



HUMAN RIGHTS360 NON-PROFIT CIVIL LAW PARTNERSHIP

COMPLAINTS' MANAGEMENT POLICY

I. Introduction

Our organization, Human Rights360 Non-profit Civil Law Partnership (hereinafter "Human Rights360" or the "Organization"), follows practices governed by high moral values and attaches paramount importance to the exercise of its activities with respect, honesty, credibility, integrity, and consistency.

The primary concern of the organization is the respect for partners, funders, donors, beneficiaries and every third party in contractual relationship with our organization, the flawless provision of services, and the satisfaction of the needs and demands of all the above parties.

This policy of complaints defines the basic rules and principles followed by HumanRights360 to effectively handle complaints in the context of safeguarding more extensively the interests of these persons (partners, funders, donors, beneficiaries and every third party in contractual relationship with the organization) and complying with the principle of legality in the exercise of the organization's activities.

The complaints' procedure regards the referral of minor suspicions in terms of gravity of the misconduct as well as in terms of harm to the affected party in comparison to the complaints' procedure described in the Policy of Grievances.

It is clarified that this policy has taken into consideration all policies and procedures applied by HumanRights360, as well as the Code of Conduct and Ethics thereof and it is valid together with the other Policies and Procedures of Human Rights360 complementing them.

II. Purpose

This policy aims at:

- providing clear and updated guidelines regarding the process for effective handling of complaints
- raising awareness and providing guidance to the personnel to avoid acts that could lead to sanctions or damage the reputation of partners, funders, donors, and beneficiaries, but also every third party with which the organization has a relationship
- improving the general level of services provided through the analysis and systematic utilization of information arising from the management of complaints

- upgrading the quality of the organization's relations with third parties through the empowerment of a mentality of regulatory compliance to the staff of the organization
- monitoring effectively the management of complaints for identifying, evaluating, handling and minimizing risks associated with or arising through the management of complaints
- strengthening the framework principles and rules of ethical behavior and ethics of the organization.

III. Definitions

For the purposes of this Policy:

- (a) "complaint" means any oral or written declaration of dissatisfaction with regards to services offered by the organization or the conduct of staff, which is submitted in accordance with the defined procedure for complaints.
- (b) "complainant" means any natural or legal person who, in accordance with the applicable legislative and regulatory framework, is entitled to lodge complaint and who has already lodged a complaint to HumanRights360 following the complaints' procedure described herein.
- (c) "staff" means the senior management officers, with or without remuneration, of HumanRights360, and all persons employed by HumanRights360, either with an employment contract, or other types of contracts (provision of services, works contract, contract for the provision of voluntary Services, traineeship contract, etc.)

IV. Scope of application

This policy:

1. Binds directly the organization as it establishes the basic principles and rules governing the management of complaints regarding the services provided by the organization.
2. Applies to all staff members of HumanRights360 and its associates.
4. Covers all the activities of HumanRights360 in Greece and abroad.
4. Complements the framework of principles and rules of conduct and ethics of Human Rights360, as formulated in particular by the Code of Conduct and Ethics, the Policy on Gender Equality and the Prevention of Violence and Harassment at Work, the Policy on Data Protection, the Anti-Fraud Policy, the Whistleblowing Policy, the Policy of Grievances, as well as other Policies implemented by Human Rights360, establishing principles for the lodging of complaints by any third party that is entitled to do so.

It is emphasized that filing a complaint with Human Rights360 does not set aside the possibility of a grievance or legal action for the protection of these legal interests, nor does it interrupt the prescription of the claim.

