

FAST-*Infra* Label

PRO3: Accountability Mechanism

Version 0.2

December 2024

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The FAST-Infra Label is a credible, consistent, integrative, and globally applicable labelling system designed to empower investors to identify and evaluate the sustainability and resilience performances of sustainable infrastructure projects, with the overarching objective of supporting potential investors investment into sustainable infrastructure to make informed decisions and play a role in the development of creating a liquid asset class.

The FAST-Infra Label took effect in January 2025 with v1.0. All revision cycles begin from this date. In line with ISEAL requirements, the Secretariat will review all Label documents at least every five years, and may revise them earlier if needed.

1. INTRODUCTION AND PURPOSE

- 1.1. The present document outlines the accountability mechanism ('Accountability Mechanism') of the FAST-Infra Label (the 'Label'). This Accountability Mechanism, which includes a complaints procedure ('Complaints Procedure'), a grievance procedure ('Grievance Procedure'), and a whistleblower policy ('Whistleblower Policy'), has been developed in accordance with the requirements of the ISEAL Code of Good Practice for Sustainability Systems (Version 1.0 – December 2023).
- 1.2. The FAST-Infra Label Secretariat ('Secretariat') is responsible for managing and overseeing the Label's Accountability Mechanism. It ensures that all grievances and complaints are properly documented and handled, and that the Accountability Mechanism is and remains robust, transparent, and accessible to all potentially affected parties.

2. KEY DEFINITIONS

- 2.1. For the purposes of this Accountability Mechanism, 'Complaint' shall refer to any expression of dissatisfaction by any person or organisation external to the Secretariat, the Label data repository ('Data Repository'), the FAST-Infra Group ('FIG'), or the Label's governance bodies, the Executive Advisory Committee and the Steering Committee (respectively, 'EAC' and 'SC', and jointly 'Governance Bodies'), formally communicated to the Secretariat by the means outlined herein, pertaining to the activities of the Secretariat, where a response is expected by the person submitting the Complaint ('Complainant').
- 2.2. For the purposes of this Accountability Mechanism, 'Grievance' shall refer to any expression of dissatisfaction by the Label's staff or associates, and those serving on the FAST-Infra Label's Governance Bodies, formally communicated to the Secretariat by the means outlined herein, pertaining to the activities of the Secretariat, where a response is expected by the person submitting the Grievance ('Grievant').
- 2.3. For the purposes of this Accountability Mechanism, 'Whistleblowing' shall refer to the act of reporting alleged, suspected, or confirmed wrongdoings pertaining to the activities or implementation of the FAST-Infra Label.
- 2.4. For the purposes of this Accountability Mechanism, 'Affected Party' shall refer to any person who is negatively or adversely affected by issues that are the subject of a Grievance, Complaint, or Whistleblowing disclosure. A person is considered negatively or adversely affected if they experience or can demonstrate actual or potential harm, loss, or adverse impact due to the subject matter of a Complaint or Grievance. This includes, but is not limited to instances of financial loss,

physical or psychological harm, impairments of rights or freedoms, or environmental or community impacts.

3. SCOPE

- 3.1. This Accountability Mechanism applies to Complaints and Grievances directly referred to and admissible for resolution by the Secretariat. It provides details on the types of Grievances and Complaints that can be submitted to the Secretariat, and outlines how the Secretariat will address, resolve, and report on admissible Complaints and Grievances.
- 3.2. Admissible Complaints and Grievances include grievances pertaining to the FAST-Infra Label's standards setting and maintenance, assurance processes and decisions, the Label's codes of conduct or policies, and issues pertaining to the misuse of claims against the FAST-Infra Label as outlined in Label Document GD01: Claims and Label Usage. The Accountability Mechanism may also be used to raise concerns or inform the Secretariat with regard to abuse, misconduct, or other such issues in the implementation of the Label by third parties.
- 3.3. Issues pertaining, directly or indirectly, to actions, omissions, practices, policies, or activities of certified projects are not admissible for resolution by the Secretariat. However, suspicions or knowledge of such issues which appear to be incompatible with a project's FAST-Infra label certified status can be reported to the Secretariat via the general [FAST-Infra contact form](#).
- 3.4. Any concerns or disputes related to the labelling decisions of third-party accreditation or certification bodies (e.g. the decision, by a third-party verification body, not to award the Label to a specific project) do not fall under the scope of this Accountability Mechanism and should be directly referred to these bodies for resolution based on their respective dispute resolution or complaints procedures. These claims cannot be directed to the Secretariat. The Secretariat may be notified at any time that such procedure has been initiated and may decide to intervene at its own discretion if an amicable solution is not reached.
- 3.5. Human Resources (HR) issues pertaining to the employment relationships of the members of the FAST-Infra Label Secretariat and Data Repository shall not be admissible for resolution through this Accountability Mechanism. Such issues shall be resolved through each employer organisation's internal HR regulations and procedures.

