

WORKER AND EMPLOYEE GRIEVANCE MECHANISM

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[1] DEFINITIONS

- **Access Channels:** The means through which a worker can submit a grievance.
- **Worker:** Any person working on or for Catalyst-financed activities, including workers of Portfolio Companies / Project Entities, contractors, subcontractors, and other eligible project-related workers. Where relevant and feasible, this may also include primary supply chain workers in relation to forced/child labour risks.
- **Employee:** Any individual directly employed by Catalyst Investment Management Company under an employment contract, whether on a full-time, part-time, temporary, or fixed-term basis.
- **Grievance:** A concern, complaint, or suggestion raised by a worker related to labor and working conditions and/or workplace impacts linked to Catalyst-financed activities.
- **Grievance Mechanism:** A structured framework of procedures, defined roles, and rules established to systematically receive, assess, manage, and resolve grievances in a timely, fair, and consistent manner.
- **Grievance Owner:** The party responsible for addressing grievance and implementing corrective, preventive, and/or remedial actions (e.g., Contractor/Subcontractor, Portfolio Company/Project Entity, Catalyst, or shared).
- **Non-Retaliation:** Any retaliation against a worker who raises grievance in good faith is prohibited and may trigger disciplinary and/or contractual remedies.

[2] PURPOSE

Catalyst Investment Management (“Catalyst”) establishes this Grievance Mechanism to provide a credible, accessible, and effective process for receiving, assessing, and facilitating the resolution of concerns and complaints from workers and employees regarding Catalyst’s labor and working conditions performance. In line with IFC Performance Standard 2 (Labor and Working Conditions) and good international industry practice, the mechanism is designed based on the following principles:

- Accessibility and no-cost use for all workers, including contractors/subcontractors.
- Transparency and predictability through clear steps, roles, and timeframes.
- Worker protection includes the option to remain anonymous where feasible.
- Non-retaliation for raising grievances in good faith.
- Does not impede access to other legal remedies.

Objectives:

- Provide accessible and safe channels for workers to raise concerns, at no cost.
- Ensure a transparent and predictable process with defined steps, roles, and timeframes.
- Promote fairness, consistency, and accountability via documentation and escalation pathways.
- Protect complainants through anonymity requests and non-retaliation commitments.
- Support continuous improvement of project performance.

This mechanism is established at Fund level and is intended to address worker and employee grievances linked to Catalyst-financed activities. For each Catalyst-financed investment, this mechanism will be adapted, updated, and operationalized on a project-level grievance mechanism in coordination with project entity, considering the project details and local context. The mechanism complements without replacing other workers’ engagement.

[3] SCOPE

This mechanism applies to employees and workers engaged in Catalyst-financed activities implemented by Portfolio Companies / Project Entities and their contractors and subcontractors, across the investment lifecycle to the extent permitted by applicable law and contractual arrangements.

3.1 Mechanism Positioning

This Grievance Mechanism is intended to support fair and timely resolution of employee and worker grievances. As a general rule, workers should first seek to raise workplace-related concerns through their employer's internal channels (Portfolio Company / Project Entity and/or Contractor/Subcontractor), where such channels exist and where the worker feels safe and able to do so. This grievance mechanism remains available to workers where internal channels are not available, are not accessible, are not effective, or are not safe to use, and for sensitive grievances require enhanced confidentiality.

3.2 Who can use this Mechanism

This mechanism is available to employees and workers associated with Catalyst-financed activities, including but not limited to workers employed by portfolio/project employees, contractors, subcontractors, service providers whether temporarily or permanently employed in relation to Catalyst activities.

3.3 What issues this Mechanism covers

This grievance mechanism covers concerns or complaints related to labor and working conditions and workplace impacts linked to Catalyst-financed activities, including issues arising from Portfolio Companies / Project Entities and their contractors/subcontractors. Examples include (non-exhaustive):

- Terms and conditions of employment: wages, overtime, working hours, leaves, contracts, disciplinary practices, and unfair treatment.
- Occupational Health and Safety (OHS): unsafe working conditions, inadequate PPE, unsafe equipment, unsafe work practices, incident reporting/response, emergency preparedness, and work-related transport safety (where applicable).
- Respectful workplace: bullying, harassment (including sexual harassment), discrimination, intimidation, and retaliation.
- Worker welfare and living conditions: accommodation, sanitation, potable water, food hygiene, and related welfare matters where the project/entity provides such facilities.
- Human rights-related workplace impacts linked to the financed activity, including credible allegations involving forced labour or child labour indicators connected to project execution or supply chain.