V. Basic principles

The HumanRights360 Complaints Policy adheres to the following basic principles:

- The ability to submit and manage a complaint is free of charge
- all complainants enjoy equal treatment and an equal degree of protection of their interests,
- the complaints are investigated and dealt with in good faith, through the collection and processing of any direct or relevant evidence and information,
- during the investigation of the complaint, Human Rights360 communicates, if necessary, with the complainant clearly, in a simple and comprehensible language and responds in a timely and correct manner, without undue delay,
- complaints are dealt with effectively and separately, with respect for general and specific principles and values such as respect for personality, trust, transparency, decency, honesty, professional conscientiousness, the consideration of the legal interests of the person affected or likely to be affected, and the general willingness to cooperate. **They are investigated and dealt with by a three-member Complaints' Management Committee appointed by the General Assembly of Human Rights360,**
- Personal data included in the complaints are processed in a legal, legitimate and safe manner for strictly defined purposes and shall be kept in accordance with the applicable provisions of the legislative and regulatory framework.

VI. Process of submission and management of complaints

Human Rights360 establishes a special procedure regarding the stages of filing complaints. This procedure outlines the immediate steps to be taken in the event of a complaint. Within this framework, a special mechanism for submitting, managing, and carrying out the complaint is defined, ensuring that the procedure of submitting a complaint is simple and fast, the competent Committee deals immediately with the management of the complaint and that the issue is resolved, to the extent possible.

The main goal of the organization is to investigate and handle complaints in a way that leads to resolving the issue with transparency, impartiality, objectivity and within the specified time limits.

A. Persons entitled to file a complaint

For the purposes of this Policy, a complaint may be filed by any natural or legal person who has a transaction, cooperation, contract, or any other benefit from HumanRights360, or any third party expressing his/her dissatisfaction regarding the services offered by the organization, its way of functioning, or the behavior of an individual staff-member or all its staff. Complaints should not be vague, but based on concrete facts, should always be made in good faith without the intention of blackmail, retaliation or of obtaining personal benefits.

B. Cases for which a complaint is filed

A complaint is mainly filed for acts and omissions regarding the functioning of the organization that spawned resentment to the complainant, as well as bad or inappropriate behavior by employees or associates of the Organization.

Complaints are not submitted for acts, omissions or conduct that:

- (a) are not related to Human Rights360 and the services provided by or through it;
- (b) are not related to the activities of third parties (e.g. Implementing Partners of Programs and Activities, etc.) for which Human Rights360 bears no legal, moral or regulatory responsibility,
- (c) relate to any expression of protest, dissatisfaction, opinion and / or complaint that does not fall within the above meaning of the complaint,
- (d) are not submitted through the complaints' procedure adopted by Human Rights360 hereby,
- (e) constitute a manifestation of protest with exclusively abusive content, or
- (f) regard documents related to the initiation/conduct and general involvement of Human Rights360 in litigation procedures (e.g., civil lawsuits, reporting of criminal offences, etc.).

C. Way of submitting complaints

Anyone can file a complaint completely free of charge, in one of the following (alternative) ways:

- by filling in the standard electronic complaint form posted on the Organization's website.
- via email complaints@humanrights360.org . Complaints can be submitted through either the complainant's corporate or personal email address.
- by letter via post.

The Organization accepts the submission of complaints through this procedure only. Any expression of protest, dissatisfaction, opinion and / or complaint that is not submitted through the above procedure is not recognized and is not treated as a complaint by the Organization.

When filing a complaint, the complainant should provide his / her personal information, which will allow Human Rights360 to contact him / her and to conduct his / her investigation regarding the reported act (name, contact details, father's name, Tax Identification Number). Complaints can also be made anonymously, but this means that the Organization will not be able to contact the complainants to obtain more information and / or provide them with relevant information, which may ultimately make it difficult to deal with the reported event. Therefore, the Organization does not encourage the submission of anonymous complaints. It is also emphasized that the submitted complaints are treated with absolute confidentiality by the Organization and the competent Committee.

The complainant should also accurately describe the issue and substantiate it with as much information and evidence as possible, facilitating further investigation.

D. Handling of complaints

After the submission of the complaint, the Organization, through its competent bodies, carefully investigates the issue reported, and in case additional information is needed, communicates with the complainant, if the latter has indicated his contact details during the submission of the claim.

