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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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Annex B	JCM-ESG-GRF-AB-0.1 JCM Corporate Grievance Mechanism
Annex C	JCM-ESG-GRF-AC-0.1 JCM Project Grievance Mechanism Template

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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).

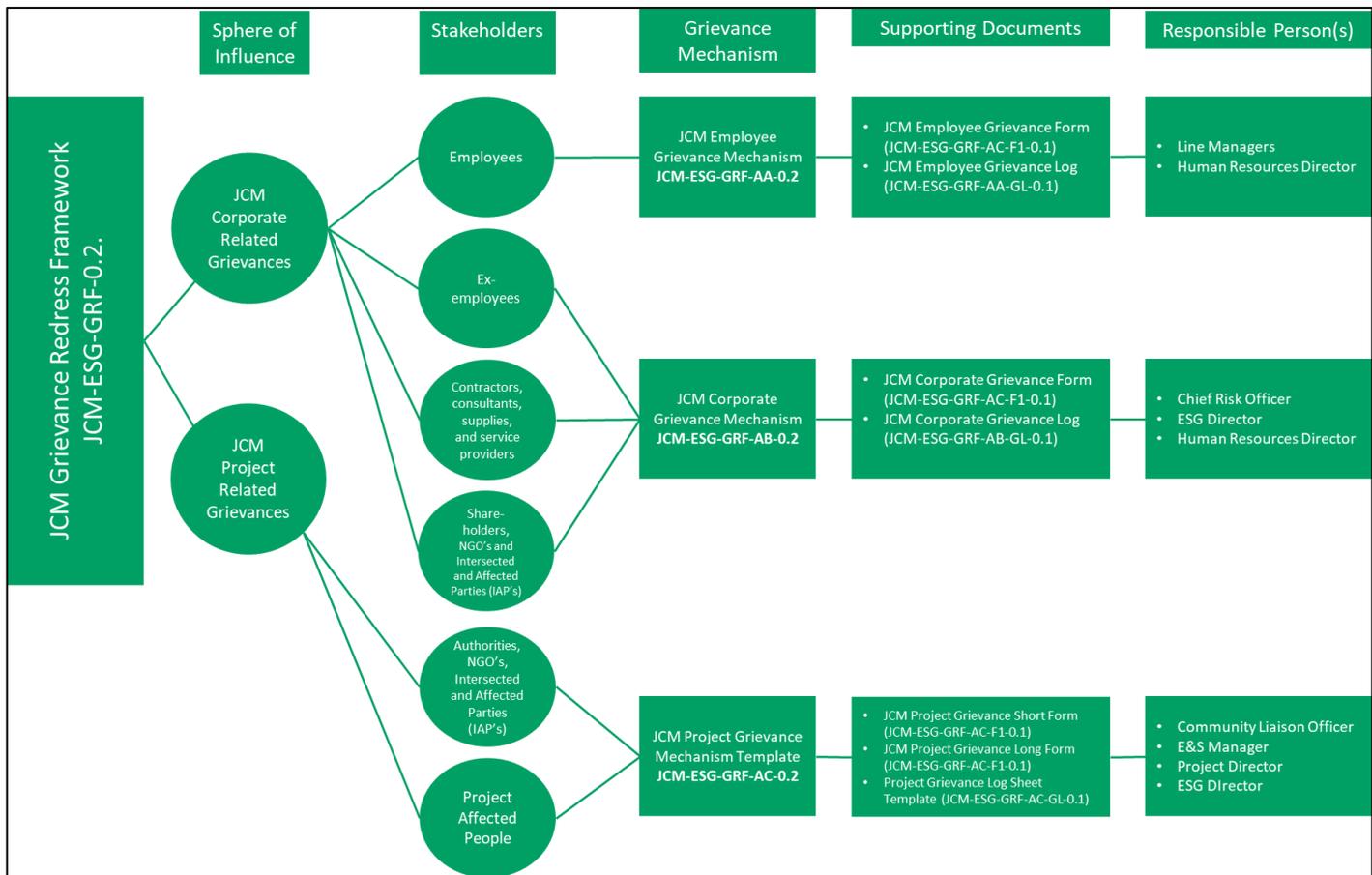


Figure 1: JCM Grievance Redress Framework Structure.

