

# Comprehensive Grievance Assessment Report

An Evaluation of Sustainability Performance & Strategic  
Innovation Opportunities

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DIGITAL ACCESS

POWERED BY **ESG GLOBAL STANDARDS**

## Grievance Assessment Results

Detailed sustainability evaluation

**3** /5

Sustainability Rating

## **The Following Best Describes Our External Stakeholder Grievance Mechanism Related To Our Esms:**

Option: We have procedures covering all aspects of our grievance mechanism. We involve external stakeholders in reviewing its effectiveness and revising it as needed. (=5)

Justification: According to the referenced standards (IFC/World Bank-based ESMS guidance, e.g., Loop: Stakeholder Engagement Good Practice Handbook and related external communications and grievance mechanism guidance cited in the context), a fully implemented external grievance mechanism should include: public, accessible channels to receive concerns; clear assignment of responsibilities; documented procedures to register, screen, investigate, determine resolution and redress options; timely and transparent communication of decisions; a formal grievance register; and ongoing monitoring and periodic review of the mechanism with stakeholder involvement. Assessment against these requirements shows that the assessed ESMS documentation provides:

- External channels and documented procedures: Gridworks discloses an External Grievance Form, a Grievance Register, and a defined flow for submission, acknowledgement, assessment, investigation, response, closure, and escalation to external dispute resolution if needed. This demonstrates a concrete, procedural approach rather than mere policy statements.
- Assigned responsibilities and timelines: The procedure assigns roles (ESG Lead, CFO, Executive Management) for engagement protocols and specifies a 48-hour acknowledgement and a 10-working-day response after investigation. This reflects accountability and time-bound processing.
- Documentation and transparency: The process requires recording minutes of external engagements and maintaining a Grievance Register. The policy includes a mechanism to inform complainants if they can pursue external dispute resolution and outlines close-out and documentation of evidence and agreements.
- Monitoring and continual improvement: The ESMS references annual review of grievances for trends and potential improvements, and mentions stakeholder-driven monitoring as part of ES monitoring, implying some level of stakeholder involvement in evaluating effectiveness. Gaps relative to the higher end of the standard (to justify not dropping below 5 and to explain any potential improvement):

- External stakeholder involvement in reviewing effectiveness is mentioned in practice but could be strengthened with a formal, ongoing multi-stakeholder review process (e.g., a standing external stakeholder panel or an explicit annual joint review with representatives from affected communities, NGOs, regulators) with documented terms of reference and action plans. The current text suggests stakeholder-driven monitoring but does not clearly codify a formal multi-stakeholder review cycle.
- Public accessibility and language considerations: While external channels exist (External Grievance Form) and communications are recorded, the documentation does not explicitly state public availability, language accessibility, or measures to ensure culturally appropriate and barrier-free access (beyond general references in the standards).
- Independent mediation for complex or recurring issues: The materials note escalation to external dispute resolution but do not specify the use of independent mediators or third-party facilitators for particularly complex or persistent grievances, beyond general guidance.
- Metrics and verification of effectiveness: There is a reference to annual grievance reviews, but the documentation would benefit from explicit grievance

metrics (e.g., time-to-resolve, rate of closure, re-opened cases, satisfaction surveys) and a formal verification step to close the loop with stakeholders. Actionable recommendations to reach higher performance (aligned with the standards):

- Formalize multi-stakeholder oversight: Establish a formal, documented process for external stakeholder involvement in evaluating and revising the grievance mechanism (e.g., annual stakeholder review with terms of reference, representative inclusion, and published outcomes/actions).
- Enhance accessibility and inclusivity: Explicitly state public availability of the grievance mechanism, provide materials in relevant local languages, and ensure options for anonymous or verbal submissions are clearly supported and protected. Include no-cost access and solutions for low-literacy stakeholders.
- Strengthen monitoring and metrics: Develop and publish a Grievance Mechanism Performance Dashboard with defined KPIs (e.g., number of grievances received, time to acknowledge, time to resolve, resolution outcomes, rate of re-opened cases, stakeholder satisfaction, and closures). Include periodic independent verification or audit of the grievance process.
- Expand independence for complex cases: Create a tiered resolution approach where highly sensitive or systemic issues can be escalated to independent mediators or third-party facilitators, with clear criteria for such escalation.
- Documentation and feedback loop: Ensure all steps (screening, investigation, decision, redress, and closure) are consistently logged with traceable evidence, and publish periodic anonymized summaries to demonstrate responsiveness and system learning.
- Training and awareness: Implement ongoing training for all staff involved in grievance handling to ensure consistency, confidentiality, non-retaliation, and timeliness in responses.

