



Stakeholder Grievance Procedure



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51toCarbonZero – Stakeholder Grievance Procedure

Purpose & Commitment

51toCarbonZero is committed to conducting business responsibly, ethically, and transparently. We recognise that our activities, services, business relationships, or decisions may occasionally give rise to concerns from external stakeholders.

This External Grievance Procedure provides a fair, accessible, and transparent mechanism for external stakeholders to raise concerns and seek resolution where they believe they have been adversely affected by the actions of 51toCarbonZero.

We are committed to listening to concerns, investigating them appropriately, and taking reasonable steps to address legitimate issues.

Who Can Raise a Grievance?

This procedure is available to any external stakeholder, including but not limited to:

- Clients and customers
- Suppliers and contractors
- Business partners
- Community members
- Civil society organisations
- Beneficiaries of our work
- Members of the public

Employees should normally use the Company's Internal Grievance Procedure. Concerns relating to suspected fraud, corruption, legal breaches, environmental harm, or other serious misconduct should normally be raised through the Company's Whistleblowing Policy.

This procedure may be used independently of, alongside, before, or after the Company's Whistleblowing Policy. Stakeholders are not expected to determine whether a concern constitutes a grievance or a whistleblowing matter before raising it.

Where a concern raised under this procedure is more appropriately addressed under the Whistleblowing Policy, 51toCarbonZero may transfer the matter to the appropriate process. Likewise, concerns raised through the Whistleblowing Policy may be addressed through this procedure where appropriate. In all cases, the Company will seek to ensure concerns are handled fairly, promptly, and through the most suitable mechanism.

Feedback Mechanisms

51toCarbonZero encourages all stakeholders to provide feedback and raise any concerns with their usual point of contact at the Company as early as possible. We are committed to listening to feedback and resolving issues promptly, fairly, and constructively wherever possible.

In many cases, concerns can be addressed quickly through open dialogue and informal resolution. However, where a stakeholder does not feel comfortable raising a concern through normal channels, or where a concern has not been satisfactorily resolved, this External Grievance Procedure may be used.

No stakeholder will be disadvantaged for raising a concern in good faith.

How to Raise a Grievance

Grievances may be submitted by email or in writing.

Please provide:

- Your name and contact details (unless you wish to remain anonymous)
- A description of the concern
- Relevant dates and individuals involved
- Any supporting evidence available
- The outcome you are seeking, if applicable
- Any steps already taken to resolve the matter

Grievances should be submitted to:

Executive Chairman

Neil Woodcock

neil.woodcock@51tocarbonzero.com

Investigation Process

All grievances will follow a structured, fair, and transparent process.

Acknowledgement

We will acknowledge receipt of the grievance within 10 working days where contact details have been provided.

Initial Assessment

The concern will be reviewed to determine:

- Whether it falls within the scope of this procedure
- Whether additional information is required
- Whether immediate action is required

Following the initial assessment, the complainant will be informed, where appropriate, whether the grievance will proceed to investigation, whether further information is required, or whether the matter will be addressed through an alternative process.

Investigation

Where appropriate, an impartial person will investigate the matter. This may involve:

- Reviewing relevant documentation
- Interviewing relevant individuals
- Gathering additional evidence

51toCarbonZero may seek clarification or additional information from the complainant during the investigation process where necessary.

Outcome

Following the investigation, 51toCarbonZero will communicate the outcome to the complainant where possible and appropriate.

Potential outcomes may include:

- Clarification or explanation
- Corrective action
- Changes to policies or procedures
- Further investigation
- No further action where the grievance is not substantiated

Appeals

If the complainant believes that their grievance has not been handled appropriately or that relevant information was not adequately considered, they may submit an appeal within 10 working days of receiving the outcome.

Appeals should be submitted in writing and should clearly explain the reasons for the appeal, including any additional information that may be relevant.

Where possible, appeals will be reviewed by an individual who was not directly involved in the original investigation. The outcome of the appeal will be communicated to the complainant and will be considered final.

Confidentiality

51toCarbonZero will treat all grievances confidentially and will only share information with those who need access in order to investigate and resolve the matter.

Anonymous grievances will be considered where sufficient information is provided to enable investigation.

Timeframes

51toCarbonZero is committed to handling grievances as promptly as possible. However, the time required to investigate and resolve a grievance will depend on the nature and complexity of the concern, the availability of relevant information, and the parties involved.

We will seek to keep complainants informed of progress where appropriate and provide updates if investigations are expected to take longer than initially anticipated.

Protection Against Retaliation

51toCarbonZero prohibits retaliation against any individual who raises a concern in good faith.

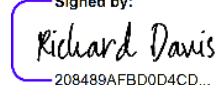
No stakeholder will be disadvantaged, penalised, or treated unfairly for submitting a grievance or participating in an investigation.

Continuous Improvement

We view grievances as an opportunity to improve our business practices and stakeholder relationships.

The Company will maintain a record of grievances received, investigations undertaken, outcomes reached, and any corrective actions implemented. We will periodically review grievance trends and outcomes to identify opportunities to strengthen our policies, processes, and stakeholder engagement practices.

This procedure was approved by the leadership team of 51toCarbonZero on 11th of June 2026.

Signed by:

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Richard Davis
CEO
51toCarbonZero