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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 are provided as annexures to this document, they are as follows:

- Annex A: JCM Employee Grievance Mechanism;
- Annex B: JCM Corporate Grievance Mechanism; and
- Annex C: 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**.

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Annex A:

JCM-ESG-GRF-AA-0.2 JCM Employee Grievance Mechanism

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Annex B:

JCM-ESG-GRF-AB-0.2 JCM Corporate Grievance Mechanism

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Annex C:

JCM-ESG-GRF-AC-0.2 JCM Project Grievance Mechanism Template

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Annex B: JCM Corporate Grievance Mechanism

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Annex AB Form 1 (190122-JCM-ESG-GRF-AB-F1-0.1) Corporate Grievance Form

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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 mechanism for dealing with grievances against JCM or its employees in a fair and equitable manner.

2 Purpose

The purpose of a Grievance Mechanism 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.

3 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).

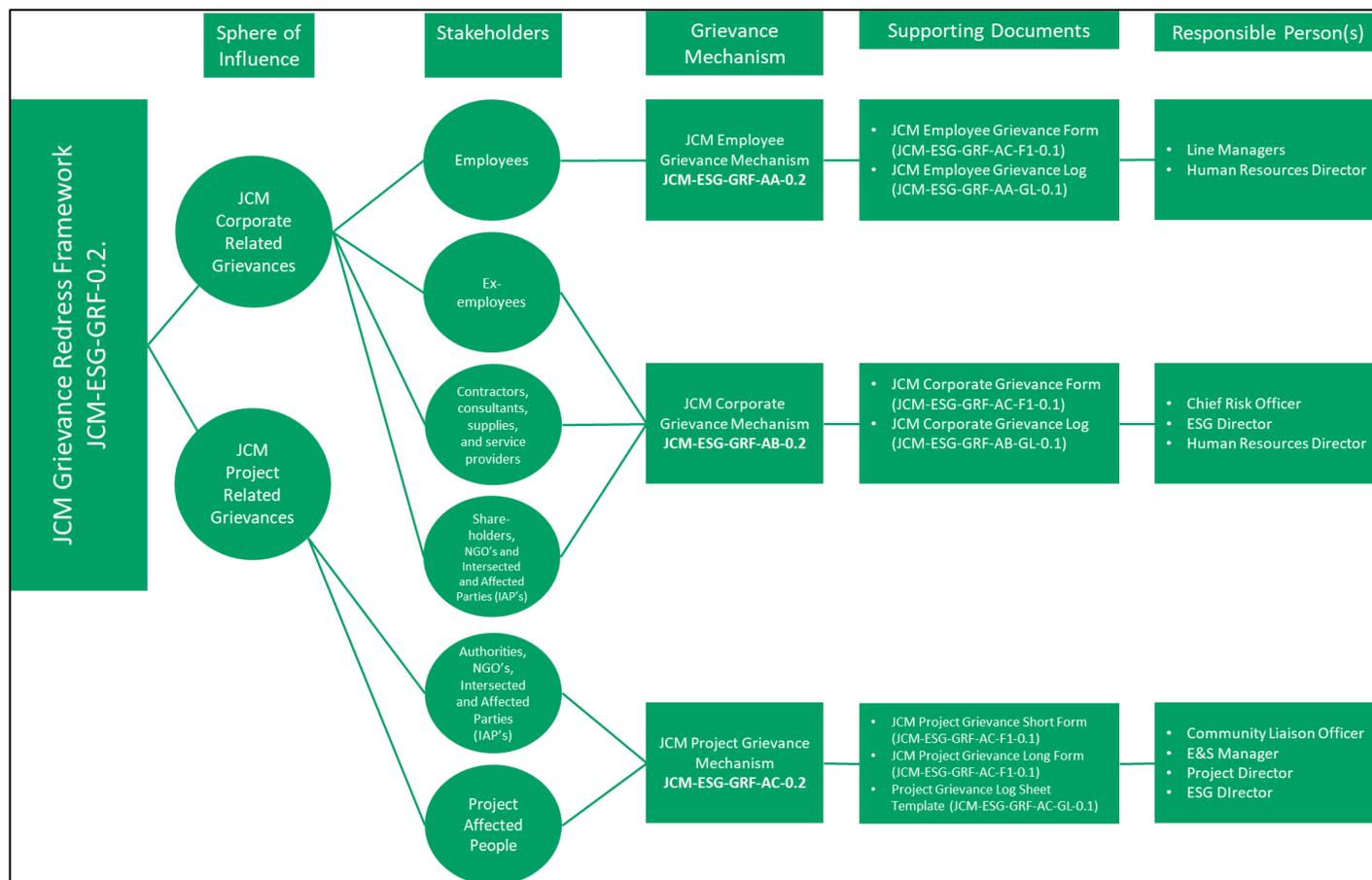


Figure 1: JCM Grievance Redress Framework Structure.