In summary, the assessed ESMS content provides a robust, procedural external grievance mechanism with defined responsibilities, documented processes, and a commitment to ongoing review, aligning with the highest tier of the referenced standards. The identified gaps are primarily around explicit formalized external stakeholder review, broader accessibility considerations, and enhanced metrics/independent review for complex cases. Implementing the recommendations will strengthen alignment with the standards and move toward full compliance at the 5 level.

★ ★ **Score: 5/5**

## **At My Company, Handling Inquiries, Concerns Or Formal Complaints From External Stakeholders Is The Day-To-Day Responsibility Of:**

Option: We have one person or one area of the company that manages this, and they coordinate with other areas of the company relevant to particular cases. (=2)

Justification: According to the reference standards (as described in the provided context on formal complaint handling and stakeholder engagement, including the right of external stakeholders to lodge complaints through written or verbal channels, and the requirement that complaints be managed in a structured, accountable manner), the organization should have a clearly defined responsibility for grievance handling, with coordination across relevant functions and documented escalation when needed. The assessed ESMS documentation assigns the responsibility to a small leadership duo: “the ESG Lead together with the Chief Financial Officer (CFO) in charge of Human Resources at Gridworks” for implementation of the Grievance Redress Procedure across activities, and outlines a structured process for handling each complaint—from registration, impact assessment, and investigation by the Labor and Environmental Standards Performance Team, Sourcing Team, and other relevant departments, to escalation to the Company Executive Committee if unresolved, and finally to documentation, reporting to originators/all parties, and a public summary where appropriate. This aligns most closely with option 2, which describes having one person or one area that manages this and coordinates with other areas relevant to particular cases. The documentation does not demonstrate a full, separate, cross-functional “team” with formal training (which would align with option 3), nor does it show an independent external facilitation mechanism for serious grievances (which would align with option 5). While there is a formal escalation pathway to the Executive Committee, the governance remains centralized around two roles rather than a dedicated, trained grievance team with senior management directly involved in day-to-day decisions (which would be closer to option 4). There is no explicit reference to independent facilitators for serious complaints, as described in option 5, so that option is not supported by the evidence. Gaps relative to the reference standards and implications for improvement: - While the policy identifies roles (ESG Lead and CFO-HR) and escalation to the Executive Committee, it lacks explicit evidence of a formal, trained, dedicated grievance handling team with defined competencies and ongoing training. This would be required to reach higher scores (3–5) per the standard expectation of a dedicated, trained group with clear responsibilities and, for higher levels, senior management authority. - The documentation does not clearly demonstrate external, independent oversight or facilitation for serious or high-risk complaints, which would be expected under more robust, externally verifiable grievance mechanisms (as implied by options 4–5). - There is limited detail on performance indicators, time-bound targets beyond the generic acknowledgement within 48 hours and a 10-working-day investigation outcome, and on ongoing monitoring/review of grievance outcomes beyond annual trend review. Stronger evidence would include specific metrics, responsible owners for each metric, and verification steps. - Public disclosure is mentioned in the reference example, but the assessed ESMS only notes internal documentation and reporting back to complainants; no explicit mechanism for external or independent



