

GRIEVANCE AND COMPLAINTS PROCEDURE

Document number	BIO-TK-[XX] (GCP 01)
Version	Rev 0.3
Date	28 July 2026
Status	Draft for review
Prepared by	Environmental Compliance Consultancy (ECC), Group Scheme Manager
Reviewed by	
Approved by	[NamPower SHEW Manager] and [ECC Principal]
Review	Annually, or after any appeal or audit finding

1 Purpose

1.1 This procedure sets out how complaints and grievances about the NamPower Biomass Project harvesting and transport operations are received, recorded, resolved, reported and closed.

1.2 It gives effect to EMP clauses 7.1.2.12 to 7.1.2.17, FSC-STD-NAM Criteria 1.6, 2.6 and 4.6, FSC-STD-30-005 V2-0 clauses 9.1(f) and 10.2, and clause 55 of the MOA. It operates alongside the NamPower Stakeholder Grievance Mechanism (BIO-GRM v0.1). Where these documents differ, the strictest requirement applies.

2 Scope

2.1 This procedure applies to all activities under the FSC Group Scheme, on all RMUs and LTFS sites.

2.2 It covers two groups, which use the same channels but are recorded separately:

- (a) Workers: employees of harvesting contractors, LTFS and subcontractors.
- (b) External parties: landowners, neighbours, communities and any other stakeholder.

3 Definition

3.1 Complaint or grievance: any concern, dispute or claim of loss, damage, injury or unfair treatment linked to project activities. All are recorded and handled under this procedure. No complaint is refused at intake.

4 Roles and responsibilities

Role	Responsibility
Site Supervisor (contractor or LTFS)	Receives complaints on site, records them in the TMP 06 register, reports them to ECC and NamPower within 1 working day.
ECC Group Scheme Manager	Keeps the master grievance register, assesses and investigates every complaint, responds to the complainant, reports quarterly.
NamPower Senior Environmentalist (Generation)	Receives complaints made by phone, WhatsApp or email (clause 5.1), logs them and passes them to ECC within 1 working day.
NamPower SHEW Manager and Snr Stakeholder Liaison Officer	Notified of every complaint within 1 working day. Link to the NamPower corporate mechanism (BIO-GRM).
Appeal panel	One NamPower and one ECC representative from the Steering Committee, neither involved in the matter. Decides appeals.

5 How to lodge a complaint or grievance

5.1 Any person may lodge a complaint at no cost, in any language, in writing or orally, through any of these channels:

- (a) Orally, to the Site Supervisor or to any ECC staff member on site.
- (b) In the TMP 06 Site Complaints and Grievance Register kept on each farm.
- (c) By phone or WhatsApp to the NamPower Senior Environmentalist, Tsenaye Usiku: 081 321 8385.
- (d) By email to the NamPower Senior Environmentalist: Tsenaye.usiku@nampower.com.na.

(e) Through the complaints page on the ECC website [confirm URL is live].

(f) On the NamPower grievance form (BIO-GRM) to the Snr Stakeholder Liaison Officer.

5.2 If a complaint is made orally, the person receiving it writes it in the register and reads it back to the complainant to confirm it is correct. A complainant does not need to be able to read or write English to use this procedure.

5.3 A complaint may be made anonymously. Anonymous complaints are recorded and investigated on the information available. The identity of a complainant who asks for confidentiality is not disclosed beyond those who must handle the matter.

5.4 A complaint may be made about any person or party, including the contractor, ECC, NamPower staff, the Project Manager or the Liaison Officer. A complaint is never handled or decided by the person it is about.

5.5 A complaint received by NamPower through any channel is passed to ECC within 1 working day. A complaint received by ECC or a Site Supervisor is reported to NamPower within 1 working day (EMP 7.1.2.15). Both organisations hold the same record.

6 Worker grievances (internal channel)

6.1 A worker should first raise a grievance with the supervisor or employer where the worker is comfortable to do so. If it is not resolved within 5 working days, or if the worker prefers, the worker may raise it directly with ECC through any channel in clause 5.

6.2 Worker grievances are recorded in the internal (worker) section of the register, separate from external complaints, as required by EMP 7.1.2.13 and FSC Criterion 2.6.

6.3 No worker will be dismissed, disciplined, victimised or disadvantaged in any way for raising a grievance in good faith. Any retaliation is itself a grievance and a disciplinary matter.

6.4 Grievances about loss or damage to property, occupational disease or occupational injury are recorded with the steps taken, the outcome and any compensation, as required by FSC Indicators 2.6.3 and 2.6.4. Fair compensation is provided through Social Security registration and employer liability.

