Crop Trust Project Grievance Mechanism

ADOPTED:
December 12, 2025

ADOPTING BODY:
Executive Secretary

LAST UPDATED:
December 12, 2025

CROP TRUST

Table of Contents

TABLE OF CONTENTS 2
PREAMBLE 3
1. SCOPE OF APPLICATION AND PURPOSE 4
2. KEY PRINCIPLES 4
3. TYPES OF GRIEVANCES COVERED 5
4. PROCEDURE 8

Preamble

Global Crop Diversity Trust (Crop Trust) is an autonomous international fund established under international law pursuing its objective to ensure the long-term conservation and availability of plant genetic resources for food and agriculture with a view to achieving global food security and sustainable agriculture. For this objective, in accordance with its Constitution, the Crop Trust has established an endowment fund to provide guaranteed long-term grants to support the maintenance of eligible collections of plant genetic resources for food and agriculture that meet agreed standards of management and availability of the genetic resources, related information, knowledge and technologies, and to cover operating expenses and other expenses incidental thereto.

The Crop Trust is committed to upholding international environmental, social, and governance (ESG) standards, including human rights, gender equality, and ethical conduct, in line with international standards and as indicated in its governance and policies and guidelines. As part of this commitment, the Crop Trust has established this Grievance Mechanism (GM) to provide a fair, accessible, and transparent process for addressing concerns related to the programs and projects it supports.

The GM seeks to address grievances promptly, reduce harm, and support learning and accountability across the organization. While guided by internationally recognized frameworks of, e.g., those of the UN system, this Policy does not create binding legal obligations for the Crop Trust unless expressly required by applicable international law.

Once approved, the Director of Administration is responsible for the maintenance and regular update of this Grievance Mechanism. As the need arises, the Director of Administration may endorse changes to the GM with approval from the Executive Secretary.

1. Scope of Application and Purpose

1.1. This Policy defines the grievance mechanism of the Crop Trust. It enables any affected external stakeholders to raise concerns about programs or projects implemented. It applies to issues arising in the Crop Trust's own operations or the work of its project partners within the framework of a project funded by the Crop Trust. The objective of the policy is to resolve legitimate concerns and grievances fairly and promptly, to prevent or mitigate harm, to learn lessons, and to build trust in the Crop Trust's commitments including social, ethical or environmental commitments.

1.2. This Policy does not cover whistleblowing by Crop Trust personnel. Internal whistleblowing is managed in the Personnel Policies and Procedures Manual (PPPM) to provide a safe vehicle for staff to report suspected cases of misconduct, ensuring that no staff shall suffer any retaliation for such reporting.

1.3. This Policy also does not cover complaints related to tender processes and service contracts linked to those processes. In line with well-established standards, the Crop Trust Procurement Policies and Procedures Manual offers complaint mechanisms to applicants and providers.

2. Key Principles

The grievance mechanism is guided by the following principles:

- **Accessibility and Inclusivity**: The mechanism is free and easy to use. Partners are required to support outreach so all stakeholders, including vulnerable groups, can access the mechanism without barriers. The outreach plans will be developed on a case-by-case basis upon mapping of the external stakeholders and reviewing the capacity of relevant implementing partners.
- **Impartiality and Independence**: Grievances are handled by a dedicated Grievance Officer who reports directly to the Executive Secretary.
- **Confidentiality and Anonymity**: All concerns are treated confidentially and may be submitted anonymously. Information is shared only on a need-to-know basis, in line with the Crop Trust's Data Protection Policy.

- **Protection from Retaliation**: Every individual or group has the right to file complaints in relation to a Crop Trust supported project without threats to their safety or fear of retaliation. The Crop Trust expects its partners not to threaten or harm stakeholders who criticise a Crop Trust supported project. Any retaliatory behaviour by Crop Trust staff against an external party will be managed in line with the Crop Trust's Whistleblower Policy.
- **Transparency and Predictability**: The process, timelines, and rights of complainants are clearly communicated. Outcomes and reasons are shared, and anonymized grievance data may be published for accountability.
- **Fairness and Equity**: The process is respectful, impartial, and non-adversarial. All parties are heard, and decisions are based on facts and fairness.
- **Remedial and Corrective Action**: Verified harms lead to timely and appropriate remedies, developed with affected parties and monitored through to completion.
- **Continuous Learning**: The mechanism is regularly reviewed by the Compliance Office, and lessons learned inform policy and risk management improvements.

3. Types of Grievances Covered

Within the scope of this policy as provided above, the Crop Trust will consider concerns and grievances originating from any of the categories outlined below in the context of activities of the Crop Trust itself or its implementing partners in projects supported by the Crop Trust.

Category	Specific Types of Grievances
Internal rules and standards	Violations by the Crop Trust or its partners of internal rules and standards, including failure to comply with the Crop Trust's policies and procedures on, for example, procurement, finance, HR, privacy, etc. Relevant Crop Trust policies are publicly available on its website at www.croptrust.org/who-we-are/governance/policies-and-related-documents
Human Rights and Labor Rights	• Child labor: employment below minimum age; worst forms (slavery, trafficking, hazardous work, child soldiering, prostitution, drug trafficking).