publication of summaries or aggregated learnings is described. Recommendations to improve toward higher options (based on the standards): - Establish a formal, trained Grievance Handling Team with defined roles across ESG, HR, Legal, and Operations, including documented training plans, competency requirements, and regular refresher courses. Clearly assign responsibilities for intake, triage, investigation, remediation, and closure. - Implement explicit external oversight or independent facilitation for serious grievances (e.g., a standing arrangement with an independent third party or external mediator for select cases) and document when and how such facilitation is engaged. - Develop and publish specific grievance handling KPIs (e.g., max days to acknowledge, max days to initial response, investigation duration targets, proportion of grievances resolved within target timeframes, rate of reoccurrence for root causes) with assigned owners and verification steps (internal audits, management review meetings, and external assurance where feasible). - Strengthen transparency with stakeholders by providing clear escalation criteria to senior management, defined steps for root-cause analysis, corrective action plans, and a mechanism for external reporting where appropriate (including anonymized summaries of grievances and lessons learned in annual ESG disclosures or on the website). - Expand the Grievance Register to include trend analysis, risk-based prioritization, and periodic performance reviews (e.g., quarterly management reviews) to ensure continual improvement and alignment with the referenced standards. In summary, the current ESMS supports a centralized grievance handling model managed by two senior roles with cross-functional coordination and an escalation pathway, aligning best with option 2. To advance to higher options, the organization should establish a trained, dedicated grievance team with clear authority, external facilitation for serious cases, robust performance metrics, and enhanced transparency and independent review mechanisms in line with the referenced standards.

★ ★ Score: 2/5

## **If Representatives Of The Local Community Complained That Our Company Was Causing Negative Environmental Or Social Impacts, We Would Most Likely Respond As Follows, Based On Our Current Practices:**

Option: We would meet and coordinate with the group to investigate the problem and discuss the related action plan. (=3)

Justification: According to the referenced standards (The Office of the Compliance Advisor Ombudsman: A Guide to Designing and Implementing Grievance Mechanisms For Development Projects, Part II), grievance management should involve a formal process beginning with acknowledgment and assignment, dialogue with complainants, investigation, development of an action plan, and coordination for implementation—with clear responsibilities, timelines, and eventual closure or escalation if needed. The assessed ESMS documentation demonstrates procedural elements related to grievance management: there is a Grievance Reporting Procedure and a Grievance Redress Policy with defined roles (e.g., ESG Lead, ESG Associate, Chief Financial Officer) and responsibilities including monitoring, investigation of incidents, and development of corrective/preventive measures as needed. There is evidence of internal handling, investigation, and corrective actions, and coordination of site visits as part of E&S oversight, suggesting that complaints can be investigated and discussed within the organization, with action plans as a potential outcome. However, the documentation lacks explicit, documented steps showing direct, structured engagement with complainants to jointly investigate, discuss, and agree on an action plan (and to coordinate with the complainants to implement and monitor that plan). It also does not specify timelines, verification steps, or formal close-out with complainant acceptance, as emphasized in the reference process flow (e.g., preliminary response, formal investigation, agreed action plan, monitoring, and closure). Therefore, while there is evidence of internal handling and corrective-action processes, it does not fully demonstrate the “meet and coordinate with the group to investigate the problem and discuss and implement a monitored action plan” level of procedural detail required for a higher score. Gaps relative to the reference standards: - Absence of documented, complainant-facing steps that require joint investigation with communities and explicit negotiation of a time-bound action plan. - No clear timelines or targets for preliminary responses, investigation completion, or implementation and monitoring of actions. - Lack of documented verification steps and indicators to confirm that action plans are implemented and effective, and explicit close-out with complainant acceptance. - No explicit external escalation path or remediation referral if complainants are not satisfied with internal resolution. Recommendations to improve toward higher scores (aligned with the reference standards): - Develop a formal Grievance Resolution Procedure that includes: (a) initial acknowledgment and assignment of responsibility; (b) a defined timeframe for a preliminary response; (c) a joint meeting with complainants to discuss the issue and gather input; (d) an investigation plan and root-cause analysis conducted with complainant participation where feasible; (e) a jointly developed action plan with clear owners, timelines, and resources; (f) a monitoring framework with predefined indicators and cadence; (g) periodic updates to complainants and documented verification of action plan progress; (h) a

formal close-out step with evidence of resolution and intake of complainant acceptance or, if not accepted, escalation to external mechanisms. - Introduce concrete roles and responsibilities for grievance handling that align with the “central unit” or senior management structure described in the standards, including a designated time-bound grievance response schedule and escalation triggers. - Implement a monitoring and verification protocol for action plans, with periodic site visits, evidence collection, and performance indicators (e.g., completion rates, mitigated impact measures, stakeholder satisfaction). - Document and publish a grievance log or dashboard (anonymized as needed) showing number of complaints, status, age of open items, actions taken, and outcomes to improve transparency and legitimacy. - Include a formal external referral option if complainants are dissatisfied with the internal resolution, consistent with the guidance to retain access to remedies outside the company mechanism when necessary. In sum, the current ESMS shows partial alignment with the reference standards by enabling internal complaint handling and corrective action, but it needs explicit, complainant-facing, jointly executed steps with timelines and monitored implementation to reach the level described in option 4 or 5 of the reference question. Implementing the recommendations above would elevate the procedure to align more closely with the standards’ expected practice.