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 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

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- 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.

This document is the JCM Corporate Grievance Mechanism (JCM-ESG-GRF-AB-0.2) and applies to all individuals or organizations external to JCM employment and not related to a specific project.

4 Procedure

This Grievance Mechanism should ensure that all grievances that exist are reported and recorded, assigned to the correct person or team and resolved in a timely manner. This includes ensuring that:

- Grievances received are acknowledged and recorded;
- A suitable person is assigned responsibility for addressing, resolving and closing out the grievance; and
- That the complainant is kept informed on a regular basis and knows what to expect in terms of response time and when.

The Grievance Mechanism Procedure consists of 4 steps, namely:

- Step 1: Formally raising a grievance;
- Step 3: Grievance resolution; and
- Step 4: Appeal.

These steps are described in detail in the sections below.

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4.1 Step 1: Raising a Grievance

To raise a grievance, you should put your grievance in writing using the form provided (see “JCM Power Corporation Formal Grievance Form” in Section 5.8), without unreasonable delay, and send it to the JCM Chief Risk Officer (CRO). Grievance Forms can be emailed, sent via post or delivered verbally in person or by phone. Contact details for the submission of a grievance are as follows:

Attention: Mr Martin Ritchie, Chief Risk Officer

Email: mritchie@jcmpower.ca

Tel: +1 647 447 1662

Address:

JCM Power Corporation
21 St. Clair Avenue East
Suite 700 Toronto,
Ontario
M4T 1L9
Canada

The CRO will arrange a meeting with you to discuss your grievance, normally within five (5) working days of receiving your complaint. You will be given the opportunity to explain your grievance and how you think it should be resolved. The CRO will listen carefully to what you have to say and will discuss the matter thoroughly with you. Your complaint may need to be investigated further and you will be advised if this is the case.

Should you wish to raise a grievance with a female manager please address it to the Human Resources Director as follows:

Attention: Ms Olivia Ariss, Human Resources Director

Email: oariss@jcmpower.ca

Tel: +1 647 447 1662

Address: As above

If in the unlikely event that your grievance involves the CRO, please direct your grievance to the Chief Operating Officer (COO) as follows:

Attention: Mr Tom Heintzman, Chief Operating Officer

Email: theintzman@jcmpower.ca

Tel: +1 647 447 1662

Address: As above

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4.2 Step 2: Grievance Resolution

After your grievance has been fully investigated, you will be notified in writing of the outcome and of any action to be taken to resolve your grievance. This response will be given to you in writing, within ten (10) working days of the meeting. If it is anticipated that the response will take longer you will be informed of this and of the expected timescale. You will also be informed of your right to appeal if you are dissatisfied with the outcome.

4.3 Step 3: Appeal

If you are dissatisfied with the handling of your grievance, you can appeal in writing to a senior manager who has not been involved in the grievance up to this point. In such as case you should submit your appeal to one of the following Senior managers:

Human Resources Director: Ms Olivia Ariss, oariss@jcmpower.ca

Chief Operating Officer: Mr Tom Heintzman, theintzman@jcmpower.ca

General Counsel: Mr Patrick Moyer, pmoyer@jcmpower.ca

Chief Financial Officer (CFO): Mr Donn Hanbidge, dhanbidge@jcmpower.ca

Chief Executive Officer (CEO): Mr Christian Wray, cwray@jcmpower.ca

Tel: +1 647 447 1662

Address: As above

An appeal officer (where possible, a senior manager with no previous involvement in the case) will be appointed to consider your appeal and, normally within five (5) working days of receiving your appeal, will arrange a meeting with you to discuss your appeal. The appeal officer will listen carefully to what you have to say and will discuss the matter thoroughly with you. The appeal officer may want to investigate your complaint further and you will be advised if this is the case. After your appeal has been investigated, you will be advised, in writing of the outcome. This response will normally be given to you in writing, within ten (10) working days of the appeal meeting. If it is anticipated that the response will take longer you will be informed of this and of the expected timescale. You will have no further right of appeal.