4. COMPLIANCE

Implementing the FAST-Infra Label for projects is supported by additional documents. The documents referred to in this document are detailed in Table 1 below and publicly available in the following section on the FAST-Infra Label website or upon request: <https://www.fastinfralabel.org/label-documents>

Code	Title	Description
GO01	FAST-Infra Label Governance Bodies	Introduction to and terms of reference of the FAST-Infra Label's governance bodies: the Executive Advisory Committee (EAC), the Steering Committee (SC) and the Secretariat.
GD01	FAST-Infra Label Guide to Claims and Label Usage	A guide for organisations who wish to use the FAST-Infra Label to promote infrastructure assets or services (such as consulting or verification services) that follow or comply with the environmental, social, governance, and resilience requirements of the Label.

5. GUIDING PRINCIPLES

Complaints regarding the FAST-Infra Label shall be handled based on the following principles:

- a) Accessibility: All affected parties shall have the ability to submit a Grievance or Complaint, either directly or via an authorised representative, and access to the Accountability Mechanism without fear of repercussion or retaliation;
- b) Impartiality: Parties with conflicting interests shall receive balanced representation (see Label document GO01 - Governance Bodies Terms of Reference); all parties shall have fair and even access to information pertaining to the Complaint or Grievance;
- c) Transparency: Complaints and Grievances cannot be submitted anonymously; however, Complainants and Grievants may request that their personal details and/or those of the directly affected parties be treated as confidential. Such confidentiality requests will be respected to the extent that it is feasible. The Secretariat will maintain an accessible and comprehensive case register of all concluded Complaints and Grievances (for more details, see the procedures below under point 5);
- d) Responsiveness: Complaints and Grievances will be acknowledged and handled promptly. Complainants, Grievants, and other affected parties will be kept informed throughout the process and notified of any decisions or actions taken to address their Complaint;

e) Incremental improvement: Complaints, Grievances, and Whistleblowing disclosures shall be used as a means to further develop the Label and its implementation, and as a source of continuous learning for the Secretariat and the Label.

6. PROCEDURE

6.1 COMPLAINTS

Complaints may be submitted by any person or organisation affected by an issue pertaining to the Label, the Label's standard-setting process, system, or operation. Complaints can be submitted directly by the Affected Party, or by a person authorised by the Affected Party.

6.2 GRIEVANCES

Grievances may be submitted by the Label's staff, associates, consultants, and those serving on the FAST-Infra Label's Governance Bodies. Grievances can be submitted directly by the Affected Party, or by a person authorised by the Affected Party.

6.3 SUBMITTING A GRIEVANCE OR A COMPLAINT

6.3.1. Complaints and Grievances must be submitted in writing, through one of the following channels:

- Through the Accountability Mechanism form available on the FAST-Infra website.
- By registered mail to the following address: FAST-Infra Label Secretariat, c/o Global Infrastructure Basel, Elisabethenstrasse 28, 4051 Basel, Switzerland.

6.3.2. Complaints and Grievances may be submitted in any language but will be translated into English for processing. The Secretariat shall make reasonable efforts to respond to the Complainant or Grievant in the language of the Complaint or the Grievance, respectively; however, this may not be possible in all cases. The main communication language shall be English.

6.3.3. All Complaints and Grievances must:

- Include the Complainant's/Grievant's name and contact information;
- If the Complaint or Grievance is submitted by a representative of the Affected Party, indicate on whose behalf the Complaint or Grievance is made;

- c. Confirm whether the Complainant or Grievant would prefer that their details be included in the Complaint or Grievance, or kept confidential, to the extent that it is feasible;
- d. Attest that the Complaint or Grievance is not fraudulent, frivolous or malicious in nature;
- e. Confirm that the Complainant or Grievant has no real, apparent or potential conflict of interest in connection with the submission of the Complaint or Grievance;
- f. Contain a detailed description of the concern giving rise to the Complaint or Grievance;
- g. Outline any good faith efforts the Complainant or Grievant has made to address the issues in question, if applicable, or explain why no such efforts have been made.

