

GRIEVANCE REDRESSAL MECHANISM PROCEDURE

1. Context

A formal process is required to manage grievances and minimize social risks. The implementation of this procedure will result in the reduction of social risks, generate systemic change to reduce the volume of grievances and enhance the quality of the relationship between the project and its stakeholders.

The specific objectives of the grievance procedure are as follows:

- To provide a process by which grievances from communities, groups, individuals, local authorities, NGOs and other local stakeholders can be processed efficiently, and constructively. The goal is to resolve grievances amicably and if possible, minimize the use of the legal system.
- To offer individuals and community groups with a way to express their grievances and problems in a rational and transparent manner and demonstrate the important role of stakeholders in programme design and implementation.
- To institutionalize a reporting system to take corrective action.
- To establish a transparent relationship based on mutual respect with the communities and other local stakeholders.
- To establish Project responsibility regarding grievances and establish a course of action to manage the grievances in a timely manner.

A functioning, transparent, and accessible Grievance Redress Mechanism (GRM) is an essential part of ensuring compliance with the Project's Social and Environmental Safeguards (ESS). The project guarantees that communities which are affected or likely to be affected by the project will be informed about the project and that they have channels to raise their grievances, which may arise from Project activities. It is also accessible to other stakeholders, for example Project Owners, CSOs, private sector companies.

The GRM is to be disseminated at an early opportunity in the stakeholder engagement process (i.e. during Stakeholder Engagement Process) in a way that is easily understood by diverse stakeholders, including those who are illiterate and other especially vulnerable people. The GRM guarantees that stakeholders are fully informed on how to register complaints, including full contact details for anyone to lodge a formal complaint. This GRM is consistent with international standards and Grenada law.

Stakeholders **firstly should use the GRM process as developed and implemented by the project (see details described in this document)**. If the grievant does not see their grievances addressed by the project, the grievant may also get in contact with the Vertical Head- Audit

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GRM Principles

The GRM helps ensure and embrace the following principles and actions:

- Protect the rights and interests of the participants, beneficiaries, and stakeholders (hereafter, “stakeholders”) of the Project;
- Adequately and promptly address grievances that arise during implementation;
- Confirm compliance with the GCF Safeguards on environmental and social issues.

The GRM applies to grievances regarding the implementation of the overall project, which will be managed jointly by the project manager in collaboration with Vertical Head-Audit. As specifically outlined in the project’s Environmental and Social Assessment & Environmental and Social Management Plan (ESMP) the grievances mechanism accounts for:

- a) persons affected by land acquisition and temporary land occupation,
- b) persons affected by construction nuisances.
- c) grievances for construction workers which is to be managed.

2. Objectives and Approaches

The Objectives of the project’s Grievance Redressal Mechanism (GRM) is to

- a. be responsive to the concerns of people adversely affected by project
- b. be fair and equitable to all stakeholders;
- c. ensure all Government and Environmental and Social Standards are adhered to in all subprojects and activities.
- d. address negative environmental and social impacts of all sub-projects and activities.
- e. resolve all grievances emanating from the project activities.
- f. establish relationships of trust between project staff and local communities and stakeholders.
- g. create transparency between stakeholders including affected local communities and residents through an established communication system.
- h. resolve environmental and social grievances in the project areas.

3. Governance and Management Structure of the

Responsibility for Grievance Redressal

The Permanent Secretary, of the Ministry of Infrastructure Development, Public Utilities, Energy, Transport and Implementation has overall responsibility for the GRM. The Project Manager is designated as the key officer in charge of Grievance Redressal. He/ she can set up a Safeguard Team to advise and support on the grievance mechanism. The team will be

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tasked with the following:

- a. Coordinate Grievance Redressal Mechanism (GRM of project activities to resolve issues in general).
- b. Act as the Focal Point on Grievance Redressal
- c. Create awareness of the Grievance Redressal Mechanism (GRM) amongst all the stakeholders through public awareness activities.
- d. Assist in Redressal of all Grievances by coordinating with the concerned parties.
- e. Maintain information of grievances and Redressal.
- f. Monitor the project activities of contractors and consultants on Redressal of Grievances.
- g. Regularly contact all points of receipt of complaints, receive the complaints made and assist in Redressal of all Grievances by coordinating with the concerned parties.
- h. Prepare the progress for quarterly reports.

The Project Manager may set up a safeguard team to process the grievance in accordance with the tier approach outlined below.

