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# POLICY FOR GRIEVANCES MADE TO THE BRAZILIAN BIODIVERSITY FUND - FUNBIO

P-17/2018

Department Responsible: Legal Counsel

## **OBJECTIVE:**

Establishes the institutional grievance policy for deviations from ethical conduct, safeguard violations and others in relation to projects funded by Funbio.

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## **ORGANIZATIONAL SCOPE:**

This policy applies to the entire organization, its partners, and suppliers.

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## APPROVAL

Current Version	Action	Date
5	Approval	Nov 14, 2024
	Validity start date	Nov 14, 2024
	Next revision	Mar 2026

## CONTROL OF VERSIONS

Version	Date	Person Responsible	Status
0.1	Feb 14, 2013	Flávia Neviani	Draft
0.2	Feb 28, 2013	Jacqueline Ricarte	Revised
1	Mar 1 <sup>st</sup> , 2013	Rosa Lemos	Approved
2-draft	Oct 19, 2018	Alexandra Leitão, Fábio Leite and Flávia Neviani	Draft
2	Nov 29, 2018	Advisory Board	Approved
3-draft	Nov 19, 2020	Flávia Neviani	Draft
3-draft	Feb 10, 2021	Fabio Leite, Alexandra Leitão, and Rosa Lemos	Revised
3	Apr 29, 2021	Advisory Board	Approved
4 - draft	May 29, 2023	Flávia Neviani	Revised
4	May 30, 2023	Rosa Maria Lemos de Sá <sup>1</sup>	Approved
5 - draft	Sep 13, 2024	Alexandra Viana	Draft
5- draft	Nov 14, 2024	Flavia Neviani	Revised
5	Nov 14, 2024	Rosa Lemos	Approved

## RELATED DOCUMENTS:

- Funbio Ethics Code
- Grievance Operational Procedures
- Funbio Employee Handbook
- Social and Environmental Safeguards Policy

<sup>1</sup> Approval of the update pursuant to the resolution of the 67th Ordinary Meeting of Funbio's Advisory Board, held on 08/25/2022: "3) 'The Advisory Board, unanimously, delegates to the Secretary General the competence to analyze and approve updates in the Institutional Policies and Code of Ethics that do not imply substantial modifications or scope reduction.'"

## CONTACT INFO:

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The Ethics Committee can be contacted by e-mail: [comite.etica@funbio.org.br](mailto:comite.etica@funbio.org.br)

### Privacy:

This document is public and will always be available on Funbio's website. It must not be edited or altered without prior consent.

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## I. INTRODUCTION AND OBJECTIVES

1. Funbio is committed to transparency and recognizes its importance as a guiding principle in its operations. One way to promote transparency is to be open to complaints from people who feel affected by Funbio's operations and projects, as well as reports of breaches of the Code of Ethics<sup>2</sup> or Brazilian law.
2. This policy defines how Funbio receives any and all grievances that may be made, as well as how each of them is dealt with. Finally, this policy defines the roles that different sectors of Funbio will play in this regard.
3. The main objective of this policy is to ensure the effectiveness of Funbio's Code of Ethics and its Environmental and Social Safeguards Policy.
4. Grievances that are not linked to project safeguards will be directed to the responsible areas within Funbio.

## II. DEFINITIONS

5. **Complaint:** This is a voluntary act of reporting any dissatisfaction with Funbio's procedures or failure to comply with existing procedures, including malpractice, considering the provisions of the Environmental and Social Safeguards Policy - P 24/2020 and/or those adopted by the Project's donors.
6. **Report:** A voluntary act of reporting any fact related to the misconduct of ethical bearing in violation of Funbio's Code of Ethics, cases related to Policy P-44/2022- Policy on measures to protect against abuse, harassment, and sexual exploitation (SEAH), and/or Brazilian law.
7. **Protests:** Type of complaints or grievances that are objections made by proponents participating in Funbio's selection processes regarding non-compliance with Funbio's Procurement Policy - P-31/2014.
8. **Ethics Committee:** is a board established by Funbio with the responsibility of ensuring compliance with the rules established in the Funbio Code of Ethics and other related policies.

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<sup>2</sup> Funbio's Code of Ethics can be found on Funbio's website ([www.funbio.org.br](http://www.funbio.org.br))

9. **Safeguards:** A set of planned, usually precautionary, actions to prevent projects supported by Funbio from having negative social and environmental impacts, whose frameworks are established in P 24/2020 or in specificities established by project donors.
10. **Safeguard Grievance Officer:** the person responsible for the Grievance System (GS).
11. **Grievance System (GS)** – an independent and exempt mechanism that reports to the Management Committee of Funbio's Advisory Board. The GS contains a channel for receiving, processing, and addressing complaints, claims and conflicts related to Funbio's socioenvironmental safeguards in its projects, with the aim of ensuring compliance with the safeguards.
12. **Protest focal point:** this is an internal Funbio unit assigned to analyze protest demands and provide them with appropriate answers and referrals.

