

INSTITUTIONAL GRIEVANCE REDRESS MECHANISM

TERMS OF REFERENCE

Approval status: Pending approval by the Board of Directors, expected on December 1, 2026

Effective date: To be recorded upon approval

Responsible function: Designated GRM responsible function

Governance oversight: Board of Directors through the Ethics and Integrity Committee

Classification: Public and posted on the RFUS website

Review cycle: At least every three years or earlier when required

1. Purpose

The Institutional Grievance Redress Mechanism (GRM) provides a safe, accessible, impartial and accountable mechanism through which individuals, communities, organizations and other stakeholders may raise concerns, complaints or grievances regarding RFUS operations, personnel, programs, projects, partners or other activities.

The GRM is intended to facilitate the timely, fair and constructive resolution of concerns, strengthen accountability to affected stakeholders, identify and address systemic issues, and promote organizational learning and continuous improvement.

The GRM forms part of RFUS's broader accountability framework and operates in coordination with, but does not replace, the organization's Ethics and Integrity Committee, Investigation Function, Protection of Whistleblowers and Witnesses Policy, safeguarding mechanisms, or project-level grievance mechanisms.

2. Objectives

The GRM shall:

1. Provide accessible channels for stakeholders to raise concerns without fear of retaliation.
2. Ensure grievances are received, assessed and addressed in a timely, fair and impartial manner.
3. Provide appropriate remedies or corrective actions where a grievance is substantiated.
4. Protect complainants and other participants from retaliation.
5. Ensure confidentiality and responsible handling of personal information.
6. Ensure that serious allegations are referred to the appropriate independent function.
7. Provide appropriate escalation and appeal pathways.
8. Identify recurring or systemic issues and communicate lessons to management and governance bodies.
9. Ensure that project- and activity-level grievance mechanisms are appropriately linked to RFUS's institutional GRM where applicable.
10. Meet applicable GCF environmental and social safeguard and grievance-redress requirements.

3. Scope

The institutional GRM applies to concerns and grievances relating to:

- RFUS programs, projects and activities;
- environmental and social impacts;

- impacts on Indigenous Peoples and local communities;
- stakeholder engagement;
- discrimination or exclusion;
- abuse of power or inappropriate conduct;
- safeguarding concerns;
- retaliation;
- concerns regarding implementation of RFUS policies;
- concerns regarding partners, contractors or other third parties acting on behalf of RFUS, where appropriate;
- failures in organizational processes that may adversely affect stakeholders; and
- other concerns related to RFUS's operations or activities.

The GRM may receive complaints from:

- community members;
- Indigenous Peoples and community organizations;
- project participants and affected persons;
- beneficiaries;
- employees and former employees;
- consultants and contractors;
- implementing or executing partners;
- civil society organizations;
- donors or other stakeholders; and
- any person or group that believes they may have been adversely affected by an RFUS activity.

A grievance may be submitted directly by an affected or potentially affected person or group, or by an authorized representative acting on their behalf. Where representation is used, the GRM shall take reasonable steps to confirm authorization while avoiding unnecessary barriers to access.

4. Relationship with Other RFUS Accountability Mechanisms

The GRM is an institutional entry point and coordination mechanism. It does not replace specialized mechanisms that already exist within RFUS.

4.1 Protection of Whistleblowers and Witnesses Policy

Concerns involving suspected fraud, corruption, financial misconduct, serious wrongdoing or retaliation that fall within the Protection of Whistleblowers and Witnesses Policy shall be handled in accordance with that policy.

The GRM shall ensure that complainants are informed, where appropriate, of the availability of the Whistleblower mechanism.

4.2 Investigation Function

Allegations requiring formal investigation shall be referred to the Investigation Function in accordance with the Investigation Terms of Reference and Investigation Procedures and Case Management Guidelines.

The GRM shall not conduct a parallel investigation into matters formally assigned to the Investigation Function.

4.3 Ethics and Integrity Committee

The Ethics and Integrity Committee provides oversight and/or independent review in accordance with its approved Terms of Reference.

The Ethics and Integrity Committee may receive escalated grievances where:

- senior management is implicated;
- there is a significant conflict of interest;
- the independence of the normal GRM process may reasonably be questioned;
- the grievance raises significant ethical or institutional concerns; or
- the matter requires governance-level consideration.

4.4 Safeguarding and SEAH

Sexual exploitation, abuse and harassment (SEAH), child safeguarding and other serious safeguarding concerns shall be handled through RFUS's applicable safeguarding procedures.

The GRM shall ensure that such complaints are handled in a survivor-centred, confidential, gender-responsive and trauma-informed manner and are promptly referred to the appropriate specialized function.

4.5 Project-Level Grievance Mechanisms

Where an RFUS-supported or GCF-financed activity has a project- or activity-level grievance mechanism, that mechanism should normally provide an accessible first-level avenue for activity-specific grievances. However, complainants shall not be required to exhaust the project-level mechanism before accessing the RFUS Institutional GRM where direct access is appropriate, including where the complaint concerns RFUS itself, involves significant conflict of interest, raises safety or retaliation concerns, or where use of the project-level mechanism would otherwise be inappropriate.