In case of the need for the second tier of Redressal, the Project Manager will involve the national Grievance Redressal Committee (GRC), which consists of members of the Ministry of Social Affairs and the Ministry of Infrastructure Development, Public Utilities, Energy, Transport and Implementation and civic leaders and representatives. This committee will be chaired by the Permanent Secretary of the Ministry of Infrastructure Development, Public Utilities, Energy, Transport and Implementation or the Minister.

The terms of Reference of the GRC are as follows:

- a) Provide relief and support to the affected persons;
- b) Prioritize grievances and resolve them at the earliest;
- c) Provide information to Project Manager and Environmental and Social Specialist on serious cases at the earliest.
- d) Coordinate on the affected person getting proper and timely information on the solution worked out for his/her grievance.
- e) Study the grievances and advise Project Manager and Environmental and Social Specialist.

4. Submitting a Grievance or Complaint

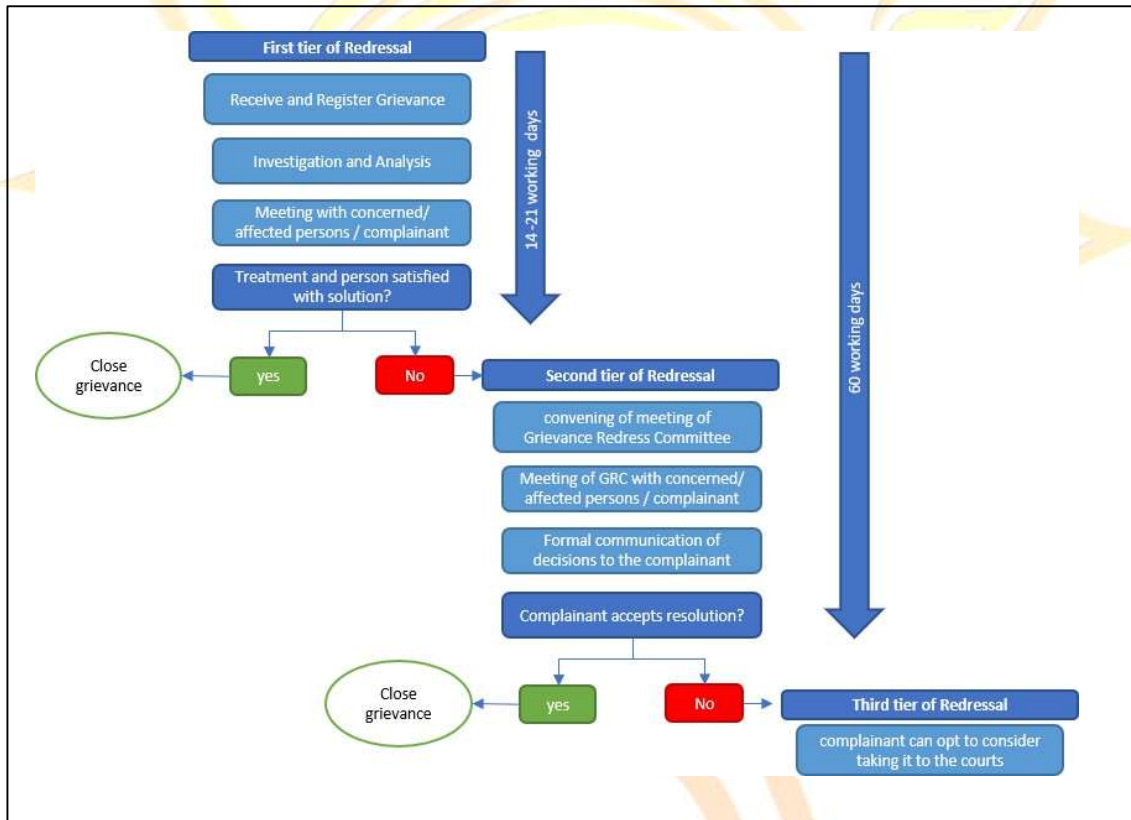


Figure Overview of the Grievance Redress Mechanism

A grievance or complaint can be submitted by a natural person or group of persons or community who has/have been or who may be affected by adverse impacts of the G-CREWS project. There are three tiers of redressal available as outlined in the following:

First tier of Redressal

The complaints are received at various established points at work levels. The stakeholders are informed of various points of making complaints. Complaints can also be made in writing, email, telephone or anonymously to:

Telephone #: +91 87772 45201, E-mail Address projects@ganapatiproductions.com .The Project Manager will collect the complaints from these points on a regular basis and document them. This is followed by the Project Coordinator contacting the concerned

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people/person to redress the Grievances. If the complaint cannot be resolved at this level within 21 working days it is taken to the next level, except were the complaint agrees to an extension of the timeline on the level of tier 1.

i. Mode of receipt and recording of Complaints

A grievance or complaint may be submitted in English only. Complaints can be made in writing, verbally, over the phone, emails, text messages that is available to the project. Complaints can be made anonymously. As soon as the designated persons identified above receives a complaint he/she would issue an acknowledgement in the format as given in Annex 1. The person receiving the complaints should try to obtain relevant basic information regarding the grievance and the complainant and will immediately inform the Project Manager in the format – Grievance Information Form (GIF) as given in Appendix 2.

After registering the complaint in the Grievance Redressal Registration and Monitoring Sheet, the Project Manager and the Safeguard team will review the complaint made in detail and forward the complaint to the concerned persons to address the grievance with specific dates for replying and redressing the same. Meetings with the affected persons /complainant will be held and an attempt to find a solution to the complaint received.

If necessary meetings, will be held with the concerned/ affected persons / complainant and the officers to find a solution to the problem and create plans to redress the grievance. The deliberations of the meetings and decisions taken are recorded. All meetings in connection with Redressal of Grievance including the meetings of the Grievance Redressal Committee will be recorded in established formats. Community representatives or representatives of the complainant will be allowed to sit in meetings.

The resolution at the first tier will normally be done within 14 working days and notified to the concerned through a disclosure form. Should the Grievance be not solved within this period, it would be referred to the next level of Grievance Redressal. However, if the Project Manager think that progress is being made towards a solution a decision may be taken to retain the issue at this first level. If the issue cannot be resolved within 21 working days, it will be transferred to the next level automatically, except were the complaint agrees to an extension of the timeline on the level of tier 1. The complainant may also request that the issue be transferred to the next level, after the 14 days period, if he or she feels it is not being addressed.

Second tier of Redressal:

The Project Coordinator with assistance from the safeguard team will coordinate the convening of the meetings of the GRC. He / She is also responsible for briefing the GRC on the deliberations of the first level of Redressal and on the views of both the parties. (Complainant and the Project).

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The GRC will hold the necessary meetings with the affected party / complainant and the concerned officers and attempt to find a solution acceptable at all levels. GRC would record the minutes of the meeting.

The decisions of the GRC are communicated to the complainant formally and if s/he accepts the resolutions, the complainant's acceptance is obtained on the disclosure format.

If the complainant does not accept the solution offered by the GRC, then the complaint is passed on to the next level / or the complainant can activate the next level. It is expected that the complaint will be resolved at this level in a maximum of 60 working days.

Third tier of Redressal

If the affected party / complainant does not agree for the resolution at the 2nd level, or there is a time delay of more than 60 working days in solving the issue, the complainant can opt to consider taking it to the courts.

The steps taken from the receipt of grievance to the resolution or grievance closure is in short outlined below:

Table 3 Grievance Redress Mechanism Steps

Grievance Redress Mechanism Steps	Description
1. Receive and register grievance	Stakeholders submit their grievances through the available grievance channel as described above. All grievances are registered by the receiving entity using a standard template (see chapter below). All grievances filed must be clearly documented and securely stored in the G-CREWS cloud database with limited access to the Safeguards Team.
2. Acknowledge and assign	The Safeguards Team must acknowledge receipt of the grievance to the grievant. As part of an internal assessment process the Safeguards Team must outline into the available template, how the grievance will proceed, assess the eligibility of the grievance, and assign organizational responsibilities to propose a response to the grievance.