3.4 What this Mechanism does not cover

The following are outside the scope of this mechanism and are managed under separate channels/procedures:

- Community grievances (project-affected communities and other external stakeholders), which are handled through Catalyst's Community Grievance Mechanism.
- Whistleblowing / ethics reports (e.g., fraud, corruption, bribery), which are handled through the designated ethics/whistleblowing channel.
- Commercial disputes unrelated to labor and working conditions and not linked to project implementation.
- Political, legal, or judicial matters not linked to workplace impacts (while noting that workers may pursue external remedies at any time).

3.5 Grievance management

Grievances submitted under this Procedure shall be managed through two separate tracks, depending on the status of the complainant:

a) Catalyst direct employee grievances

Grievances raised by Catalyst direct employees shall be managed by Catalyst's HR function. HR shall be responsible for intake, acknowledgement, registration, tracking, screening, coordination of review or investigation, engagement with the complainant as appropriate, and close-out of the grievance in accordance with this Procedure. Where needed, HR may coordinate with other internal functions, including the ESG Team, Legal, or senior management, depending on the nature of the complaint.

b) Project-related worker grievances

Grievances raised by workers associated with Catalyst-financed activities, including workers of Portfolio Companies / Project Entities, contractors, subcontractors, and other eligible project-related workers, shall be received and managed by Catalyst's ESG Team. The ESG Team shall be responsible for intake, acknowledgement, registration, tracking, screening, coordination of review or investigation, engagement with the complainant as appropriate, and close-out verification under this Procedure.

3.6 Special handling of sensitive grievances

Certain grievance types may require enhanced confidentiality, survivor-centered handling, and restricted access to information, including:

- Sexual Exploitation, Abuse, and Harassment (SEAH).
- Gender-based violence & harassment (GBVH).
- Child Labour or Forced Labour.
- Retaliation or Intimidation Claims.
- Serious violent threats.

Such grievances will be managed under strict confidentiality and escalation protocols under management of the ESG team and HR team, including referral pathways where appropriate, while respecting the complainant's preferences and safety.

[4] GRIEVANCE MECHANISM PROCESS

This section describes the end-to-end process for receiving, registering, assessing, resolving, closing, and documenting worker grievances as shown in [Figure 1](#).