	• Forced labor, debt bondage, slavery-like practices. • Discrimination at work: based on race, ethnicity, gender, age, disability, nationality, social status, religion, political opinion, union activity, sexual orientation. • Violations of freedom of association and collective bargaining. • Occupational health and safety violations. • Poor employment conditions: precarious contracts, substandard wages, exploitative terms. • Sexual exploitation, sexual abuse, sexual harassment (SEAH). • Causing, contributing to, or being complicit in human rights abuses, including through supply chains. • Lack of respect for indigenous people's rights. • Violation of equal opportunity rights for employees. • Retaliation against whistleblowers. • Involvement in systemic or egregious human rights abuses. • Involvement in production or distribution of pornography.
Environmental and Health Impacts	• Pollution (soil, water, air), including GHG emissions contributing to climate change. • Harmful environmental degradation affecting ecosystems and landscapes. • Overuse or depletion of natural resources (forests, water, biodiversity). • Poor waste management (improper collection, disposal, hazardous materials handling). • Negative environmental impact linked to mining, chemicals, large infrastructure, and agriculture sectors. • Improper use, manufacture, or disposal of hazardous chemicals (e.g., mercury, POPs, banned pesticides). • Illegal wildlife trade and CITES violations. • Mistreatment of animals. • Breach of environmental obligations under the Basel, Stockholm, Minamata Conventions. • Breach of environmental protections under the UNFCCC, Paris Agreement, Convention on Biological Diversity (CBD), Nagoya Protocol, UNCCD, Rio Declaration, Kyoto Protocol.
Community Rights and Participation	• Disregard for community health and safety. • Negative impacts on livelihoods: land grabbing, eviction, destruction of traditional livelihoods. • Prevention of local participation in decisions affecting communities. • Social discrimination against minorities, indigenous peoples, vulnerable groups.

	• Failure to consult or respect rights related to access and benefit-sharing (ABS) under the ITPGRFA and Nagoya Protocol.
Anti-Corruption, Anti-Money Laundering and Counter-Terrorism	• Corrupt practices: offering, giving, receiving, or soliciting improper benefits. • Fraudulent practices: misrepresentation for undue advantage. • Coercive practices: use of threats or harm to influence decisions. • Collusive practices: secret agreements to distort fairness. • Money laundering and terrorist financing activities. • Violation of UN sanctions, EU sanctions, US OFAC sanctions, German national sanctions. • Tax evasion, illicit financial flows. • Misuse or diversion of funds for illegal activities (e.g., terrorism, drug trafficking, violence).
Ethical and Compliance Concerns	• Failure to maintain internal controls against fraud, corruption, favoritism, or nepotism. • Failure to establish grievance mechanisms or whistleblower protections. • Inadequate measures for preventing, detecting, or responding to SEAH. • Violations of Crop Trust codes of conduct, ethics policies, or sustainability commitments. • Involvement in prohibited industries: tobacco, pornography, gambling without charitable purpose. • Negative brand reputation linked to ethical misconduct. • Leadership involvement in corruption, fraud, sanctions breaches, or sustainability violations.
Program or Project Issues	• Inadequate stakeholder consultation and exclusion of vulnerable groups. • Failure to apply social and environmental safeguards. • Negative impacts on human rights, livelihoods, biodiversity, or food security from projects. • Breach of obligations related to Access and Benefit Sharing (ABS) for plant genetic resources.
Violations of International Humanitarian Law and serious crimes	• Involvement in activities that breach international humanitarian law, including the Geneva Conventions. • Engagement in or facilitation of crimes against humanity, war crimes, genocide, torture, enforced disappearance, or terrorist financing.

4. Procedure

4.1. This grievance mechanism is open to anyone affected by or concerned about activities of the Crop Trust itself or its implementing partners in projects supported by the Crop Trust ('Stakeholder').

4.2. Stakeholders can submit grievances through email at **grievances@croptrust.org**, by mail or in person to the Crop Trust office in Bonn (Platz der Vereinten Nationen 7, 53113 Bonn, Germany). If the local implementing partner has a grievance mechanism in place, the Stakeholders can also submit their grievances to the channels provided by the implementing partner. In this case, the implementing partner will be required to report to the Crop Trust on the submissions relevant to the project supported by the Crop Trust.

4.3. Submissions should mandatorily include information about the project in question, and also include a description of the issue, location, date, and any supporting evidence. Anonymity is acceptable but contact details are helpful for follow-up. All grievance-related information is treated confidentially.

4.4. Upon receipt of the complaint, an assessment by the Grievance Officer is made as to whether the complaint is within the scope of this policy. The receipt of the complaint is documented internally. The complainant will receive an acknowledgement of receipt within seven calendar days.

4.5. The complaint is forwarded to the director of the responsible Crop Trust unit for further processing. As required, the facts of the individual complaint may be discussed with the complainant to gain a comprehensive understanding of the facts and measures to be initiated by the respective processing unit. The processing unit may decide to include other units and the Executive Secretary of the Crop Trust in its problem-solving efforts. At the sole discretion of the Executive Secretary, particular cases might be brought to the attention of the Executive Board of the Crop Trust.

4.6. Once the processing unit has decided on the reaction to the individual complaint, this decision will we communicated in writing to the complainant provided their identity was disclosed. A decision shall be made within three months following the submission of the grievance.

4.7. If the grievance has merit and is not an individual case, the project proposal will be revised and the risk matrix updated to address the issue and the

implementing partner will be required to report on the implementation and progress.

THE GLOBAL CROP DIVERSITY TRUST
Platz der Vereinten Nationen 7
53113 Bonn
Germany

GRIEVANCES CONTACT
grievances@croptrust.org

GENERAL CONTACT
info@croptrust.org

CROP TRUST