

Grievance Redress Procedure

Introduction

This Grievance Redress Procedure ("GRP") outlines the methods for addressing disputes that may arise between Growers ("Grievers") and Groundwork BioAg during the planning and implementation of the Rootella Carbon program (the "Program") developed by Groundwork BioAg.

Objective

The GRP aims to provide a fair and efficient process for receiving, hearing, responding to and attempting to resolve grievances related to the Project within a reasonable timeframe.

Nature of Disputes

This GRP addresses grievances concerning benefit sharing and all other safeguard and stakeholder engagement requirements specified in Sections 3.18 and 3.19 of the VCS Standard (v4.7, dated April 16, 2024).

Grievance Submission

- Grievances may be submitted by completing the <u>online Grievance Submission Form</u> available on the Groundwork BioAg website, or by sending an email to <u>RCService@GroundworkBioAg.com</u>
- 2. The submission should include:
 - A detailed description of the grievance.
 - Specific details, including dates, locations, or any other relevant information.
 - Supporting documentation (if available).
- 3. A Grievant may submit a grievance no later than 60 days from the date the matter giving rise to the grievance occurred or the grievance began. Groundwork BioAg reserves the right, at its sole discretion, to accept grievances submitted beyond this two (2) month period under exceptional circumstances, provided the Grievant can present compelling evidence justifying the delay.

Grievance Handling

- 1. Groundwork BioAg will acknowledge receipt of the grievance within 14 days.
- 2. An internal investigation will be conducted to assess the validity of the grievance and determine a resolution path.



- 3. Where needed, Groundwork BioAg will initiate a dialogue with Griever to seek an amicable solution before further actions are taken and or to obtain additional information.
- 4. Within 30 days of the acknowledgment of the grievance, Groundwork BioAg will communicate a written response to the Griever outlining the investigation findings, proposed resolution (if applicable), and any necessary actions.
- 5. Within 30 days of the written response to the Griever, the Griever will provide to Groundwork BioAg a written reply.
- 6. Within 14 days of the Griever's reply, Groundwork BioAg will communicate a written final decision, which will be reasonable, proportional to the grievance, and consider cultural norms.
- 7. In cases where an in-depth or complex factual inquiry or investigation is required, Groundwork BioAg reserves the right to extend the aforementioned deadlines in a reasonable time under the circumstances of the case. Groundwork BioAg will inform Griever regarding such extension.

Mediation

If grievances are not resolved through amicable negotiations, Groundwork BioAg will facilitate mediation by a neutral third party chosen by Groundwork BioAg. Notwithstanding the procedures outlined, Groundwork BioAg may also initiate mediation proceedings for grievances involving Grower, if grievances are not resolved through amicable negotiations. Groundwork BioAg will facilitate mediation by a neutral third party chosen by Groundwork BioAg.

Adjudication

Any grievances unresolved within 45 days from the beginning of the mediation, each party may refer its claims to a competent court.

Recordkeeping and Publicity

Groundwork BioAg will maintain a dedicated GRP database to track all grievances received under any applicable law. General information about grievances resolved through GRP will be made publicly available, excluding any confidential information and in compliance with any applicable laws. Groundwork BioAg reserves the right to withhold details whose publication may be considered detrimental to any party involved in the grievance.

Review and Revision

This GRP will be periodically reviewed to ensure its effectiveness and compliance with the VCS Standard and relevant legal requirements. Groundwork BioAg will update the GRP as necessary based on these reviews.