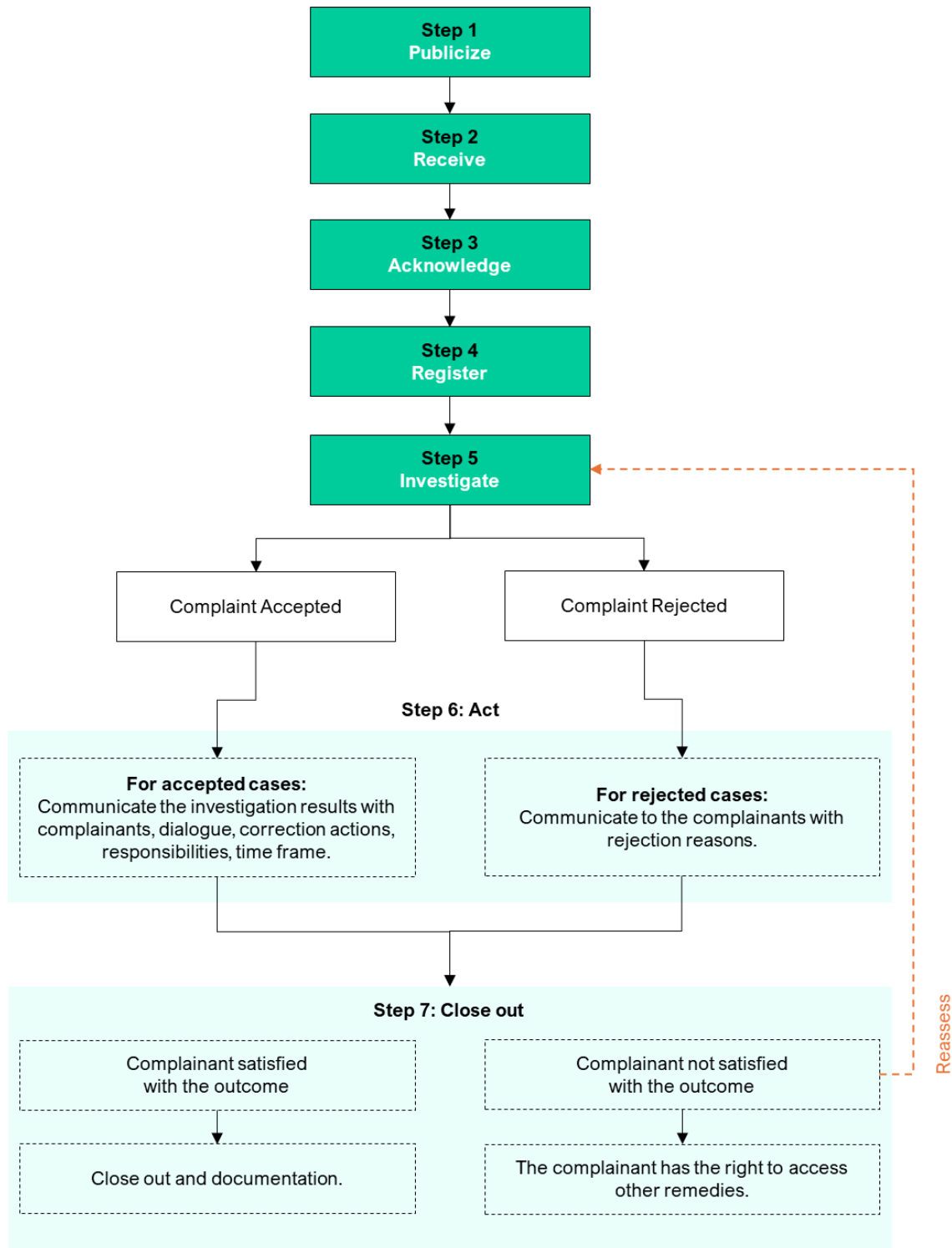


Figure 1. Grievance Mechanism Process

STEP 1: PUBLICIZE THE MECHANISM

To ensure accessibility and awareness, Catalyst, Portfolio/ Project Company (and its contractors/subcontractors, as applicable) shall maintain ongoing communication about the purpose, scope, and use of this Grievance Mechanism. Publicizing is continuous across the project lifecycle during worker engagement activities. All official grievance channels in [Table 1](#) route directly to Catalyst ESG & Impact Lead with access by Catalyst Team. Catalyst ESG & Impact Lead and/or ESG Team serve as the primary receiving channel during project implementation and operations. Use of this mechanism does not limit the complainant's right to access other applicable remedies.

Publicizing shall clearly communicate, in a culturally appropriate manner and in relevant worker languages, at minimum:

- Who can use the mechanism.
- What the mechanism covers.
- Non-retaliation.
- Anonymity.
- The mechanism is free of charge.
- No waiver of rights.

Publicizing methods (non-exhaustive) shall include:

- Employee and worker induction / onboarding: employees and workers receive grievances mechanism information at hiring and during site induction.
- On-site noticeboards: visible postings in worker-accessible locations.
- Toolbox talks: periodic reminders on how to submit grievances and the non-retaliation commitment.
- Contractor communication requirements: contractors/subcontractors shall be required (through contractual and site management arrangements) to disseminate this grievances mechanism information to their workforce and to cooperate with the process.
- Refreshers: periodic awareness refreshers, especially when there are changes to the mechanism, key contacts, or access channels.

Note: Contractors and subcontractors shall not interfere with, filter, discourage, or restrict workers' access to the Grievance Mechanism. Any retaliation or obstruction by contractors/subcontractors shall be treated as a contractual non-compliance and may result in corrective action, escalation, or contractual remedies.

Table 1. Access Channels to Raise a Grievance

Onsite	A signboard with online submission details will be installed in a designated and accessible location at the project site. Clear instructions will be displayed on the signboard as shown in as per Annex 2: Grievance Registration Online Submission. The content of the online grievance registration form is shown Annex 3: Grievance Registration Form and will be made available in the relevant employees' and workers' languages with anonymous communication channels.
Project Company Website	[To be Determined]

STEP 2: RECEIVE A GRIEVANCE

Any eligible employee and worker associated with a Catalyst-financed activity (as defined in Section [\[3\] SCOPE](#)) may submit a grievance regarding labor and working conditions linked to the Portfolio Company / Project Entity and/or its contractors/subcontractors through either of the following routes:

Route A	Route B
Direct submission via official Access Channels	Submission support through on-site Grievance Support Contact
Workers may submit grievances directly through the official Access Channels listed in Table 1 .	Worker: Where a worker prefers in-person support, they may approach a dedicated trained person at the project site (the Grievance Support Contact) to support them in submitting the grievance through the official Access Channels in Table 1. The Grievance Support Contact role is only to explain the mechanism and guide the complaint to submit the grievance online. Employee: Where an employee prefers in-person support, they may approach a HR team to support them in submitting the grievance through the official Access Channels in Table 1 and explain the process.

