with the Local Stakeholder, Agreeena staff and contractors, and other parties involved in AgreeenaCarbon.

6. Answering and resolution of Grievances

Agreeena shall attempt to amicably resolve the Grievance and shall prepare a written response to the Local Stakeholder in a manner that is culturally appropriate. The response shall include relevant information and analysis from the Investigating Officer. The response to the Local Stakeholder is brought to the attention of and approved by Agreeena's executive management.

A written response to the Grievance is sent to the Local Stakeholder within 30 calendar days from the receipt of complete information on the Grievance.

Grievance resolution steps

If a Grievance is not resolved through amicable negotiations, the subsequent step involves mediation facilitated by a neutral and independent third party. If mediation proves unsuccessful in resolving the issue, arbitration or legal proceedings shall be pursued by the Local Stakeholder, as permitted by the laws of the relevant jurisdiction.

1. Mediation

If the Grievance is not amicably resolved, the Local Stakeholder may request a mediation between the Local Stakeholder and Agreeena. The mediation shall be conducted under the rules and procedures of the Danish Institute of Mediation, and the mediator shall be chosen by the Institute. Agreeena shall coordinate with the Institute to appoint a mediator within 14 days of receiving the request from the Local Stakeholder, and the mediator shall attempt to facilitate a resolution within 30 days of appointment. The language to be used in the mediation shall be English. The cost of the mediation shall be borne equally by Agreeena and the Local Stakeholder.

2. Arbitration

Any Grievances that are not resolved through mediation shall be referred to and settled by arbitration administered by the Danish Institute of Arbitration, in accordance with the rule of arbitration procedure adopted by the Danish Institute of Arbitration, and in force at the time when proceeding commenced. The arbitral tribunal shall be composed of one arbitrator. The place of arbitration shall be Copenhagen, and the language to be used in the arbitral proceedings shall be English.

Cultural Sensitivity

Agreeena shall make all responses in English, with translations offered as necessary, and shall ensure that the process is accessible and sensitive to the cultural context of the Local Stakeholders.

Transparency and publication

Agreena will not make any Grievance public, and the Grievance Register is not publicly available. However, Agreena reserves the right to comment publicly on any Grievance if a Grievance is made public by the Local Stakeholder or other parties, and/or if the Local Stakeholder makes any public statements about Grievances. Information on Grievances posted on social media, including in closed groups, is considered public information.

Documentation of disputes resolved through this Procedure will be made public by Agreena.

Review and Evaluation

This Procedure shall be reviewed and evaluated periodically by Agreena to ensure its effectiveness and relevance, and to identify areas for improvement.

(May 2023)