

oikos
cooperação e desenvolvimento



COMPLAINT

| Complaints Policy

COMPLAINTS POLICY

1. SCOPE

Oikos – Cooperação e Desenvolvimento seeks to ensure that all its policies guarantee that the organization maintains a level of conduct, integrity, and ethics in accordance with Portuguese and European legislation, as well as the guidelines of the United Nations, best sector practices, and other relevant legislation applicable in the countries in which it operates and to which it is bound.

This policy aims to encourage all employees and third parties involved in the organization's activities to report any incident, behavior, or event that violates its principles, values, code of conduct, ethical integrity, or legal compliance, without fear of reprisals or consequences, as well as to make known all mechanisms and procedures for their protection.

In this way, Oikos ensures that any complaints are investigated and, if relevant and pertinent, shared with third parties involved in the activities, depending on the severity and impact on the course of those activities. This recognition of the importance of the topic ensures respect for the organization's basic principles, such as transparency and accountability, and compliance with the code of conduct and other complementary policies by the organization.

Oikos understands that the reporting policy consolidates the approach to be followed by both Headquarters and the various Representations and Delegations, particularly with regard to the responsibilities of each stakeholder, the principles to be considered at all times and the periods associated with

submission and handling of a complaint. This policy complements and does not override the organization's existing policies.



2. APPLICABILITY

This policy applies to all employees, partners, and third parties related to the organization's activities.

- The term "organization employees" refers to all members of the Head Office, including all members of the Management and different Departments, and the different Delegations in each country where it operates.
- Partners of the organization are understood to be all entities that contractually share activities and functions in the various projects and countries in which Oikos operates.
- Third parties related to the organization's activities are understood to be volunteers, interns, donors, funders, consultants, service providers, and other national or international entities not included in the above points.

This policy applies during and after contracted working hours. Any activity by employees, partners, and third parties related to the organization's activities outside of contracted working hours that does not comply with this policy will be considered a violation of the policy.

3. DEFINITIONS

Confidentiality

Confidentiality is understood to mean a person's right to privacy and respect for their intentions. Data collected and shared will not be publicized or shared with third parties, except if the person agrees to this or if the event requires that the information be made public, namely to judicial authorities. In any circumstance, Oikos recognizes that it is obliged to strictly comply with the General Data Protection Regulation.

Whistleblower

An individual who may be an employee of the organization or a third party, internal or external to Oikos, who makes a substantiated report about the conduct of another person or organization, given the latter's involvement in activities that may not comply with ethical conduct and integrity and/or may be illegal. They make the report because they believe there is a potential event that constitutes (or is likely to constitute) malpractice or a crime, have become aware of the occurrence, or have participated in or witnessed the occurrence.

Bad practices

Bad practices are understood to mean all activities, services, actions or behaviors considered illegal, illicit, or negligent. These activities can damage or harm the organization's performance and image.

Superior

An individual who holds a position in the organization with functions of hierarchical responsibility above the person concerned, implying the establishment of a relationship of dependence of functions and response of the person concerned to the individual who occupies the aforementioned position.

4. PRINCIPLES

In order to protect the vulnerability of employees, beneficiaries, and other stakeholders in the organization's activities, particularly vulnerable adults and children, as well as to ensure the integrity of the organization, Oikos follows the following principles.

- Privacy and confidentiality are fundamental characteristics in the process of reporting and investigating complaints. No personal data will be shared with third parties that could facilitate the identification of a person, safeguard the dignity and safety of the complainant and third parties, as well as ensure the integrity of an investigation.
- In order to ensure a swift and transparent process, anonymous reports are discouraged
- Anonymous complaints are discouraged to avoid undermining the ongoing investigation process or the filing of complaints in bad faith; however, if the complainant wishes to remain completely anonymous, Oikos will investigate the complaint based on the information provided in the complaint.
- Complaints will be kept confidential to the extent possible, regardless of the channel used to file the complaint, and the employee and complainant will not be subject to any type of retaliation for filing the complaint.
- Whenever the context and circumstances require it, Oikos will follow a victim- or survivor-centered approach. Such an approach requires consideration of the victim's or survivor's perspective, taking into account their safety and possible inherent risks. This approach is applied in conjunction with respect for their rights, existing policies, and due process regarding the complaint.
- All employees or third parties related to the organization's activities are required to create or maintain an environment that prevents potential malpractice or illegal activities, as well as to promote the implementation of this policy.