Procedure for Verbal Grievances

- A. If grievance is raised verbally to any staff member, the staff member shall:
 - Avoid seeking unnecessary information.
 - Refer the complainant promptly to the trained Grievance Support Contact for support in submitting the grievance through the official Access Channels in [Table 1](#).
- B. If grievance is raised verbally to the Grievance Support Contact, the Grievance Support Contact shall:
 1. Listen respectfully without making any commitments or promises regarding outcomes.
 2. Explain that grievances are formally received only through the official Access Channels in [Table 1](#), and guide the complainant to use online grievance form.
 3. Confirm protection and access:
 - The mechanism is free of charge.
 - No retaliation is permitted for raising grievance.
 - The complainant may remain anonymous.
 4. In grievances where the complainant is unable to submit the online grievance form due to literacy or accessibility constraints, the complainant can choose one of the following options:
 - Option 1: The complainant may choose to consult a trusted person to assist them in completing and submitting the online form; or
 - Option 2: The complainant may seek the Grievance Support Contact support to fill and submit the online form in the complainant's presence, without collecting unnecessary personal information and in a manner that respects the complainant's request for anonymity.

Urgent grievances (cannot wait) – Immediate risk escalation

If the Grievance Support Contact and/or ESG Team received a high-severity grievances requiring immediate action (“cannot-wait” cases – check Level (3) Severity [Table 2](#)) excluding sensitive grievances in [Section 3.6 Special handling of sensitive grievances](#); immediately inform the relevant Site Manager / Site Representative / designated responsible party (e.g. contractor supervisor or HSE lead), and the Catalyst ESG & Impact Lead, to enable prompt risk-control actions on site.

Upon notification, the responsible party shall take immediate precautionary measures appropriate to the nature of the risk where eligible and permitted (e.g., stop unsafe activities, isolate hazards, activate emergency response procedures, provide urgent medical assistance, secure the area) to stabilize the situation. This urgent response is intended solely to prevent or control harm and does not replace the grievance process. The complainant should still be directed to submit the grievance through the official online form.

- Note: Sensitive grievances are subject to strict confidentiality requirements and shall be reported directly to the ESG Team and HR Team as per [Section 3.6 Special handling of sensitive grievances](#).

Table 2. Grievance Level of Severity

Severity	Classification	Grievance / Examples (Non-exhaustive)
Level 1 (Low)	Limited harm, localized impact, easily resolvable, minimal risk of recurrence.	Minor workplace concerns (e.g., clarification requests on payslip/leave balance), minor supervisor communication issues, minor welfare issues (toilets/cleanliness) with no immediate health risk, minor PPE availability issue with immediate replacement possible, isolated minor disrespectful behavior (non-threatening), suggestions for workplace improvement.
Level 2 (Medium)	Repeated issues, broader workforce impact, credible risk of escalation, potential non-compliance with labor/OHS requirements or contractual commitments.	Repeated payroll/overtime disputes, recurring excessive working hours or rest-day concerns, repeated OHS non-conformities (e.g., inadequate PPE supply, repeated unsafe practices), patterns of bullying or harassment (non-SEA/SH), discrimination allegations, inadequate grievance handling by employer channels, recurring accommodation or welfare issues (water/sanitation/food hygiene) if provided with potential health impact, retaliation concerns without imminent threat, repeated grievances on same topic/site/contractor.
Level 3 (high)	Urgent grievances (cannot wait), serious harm or imminent risk, credible rights violations, severe legal/ contractual /reputational risk, or sensitive grievances requiring special handling.	Actual or imminent fatality or serious injury (e.g., unsafe work at height, energized electrical work without control, confined space without permit, lifting operations with critical failures), large-scale labour unrest/strike risk linked to serious unresolved issues, any grievance likely to trigger legal action, regulatory involvement, media exposure, or lender notification. Sensitive grievances: • Sexual Exploitation, Abuse, and Harassment (SEAH). • Gender-based violence & harassment (GBVH). • Child Labour or Forced Labour. • Retaliation or Intimidation Claims. • Serious violent threats.

STEP 3: ACKNOWLEDGE THE GRIEVANCE

The responsible function shall acknowledge receipt of each grievance to confirm that it has been received and to explain the next steps, without promising or providing any solution. The acknowledgement also enables the responsible function to request any clarifications or additional information necessary to further assess the grievance.

- The Catalyst HR Team shall acknowledge grievances raised by Catalyst direct employees.
- The Catalyst ESG Team shall acknowledge grievances raised by workers.

Language

Where the grievance is submitted in a language not spoken by the Catalyst Team, reasonable efforts will be made to facilitate understanding and communication, including, where feasible, engaging employees or other personnel with appropriate language skills (such as native speakers) or routing the acknowledgement and follow-up communication through a designated Grievance Contact Person who can support translation or interpretation, while maintaining anonymity and avoiding conflicts of interest.

Timing

- Acknowledgement will be issued within 2 working days of grievance receipt.
- The date of each acknowledgement will be documented in the [Annex 1: Grievance Log](#).

How acknowledgement is provided

Acknowledgement will be provided using the employee and worker preferred method of contact (e.g., phone call, message, email). If the grievance is anonymous, acknowledgement cannot be sent directly. In such grievances, the Catalyst ESG Team will document this in the grievance file and proceed with the process based on available information.

