

AKIING AZHENAN IMPROVED FOREST MANAGEMENT PROJECT

Feedback and Grievance Redress Procedure

The Feedback and Grievance Redress Procedure (FGRP) is intended to address Tribal constituent complaints regarding process or action related to the project. This differs from standard personal grievance policy in that this grievance redress procedure seeks to focus on addressing program process and procedure. If grievances arise due to employees, volunteers, or community members involved in the program, the existing Bois Forte Human Resource policy will be the model used to address the grievance (reference Bois Forte Reservation Tribal Government Revised Personnel Policy Effective July 15, 2017, Section 12).

The development process and Feedback and Grievance Redress Procedure is documented in the table and figure below.

Development process

As per VCS and CCB requirements, all projects must include a three-stage grievance redress procedure as follows:

1. The project proponent shall attempt to amicably resolve all grievances and provide a written response to the grievances in a manner that is culturally appropriate.
2. Any grievances that are not resolved by amicable negotiations shall be referred to mediation by a neutral third party.
3. Any grievances that are not resolved through mediation shall be referred to a) arbitration, to the extent allowed by the laws of the relevant jurisdiction or b) competent courts in the relevant jurisdiction, without prejudice to a party's ability to submit the grievance to a competent supranational adjudicatory body, if any.

The CCB Rules define a grievance as, "A dispute with communities and other stakeholders that may arise during project planning, implementation and evaluation with respect but not limited to free, prior and informed consent, rights to lands, territories and resources, benefit sharing, and participation." This definition of a grievance will be used by Bois Forte for the implementation of this FGRP.

The Steering Committee assigned a small working group to develop a first draft of the FGRP. That working group reviewed the Tribe's existing communication methods and channels, including internal policies on anti-discrimination, worker training, community employment opportunities, and occupational health and safety. Based on that review, the working group created a draft FGRP to be in alignment with the VCS/CCB Standard and the Tribe's traditional methods of dealing with feedback and complaints. That draft was then presented to the full Steering Committee for review and input. The input from the Steering Committee was integrated into the draft and then presented to the community for review and feedback during a 30-day public comment period. Community comments and edits were included, and the draft FGRP was sent to the Tribal Council where it was reviewed, further refinements were incorporated, and subsequently approved for implementation.

Grievance redress procedure

The following methods will be used to address feedback and grievances that arise from stakeholders that may occur during the planning or implementation of the project.

1. Awareness and Communication

The grievance redress procedure will be made publicly available electronically on the project website. Hard copies of the FGRP will also be available in the following offices: Forestry, DNR, Vermilion and Nett Lake Reception Areas, and the Duluth and Minneapolis Urban Offices. Communication to the public will be made through the common and existing communication channels used by Bois Forte including but not limited to public meetings, social media sites, radio, and the Bois Forte News.

2. Receiving and Recording Grievances

- a. Grievances will be collected through various channels such as email, in person, the project website, and telephone to accommodate the various communication needs of the community (see section Contact Points for Submitting Grievances).
- b. Within the Tribe, it is common for complaints or issues to be raised verbally in person with relevant Tribal staff members. If the grievance is raised verbally, the Bois Forte staff member will confirm if the complainant would like to officially lodge the grievance. If not, the issue will be considered resolved through the initial conversation. If so, the staff member will log the grievance, and the process described in this document will be followed.
- c. Grievances will be monitored by the FGRP Designated Focal Point and responses will be handled as follows:
 - 10 business days to send a written acknowledgment of the grievance receipt.
 - 30 business days for first stage resolution.
 - 30 business days for redress through the Hearing Committee, with possibility of an extension if additional investigation is needed.
 - 10 business day added to present the case and documentation to legal counsel.
- d. All grievances submitted will be recorded and made public on the project website, with written responses and justification if action is not taken. To ensure confidentiality regarding sensitive issues, the cases will be summarized, with identifying information removed.
- e. Any grievance received that is determined to be criminal in nature will be transferred immediately to the proper

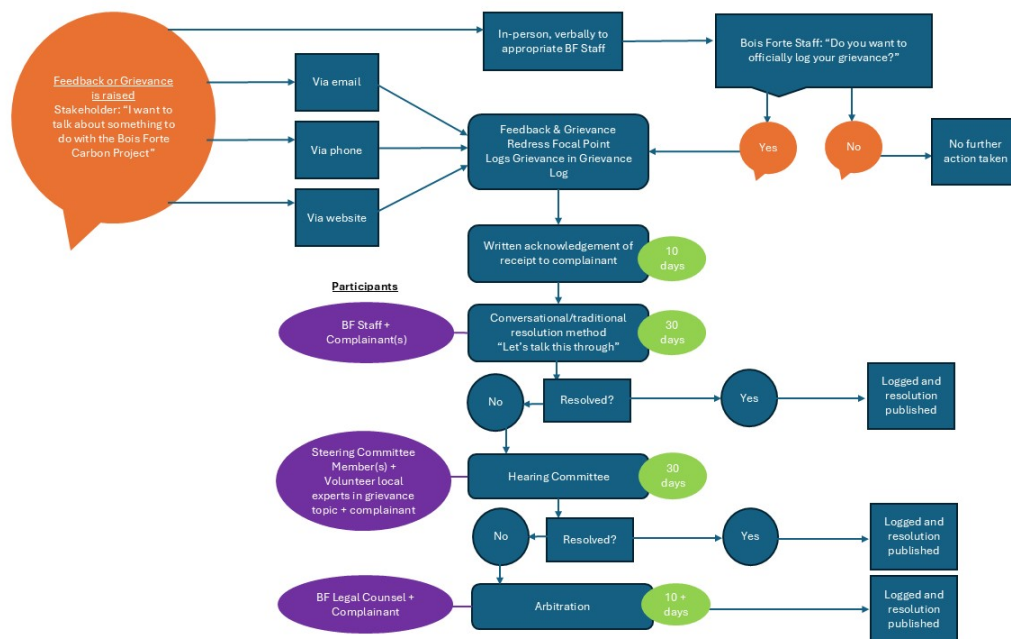


Diagram of Project Feedback and Grievance Redress Procedure