In dealing with the complaint, the competent Committee must:

- investigate the submitted complaints and handle them with due diligence and without discrimination,
- respond carefully to any complaint, showing courtesy and understanding,
- do their utmost and exhaust all possibilities of immediate settlement of the issue and provision of services to the complainant,
- not argue with the complainant, but provide appropriate and adequate explanations,
- keep a low profile and urge the complainant to keep it low-key as well, so as not to create impressions which could have a negative impact on the reputation of Human Rights360,
- not perceive any reproach of the complainant as a failure on a personal level,
- respect the personal data disclosed by the complainant and pledge that the latter will be handled in accordance with European and national legislative and regulatory framework for the protection of personal data.

Once the process of investigation of the complaint is completed, the complainant is informed in the manner he/she indicated as preferred (e.g., at the e-mail address he/she has indicated) about the issue related to the complaint and the manner it was handled. The time limit for the response is set at 45 calendar days, the latest, from the submission of the complaint. However, when, for a significant reason, it is not possible to reply within the above time limit, the Organization shall ensure that the complainant is informed of the reason for the delay and of the new deadline to respond to his/her complaint.

VII. The protection of the complainant

It is the policy of the Organization to protect the complainant who reveals concerns, provided that the complaint is made in good faith, without the intention of harming the person, whose conduct is linked with the complaint.

All statements and disclosures arising from complaints will be treated with the utmost confidentiality. The Organization shall consider the following parameters in the investigation of the complaint:

- seriousness of the reported issue,
- importance and credibility of the issue,
- possibility of verification of the complaint

Any retaliation will be dealt with accordingly. The imposition of retaliation against the complainants is not tolerated. Complainants are protected and their identity remains confidential.

VIII. Persons responsible for the implementation of the Policy

A. The General Assembly is responsible for the adoption and approval of this Policy, its periodic review, the monitoring of its implementation and the annual evaluation of the adequacy and effectiveness thereof.

B. The Complaints' Management Committee appointed by the General Assembly of Human Rights360 is composed of three members, consisted of the Legal Adviser and Regulatory Compliance Officer of Human Rights360, its legal representative and an employee appointed by the General Assembly, and:

(a) is responsible for establishing and continuously monitoring the implementation of this Policy and the procedures under which complaints are made according to this Policy,

(b) evaluates periodically the adequacy and effectiveness of this Policy and is responsible for submitting a proposal to the General Assembly of Human Rights360 regarding its revision, whenever this is deemed necessary, in accordance with the relevant legal and regulatory amendments, but also the activities of Human Rights360,

(c) investigates and manages complaints submitted under this Policy, as well as take any necessary action.

(d) informs the General Assembly of Human Rights360 annually of all complaints lodged in the previous year, the manner of processing, the conclusion and the actions taken.

The Complaints' Management Committee is different from the Grievances' Management Committee.

IX. Developing a culture of submitting complaints

The Organization attributes considerable importance to the creation of a culture in which the submission of complaints is considered legitimate and helps to improve the organization and the provision of services by the organization itself. To create an environment that ensures the effectiveness of the complaint mechanism throughout the Organization, the following measures need to be adopted:

1. Commitment of the Management: The Management of the Organization is expected to support the submission of complaints.

2. Communication: The organization ensures that this policy is clearly communicated to staff and third parties through this publication on the website of the organization.

3. Investigation and action: All notifications or concerns about complaints should be investigated promptly and properly and appropriate action needs to be taken following the completion of the investigation. In addition, the investigation of the above shall remain confidential.

X. Publication of the Policy

This Policy is also posted on the website of Human Rights360 in Greek and English. In this way, Human Rights360 seeks to enhance transparency, as it provides an opportunity for anyone concerned to learn about and evaluate the core values, rules and principles that govern its operation.

XI. Policy Review

The General Assembly of Human Rights360 reviews this Policy whenever necessary, but at least every three years, in order to ensure its adequacy with regard to the principles adopted and the rules applied by Human Rights360, as well as the applicable legal and regulatory framework and practices. In case of amendment of the Policy, Human Rights360 takes care of the immediate disclosure of its revised text to the Personnel and third parties in any way it deems appropriate.

Athens, October 29, 2021