The institutional GRM remains available for escalation, oversight and grievances concerning RFUS itself.

5. Principles

The GRM shall operate according to the following principles:

5.1 Accessibility

The mechanism shall be readily accessible to affected persons, including individuals and communities with limited literacy, language barriers, disabilities or limited access to technology.

5.2 No Cost

Access to the GRM shall be free of charge to complainants.

5.3 Independence and Impartiality

Complaints shall be assessed and handled independently and impartially. No person shall handle a complaint where they have an actual, potential or perceived conflict of interest.

5.4 Confidentiality

Information shall be shared only with persons who have a legitimate need to know, subject to applicable law and organizational policy.

5.5 Non-Retaliation

RFUS prohibits retaliation against any person who raises a concern or participates in a grievance process in good faith.

5.6 Fairness

Complainants and respondents shall be treated fairly and respectfully.

5.7 Predictability

The process, anticipated steps and expected timelines shall be communicated clearly to complainants.

5.8 Transparency

The organization shall provide appropriate information about the GRM, its procedures and outcomes while protecting confidentiality and privacy.

5.9 Cultural Appropriateness

The mechanism shall take account of local cultures, Indigenous Peoples' rights, community practices and relevant languages.

5.10 Survivor-Centred Approach

Where allegations concern SEAH or other serious safeguarding matters, the process shall prioritize the safety, dignity, wishes and well-being of the survivor.

5.11 Do No Harm

The grievance process shall not expose complainants, witnesses, communities or other participants to additional risks.

5.12 Continuous Learning

Grievance information shall be analyzed, where appropriate and without compromising confidentiality, to identify systemic problems and improve RFUS policies, programs and practices.

6. Institutional Independence

The GRM shall have sufficient institutional independence to ensure that grievances can be received and addressed without inappropriate influence by the persons or organizational units that may be the subject of a grievance. The GRM responsible function shall exercise its case-management responsibilities independently. No member of management, the Ethics and Integrity Committee, the Board of Directors, a program or project team, or any person who is the subject of or implicated in a grievance may direct or improperly influence the screening, categorization, referral, assessment, resolution, documentation or closure of that grievance. This does not prevent the Ethics and Integrity Committee or Board of Directors from exercising governance oversight, receiving escalated matters, or making decisions within their respective mandates.

The organization shall ensure:

1. A GRM focal point or responsible function is formally designated.
2. The responsible function has the authority to receive and register grievances.
3. Cases are assigned based on the nature and sensitivity of the complaint.
4. Conflicts of interest are identified and managed.
5. Complaints involving the GRM focal point are reassigned.

6. Complaints involving senior management shall be screened and handled through an independent route and may be referred directly to the Ethics and Integrity Committee where ordinary management involvement could reasonably compromise independence.
7. Complaints concerning the Executive Director shall be referred directly to the Ethics and Integrity Committee or another independent mechanism designated by the Board of Directors. The Executive Director shall have no role in screening, assigning, investigating, deciding, closing or otherwise controlling such a grievance. Matters requiring Board of Directors-level action shall be escalated directly to the Board of Directors.
8. Where a grievance concerns or creates an actual, potential or perceived conflict of interest for a member of the Ethics and Integrity Committee, that member shall recuse themselves and shall have no access to confidential case information except where strictly necessary and authorized.
9. Where a grievance concerns the Ethics and Integrity Committee Chair or affects the independence of the Ethics and Integrity Committee as a whole, the matter shall be referred directly to the Board of Directors or to an independent external mechanism designated by the Board of Directors.
10. Where a grievance concerns a member of the Board of Directors, that member shall take no part in the consideration or decision of the matter. Where the grievance concerns the Board Chair, the Chair shall recuse themselves and the matter shall be handled by the non-conflicted members of the Board, under the leadership of the Vice-Chair or another non-conflicted director designated by the Board of Directors.
11. Where independence cannot reasonably be secured through internal recusal or reassignment, RFUS shall arrange for the matter to be handled through an appropriately independent mechanism. Depending on the nature of the matter, available capacity, and required expertise, this may include an independent external reviewer, mediator, investigator, legal adviser, or other qualified specialist.
12. The GRM has appropriate access to relevant information and personnel.
13. The organization provides adequate resources and training for the GRM.
14. The Board of Directors receives appropriate periodic information concerning the functioning of the GRM.

7. Governance and Reporting

The GRM shall operate under the governance oversight of the Board of Directors, exercised through the Ethics and Integrity Committee where matters fall within the Committee's mandate. Such oversight shall not include direction or interference in the intake, screening, categorization, referral, assessment, resolution, documentation or closure of individual grievances, or in the conduct, methodology, scope, findings or final reporting of investigations assigned to the Investigation Function. This limitation does not prevent the Board or Ethics and Integrity Committee from addressing conflicts of interest, establishing an independent handling route, considering governance escalation, authorizing measures within its authority, or reviewing the effectiveness of the mechanism. Such action shall not permit a governance body to substitute itself for the GRM responsible function in routine case management or to alter independent

investigative findings. The designated GRM responsible function shall provide proportionate periodic reporting, as relevant, on matters such as:

- number and types of grievances received;
- geographic or programmatic trends;
- status of cases;
- average resolution time;
- systemic issues;
- significant risks;
- corrective actions;
- lessons learned; and
- implementation of recommendations.