★ ★ **Score: 3/5**



## Maturity Level

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### Grievances Implemented But not Effective



Grievance mechanism is fully implemented; however there is not enough evidence of its effectiveness. No tracking of internal or external awareness; limited tracking of cases.

## Recommendations

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### Schedule Procudere With Senior Management

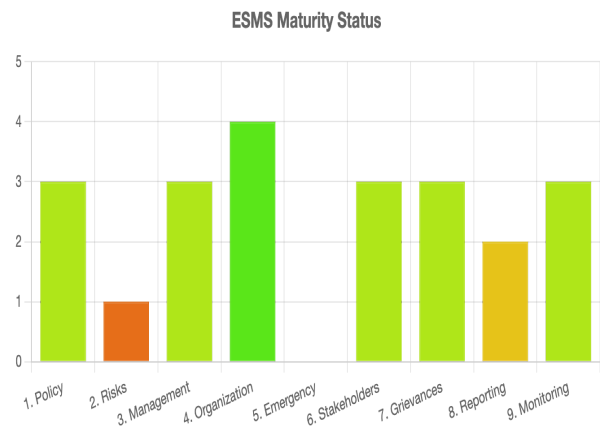
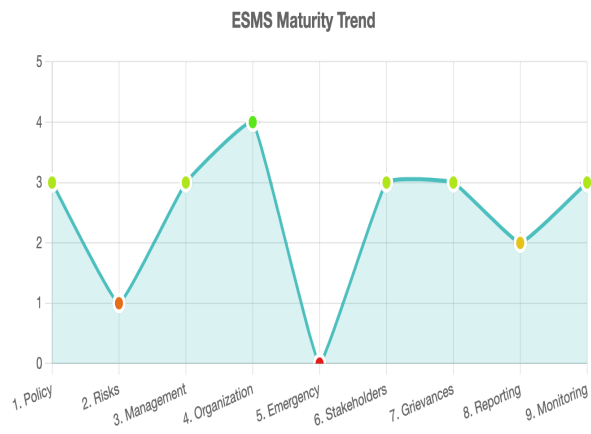


Set schedule for procedure for senior management and team to periodically review the system and the cases. Develop a documentation system for logging, tracking and analyzing complaints and resolutions.

## Performance Visualization

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This section illustrates highlights the most current score per element. For complete transparency, any unassessed elements are assigned a score of zero.



# ESG Performance Dashboard

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## DASHBOARD OVERVIEW

This dashboard provides a comprehensive summary of performance across all nine categories of IFC Performance Standard 1 (PS1).

Each chart illustrates the trajectory of scores over time, with a focus on the five most recent assessments for each element.

This visualization is designed to support informed decision-making by highlighting trends, measuring progress, and identifying key areas requiring improvement.

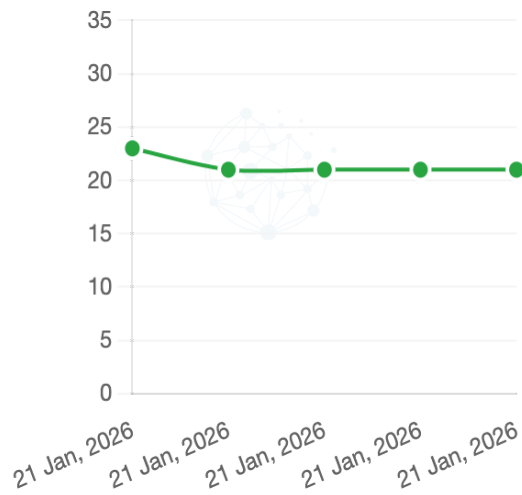
Use this tool to guide continuous enhancement in alignment with IFC's sustainability and risk management framework.