Acknowledgement content

Where contact details are available, the acknowledgement will include, at minimum:

- Confirmation that the grievance has been received.
- A confirmation that a reference number will be issued upon registration.
- A brief description of the next steps (registration, review, investigation, and follow-up).

Acknowledgement output

The Catalyst ESG Team will update [Annex 1: Grievance Log](#) with the acknowledgment time by updating the following section:

1. Date Acknowledged.

STEP 4: REGISTER THE GRIEVANCE

All grievances received under this mechanism will be registered in [Annex 1: Grievance Log](#). Each grievance will be assigned a unique reference number (Grievance Number), which will be used in all follow-up actions and communications (where contact details are available).

The Grievance Log will be accessible to the Catalyst Team to ensure proper tracking, accountability, and timely follow-up. Registration is an administrative step and does not determine whether grievance is valid or accepted. The Catalyst ESG Team is responsible for registering grievances and follow up.

Timing

- The Catalyst ESG Team shall register grievances within four (4) working days of grievance receipt.
- For Level (3) grievances, registration should be completed as soon as practicable, without delaying immediate risk-control notifications described in [STEP 2: RECEIVE A GRIEVANCE](#).

Recordkeeping

- Where anonymity is requested, the Grievance Log will not include identifying details, and the Grievance will be managed accordingly.
- The Grievance Log and all supporting documents shall be saved in Catalyst shared file system for record keeping purposes.

Registration output

The Catalyst ESG Team will update [Annex 1: Grievance Log](#) by updating the following sections:

1. Case Number.
2. Date Received.
3. Type of Issue.
4. Topic.
5. A Recurring Issue?
6. Received By.
7. Access Point.
8. Name Of Complainant (Or “Anonymous”).
9. Brief Grievance Description.

STEP 5: INVESTIGATE GRIEVANCE

The investigation step follows grievance registration and preliminary screening and focuses on fact-finding, assessment, and determination of appropriate response measures. Investigation is the process of collecting and reviewing information to:

- (i) understand the grievance, and
- (ii) determine whether it falls within the scope of this Grievance Mechanism, and
- (iii) confirm urgency and severity in accordance with [Table 2](#).
- (iv) determine the Grievance Owner, and
- (v) understand what happened and potential root causes, and
- (vi) define appropriate corrective and/or preventive and/or remedial actions.

Grievance Committee consists of:

1. Core Member/s:

- Catalyst ESG & Impact Lead (the main focal point for worker grievance).
- Catalyst ESG Team (if available and applicable).
- Catalyst HR (the main focal point for employee grievance).

2. Investigation Support Member/s:

Depending on the grievance nature and the information required, the Catalyst Team determines whether support from relevant party/parties is needed during the investigation process for the purposes of evidence collection, technical assessment, and resolution planning. Relevant parties may include:

- Catalyst Technical Team / Site Team / Site Representative (for site evidence, access facilitation, and implementation coordination).
- Catalyst Senior Management (for Level (3) Severity grievances, significant legal/contractual implications, high reputational risk, or decisions requiring executive approval).
- Portfolio Company / Project Entity representatives (e.g., Project Manager, E&S focal point, Liaison Officer) to provide project documentation, clarify commitments, and propose corrective actions.
- Qualified external experts / mediators where specialist support is required (e.g., technical E&S matters such as water quality/biodiversity, structural safety, independent mediation, or SEAH/GBVH safeguarding expertise for sensitive grievances).

If any person supporting the investigation is implicated in grievance or has a conflict of interest, they shall not be involved in handling that grievance.

Investigation Arrangements

1. Catalyst ESG Team and HR Team shall convene an investigation meeting with Investigation Support Member to review grievance, confirm scope and severity, determine information needs, and agree with the next steps.
2. For worker grievance, Catalyst ESG Team shall coordinate the investigation process, schedule and document the investigation process, and ensure evidence requests, actions, and decisions are recorded.
3. For employee grievance, Catalyst HR Team shall coordinate the investigation process, schedule and document the investigation process, and ensure evidence requests, actions, and decisions are recorded.
4. Where feasible, the Grievance Committee shall commence the initial investigation assessment within five (5) working days of grievance receipt. If the investigation is expected to take longer, the Catalyst Team shall inform the complainant (where contact details are available) of progress and revised timelines.
5. The complainant's identity shall remain anonymous if requested by the complainant, and all individuals involved in the investigation shall be informed of and respect this requirement.

