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Grievance Redress Framework

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Document Version Control

Date	Document Number	Prepared By	Approved By	Notes
2018-11-30	JCM-ESG-GRF-0.1	A. Cochran	Not approved	Draft Grievance Redress Framework for internal review
2019-01-22	JCM-ESG-GRF-0.2	A. Cochran	JCM Board	Revised Draft Grievance Redress Framework approved by JCM Board on 19 March 2019.



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1 Introduction

At JCM Power, we are committed to fighting climate change and to promoting and practicing the protection of the natural environment and the social wellbeing of our employees and the local communities/Project Affected Persons (PAPs) in the countries that we operate. We do this by realizing renewable energy production and by conducting our business and managing investment projects in a manner that will prevent, minimize, mitigate or remediate negative environmental and social impacts associated with our business activities while maximizing positive impacts. Our mission is to accelerate social, economic and environmental sustainability in growth markets through the development of renewable energy. We aim to do this through addressing the following aspects: (1) energy as a basic need and development driver; (2) the necessary transition to energy production that does not contribute to climate change, (3) the recognition that this also needs to be to the benefit of the communities hosting the projects and not to the detriment of the receiving environment.

In striving to achieve the above JCM recognizes that situations may arise whereby stakeholders may need to raise grievances with JCM and that dealing with these grievances is of great importance to maintaining healthy relationships with stakeholders. Therefore, this document serves to provide a framework for dealing with grievances against JCM or its employees in a fair and equitable manner.

2 Grievance Policy Statement

At JCM:

- We are committed to a transparent process for stakeholders to express their concerns and file grievances, including anonymous complaints.
- We will not tolerate retaliation or discrimination against those who express grievances, and that any grievances will be treated confidentially.
- Management will treat grievances seriously and take prompt and appropriate action in response.
- Our Grievance Redress Framework and Grievance Mechanisms do not replace other channels for grievance resolution as defined by law or collective agreements.

3 Purpose

The purpose of a Grievance Redress Framework (GRF) and its supporting Grievance Mechanisms (GM's) is to provide stakeholders with a clear process through which to raise issues, concerns or complaints and to have these matters dealt with in a fair and equitable manner.

4 Scope

JCM conducts its business and manages operations across North and South America, Africa, and Asia. Within this geographic setting and with reference to Figure 1, JCM's activities can be divided into two main spheres, namely the *Corporate Sphere* and the *Project Sphere*.

The Corporate Sphere consist of all the activities required to run JCM as a business as well as the activities to fund and technically develop and operate projects at the corporate level. This could include activities such as raising capital with investors, development and updating of financial models, engineering and design, company administration such as accounting, legal and human resources, and so on.

The Project Sphere is made up of the activities on, or directly related to, the various project sites. This includes (but is not limited to) activities such as local stakeholder engagement, on site surveys and technical studies, construction activities, and asset Operation and Maintenance (O&M).

