



Grievance Policy

1. Scope

- 1.1. This Procedure is open to all stakeholders, including a person or organisation representing a group of affected parties, who consider themselves affected by KSV's investment activities. Complaints may be submitted on a named or anonymous basis. Although anonymous submissions may be harder to resolve, they will be treated in the same way as named Complaints to the extent reasonably possible.
- 1.2. There are no restrictions on the type of issue a stakeholder can raise under this Procedure. However, when a Complaint is received that is more appropriately handled under a separate KSV process established for that purpose (such as employment or business integrity related issues), it will be re-directed so as to prevent a parallel process being followed. All Complaints received under this Procedure shall be tracked until close-out regardless of the process under which they are handled.
- 1.3. KSV reserves the right not to address a Complaint which, after consideration, is not eligible due to being general, unspecified, and therefore un-actionable, is otherwise malicious or vexatious in nature, or concerns a matter for which KSV has no formal responsibility (for example, a matter which is under government control).

This GRM will be made available to parties who have grievances arising from activities related to the implementation of GCF-funded projects. These grievances could be related, but not limited to:

- Environmental, social, community health, safety, and security;
- Gender bias and harassment;
- Labor, compensation, and any issues that may arise due to interactions between the labor workforce and host communities;
- Resettlement-related grievances, such as the valuation of assets, amount of compensation paid, level of consultation, non-fulfilment of contracts, and timing of compensation, amongst others, will also be handled by this process.

Grievances will be deemed non-eligible if:

- Complaint is submitted 2 years after the GCF- funded project or program has been closed;



- Complaint is submitted 2 years after the date that the complainant became aware of the negative impacts by a GCF-Funded project or program.

2. Workflow

Process	Description	Days
Complaint reported		
Receive	• KSV receives the Complaint from the Complainant in any communication form (including face-to-face, phone, fax, letter, delivery, or email) • Complaint recorded by KSV Staff Members • KSV staff assist Complainant to complete and submit the Complaint form	1 day
Assess and assign	• Record Complaint in Complaints Log • Complaint Officer to assess Complaint eligibility and significance • Complaint Officer to assign the complaint to an appropriate Complaint Owner	3 days
Acknowledge	• Receipt of Complaint formally acknowledged to the Complainant through appropriate communication medium (recorded in writing)	1 day
Investigate and respond to Complaint		
Investigate	• Consult with relevant parties • Identify further action required • May require site visits and discussions with other stakeholders	Up to 1 month
Response	Progress update provided to Complainant – including, if necessary, an indication of additional time and resources required to resolve Complaint	Up to 1 month
Resolution	Confirm with Complainant that Complaint can be closed, or determine what follow-up is necessary.	Case by case
Appeal	If KSV and the Complainant are unable to agree on a solution, the Complaint may be escalated to the Appeals Committee for review and final decision.	Within one month after escalation
Close Complaint	Record final sign-off of Complaint according to appropriate outcome	Case by case



3. Roles and Responsibilities

Roles and responsibilities under this Procedure are as follows:

Role	Responsibility
Fund Manager	Accountable for the implementation of this procedure and approving the close out of complaints based on recommendations from the Complaint Officer
Complaint Officer	Responsible for the overall implementation of this procedure. This includes • serving as custodian of the Complaints process • monitoring the handling of Complaints • suggesting changes to policies or practices based on lessons learned • receiving and reporting Complaints • maintaining the Complaints Log • supporting the resolution of Complaints • coordinating the response to a Complaint and serving as the main point of contact with the Complainant
Complaint Owner	Responsible for investigating and resolving a Complaint in coordination with the Complaint Officer. This includes • conducting investigations • proposing resolutions • implementing corrective actions • coordinating with the parties.
Investment Officer	If the Complaint relates to a particular KSV investment, then the Investment Officer acts as the relationship manager with the Investee Company in question and will notify them of the Complaint and engage with them with regard to the resolution procedure.
Appeals Committee	Responsible for reviewing overdue or escalated Complaints, authorising additional actions, and approving the close out of Complaints where it is not reasonably possible to reach an agreed resolution with the Complainant



4. Lodging Grievances

KawiSafi aspires to make any effort to report a grievance easily accessible through a variety of communications channels. KawiSafi believes that any stakeholder who has a legitimate grievance should be able to access KawiSafi's Grievance Redress Mechanism via the communication style that best fits their needs. We seek to ensure that grievances can be shared by any population including youth, women, and marginalized and vulnerable populations like indigenous populations. We also seek to ensure that lodging grievances does not harm the populations that may participate by ensuring anonymity if the complainant requests anonymity or we believe that identification could lead to harm, intimidation, or fear. The following methods of communication are available for lodging a grievance:

- KawiSafi's Grievance Redress Mechanism webpage has a detailed grievance procedure, delineates eligible grievances, and references our GRM investigator's biography. Webpage also has a complaints [box](#) where complainants can share complaint confidentially and anonymously if they so choose.
- Direct complaints to KawiSafi's GRM investigator, our Managing Director.
- Direct complains to KawiSafi staff including the directors or other members of the team.
- Calling KawiSafi's Nairobi phone line: +254 717 861 827
- Mailing KawiSafi's manager's Nairobi's address: Acumen Capital Partners (EA) LTD, P.O. Box 60190-00100, Nairobi, Kenya and
- Emailing KawiSafi's email address: info@kawisafiventures.com