Investigation actions and responsibilities

During investigation, the Grievance Committee will, as appropriate:

- Review the grievance submission and identify any additional information required for effective follow-up.
- Confirm applicability and scope by assessing whether the grievance relates to Catalyst-financed activities and falls within [\[3\] SCOPE](#).
- Assess urgency and apply immediate risk notification requirements for Level (3) Severity grievances.
- Assign and/or confirm the severity classification using [Table 2](#), and update it if new information indicates a change.
- Identify/confirm the Grievance Owner.
- Request and review evidence, which may include site-based documentation and records (e.g., logs, monitoring records, incident registers, photos where appropriate, relevant reports, contractor records), respecting anonymity.
- Engage the complainant (where possible) to clarify facts or request additional information. For anonymous grievances, the investigation proceeds based on available evidence.
- Communicate with Contractor/Subcontractor representatives (e.g., site supervisor, HSE lead, Liaison Officer) to provide site records, incident logs, and data.
- Decide whether grievance is accepted or rejected under this mechanism based on [\[3\] SCOPE](#), and document the rationale.
- While the Catalyst ESG Team coordinates and oversees the investigation, corrective and remedial actions are implemented by the Grievance Owner, with oversight and verification by Catalyst.

Investigation output

The Catalyst ESG Team will update [Annex 1: Grievance Log](#) by updating the following sections:

1. Grievance Committee.
2. Investigation Outcome.
3. Grievance Owner.
4. Level Of Severity.
5. Internal Review and Proposed Resolution.
6. Expected Date of Resolution.

STEP 6: ACT ON THE GRIEVANCE

Following the investigation (Step 5) and after the Grievance Committee decision on whether grievance is accepted or rejected, the response will proceed through one of the two tracks below.

Rejected Grievance

1. Catalyst ESG Team records the rejection decision and rationale in [Annex 1: Grievance Log](#) (e.g., out of scope, not actionable, insufficient information, unsubstantiated based on available evidence).
2. Where contact details are available, the Catalyst Team (HR Team for employees and ESG Team for workers) inform the complainant of:
 - the decision to reject/close without action,
 - the reason(s) (in plain language), and
3. The grievance may proceed to [STEP 7: CLOSE OUT & FOLLOW UP](#) for formal close-out or be recorded as “Closed – Rejected” in the log (unless new credible information is received).

Accepted Grievances

For accepted grievances, resolution will be managed through an Action Plan developed and implemented by the Grievance Owner, with Catalyst focal point team coordinating and tracking completion. The resolution process is as follows:

1. The Grievance Committee confirms the Grievance Owner.
2. The Catalyst Team (HR Team for employees and ESG Team for workers) (or delegate) formally notifies the Grievance Owner of:
 - relevant investigation findings (as appropriate and on a need-to-know basis),
 - required actions and expected timeframe, and
 - verification evidence requirements.
3. The Grievance Owner prepares an Action Plan that includes:
 - corrective / preventive / remedial measures,
 - responsible person(s),
 - target completion dates,
 - required resources,
 - verification evidence to be provided, and
 - any interim risk-control measures (where relevant).
4. Where contact details are available, the Catalyst Team (HR Team for employees and ESG Team for workers) shares the proposed resolution with the complaint using [Annex 4: Grievance Resolution Form](#) to collect initial feedback/acknowledgement:
 - The complaint may accept, comment, or request clarification.
 - The complaint retains the right to raise concerns if actions are not implemented or not solved the issue.
 - For sensitive grievances, the “initial feedback/acknowledgement” may be adapted, restricted, or replaced with appropriate referral pathways and safety planning.
5. The Grievance Owner implements the Action Plan actions in accordance with agreed timelines.
6. The Catalyst ESG Team tracks progress against milestones using updates and evidence.
7. Where contact details are available, the Catalyst ESG Team provides the worker and Catalyst HR Team provides the employee with reasonable updates on progress and revised timelines where required.

Documentation

The Catalyst ESG Team will update [Annex 1: Grievance Log](#), including:

1. Actions Description.
2. Actions Completion Date.

STEP 7: CLOSE OUT & FOLLOW UP

Close-out is the formal confirmation that the grievance has been addressed and that the grievance can be closed in [Annex 1: Grievance Log](#). The Catalyst ESG Team leads the close-out process, track completion, and ensures the outcome is communicated to the worker and employee (where contact details are available).

Close-Out Requirements

A grievance may be closed only when one or more of the following conditions are met and properly documented:

- The Grievance Owner has implemented all agreed corrective / preventive / remedial actions within the Action Plan.
- The Grievance Committee to track the completion based on evidence provided by the Grievance Owner.
- Where relevant, effectiveness is to be reasonably confirmed (e.g., follow-up checks indicate improvement; recurrence has not been observed within an appropriate period).
- A documented decision if grievance is out of scope, not actionable, unsubstantiated, or cannot be progressed due to insufficient information.
- The complainant withdraws the grievance, noting that the Grievance Owner may still implement preventive actions if material risks remain.