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3. Propose a response	The entity responsible for proposing a response (as assigned by the Safeguards Team in step 2), will then propose options to the complainant and any other related parties to address the grievance. This could include: i) direct organizational response/action, ii) stakeholder assessment and engagement, iii) referral to a different mechanism (e.g. judicial grievance mechanism), or they could decide that the grievance is ineligible (see "Criteria for Eligible Grievances and Exclusions").
4. Agreement on response	Based on the responses proposed in step 3, the Safeguards Team, in collaboration and/or other entities involved to resolve the grievance will meet with the complainant and other related parties and try to reach an agreement that is acceptable to all parties. A meeting with the grievant should be prepared within 14 days.
If complainant agrees on response, refer to step 5, if not, refer to step 6	
5a. Implementation of response	The Safeguards Team will assign a relevant officer to oversee the implementation of the grievance, monitoring its progress and the effectiveness of the response. All grievances filed must be reported to SRPL Safeguard Team using a standardized template, including information on the status of all grievances.
5b. Grievance resolved and successfully closed	If the response is successful, the grievance will be resolved and successfully closed. The grievance report to SRPL Safeguard Team will be finalized and submitted by the project manager, noting that the grievance has been successfully resolved and has been closed.
5c. Grievance not resolved	If the response is not successful, the project manager, responsible for overseeing and monitoring the response, will review the response to be implemented (step 6).
In complainant does not agree on response (in step 4)	
6. Review	If no response can be met, the project manager will review the grievance with the Grievance Redress Committee. Together they will determine whether to revise the approach and propose other alternative responses, refer the grievance to another system (e.g. legislative, administrative, party, judicial, law enforcement, customary), or close out.

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7. Grievance referred or closed out	<p>Pending the result of the grievance review, grievances that cannot be re-resolved within 60 days from the acknowledgement of the complaint will be either referred to a different system or closed out.</p> <p>All grievances, including grievances that cannot be resolved, will be documented using a standard template, and reported to the PSC safeguard representative. The complainant can opt to consider taking it to the courts.</p>
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ii. Exclusions

A grievance or complaint received by the GRM will not be eligible, if it falls into any one or more of the following exclusions:

- A grievance or complaint regarding matters already concluded by any of the grievance mechanism in place, unless the complainant has submitted new material information or evidence that was unavailable at the time the matter was previously considered.
- a malicious, frivolous, or fraudulent grievance or complaint;
- a grievance or complaint to gain competitive advantage,

iii. Information Provided in a Grievance or Complaint

There are no formal requirements for filing a grievance or complaint. If the complainant does not wish to stay anonymous, the name, address, telephone number, email, and/or other contact information of a contact representing the complainant should be provided. In addition, the complaint should provide the following information:

- The name, location, and nature of the activity that has caused or may cause adverse impacts;
- A brief explanation as to how the complainant has been, or may be, adversely affected by the project; and

an indication of whether confidentiality is requested by the complainant.

In addition, where possible a complainant may wish to include:

- A description of the relevant operational policies and procedures, if known, that the complainant alleges have not been complied with;
- A description of other efforts including access to grievance/redress mechanisms of the AE or EE or other dispute resolution processes, if any, that the complainant has pursued or intends to pursue to resolve the concerns, and redress, if any, already received from such efforts; and
- Other relevant information including documents, media reports, photographs, videos

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and recordings, if any, which might assist and/or facilitate the GRM's processing of the grievance or complaint.

5. Independent Redress Mechanism

Complaints to the SRPL can be made through the SRPL whistle-blower policy. Confidential submission of reports is possible and can be submitted online via mail accounts_legal@ganapatipproducts.com. Information about any negative impacts of SRPL's actions on human rights can be sent to the independent integrity officer at the Compliance and Integrity Unit at solar@ganapatipproducts.com. All complaints are dealt with immediately and confidentially, drawing on internal and external expertise as required.

6. Building Awareness on GRM Structure

The Project Manager with support of the Safeguard Team will initially brief all the staff of project office, the sub-projects including consultants and contractors, and activities and the staff of the implementing Ministry, on the Grievance Redressal Mechanism of the Project and explain to them the procedures and formats to be used including the reporting procedures.

The Project Manager with support of the Safeguard Team will brief the Parish representatives and community and civic leaders of the project communities on the Grievance Redressal Mechanism of the Project and explain the procedures and formats to be used including the reporting procedures.

Awareness campaigns would be conducted targeting the project staff and Implementation staff, communities of project and sub-project's location, to educate the people on the availability of the mechanism. Various mediums will be used. A project site board will be elected on the sites of sub-projects indicating the existence of the mechanism and a phone number, email and address for further information. The GRM will be translated into local and colloquial expressions if determined to be needed.

Informing beneficiaries about GRM

The 3 options to submit a grievance are shown on the display board and in a flyer, which is provided to each community during the stakeholder engagement process and which is to remain accessible to all communities during the lifetime of the project.

In addition to options how to file a grievance, the following aspects are explained to beneficiaries during the stakeholder engagement process: GRM principles; Criteria for Eligible Grievances and Exclusions; confidentiality measures; GRM Steps after filing a complaint.