### III. FUNBIO GRIEVANCE CHANNELS

13. Funbio offers two main grievance channels:

Channel	Contact	When should it be used
Safeguard grievances	<a href="mailto:gs@funbio.org.br">gs@funbio.org.br</a>	To report grievances related to Funbio's procedures or the negative effect of projects (safeguards)
Ethics Committee	<a href="mailto:comite.etica@funbio.org.br">comite.etica@funbio.org.br</a>	Priority channel to report misconduct according to Funbio's Code of Ethics and cases related to SEAH Policy - P-44/2022 - policy on protection measures against abuse, harassment and sexual exploitation.
Protests related to Procurement Processes	<a href="mailto:protesto.compras@funbio.org.br">protesto.compras@funbio.org.br</a>	Participants in procurement processes who understand that Funbio's procurement policy was not observed during a specific process

14. Upon receiving a grievance, we will evaluate if it has been sent to the correct channel. If the complainant/whistleblower uses the wrong channel, he/she will be directed to the appropriate officer at Funbio. Example: if a report on ethical misconduct is sent to the grievance channel (in this case the wrong channel) it will be forwarded to the Ethics Committee by the head of the grievance channel, and vice versa.
15. The grievance channels should be easily accessible on the Funbio website.
16. In the case of projects with safeguards, the grievance channel should be disclosed to those who may be affected by project implementation.
17. In the case of projects where Funbio acts as the implementer rather than the executor, especially in GEF/GCF Implementing Agency projects, Funbio shall require the executor to have and disclose its own safeguards grievance channels.

## **IV. EXPECTATIONS BY THE COMPLAINANT/WHISTLEBLOWER ON HOW FUNBIO WILL HANDLE THE SITUATION**

### **IV.1 RESPONSE**

18. Any grievance sent to one of Funbio's channels will be answered except:
  - a. Advertisements/spam received by Funbio channels
  - b. Funbio inquiries (e.g., "how do I submit a project or my resume")
19. The fact that Funbio responds does not imply tacit agreement with the grievance, each case will be reviewed in accordance with Funbio's procedures and its Code of Ethics.
20. Funbio does not have a stipulated deadline for replies, but a 10-business-day period is considered appropriate for confirmation that the grievance was received and recorded and that verification procedures will commence.

### **IV.2 NON-RETALIATION**

21. Funbio is committed to protecting its employees and partners from unlawful discrimination or retaliation as a result of providing information

or participating in investigations involving allegations of unethical misconduct or suspected violation of the law or regulation of any jurisdiction, domestic or foreign, where Funbio does business, or Funbio Policies, by any employee.

22. Any form of retaliation that a complainant/whistleblower perceives should be reported as soon as possible to the Ethics Committee through the channel defined in section III of this document.

#### **IV.3 CONFIDENTIALITY AND ANONYMITY**

23. Whenever possible, the confidentiality and anonymity of grievances will be maintained automatically, being known only to the grievance officer and the members of the Ethics Committee.
24. Reports made anonymously will also be cleared, however, in order to provide a response, some form of contact must be provided (may be an email that does not identify the complainant/whistleblower).
25. However, for cases where the investigation can identify (even if not directly) the complainant/whistleblower, he/she may ask to remain anonymous, i.e., only the grievance officer or the members of the Ethics Committee will know his/her identity. Their responsibilities include a commitment to maintain confidentiality whenever required.
26. It should be noted that depending on the grievance it may be difficult to remain anonymous for the case to be investigated. In these cases, Funbio will contact the complainant/whistleblower to see what can be done.
27. Funbio's intention is to clarify, as best as possible, all cases coming through these channels, but a complainant/whistleblower's desire for anonymity must be respected in principle and will be greater than the need for investigation if both conflict.

#### **IV.4 ANTI-EMBARRASSMENT AND GENDER CONSIDERATIONS**

28. Funbio understands that victims of harassment or discrimination may be embarrassed to make complaints. To avoid and mitigate this possibility Funbio declares that employees who receive these grievances are trained to avoid embarrassing anyone.



29. Women may request that contact with the grievance officer or the Ethics Committee always be made with other women, we suggest that in these cases the first contact be made following the example below:

*“I would like to make a complaint, but first I would like my contact from now on to always be with a woman”*

30. If the grievances officer is not female and a message with this request is sent, it will be dealt with exceptionally by the Ethics Committee through one of its female members.
31. Any other type of embarrassment can be dealt with and, as far as possible and reasonably, before any complaint/report is made.

## **V. FUNBIO’S EXPECTATIONS RELATED TO THE GRIEVANCES**

32. Funbio's intention is to clarify complaints and investigate grievances in a transparent and fair manner. To make this possible, any grievance must contain as many facts and evidence as possible.
33. Cases that are not based on facts or evidence will also be investigated, but the ability to verify may be compromised, also compromising the resolution of the case.
34. Funbio opens these channels to everyone and expects them to be used responsibly. Numerous repeated messages, assaults, or any attempt to embarrass, hinder, or delay the work of those involved in investigating these cases will be reported to the Ethics Committee and, when necessary, to the appropriate authorities.
35. Anyone who knowingly produces a false report or evidence that he or she knows to be false will not be protected by this Policy, and may:
- Receive disciplinary action (in the case of Funbio employees), including the possibility of termination of his/her employment contract.
  - Have his/her contract canceled in case of consultants and service providers.
  - Be vetoed from future hires by Funbio or Funbio funded projects.
  - Be sued in court if Funbio deems it necessary.
  - The case may be referred to the Board if the false report is made by a member of the Board.

## **V.1 HOW GRIEVANCES ARE HANDLED**

36. The process of receiving, resolving, following up and closing each grievance shall be supervised by Funbio's Internal Audit, reporting directly to the Advisory Board.
37. Initially, the Internal Audit will not have access to grievances, but will be advised that a grievance exists and will monitor whether the responses are provided efficiently to the complainants.
38. A “public report” on grievances received will be prepared annually, without information that could compromise the complainants/whistleblowers. This document will be published on Funbio's website and additional forms of dissemination may be used.