- ❑ **Comprehensive Analysis** - Covers all 9 PS1 categories with detailed scoring
- ❑ **Trend Visualization** - Tracks performance across 5 assessment periods
- ❑ **Gap Identification** - Highlights areas requiring improvement
- ❑ **Actionable Insights** - Supports continuous enhancement of ESG performance



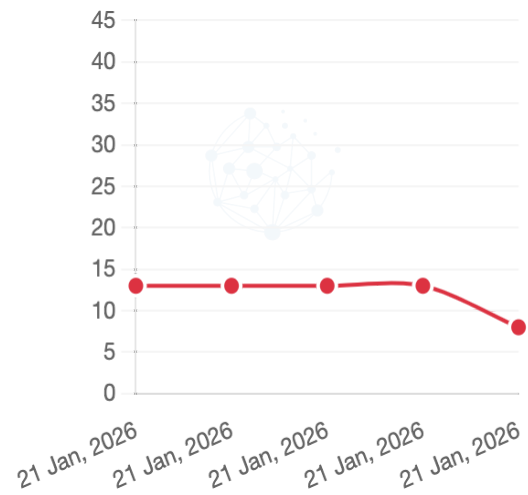
## POLICY SCORE

Current Score: 3/5



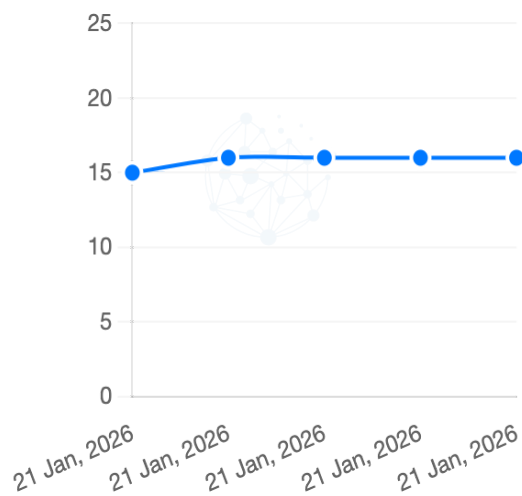
## RISK SCORE

Current Score: 0.89/5



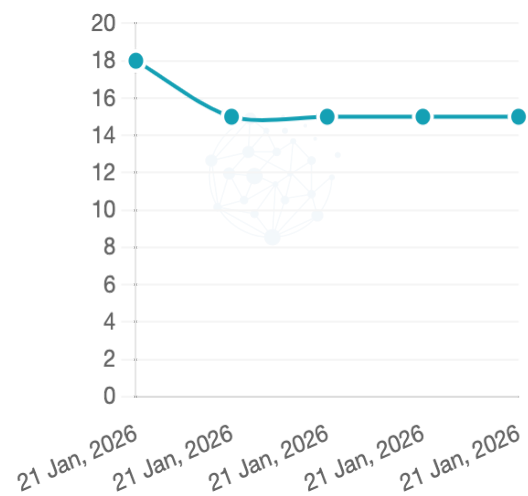
## MANAGEMENT SCORE

Current Score: 3.2/5



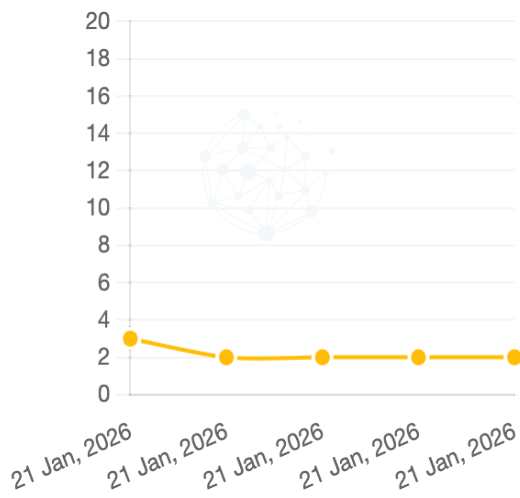
## ORGANIZATION SCORE

Current Score: 3.75/5



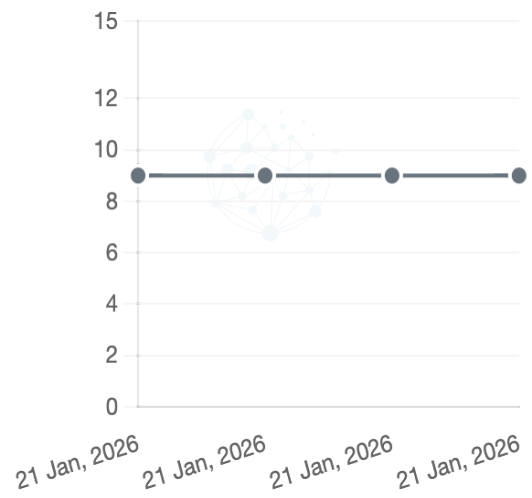
### ⚠ EMERGENCY SCORE

Current Score: 0.5/5