For Level (3) Severity grievances, closure requires confirmation that urgent risk-control and safeguarding measures were completed, and that any residual risk has been reduced to an acceptable level, with approvals and documentation recorded as applicable.

Close-Out Communication to the Complainant

Where contact details are available, the Catalyst ESG Team for the worker and Catalyst HR Team for the employee will formally notify the complainant (using their preferred method of contact) that the grievance is being closed, including:

- A summary of the grievance and the outcome (in plain, culturally appropriate language).
- Actions taken (or the rationale for no action).
- The basis for closing grievance.

Where grievance is anonymous and direct communication is not possible, the close-out decision must still be documented in the grievance file and [Annex 1: Grievance Log](#).

Satisfaction with the Outcome

- Satisfied:

If the complainant is satisfied with the outcomes, the Catalyst Team will close the grievance, finalize the documentation, and invite the complainant to provide feedback on the process and outcome by completing the [Annex 5: Grievance Close Out Form](#).

- Not Satisfied:

If the complainant is not satisfied with the outcome and provides credible grounds for reassessment (e.g., new information, recurrence, non-implementation, or evidence that actions were ineffective), the Catalyst Team will reopen the grievance and return it to Step 5 (Investigate) for reassessment. This may include additional evidence requests, escalation as needed, and requiring the Grievance Owner to revise the Action Plan and implement additional measures.

It is worth noting that a complainant may or may not be satisfied with the outcome and process followed to address the grievance, for example due to expectations, personal interests, or understanding of the issue. Even in such situation, a grievance may still be considered “Closed” where it was handled in good faith and any agreed actions (if applicable) were implemented in line with the documented process.

The Catalyst ESG Team will record the reason for closing and/or reassessment outcome in the [Annex 1: Grievance Log](#) including complainant feedback and the Grievance Owner’s evaluation of the process and satisfaction level.

Where feasible, the complainant will be invited to provide feedback on the process and outcome by completing the [Annex 5: Grievance Close Out Form](#) under Catalyst Team Management.

Documentation

The Catalyst ESG Team will finalize the grievance file and ensure that close-out is fully recorded in [Annex 1: Grievance Log](#), including:

1. Date Closed.
2. Satisfaction With Process.
3. Comments (Process).
4. Satisfaction With Outcome.
5. Comments (Outcome).
6. Status (Closed/Open/In Progress).

[5] CONTINUOUS IMPROVEMENT

The Catalyst ESG Team will periodically review grievance records to identify trends, recurring issues, root causes, and any gaps in controls or communication. Catalyst will use these lessons learned to strengthen contractor/portfolio oversight, improve mitigation and stakeholder engagement measures, and update this mechanism and related tools ([ANNEXES](#)) where needed, while maintaining anonymity.

Catalyst will provide periodic training and refreshers for relevant Catalyst staff, the on-site Grievance Support Contact, and contractors/subcontractors (as applicable) to ensure consistent implementation, proper escalation, and adherence to anonymity and non-retaliation requirements.

ANNEXES

Annex 1: Grievance Log

Excel Sheet: CIM-QHSSE-DOC-002

GRIEVANCE LOG

PROJECT/ASSET:	
COUNTRY:	
LAST UPDATE:	
UPDATED BY:	

Open:	0
In Progress:	0
Close:	0

STEP3: ACKNOWLEDGEMENT				
DATE ACKNOWLEDGED (Notify Complainant of Receipt)	CASE NUMBER	DATE RECEIVED	TYPE OF COMPLAINANT (Worker grievance / Local community grievance / Other)	TOPIC

STEP4: REGISTER				
A RECURRING ISSUE? (Yes / No)	RECEIVED BY	ACCESS POINT (QR Code / E-mail / In-person / Other)	NAME OF COMPLAINANT (OR "ANONYMOUS")	BRIEF GRIEVANCE DESCRIPTION

STEP 5: INVESTIGATION				
GRIEVANCE COMMITTEE (Names and roles)	INVESTIGATION OUTCOME (Accepted/Rejected) Case	GRIEVANCE OWNER (Responsible entity to solve)	LEVEL OF SEVERITY (Low / Medium / High)	INTERNAL REVIEW AND PROPOSED RESOLUTION

STEP 6: ACT				
EXPECTED DATE OF RESOLUTION	ACTIONS DESCRIPTION (Action 1, Action 2,...)	ACTIONS COMPLETION DATE (Action 1, Action 2,...) Completion Date	DATE CLOSED (Per Grievance Close-Out Form)	SATISFACTION WITH PROCESS (Yes/No)

STEP 7: CLOSE OUT			
COMMENTS (Process)	SATISFACTION WITH OUTCOME (Yes/No)	COMMENTS (Outcome)	STATUS (Closed, Open, In Progress)

Annex 2: Grievance Registration Online Submission



GRIEVANCE REGISTRATION - ONLINE SUBMISSION

INSTRUCTIONS

How to use the QR code to submit your complaint?