Reports shall not disclose confidential or personally identifiable information unless disclosure is legally required or appropriately authorized.

8. GRM Capacity

RFUS shall maintain institutional capacity proportionate to the size, complexity, geographic scope and risk profile of its activities.

Capacity shall include, as appropriate:

- designated personnel responsible for GRM administration;
- trained personnel capable of conducting intake and preliminary assessment;
- access to investigation expertise;
- access to safeguarding expertise;
- access to mediation or dispute-resolution expertise where appropriate;
- access to legal advice when required;
- access to independent external expertise for particularly sensitive cases; and
- appropriate financial and technological resources.

RFUS may use internal staff, committees and external specialists depending on the nature and sensitivity of a case.

9. Authority

The GRM is authorized to:

- receive grievances;
- request information necessary for preliminary assessment;
- refer matters to specialized functions;
- recommend corrective action;
- facilitate appropriate resolution;

- monitor agreed actions;
- escalate unresolved or serious matters;
- identify systemic issues; and
- report trends and recommendations to appropriate governance bodies.

The GRM does not have authority to override the mandate of the Investigation Function, Ethics and Integrity Committee, Board of Directors or other legally competent authority. The GRM may agree, facilitate or approve resolutions and corrective actions within the authority formally delegated to the GRM responsible function. Where a proposed remedy or corrective action requires authority belonging to management, the Ethics and Integrity Committee, the Board of Directors or another organizational function, the GRM shall make a recommendation to the competent decision-maker and monitor its implementation.

No decision-maker may alter the factual findings of an independent investigation. Decisions concerning disciplinary, contractual, financial, governance or other consequences arising from those findings shall remain with the competent authority under applicable RFUS policies.

10. Accessibility and Reporting Channels

RFUS shall maintain multiple channels for submitting grievances, which may include:

- dedicated email;
- online reporting form;
- written submission;
- verbal submission;
- telephone;
- in-person reporting;
- reporting through project or community representatives; and
- other culturally appropriate channels.

Anonymous grievances shall be accepted and assessed to the extent reasonably possible based on the information available. Anonymous status shall not, by itself, constitute grounds for rejecting a grievance. RFUS shall publish information explaining:

- who can submit a grievance;
- what types of concerns can be raised;
- how to submit a grievance;
- available languages;
- confidentiality protections;
- non-retaliation protections;
- expected process and timelines; and
- escalation options.

Current reporting channels and instructions are available at <https://rainforestfoundation.org/about/contact-us/>. Grievances may also be submitted verbally or

in writing through RFUS personnel, who shall securely refer them without requiring resubmission. Where a usual recipient is implicated or conflicted, the independent channel identified in the Protection of Whistleblowers and Witnesses Policy shall be used.

11. Relationship with GCF

For GCF-financed activities, RFUS shall ensure that affected or potentially affected communities and stakeholders are informed, at the earliest appropriate opportunity, about available grievance and redress mechanisms at the:

1. GCF level;
2. RFUS institutional level; and
3. activity/project level, where applicable.

Information shall be provided in understandable formats and relevant languages.

The existence of the RFUS GRM shall not restrict any person's right to access the GCF Independent Redress Mechanism, judicial remedies, administrative remedies or other legitimate grievance mechanisms.

12. Review and Continuous Improvement

The GRM shall be reviewed periodically and following significant organizational, operational or regulatory changes.

The review shall consider:

- effectiveness;
- accessibility;
- independence;
- timeliness;
- stakeholder feedback;
- recurring complaints;
- lessons learned;
- GCF requirements; and
- changes in RFUS's risk profile.

13. Approval and Review

These Terms of Reference shall be approved by the Ethics and Integrity Committee. Material amendments affecting the GRM's authority, independence, scope, reporting lines or Board-level governance arrangements require Board approval.

Approving authority: Ethics and Integrity Committee

Governance Oversight: Board of Directors through the Ethics and Integrity Committee

Review Cycle: Every three years or earlier if required.

Classification: Public and Post on the RFUS website

14. Related Documents

This TOR should be read together with¹:

- RFUS Code of Ethics and Conduct;
- Ethics and Integrity Committee Terms of Reference;
- Independent Investigation Function Terms of Reference;
- Investigation Procedures and Case Management Guidelines;
- Protection of Whistleblowers and Witnesses Policy;
- Safeguarding Policy;
- Sexual Exploitation, Abuse and Harassment procedures;
- Stakeholder Engagement procedures;
- Environmental and Social Management System; and
- applicable project-level grievance mechanisms.

¹ For more information about these documents, please visit:
<https://rainforestfoundation.org/about/financials-transparency/>