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5. COMMITMENTS

To ensure compliance with the principles set forth, Oikos makes the following commitments:

- Oikos will take appropriate disciplinary measures and actions, in accordance with the conclusion of the stated process, including the possibility of dismissal for just cause.
- Aware of the possibility of malpractice occurring within the organization's activities, Oikos guarantees the safety of all those involved, with the exception of reports made with malicious intent or known to be false;
- Provide an environment of trust that encourages the open reporting of complaints, recognizing the possibility that reports may be made confidentially;
- No form of abuse of employees, beneficiaries, or other stakeholders associated with the organization's activities will be accepted, and the necessary training will be provided for them to use this mechanism when necessary;
- If employees or third parties related to the activities of the organization suspect or if



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concerned about possible malpractice or illegal activities, they should report this immediately in accordance with the defined mechanisms and processes. If any employee witnesses an event or possible event and does not report it, the organization will consider appropriate disciplinary action;

- All investigations will be initiated following the defined process and will always reach a final decision.
- All records of complaints submitted will be kept and processed annually, in order to enable an analysis of trends and areas of greatest risk, ensuring regular monitoring of this mechanism and guaranteeing improvements.

6. RESPONSIBILITY

All employees and third parties related to the organization's activities share the obligation to prevent and respond to malpractice and potential illegal activities. It is their responsibility to follow the principles and commitments set out in this policy. All employees and third parties related to the organization's activities who work alongside communities should also contribute to monitoring the policy by seeking the opinions of beneficiaries.

Managers, supervisors and human resources managers must ensure that all employees and third parties involved in the organization's activities understand and follow this policy, and are responsible for recruitment and training. In the case of human resources managers and supervisors, they are also responsible for performance management in the

context of preventing malpractice and potential illegal activities. It is the responsibility of line managers to verify and ensure that the investigation process, reporting, and disciplinary consequences are carried out.

Coordinators of Country or representatives must ensure that vulnerable adults and children are protected from bad practices and illegal activities in projects in the country of operation. Country coordinators must ensure that the policy is culturally appropriate within the community, developing mechanisms to implement and monitor its effectiveness. This includes raising awareness among project beneficiaries, employees, and third parties related to the organization's activities about reporting bad practices and illegal activities. Country coordinators must also ensure that reports are filed and subsequently investigated, following the necessary disciplinary measures. Country coordinators are responsible for ensuring that all necessary assistance is provided to the reporter, victim, or survivor.

Any employees and third parties related to the organization's activities who consider themselves to be witnesses, victims, or survivors of malpractice or illegal activities, in light of the above or in accordance with Portuguese law or from country from operations,

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they should immediately report to their immediate superior, or in the event of a conflict of interest, report to the person responsible of the levellevel.

Any communication with third parties outside the organization, such as donors or partners, will be the responsibility and decision of the Country Coordinators, the Director of Operations, and the Executive Director.

All incidents related to fraud and corruption, as well as harassment, sexual exploitation and abuse, or protection of children and vulnerable persons, must follow the policies developed exclusively for these topics.

7. COMPLAINTS

It is understood that this policy covers the reporting of concerns about others and the organization, which may involve potential risks to the institution and/or third parties related to it. A decision will be made as to whether or not the report falls within the scope of this policy. If the report is not considered, the reporter will be informed and advised to follow the best recommended procedure according to the nature of their report.

The report applies in all cases where there are fundamental concerns regarding malpractice in the context of the organization's work and activities, regardless of location, context, or whether the information relating to the event is confidential.

Malpractice can be understood as a set of events related to:

- Violation of an Oikos policy;
- Non-compliance of any legal or professional obligation or regulatory requirement;
- Failure to comply with legal obligations, as well as any criminal and illegal activities;
- Abuse of power;
- Improper conduct or behavior that violates integrity and/or the code of ethics;
- Negligence;
- Unauthorized disclosure of confidential information;
- Physical abuse or neglect of employees or third parties related to the organization's activities towards other employees, beneficiaries, or third parties related to the organization's activities;
- Possible environmental damage in the course of the organization's activities;
- Risk to the health and safety of individuals in general, as well as employees or third parties related to the organization's activities to other employees, beneficiaries, or third parties related to the organization's activities;
- Any activity that could bring serious discredit to the organization and destroy its reputation and image;

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- Concerns related to the compliance of fundraising practices;
- Financial mismanagement or financial crimes including theft, bribery, fraud, money laundering, and misappropriation of assets for humanitarian aid and support for ongoing projects. For further details, see the Anti-Fraud and Corruption Policy;
- Sexual misconduct, including sexual abuse, harassment, or exploitation. For more details, see the Policy on Protection Against Sexual Harassment, Exploitation, and Abuse and Protection of Children;
- Any other activities carried out in an unethical manner and in violation of the organization's values or considered illegal;
- The deliberate concealment of information related to any of the above matters.
- The possibility that someone is at immediate risk of harm;
- Detailed description of the incident. If possible, note the dates, times, places, people, and context in which the incident occurred;
- People potentially involved in the incident;
- How you became aware of the incident being reported;
- When did you start to worry and consider the incident a cause for concern?
- Mention whether you discussed your concerns about the incident with anyone else;
- Indicate whether any response or solution has already been taken based on prior verification of the incident;

7.1. SUBMITTING A REPORT

Complaints may be filed by employees, volunteers, beneficiaries, or third parties related to the organization's activities. Complaints must contain sufficient information about the incident, mentioning aspects that may be relevant to the investigation, such as:

You are not required to provide consolidated evidence of any malpractice, risk, or wrongdoing before raising a concern.