Reporting to the GCF

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The Project is committed to transparency and accountability concerning complaints, while also protecting the confidentiality of those involved. To this end, from 2024, its annual report includes a brief section documenting the number and nature of complaints received and how they were resolved. Identifying details of individuals will not be included.

Periodic review by the Grievance Redressal Commit

The Grievance Redressal Committee may review the nature of grievances that have been represented and if grievances are repeated, recommend suitable changes in implementation procedures recommended these to the Project Management for consideration.

GRM Jurisdiction.

This is a project specific GRM and applicable to solve the concerns of the stakeholders of the Project. This is however not intended to bypass Governments own redress process; it is intended to address affected people's concerns and complaints promptly, making it readily accessible to all segments of the affected people and is scaled to the risks and impacts of the Project.

Access to Information, Confidentiality and Disclosure

The GRM recognizes and respects a complainant's right to confidentiality (which extends to the confidentiality of an authorized representative when requested by the complainant, but subject to the Project Manager and the Safeguards Team's consideration of the justification) including confidentiality of identities and information provided to the Project Manager and Safeguards Team.

In situations where the name and identity of a complainant or representative may need to be disclosed to process the grievance or complaint or to provide redress, the Project Manager and Safeguards Team will proactively consult with the complainant and/or the representative and will only disclose such information with their consent. Pending consultations with the complainant and/or the representative regarding confidentiality, the Project Manager and Safeguards Team shall keep the identities of the complainant and the representative, and the information provided by them to the Team, confidential.

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Appendix 1 Acknowledgement Receipt

Registration No. Subproject: Location:

Parish:

Name and Address of Complainant:

Date of Complaint..... (dd/mm/yyyy)

Documents comprising the complaint: (petition, supporting documents etc.)

1)

2)

Summary

of

Complaint:

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Name and Signature of the Complainant:

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.....

Name and Signature of Person receiving the complaint:

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.....

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Appendix 2 Grievance Information Form (GIF)

Subproject: Location: Parish:

Date: (yyyy/mm/dd) Place of Registration: Registration No.: ...

Contact details of the complainant:

Name: Age: Gender:

Address:

Phone No. Email Address:

Location related to the complaint / issue:

Village/Town:

Category of complainant:

- Affected person
- Mediator for affected person
- Civil organization / Service Organization
- Other (specify)

Summary of grievance:

.....
.....

(Attach letter or a petition / documents as submitted)

Source of complaint:

Attachments: 1) _____ 2) _____ 3) _____ Prepared

by: Date (dd/mm/yyyy)

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Appendix 3 Grievance Information Documentation Form (GIF)

Subproject: Location: Parish:

Date: (yyyy/mm/dd) Place of Registration: Registration No.: ...

Contact details of the complainant:

Name: Age: Gender:

Address:

Phone No. Email Address:

Location related to the complaint / issue:

Village/Town:

Category of complainant:

- Affected person
- Mediator for affected person
- Civil organization / Service Organization
- Other (specify)

Summary of grievance:

.....
.....

(Attach letter or a petition / documents as submitted)

Source of complaint:

Attachments: 1) _____ 2) _____ 3) _____ Prepared

by: Date: (dd/mm/yyyy)

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Letter	Telephone	Fax	Email	Verbal	Complaint Box	Other (Specify

Attachments: 1) _____ 2) _____ 3) _____

Prepared by: Date..... (dd/mm/yyyy)

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Appendix 4 Meeting Record Format – (Grievance Redress Committee (GRC) and Other Meetings)

Subproject: Location : Parish :
.....

Date of the Meeting: Complaint Register No:

Venue of meeting:

Details of Participants:

Complainant	Project/Government

Summary of

Grievance:.....
.....

.....
.....

Notes on Discussion:

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Decisions taken in the meeting / Recommendations of

GRC:.....

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.....