Complaints and Grievances may also indicate the desired outcome of the process. However, this will not be binding on the Secretariat.

6.4 ADMISSIBILITY

6.4.1. Complaints and Grievances are admissible if, according to the assessment of the Secretariat:

- a. They contain all the elements listed above under point 6.3.3;
- b. They pertain to issues that fall under the implementation of the FAST-Infra Label by the Secretariat; and
- c. The Complainant or the Grievant or, if the Complaint or Grievance is submitted on behalf of a third party, the purported Affected Party is or may be negatively affected by the issue raised in the Complaint or Grievance.

6.4.2. Complaints and Grievances are deemed inadmissible if

- a. They are filed more than 12 months after the issue that is the subject of the Complaint or Grievance occurred, or more than 24 months after the Complainant or Grievant became aware of the potential adverse effects of the issue, whichever comes later;
- b. They are anonymous;
- c. They are deemed by the Secretariat, in its reasonable discretion, to be fraudulent, frivolous or malicious, or submitted with the intention to gain competitive advantage; or
- d. They have already been the subject of a decision by the Secretariat, unless the Complainant or Grievant can submit compelling evidence justifying the need for a new Complaint or Grievance.

6.4.3. The Secretariat's determination on a Complaint's or a Grievance's admissibility is a matter of procedure and does not in any way represent a judgement on the substance of the Complaint or the Grievance. All admissibility decisions by the Secretariat are final.

6.5 RECEIVING A COMPLAINT OR A GRIEVANCE

6.5.1. The FAST-Infra Label Secretariat shall acknowledge the receipt of the Complaint or a Grievance without undue delay, and at the latest within ten working days. If no acknowledgement has been received within this timeframe, Complainants or Grievants may contact the Secretariat to verify whether their Complaint or Grievance has been received.

6.5.2. Upon reception of a Complaint or a Grievance, the Secretariat will carry out a preliminary review. As part of this preliminary review, the Secretariat will:

- Assess the admissibility of the Complaint or the Grievance as outlined above under point 5.4.;
- If the Complaint or the Grievance is deemed inadmissible, notify the Complainant or the Grievant and close the process; if the Complaint or the Grievance is deemed admissible, register the Complaint or the Grievance and proceed to points c. to e. below;
- If necessary, contact the Complainant or the Grievant to gather additional information and/or documentation pertaining to the Complaint or the Grievance;
- Develop a good understanding of the issues raised with the Complaint or the Grievance;
- Determine whether the Complaint or the Grievance is to be handled by the Secretariat, or whether it needs to be submitted to the FAST-Infra Label Steering Committee for a recommendation;
- Carry out a preliminary assessment of whether there is a potential conflict of interest that needs to be addressed when handling the Complaint or the Grievance; and
- Promptly notify the Steering Committee of its determination on the above issues and, where appropriate, provide it with a copy of the original Complaint or Grievance and any other relevant documentation.

6.6 HANDLING COMPLAINTS AND GRIEVANCES

Complaints and Grievances are processed, handled, and resolved by the Secretariat. The Secretariat must inform the Steering Committee of all Complaints and Grievances received as outlined above, and may request the Steering Committee's guidance and/or recommendations in addressing the issues raised in a given Complaint or Grievance.

The Steering Committee may decide, at its discretion, to become actively involved in processing specific complaints of particular complexity or significance for the Label. Assessing a Complaint or a Grievance as particularly complex or significant remains at the discretion of the Steering Committee.

6.7 CONFLICTS OF INTEREST

The Secretariat is committed to a fair and impartial resolution of all Complaints and Grievances. In the event that any individual involved in the processing or resolution of a Complaint or a Grievance has a personal or professional relationship that may give rise to a conflict of interest, they are required to disclose such potential conflict immediately. The Secretariat will take appropriate measures to manage, mitigate, or eliminate conflicts of interest to maintain the integrity of the Accountability Mechanism.

