



HUMAN RIGHTS360 NON-PROFIT CIVIL LAW PARTNERSHIP

POLICY OF GRIEVANCES

I. Introduction

Our organization, Human Rights360 Non-profit Civil Law Partnership (hereinafter "Human Rights360" or the "Organization"), ensures high ethical standards in all its activities and attaches paramount importance to legality, respect, honesty, integrity, and consistency. To this end, it has established various policies, as well as a Code of Conduct and Ethics, which sets out the standards of the conduct expected on behalf of all staff and associates.

This Policy of Grievances sets out the procedure by which both the Organization's staff and any stakeholder or third party may express their concerns about illicit practices and illegal or unethical acts and actions they identify within the Organization, and establishes the basic rules and principles, which should be followed for the effective handling of these grievances.

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

II. Purpose

With this Policy, Human Rights360 seeks to encourage employees as well as any third party to submit a grievance for unethical or unlawful conduct of an employee, executive or third party collaborating with the organization, in a confidential way without any fear of retaliation. Specific objectives of this Policy are:

- The encouragement of reporting of any illegal, inappropriate, unethical, or unsuitable behavior at all levels
- The provision of clear procedures for reporting and dealing with such issues
- The prevention and deterrence of offences that could affect and damage the reputation and credibility of the Organization
- The provision of assurance that all grievances will be addressed with seriousness, on a confidential basis and without fear of retaliation of any kind
- The contribution to the promotion and development of a culture of accountability and integrity within the Organization

- The safeguarding of support to the complainant.

III. Definitions

For the purposes of this Policy:

(a) "grievance" means any written allegation or concern about illicit practices and illegal or unethical acts or actions that the complainant identifies within the Organization.

(b) "reported acts" means primarily acts involving all forms of fraud, corruption, bribery, theft, acts of harm to health and safety at work, any form of criminal activity, harassment, inappropriate or unethical conduct that undermines basic morals values such as integrity, respect, honesty, accountability and justice, forms of corporate governance violations, suspicious transactions, falsification of data, sexual or physical abuse of staff, associates, and others, etc. The irregularities or concerns listed here are not exhaustive. Grievances are also submitted for inappropriate or unethical behavior on the part of employees or associates of the Organization.

(c) "complainant" means any natural or legal person who, in accordance with applicable laws and regulations, is entitled to lodge a grievance, including employees, directors and third parties, and who has already submitted a grievance with Human Rights360 for an illicit practice and illegal or unethical act within the Organization, following the grievance procedure described in this Policy.

(d) "suspect" means the person who allegedly committed the offense for which the grievance is lodged and who is the subject of an investigation.

IV. Scope of application

This Policy:

1. Establishes the basic principles and rules governing the management of grievances.
2. Applies to all staff members of HumanRights360 and its associates.
3. Covers all the activities of Human Rights360 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, as well as other Policies implemented by Human Rights360, establishing principles for the lodging of grievances by any third party that is entitled to do so.

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

V. Basic principles

The HumanRights360 Policy of Grievances adheres to the following basic principles:

- The ability to submit and process a grievance is free of charge
- all complainants enjoy equal treatment and an equal degree of protection of their interests,
- the grievances 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 grievance, 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,
- grievances 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 Grievances' Management Committee appointed by the General Assembly of Human Rights360.

VI. Grievances' procedure

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

A. Persons entitled to lodge a grievance

For the purposes of this Policy, a grievance may be lodged by any natural or legal person who has a transaction, cooperation, contract, or any other benefit from HumanRights360, or any third party concerned about the occurrence of illicit practices and illegal or unethical actions identified within the Organization. The complainant's suspicions should not be based only on conjecture and rumors, but on the knowledge of the facts, and the grievance should always be made in good faith without the intention of obtaining personal benefits.

B. Cases for which a grievance is lodged

Grievances are mainly made for acts and omissions that include any form of fraud, corruption, bribery, theft, acts harmful to health and safety at work, any form of criminal activity, harassment, illegal or unethical conduct that undermines basic moral values such as integrity, respect, honesty, accountability and justice, forms of corporate governance violations, suspicious transactions, falsification of data, sexual or physical abuse of staff, associates and others, etc. The irregularities or concerns listed here are not exhaustive.

Grievances are also submitted for inappropriate or unethical behavior on the part of employees or associates of the Organization.

Grievances 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 grievance,
- (d) are not submitted through the grievances' 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 grievances

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

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

When submitting a grievance, 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). Grievances 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 grievances. It is also emphasized that the submitted grievances 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. The entitlement of the complainant to lodge the grievance is checked by the Organization, and in case it lacks legitimacy, the grievance is not investigated.

D. Handling of grievances

After the submission of the grievance, the Organization, through its competent bodies, carefully investigates the issue reported, and in case additional information is needed, communicates with the complainant.

In dealing with the grievance, the competent Committee must:

- investigate the submitted grievances and handle them with due diligence and without discrimination,

- respond carefully to any grievance, showing seriousness and professionalism
- 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.

Once the process of investigation of the grievance is completed, the complainant is informed in writing at the e-mail address he/she has indicated about the issue he had raised (suggested solution, clarifications, sanctions, etc.). The time limit for the response is set at 45 calendar days, the latest, from the submission of the grievance. 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 claim.

VII. The protection of the complainant

It is the policy of the Organization to protect the complainant who reveals concerns, provided that the grievance is made in good faith, without the intention of harming the suspected person.

All disclosures arising from grievances will be treated with the utmost confidentiality. The Organization shall consider the following parameters in the investigation of the grievance:

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

Any retaliation, including indications of discrimination, harassment, suspension, withdrawal, reversal, revenge, or any other professional injury, direct or indirect, which poses a threat to the complainant, will be dealt with accordingly. The imposition of retaliation against the complainants is not tolerated. Complainants are protected and their identity remains confidential. Any grievances submitted by other staff are not included in the complainant's personal file kept by Human Rights360, and special attention is paid during the staff evaluation process to ensure that complainants are not adversely affected in their appraisal and development.

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 Grievances' 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 with economic or legal background, and:

(a) is responsible for establishing and continuously monitoring the implementation of this Policy and the procedures under which grievances 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) investigate and manage grievances submitted under this Policy, as well as take any necessary action. In the event of a proposal to refer the grievance to the judicial authorities, the Committee is obliged to inform the General Assembly of Human Rights360, which convenes an extraordinary meeting for this purpose.

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

IX. Developing a culture of submitting grievances

The Organization deems very important to create a culture in which employees and third parties are really encouraged to expose illegal, unethical, and bad behavior. To create an environment that ensures the effectiveness of the grievance 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 grievances.
2. Communication: All employees and third parties should be aware of the existence of a Policy and procedure of grievances through the publication of this Policy on the Organization's website. The written statement of all staff that they have read and understood the Policy will also be encouraged.
3. Investigation and action: All notifications or concerns about grievances 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