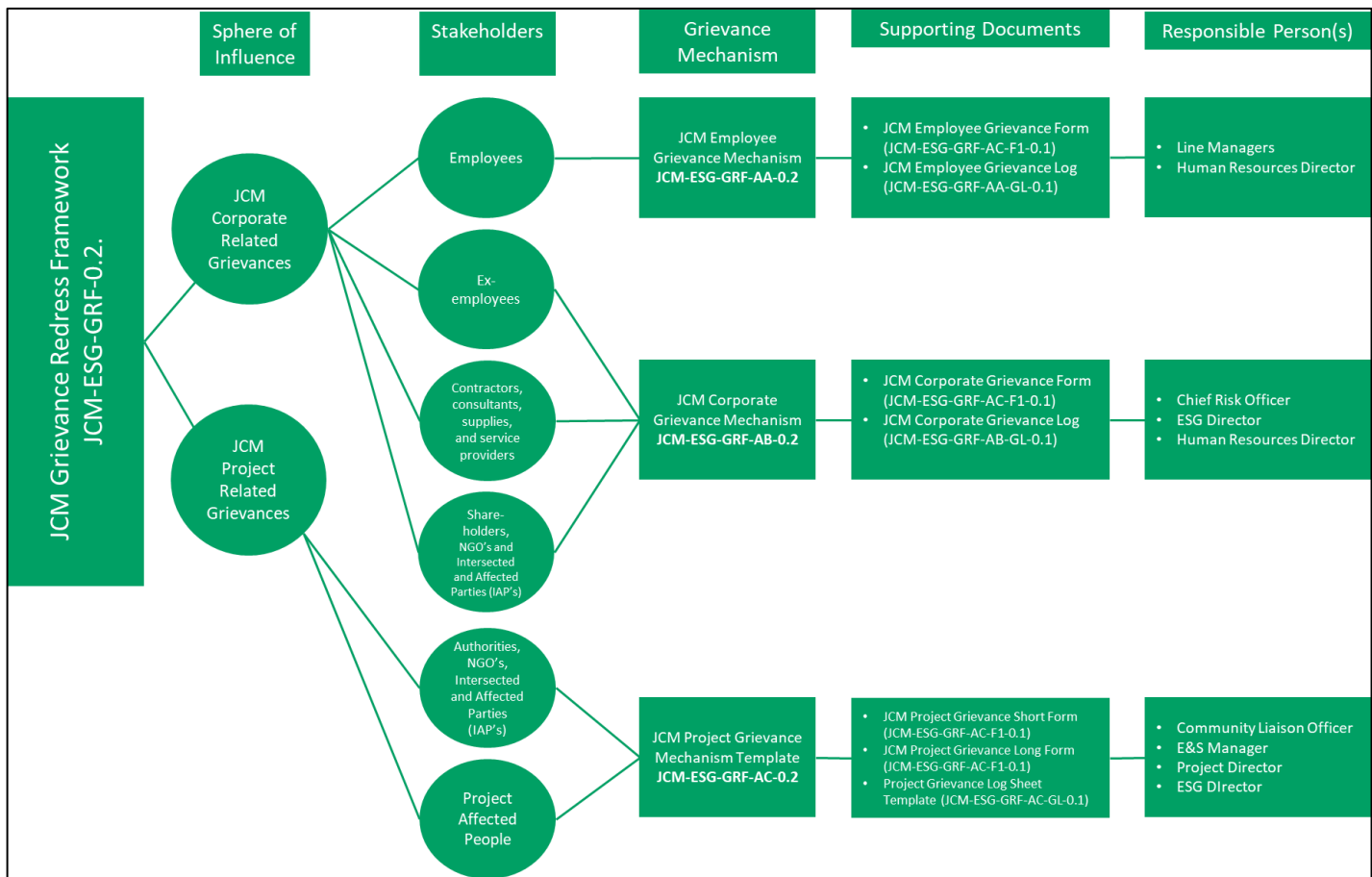



Figure 1: JCM Grievance Redress Framework Structure.

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Within these spheres JCM interacts with various stakeholders. For example, within the Corporate Sphere JCM interacts with employees, ex-employees, contractors, consultants, suppliers, service providers, shareholders, lenders, investors, etc. Within in the Project Sphere JCM (often as a locally registered business entity or Special Purpose Vehicle, “SPV”) interacts with stakeholders such as government authorities, Non-Governmental Organizations (NGO’s), Interested and Affected Parties (IAP’s) and Project Affected People (PAP’s).

The scope of this Grievance Redress Framework therefore aims to cover both of these spheres through the development of specific Grievance Mechanisms as follows:

- Corporate Sphere:
 - a. **JCM Employee Grievance Mechanism (JCM-ESG-GRF-AA-0.2):** Grievance Mechanism specifically for employees employed by JCM Power Corporation;
 - b. **JCM Corporate Grievance Mechanism (JCM-ESG-GRF-AB-0.2):** Grievance Mechanism for grievances by individuals or organizations outside of JCM employment and not related to a specific project; and
- Project Sphere:
 - a. **JCM Project Grievance Mechanism (JCM-ESG-GRF-AC-0.2):** A template Grievance Mechanism for JCM projects to be adapted on a case by case basis to suit the project context.

It is important to note that GRF does not address Whistle Blowing as this is addressed in the **JCM Anti-bribery and Corruption Policy (JCM-P-ABC-0.1)**.

5 Grievance Mechanisms

Based on the scope described above, three Grievance Mechanisms have been developed are as follows:

- JCM Employee Grievance Mechanism;
- JCM Corporate Grievance Mechanism; and
- JCM Project Grievance Mechanism Template.

Each Grievance Mechanism has supporting documentation for grievance recording and logging. The document structure is illustrated in Figure 2 below.

