

Global Battery Alliance (GBA)

Grievance & Complaints Mechanism Policy

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1. Purpose and commitment

The Global Battery Alliance (GBA) provides a grievance and complaints mechanism so that any stakeholder can raise concerns about GBA programmes, assurance activities, sustainability claims, and the conduct of GBA members and implementing partners.

In designing and implementing this mechanism, GBA aligns with internationally recognised good practice and credibility frameworks, including the **ISEAL Code of Good Practice for Sustainability Systems v1.1 (2025)**, the **OECD credibility criteria and methodology for alignment assessments of sustainability initiatives** (new version under development), and the **draft credibility criteria for recognised schemes under the EU Batteries Regulation (2025)**.

GBA is committed to addressing grievances in a timely, fair, and transparent manner, while ensuring accessibility, accountability, and protection against retaliation for anyone who raises a concern in good faith.

This grievance mechanism is established for the **Operational Trials phase** of the GBA programme and reflects a first, minimum-level process to ensure that concerns can be raised and addressed during this initial stage. The GBA recognises that the grievance mechanism will need to evolve further in line with the official launch of the certification scheme planned for **2027**. In preparation for that launch, GBA will continue to strengthen and improve this policy, including by developing an online grievance registration and case follow-up tool, expanding the range of channels through which complaints may be submitted, and establishing a more robust and comprehensive mechanism. This first version is therefore intended as a foundational framework that will be further developed over time. Suggestions for the future evolution of the scheme, after the Operational Trials phase are already suggested and marked as such. **These suggestions have been marked in green.**

2. Scope

This mechanism can be used to raise concerns about:

- GBA standards, guidance, and related policies (development, maintenance, interpretation).
- GBA assurance or verification processes and related decisions (where applicable).
- Sustainability claims rules and the implementation of GBA claims systems.
- Alleged misconduct or non-conformance by GBA members, programme participants, contractors, or implementing partners in relation to GBA requirements or commitments.
- Alleged adverse impacts on people or the environment linked to activities under a GBA programme (including human rights concerns).

This mechanism is not intended to replace judicial, regulatory, or workplace processes. GBA may refer matters to appropriate authorities where required or prudent.

3. Guiding principles

GBA will operate this mechanism in line with good practice for credible schemes and the effectiveness criteria for grievance mechanisms (UN Guiding Principles on Business and Human Rights). Key principles:

- Accessibility: no fees; reasonable accommodation for language and disability.
- Impartiality and independence: conflicts of interest are managed through recusals and escalation to an independent review panel.
- Predictability: clear steps and indicative timelines; a case reference number is provided.
- Confidentiality and data protection: identity is protected when requested or prudent.
- Equity: Complainants receive information on the process and may submit evidence and perspectives.
- Transparency: decisions are explained at least to the complainant; GBA publishes anonymised summaries on a regular basis. A yearly grievance resolution report is added to the annual impact report.
- Non-retaliation: retaliation is prohibited and may trigger corrective action.
- Continuous learning: trends are analysed to improve GBA requirements and programme implementation.

4. Who can raise a grievance

Any individual or organisation may submit a grievance, including affected communities, workers, civil society organisations, industry stakeholders, investors, auditors/assurance providers, and the general public.

Grievances may be submitted anonymously. While all grievances will be treated seriously and assessed, it may not be possible to respond or seek further clarification where the identity of the requester is unknown.

5. How to submit a grievance

GBA will accept grievances through

- An online complaint form. (available in English, Mandarin translation to be activated after the OpTrials phase)
- A dedicated email address grievances@globalbattery.org
- A dedicated WhatsApp number (to be activated after the OpTrials phase)
- A dedicated WeChat Channel (to be activated after the OpTrials phase)
- By post to Grievance Officer, Global Battery Alliance c/o Regus, Rond-Point Schuman 6, B-1040 Etterbeek, Bruxelles, Belgium. (to be activated after the OpTrials phase)

The online form will not require personal contact details and will allow supporting documents to be uploaded. The online form will be made publicly available through our website.

6. Information to provide

To help GBA assess and address the grievance, complainants are invited (but not required) to provide:

- Complainant type (e.g., worker, community member, NGO, member company, auditor, other).
- Nature of the grievance and desired outcome.
- Relevant dates, locations, programme/site, and parties involved (who/where/when).
- Any documents, links, photos, or other evidence (if available).
- Whether any steps have already been taken to resolve the issue and their results.
- Whether confidentiality is requested and, if so, what information may be shared.