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.....
Issue Solved / Unsolved _____

Signature of Chair Person of the meeting:

Name of Chair Person:

Date: DD/MM/YYYY

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Appendix 5 Disclosure Form

Subproject: Location : Parish :

Result of Grievance Redressal

1. Registration No.:
2. Name of Complainant:
3. Date of Complaint:
4. Summary of the Complaint:
5. Summary of Resolution:
6. Resolved at First Tier/Second Tier/Third Tier (Use appropriately)
7. Date of Redressal of the Grievance: (dd- mm – yyyy)

Signature of the Complainant in acceptance of the Solution to his /her Grievance

Name:

National ID number:

Signature of Social Development Specialist and Project Coordinator:

Name:

Place:

Date:(dd –mm – yyyy):

Name:

Place:

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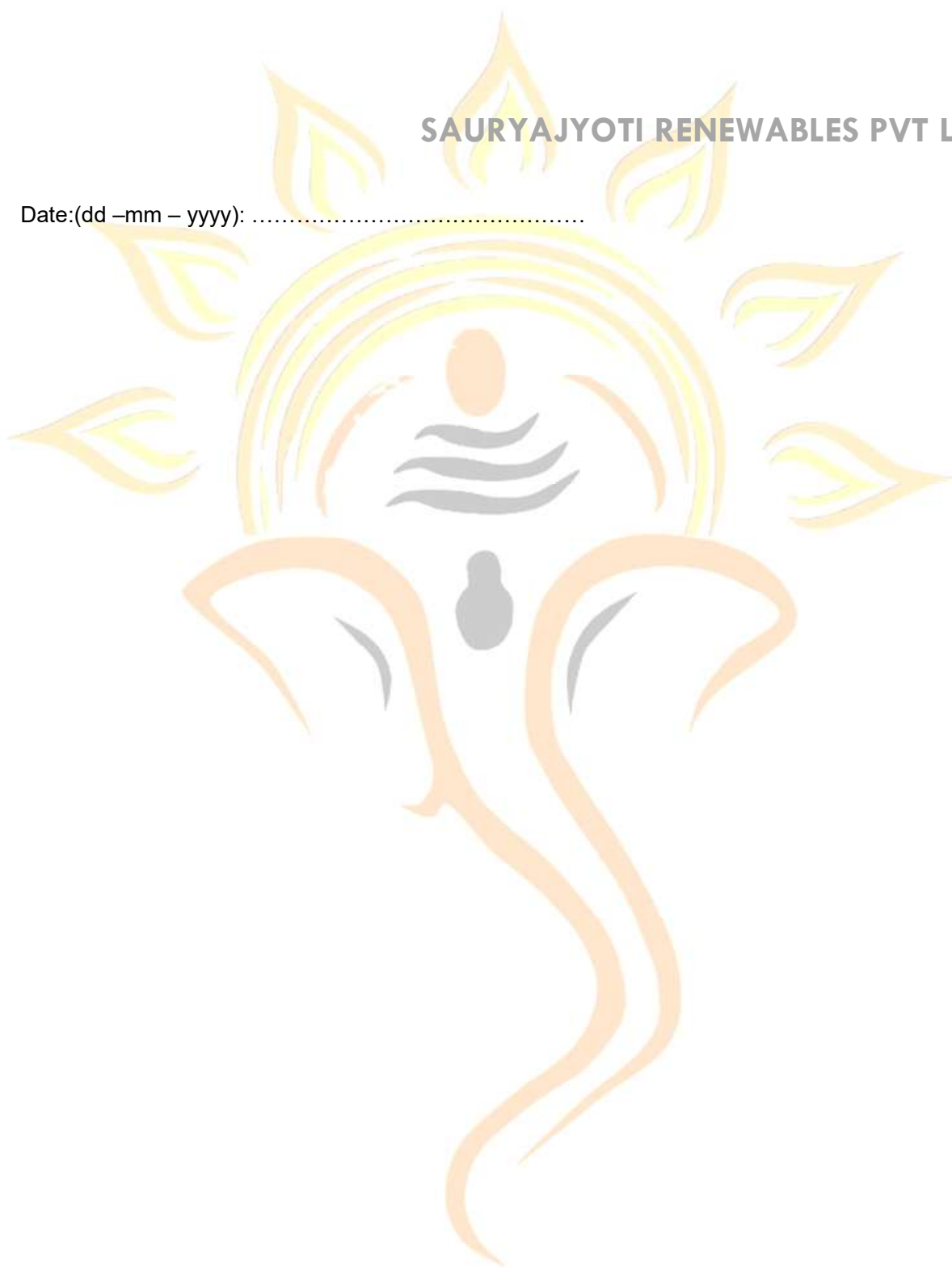
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Date:(dd –mm – yyyy):



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Appendix 6 Tracer Matrix for Grievances

Main Project	Area/Sub-	Site visit	Concern	Indicators or Evidence of concern	Composition query	Query submission	Person in charge response (relevant state rep)	Critical intervention routes	Feedback from engagement	Results or Actions following engagement	Duty bearer for follow up

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