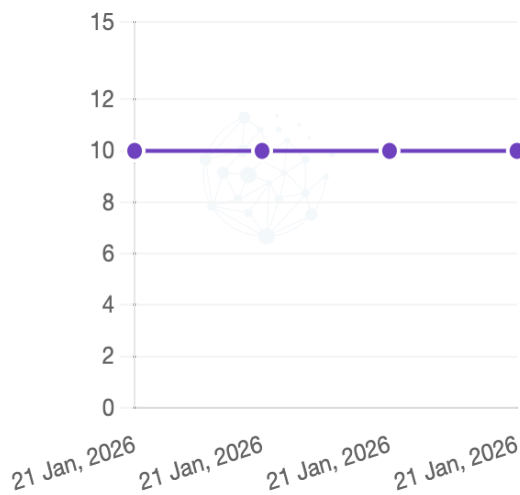
### 👥 STAKEHOLDER SCORE

Current Score: 3/5



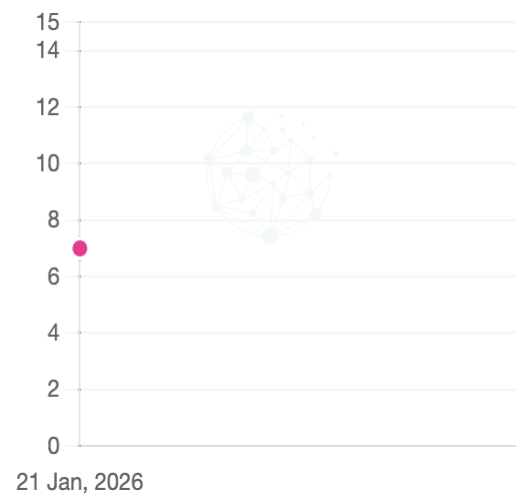
### 💬 GRIEVANCE SCORE

Current Score: 3.33/5



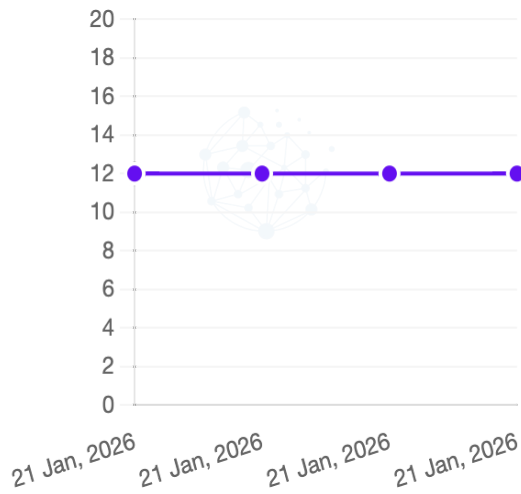
### 📄 REPORTING SCORE

Current Score: 2.33/5



## MONITORING SCORE

Current Score: 3/5



"*Sustainable leadership* isn't about being perfect—it's about being *accountable* for every step forward."

— PAUL POLMAN, FORMER UNILEVER CEO

"Building a world where we meet our own needs without denying future generations a healthy society is not impossible ... *The question is where societies choose to put their creative efforts.*"

— CHRISTOPHER FLAVIN, WORLDWATCH INSTITUTE