6.8 LEGAL IMPLICATIONS

Should the Secretariat determine, at its sole discretion, that any of the issues or concerns raised as part of a Complaint or a Grievance have legal implications, it reserves the right to bring the matter to the competent authorities. If appropriate, and to the extent that it is feasible, the Secretariat will seek to maintain the confidentiality of the Complainant or the Grievant, if such a request was made by the Complainant or Grievant at the submission of the Complaint or Grievance. If appropriate, the Complainant or Grievant will be notified if the matter is referred to the competent authorities.

6.9 RESOLVING COMPLAINTS AND GRIEVANCES

- 6.9.1. The Secretariat, where necessary and appropriate with the support and guidance of the Steering Committee, will review the Complaint or the Grievance, contacting the Complainant or the Grievant to obtain more information or documentation where necessary.
- 6.9.2. The Secretariat shall aim to respond to the Complainant or the Grievant with its determination on the substance of the Complaint or the Grievance and any proposed corrective action(s), if relevant, within three months, provided the Complainant or the Grievant is responsive where additional information is required. More complex Complaints and Grievances may require more time until resolution.
- 6.9.3. Where the Complainant or a Grievant is dissatisfied with the proposed solution, they may, within thirty calendar days from the day that the Secretariat's decision is communicated to them, appeal against the decision in writing to the Secretariat. Appeals may be submitted to the Secretariat by registered mail or by e-mail, and must be justified.

- 6.9.4. The Secretariat shall inform the Steering Committee of the appeal and invite the Steering Committee to make a recommendation on the outcome of the appeal, which shall not be binding for the Secretariat. The decision of the Secretariat on the outcome of the appeal will be communicated to the Complainant or the Grievant within three months of the submission of the appeal. More complex Complaints or Grievances may require more time until the appeal can be processed.
- 6.9.5. All decisions that have not been the subject of an appeal within thirty calendar days of their communication to the Complainant or the Grievant, as well as all appeal decisions, are final.

7. NON-RETALIATION

The Secretariat is committed to open communication and values the feedback provided by Complainants and Grievants. Any person who raises a concern or files a Complaint or a Grievance in good faith will not face retaliation or adverse consequences from the Secretariat as a result of their Complaint or Grievance. The Secretariat is staunchly opposed to any form of retaliation against Complainants or Grievants, and any such actions will be treated as a violation of our policies.

8. CASE REGISTER

The Secretariat will maintain an accessible and comprehensive case register of all submitted and concluded Complaints and Grievances, outlining any resulting actions and observing the confidentiality of any affected parties where necessary and feasible. Moreover, the Secretariat will keep a complete internal record of all complaints and resulting actions for at least five years for auditing purposes.

9.

- 9.1. The purpose of this section is to protect individuals who report suspected wrongdoing, misconduct, or dangers associated with the activities of the FAST-Infra Label from retribution, retaliation, or any other possible negative outcomes directly linked to their whistleblowing actions.
- 9.2. This policy applies to reports submitted by both internal and external individuals who are directly affected by, or have knowledge of, wrongdoings and wish to disclose or report them.

Whistleblowing disclosures must be made in good faith and with reasonable grounds to believe the reported information is correct.

- 9.3. Whistleblowing disclosures may be made using the Complaint Form (if the whistleblower is an Affected Party or representing an Affected Party) or the general FAST-Infra Contact Form (if the whistleblower is a third party), and will be investigated and resolved according to the same process outlined herein for Complaints and Grievances.
- 9.4. Protection against retaliation: The Secretariat shall ensure that whistleblowers are protected from any form of retribution or retaliation, to the extent that such protection is within the control of the Secretariat. This includes protection from reprisals, victimisation, harassment, retaliation, or any adverse employment consequences for individuals who report in good faith. Any employee of the Secretariat found to be engaging in such behaviour shall face disciplinary action.
- 9.5. Public disclosures will not be protected under this policy unless the internal procedures outlined herein are exhausted first.

10. CONTACT AND INFORMATION

The FAST-Infra Label encourages stakeholder involvement and participation. Comments on the present document are welcome and, if appropriate, will be incorporated in future versions of the Accountability Mechanism.

Persons seeking advice on how to prepare and submit a Complaint, a Grievance, or a Whistleblowing disclosure may contact the Secretariat, which will provide information and guidance, as appropriate.

Please submit any questions, comments, or suggestions to the Secretariat:

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