During all stages of the formal grievance procedure you will be provided with copies of notes as soon as they become available.

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5 Supporting Principals and Guidance

The following sporting principals and guidance notes are provided for both complainants and JCM managers handling grievances in order to facilitate a fair and equitable grievance process.

5.1 Right to be Accompanied, Employee Representation, and External Tribunals

You have a right to be accompanied by a colleague or a legal representative at formal grievance meetings. If you wish to be accompanied, please confirm your request to the CRO who will confirm if it is reasonable and appropriate for your chosen companion to attend in the circumstances.

Normally, collective grievances and disputes should be handled using the same approach as that used for individual complaints and grievances. Where there are existing arrangements for collective grievances or dispute resolution, any new procedures should build on this agreed framework. If there is an organization that files the grievance or represents the complainant filing the grievance, that organization should have the right to be notified and be present at all steps of the procedure.

5.2 Transparency, Impartiality and Confidentiality

Every complaint should be treated seriously and dealt with consistently, in an impartial, confidential and transparent manner. This helps to establish the legitimacy of the mechanism and ensures that it will be used.

5.3 Anonymity

Persons or organizations should be able to raise grievances anonymously and anonymity should be safeguarded and respected by all parties involved in a grievance.

5.4 Prejudice and Retribution

Persons or organizations should be able to raise grievances without fear of prejudice or retribution. Prejudicial behavior or retribution against a person or organization raising a grievance should not be tolerated under any circumstances and should be treated with the utmost severity.

5.5 Vulnerable Groups

Complainants that may feel particularly vulnerable (such as ethnic or religious minorities, woman, migrants, youth, persons with disabilities, etc.) should not be deterred from raising a grievance. Therefore, the process for raising grievances should be confidential in order to allow complainants to raise a grievance without anyone else knowing. It is also good practice to have both a male and a female staff member available for receiving and processing grievances so that employees can choose whom to speak to. Where there are

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language barriers, it may be necessary to provide written materials in different languages and also to engage interpreters. Interpreters should be perceived by both sides as being impartial.

5.6 Grievance Mechanism Access

All stakeholders should have access to the grievance mechanism. Details of how it operates – including an up-to-date list of contact points – should be readily accessible as follows:

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

All communications about the grievance mechanism should be in a language that stakeholders understand.

5.7 Time Keeping

Procedures should allow for time to investigate grievances fully but should aim for swift resolutions. The longer a grievance is allowed to continue, the harder it can be for both sides to get back to normal afterwards.

5.8 Record Keeping

Once a grievance has been raised, it is important that proper written records are kept, to aid transparency and allow for any review of the process or decision to be undertaken. If possible, the original complaint should be in writing. The grievance response should also be recorded. Any actions taken, along with the reasons for these, should also be recorded, for example, a grievance hearing and finding. Minutes of all meetings should be taken and signed by both parties. Documentation should respect the complainants’ rights to privacy and data protection.

A grievance form is provided in JCM document **JCM-ESG-GRF-AB-F1-0.1** and should be used when recording a grievance. All grievances should be logged in the JCM Corporate Grievance Log Sheet (**JCM-ESG-GRF-AB-GL-0.1**).



Corporate Grievance Form

If you wish to remain anonymous do not complete items 1.1-1.5, 5 and 7.

1. Statement of Grievance

- 1.1 Name of Complainant _____
- 1.2 Complainant relationship to JCM _____
- 1.3 Complainant Email _____
- 1.4 Complainant Telephone _____
- 1.5 Complainant Address _____
- 1.6 Date _____
- 1.7 Location _____

2. Statement of Grievance

Please write the nature of the facts of the grievance (what, where, who, when, why).

3. Legal, Contract, Policy, or Procedural Violation

Please list which law, contractual clause, policy or procedure was violated (if any)

4. Remedy Sought

Please write what remedy you would propose (if any).

5. Grievance Submission and Acknowledgment of Receipt

Submitted by:

Name Surname

Signature

Received by:

Name Surname

Signature



6. Grievance Close-out

Please write what remedy was implemented in order to address the grievance.

7. Grievance Close-out an Acknowledgment of Remedy

Complainant

Name Surname

Signature

Close out by:

Name Surname

Signature