- Step 1: Open your phone's camera and scan the QR Code.
- Step 2: Tap the link that appears to open the Grievance Registration Form.
- Step 3: Fill in the form and click "Submit".

QR code:



How to use the Link to submit your complaint?

- Step 1: Open any web browser (e.g., Chrome, Safari, Edge).
- Step 2: Go to: www.shorturl.at/p7t38
- Step 3: The Grievance Registration Form will open.
- Step 4: Fill in the form and click "Submit".

If you need assistance with the QR code, please feel free to contact Grievance Support Contact Person at the Project Site.

By submitting this Grievance Registration Form, you acknowledge and agree that your grievance will be received, recorded by Catalyst Investment Management Company ("Catalyst"). Catalyst will review the information you provided, conduct inquiries, collect relevant information, communicate with you, and coordinate with relevant internal and external parties, including project companies and contractors for the purposes of assessing, investigating, and addressing the grievance. Information provided through this form may be shared for grievance management, investigation, review and resolution. If you choose to remain anonymous, your name will not be recorded and direct feedback to you may not be possible; however, the grievance will still be reviewed.

Annex 3: Grievance Registration Form



GRIEVANCE REGISTRATION FORM

GENERAL INFORMATION	
Project/Asset	
Case Number	
Date Received	Date: _____ / _____ / _____ Time: _____
Complainant full Name (Mark one)	☐ I wish to stay anonymous (If selected, we may not be able to contact you directly or provide case updates) ☐ Name: _____
Type of Complainant (Mark one)	☐ Worker Grievance. ☐ Catalyst Direct-employee Grievance. ☐ Local Community Grievance. ☐ Other: _____
Complainant Gender (Mark one)	☐ Male. ☐ Female. ☐ Prefer not to say.
Contact Information (Mark how you prefer to be contacted)	☐ Mobile Phone: _____ ☐ E-mail: _____ ☐ Other: _____
GRIEVANCE DESCRIPTION	
(What happened? Where did it happen? Who was affected? What impacts or problems resulted?)	
Timing of the Issue	☐ One-time incident/grievance: Date _____ Time: _____ ☐ Occurred more than once (dates): _____ ☐ On-going issue (since): Date _____
PROPOSED RESOLUTION	
What would you like to see happen to resolve the issue?	
By submitting this Grievance Registration Form, you acknowledge and agree that your grievance will be received, recorded by Catalyst Investment Management Company ("Catalyst"). Catalyst will review the information you provided, conduct inquiries, collect relevant information, communicate with you, and coordinate with relevant internal and external parties, including project companies and contractors for the purposes of assessing, investigating, and addressing the grievance. Information provided through this form may be shared for grievance management, investigation, review and resolution. If you choose to remain anonymous, your name will not be recorded and direct feedback to you may not be possible; however, the grievance will still be reviewed.	
Name _____	Signature: _____ Date: _____ / _____ / _____

Annex 4: Grievance Resolution Form



GRIEVANCE RESOLUTION FORM

GENERAL INFORMATION	
Project/Asset	
Case Number	
Complainant full Name	☐ Anonymous. ☐ Name: _____
PROPOSED ACTIONS FOR RESOLUTIONS	
Proposed actions and timeframe	
Justification for the action	
Complainant Satisfied with the Proposed Actions	☐ Yes ☐ No Comments: _____

By signing this form, the complainant confirms that they have been informed of the investigation outcome, that the proposed actions have been explained in a clear and understandable manner, and that they agree to the implementation of these actions. This acknowledgment does not constitute a waiver of the complainant's right to pursue other applicable remedy channels.

Complainant Side

Name _____ Signature: _____ Date: ____ / ____ / ____

Annex 5: Grievance Close Out Form



GRIEVANCE CLOSEOUT FORM

GENERAL INFORMATION	
Project/Asset	
Case Number	
Complainant full Name	☐ Anonymous. ☐ Name: _____
ACTION FOR RESOLUTIONS	
Resolutive action and timeframe	
Justification for the action	
CONCLUSIONS (This section to be completed once all agreed actions have been fully implemented.)	
Action Implementation	Date: ____ / ____ / ____ Time: _____
Complainant Satisfied with Process	☐ Yes ☐ No Comments: _____
Complainant Satisfied with Outcome	☐ Yes ☐ No Comments: _____

By signing this form, the complainant confirms that they have been informed of the investigation outcome and the actions taken and/or decision made and agrees that the grievance formally closed. This acknowledgment does not constitute a waiver of the complainant's right to pursue other applicable remedy channels.

Complainant Side

Name _____ Signature: _____ Date: ____ / ____ / ____