7 Process and timeframes

Step	Action	Responsible	Timeframe
1	Receive the complaint and record it in the register	Person receiving it	Same day
2	Report it to the contractor, ECC and NamPower	Site Supervisor or ECC	Within 1 working day (EMP 7.1.2.15)
3	Acknowledge receipt to the complainant	ECC	Within 3 working days
4	Assess the merits and investigate where required	ECC with contractor and NamPower	Without delay
5	Respond to the complainant with the proposed resolution	ECC	Within 2 weeks of receipt (EMP 7.1.2.16). If more time is needed, the complainant is told why and given a date.
6	Implement the resolution and close. The complainant signs off where possible.	ECC and contractor	As agreed with the complainant

Step	Action	Responsible	Timeframe
7	Appeal, if the complainant does not accept the response	Complainant	Within 2 weeks of the response
8	Appeal decision, with reasons, given to the complainant	Appeal panel	Within 1 month of the appeal

8 Appeals

8.1 An appeal is decided by the appeal panel in clause 4. The panel may meet the complainant. The decision and reasons are recorded and given to the complainant.

8.2 If the complainant rejects a complaint outcome or an appeal outcome, this is recorded with the reasons, together with how the matter will be taken further, as required by FSC Indicators 1.6.3, 2.6.3 and 4.6.3.

8.3 Nothing in this procedure removes any legal right. A complainant may at any time use the Labour Commissioner, the Office of the Ombudsman or the courts.

9 Serious disputes

9.1 Operations cease in an affected area while a dispute remains unresolved where the dispute is of substantial magnitude (1 000 ha), of substantial duration (more than 3 months for disputes over legal or customary rights, more than 6 months for disputes over impacts of management activities), involves a significant number of interests, or is awaiting a legal verdict, as required by FSC Indicators 1.6.4 and 4.6.4. ECC decides this with NamPower and records the decision.

10 Records and reporting

10.1 Each active farm keeps the TMP 06 register on site. ECC keeps the master grievance register, with separate worker and external sections, in the restricted grievance folder (11.4) on SharePoint.

10.2 One event, one lead record: a matter first captured on the TMP 09 Event Card or in TMP 03 that is or becomes a complaint or grievance is transferred to TMP 06 as the lead record and handled under this procedure, with a cross reference kept on the original record.

10.3 All registers are kept up to date and available for inspection and audit (EMP 7.1.2.17).

10.4 ECC reports grievance statistics (number received, type, open, closed, average time to close) to the Project Steering Committee every quarter.

10.5 A substantiated stakeholder complaint increases the internal monitoring sample for the year (FSC-STD-30-005 clause 11.8). ECC applies this when planning monitoring visits.

10.6 Records are kept for at least 5 years (FSC-STD-30-005 clause 10.2).

11 Communication and training

11.1 A one page notice summarising this procedure, with the contact details in clause 5, is posted at every active site, in English and in the main languages of the workforce and neighbouring community.

11.2 The procedure is explained at every site induction and refreshed at least annually.

11.3 The procedure is publicly available on request (FSC Indicators 1.6.1 and 4.6.1).

12 References

12.1 EMP for the Harvesting and Transportation of Biomass (November 2020), clauses 7.1.2.3 and 7.1.2.12 to 7.1.2.17.

12.2 FSC-STD-NAM V1-0, The FSC National Forest Stewardship Standard for the Republic of Namibia, Criteria 1.6, 2.6 and 4.6.

12.3 FSC-STD-30-005 V2-0, FM Groups Standard, clauses 9.1(f), 10.2 and 11.8.

12.4 NamPower Stakeholder Grievance Mechanism, BIO-GRM, v0.1 (27 January 2025).

12.5 Memorandum of Agreement, clause 55.

12.6 TMP 06 Site Complaints and Grievance Register (Rev 0, 16 July 2026).

For compliance register

1. Operate all grievance handling to the EMP timeframes (report within 1 working day, response within 2 weeks). This is the interim resolution of conflict C10 pending the BIO-GRM v1.0 upgrade (gap G19, open).
2. Keep separate worker (internal) and external register sections per EMP 7.1.2.12 and 7.1.2.13 and FSC Criterion 2.6. Addresses finding C11.
3. Appeal panel named (Steering Committee members not involved in the matter), anonymity permitted, anti-retaliation commitment in force. Addresses finding H7.
4. Contact channels live at Rev 0.3: NamPower Senior Environmentalist phone and email inserted in clause 5. Confirm the ECC website complaints page URL before Rev 1. Closes the Rev 0 open action on contact details.
5. One event, one lead record: TMP 09 and TMP 03 route complaints and grievances to TMP 06 (register consolidation decision, 22 July 2026). Update the master register New Tools sheet reference to GCP 01 Rev 0.3.
6. Post the grievance notice at every active site in English and local languages, and cover the procedure at every induction. Verify during site inspections.
7. Report quarterly grievance statistics to the Project Steering Committee.
8. A substantiated stakeholder complaint increases the internal monitoring sample (FSC-STD-30-005 clause 11.8). Apply in the annual monitoring plan.
9. Risk register: unresolved serious dispute can require operations to cease in the affected area (FSC 1.6.4 and 4.6.4). Control: this procedure, early escalation and quarterly review.
10. Assign the BIO-TK toolkit number for this procedure and record it in the Working Documents and Tools Register.