The report may be submitted informally, verbally, or by telephone, and will be handled locally; or formally, by mail, letter or by filling out the form provided for this purpose.

Complaints are received and initially processed by local project staff, directly, or by the communications officer, by completing the form. These are responsible for

communicating with the Country Coordinator at the local level or their line manager. In all circumstances, the Director of Operations must be made aware of all complaints submitted. If necessary, after analyzing each case and complaint, the involvement of the Executive Management or the Board of Directors may be requested.

All complaints received will be notified, in writing or verbally, within 3 working days of receipt.

Oikos reserves the right to withdraw or modify the complaint submission process, as well as to act in defense of the organization and its employees, particularly in the case of slanderous complaints.

7.2. INVESTIGATION AND FINAL DECISION

If an investigation is necessary, the outcome may involve disciplinary measures if misconduct has been proven, which may include dismissal for just cause. The investigation will take place within a maximum of 10 working days. If this is not possible within the deadline, the whistleblower will be notified. Oikos will always endeavor to ensure that the investigation takes place as quickly as possible.

Any internal complaint relating to any of the aspects mentioned above and which constitutes grounds for complaint should be discussed with the respective line manager, following the instructions for submitting

complaints set out in this policy. When submitting complaints, the complainant(s) may bypass their immediate superiors if they are involved or offer any kind of protection and/or concealment of the practice in question, or if there is a reasonable suspicion of a conflict of interest:

- i. This should occur if the whistleblower considers that their superior is not the right person to resolve the problem that gave rise to the complaint (as they may either be the perpetrator of the malpractice or be protecting the perpetrator of the malpractice).
- ii. It should occur if the whistleblower considers that the reported practice was committed by the Country Coordinator or Country Representative, communicating directly with the Director of Operations at Oikos – Cooperação e Desenvolvimento in Portugal;
- iii. This should occur if the rapporteur considers that the reported practice was committed by the director of the department that supervises the rapporteur's functions, communicating directly with the Executive Director at the Oikos – Cooperação e Desenvolvimento in Portugal;
- iv. This should occur if the rapporteur considers that the reported practice was committed by the Executive Director, communicating directly with the Board of Directors at the Oikos – Cooperação e Desenvolvimento in Portugal.

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- v. In the event that the Governing Board of Oikos does not offer sufficient guarantees independence vis-à-vis the Executive Director, the communication shall be made directly to the Chair of the General Assembly or the Chair of the Organization's Supervisory Committee.

At the community level, in the various Oikos Delegations and Representations, Oikos - Cooperação e Desenvolvimento recognizes the specificity of each case, context, project, and country, and encourages the filing of complaints by beneficiaries and employees of local teams and delegations. Any complaint during the course of a project should be addressed to the mechanisms presented by the project or made available by the organization to file the complaint:

- Direct contact and sharing with the Oikos Team and Delegation of the project in question, being duly identified;
- Contact by email with the Oikos Team and Delegation of the project in question;
- Contact by other means of communication made available by the Oikos Team and Delegation of the project in question.

Once the investigation is complete, the final decision concluding the process is shared. The complainant is notified of the final decision of the process, however, the results may be subject to confidentiality and not shared publicly in order to protect the safety and dignity of those involved.

If, at the end of the investigation, it is concluded that the reported incident constitutes a criminal or illegal activity, the matter will be referred to the competent authorities in accordance with the legal requirements of each country.

8. CONFIDENTIALITY AND ANONYMITY

Oikos emphasizes that, although it is possible to file a complaint anonymously, this may compromise the collection of data, the investigation process, and the notification of a final decision. For this reason, and whenever the complainant allows it, the process will be disclosed to the group of people strictly necessary for handling the investigation and the process, under the terms set out in this document, and must always be conducted confidentially, ensuring the safety and well-being of the complainant, the people or organizations potentially harmed, and others potentially involved in the complaint.



Oikos – Cooperação e Desenvolvimento is a non-profit association, internationally recognized as a Non-Governmental Organization for Development. We believe in a world without poverty and injustice, where human development is equitable and sustainable on a local and global scale. Therefore, we have taken on the mission of eradicating poverty and reducing inequalities so that all people can enjoy the right to a dignified life.

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