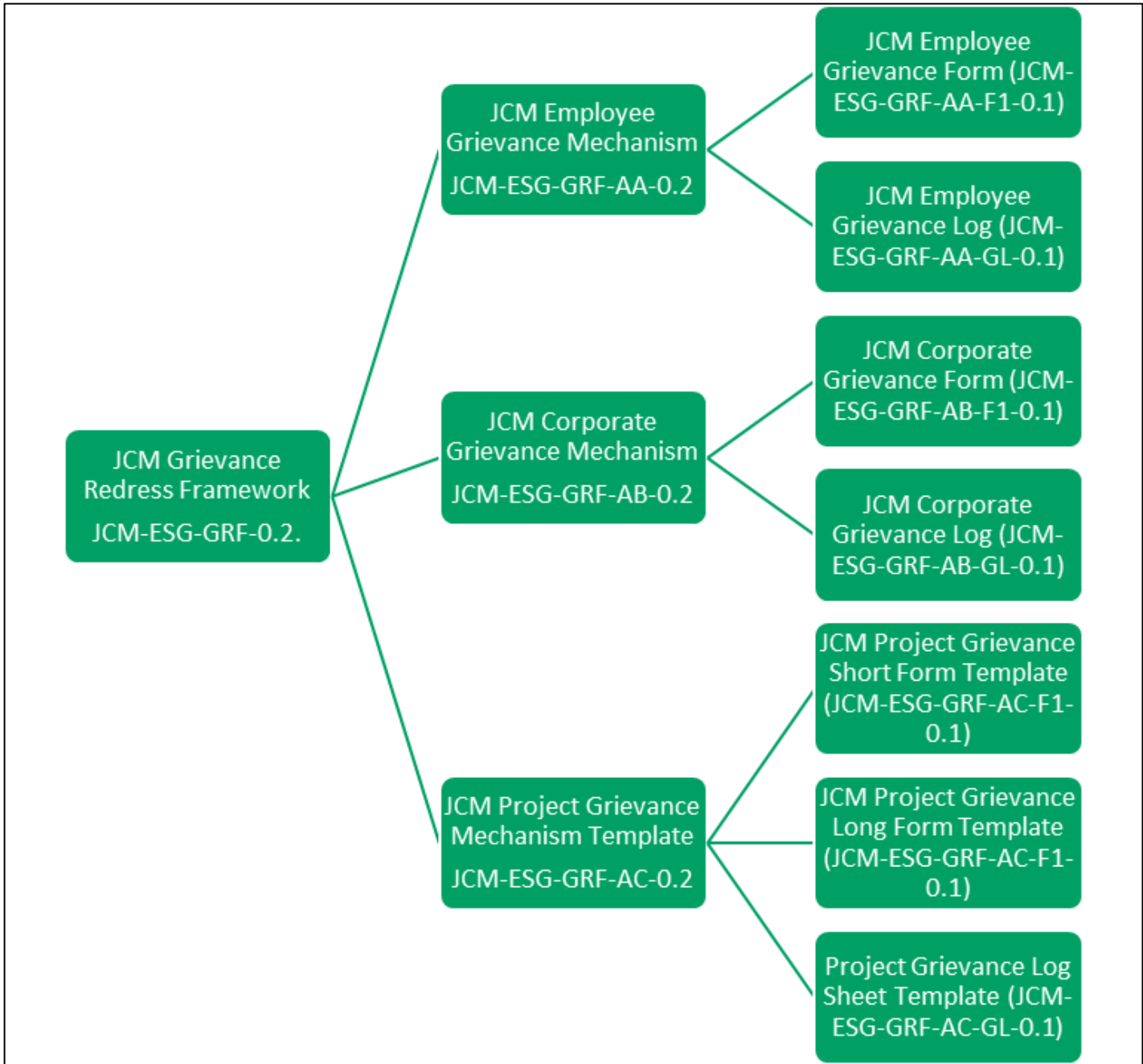



Figure 2: JCM Grievance Redress Framework Document Structure.

6 Communication

The GRF and supporting GM’s will be communicated to all employees, partners and stakeholders through the following communication channels:

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- Providing awareness training to employees and new hires;
- Electronic distribution of the GRF to employees, investors and stakeholders;
- Providing public access to the GRF on the JCM website; and
- By physical means to important stakeholders (that do not have access to internet).

The processes for dealing with grievances must be actively communicated to Corporate Sphere and Project Sphere stakeholders using the communication methods outlined above so that the stakeholders:

- are aware of the process;
- know that they have the right to submit a grievance or provide feedback; and
- understand how the mechanism(s) work and how their grievance will be addressed.

7 Continual Improvement

The GRF and GM's will be reviewed on an annual basis to assess its relevance and coverage and, if necessary, updated and re issued. Updates and changes will be communicated following the communication channels outlined in Section 6.

8 Responsibility and Accountability

It is the responsibility of the following people to implement the relevant components of the GRF, monitor compliance, and take suitable corrective action when there is non-compliance:

- JCM Employee Grievance Mechanism: Human Resources Director;
- JCM Corporate Grievance Mechanism: Chief Risk Officer; and
- JCM Project Grievance Mechanism Template: Project specific Community Liaison Officers (CLO's), E&S Managers, and Project Directors.

The ESG Director is responsible for coordinating the review and revision of the GRF on an annual basis. The Chief Executive Officer (CEO) of JCM Power will have ultimate accountability for JCM's compliance with the GRF and will ensure that JCM Executive Management provide the necessary resources required to effectively implement it.

Approved by the board of directors as of **March 19, 2019**.