7. Process and indicative timelines

GBA will register every grievance and manage it as a case. Indicative timelines may be extended for complex matters; in that case, GBA will inform the complainant and provide an updated timeline.

Step	Target timeline	What happens
Intake and acknowledgement	Within 7 calendar days	Receipt is acknowledged (where contact details are provided). A case reference number is issued.
Admissibility screening	Within 10 calendar days	GBA confirms scope, checks urgent risks, and assigns a case manager. Out-of-scope matters are redirected where possible.
Assessment and investigation	Normally within 45 calendar days	Information is gathered from relevant parties. For human rights concerns, GBA considers risks to affected people and may seek specialist advice.
Proposed outcome	Normally within 60 calendar days	GBA proposes an outcome and any corrective actions, and communicates a reasoned decision to the complainant.
Implementation	Time-bound action plan	Corrective actions are assigned and tracked.
Closure	Time-bound action plan	The case is closed when actions are complete or a justified decision is final.
Appeal (if requested)	Request within 30 days of decision	Appeals are reviewed by an independent review panel or an escalation body not involved in the original decision.

Serious allegations (e.g., severe human rights impacts, credible threats, fraud) may be fast-tracked and escalated immediately.

8. Governance and decision-making

GBA maintains overall responsibility for the grievance mechanism. Roles:

- Grievance Officer (GBA Secretariat): manages intake, case assignment, records, communications, and reporting.
- Case Manager: leads assessment/investigation and recommends outcomes and corrective actions.
- Independent Review Panel: for the duration of the Operational Trials, the Board will appoint an independent panel of a minimum of 3 non-corporate Board Members. To ensure independence, this panel will automatically receive a copy of each complaint that is filed. What is more, in the cases (i) the grievance concerns a GBA decision, (ii) the GBA has a conflict of interest, or (iii) an appeal is filed, the panel will have the final decision on case attribution, investigation, outcome recommendations and corrective action proposals.
- After the Operational Trials phase, this procedure will be reviewed. The independent review panel could be replaced by a Board-appointed external ombudsman, with a mandate to facilitate resolution. Board oversight: the GBA Board receives periodic summary reporting and ensures resources and independence of the mechanism.

9. Confidentiality, data protection and non-retaliation

GBA will protect the confidentiality of complainants and affected persons when requested or when prudent (e.g., to prevent harm). Access to case files is restricted to those who need it to manage the case. Personal data is handled in accordance with applicable data protection requirements.

Retaliation against complainants, witnesses, or anyone supporting a grievance is prohibited. Allegations of retaliation will be treated as a serious grievance and may lead to corrective actions or sanctions under relevant GBA policies.

10. Outcomes, corrective actions and role in remediation

Outcomes may include: clarification, facilitated dialogue, corrective actions, suspension or other programme consequences (where applicable), or referral to an appropriate external process. GBA will communicate decisions with reasons to the complainant.

Where grievances relate to adverse impacts, GBA will define its role in supporting remedy on a case-by-case basis. Depending on the situation, GBA may: (i) require programme participants to implement corrective actions, (ii) refer cases to company- or site-level grievance mechanisms, (iii) encourage engagement with legitimate state-based processes, or (iv) work with qualified remedy providers or experts to support remediation.

11. Complaints about sustainability claims and reporting misuse

Concerns about GBA rules on permitted claims, or the implementation of GBA claims systems, are handled through this grievance mechanism. GBA will clearly communicate what types of complaints are accepted, how they are addressed, and what information will be shared with the complainant.

Reports of potential misuse (e.g., misleading marketing or unauthorised claims) may be handled through a dedicated “report misuse” pathway or redirected within this mechanism to ensure rapid triage.

12. Recordkeeping, reporting and review

GBA will keep a case log and retain records for at least five (5) years. Records are made available for internal audits and oversight reviews.

At least annually, GBA will publish a summary of concluded grievances, including number and types, typical timelines, and outcomes, while protecting confidentiality. Where appropriate, GBA may publish anonymised case pages showing the status and timeline of cases.

GBA will periodically review the effectiveness of the mechanism (including stakeholder feedback) and update this policy as needed.