

## Complaints Policy

### **Background**

In its work on behalf of people in need, humedica follows fundamental values. By signing the humedica Code of Conduct, each employee undertakes to live up to the high ethical standards in carrying out his or her activities on behalf of humedica.

humedica's goal is to leave no room for individual misconduct. With a triad of prevention, professional reporting and consistent investigation of suspected cases, humedica has established a holistic approach.

humedica engages its employees, and encourages partners and beneficiaries, to report employee behaviour that is inconsistent with the Code of Conduct. In this document, employees are defined as full-time and voluntary staff, consultants, service providers, suppliers and all other persons acting in the name of or on behalf of humedica.

This policy describes the internal reporting system.

### **Definition**

For the purposes of this document, misconduct refers to conduct that violates the Code of Conduct. This includes, but is not limited to, unlawful conduct, embezzlement, corruption, non-transparent conflicts of interest, and abuse of power including sexual harassment, exploitation and abuse.

### **Reporting channels**

#### *For humedica staff*

As a humedica employee, you are required to report misconduct or suspected misconduct. If you believe that a humedica employee has engaged in misconduct, please report the suspicion to your line manager. If you are reluctant to speak to your line manager, you can also speak to their line manager. If this option does not seem viable either, you have the option of contacting the humedica ombudsperson in confidence.

#### *For all other groups of people*

If you believe that a humedica employee has committed misconduct, please contact the humedica project or country coordinator outside Germany. Alternatively, you can send us your message through the project's established grievance mechanisms or directly through the ombudsperson.

Confidential messages can be left with the ombudsperson by email or on an answering machine. Messages in English, French, Spanish and German can be handled immediately. Messages in other languages are handled with the help of translators who are sworn to secrecy.

The contact details of the humedica ombudsperson are systematically publicised throughout the organisation and at all project sites in an appropriate manner.

Suspicion can also arise from rumours in the community or behavioural problems of possible witnesses. In this case, the staff member as well as all other groups of people are encouraged to report their concerns to the organisation in the form of a possible complaint.

### **Case management**

All reports will be handled professionally and confidentially according to the procedure below:

In the event of a report being made to the **line manager(s)**, the line manager has a duty to:

- acknowledge receipt of the complaint,
- obtain the following information from the complainant, if possible:
  - Who is the complainant?
  - What is the allegation? (What happened? By whom? When? Where? Who else was present/involved?)
- to make an initial assessment of the case,
- if necessary, in consultation with the management and a person trained in investigations, to decide on the further course of action and, if necessary, to initiate investigations.

In the case of a report to the **ombudsperson**, the ombudsperson has the duty to:

- acknowledge receipt of the complaint,
- obtain the following information from the complainant, if possible:
  - Who is the complainant?
  - What is the allegation? (What happened? By whom? When? Where? Who else was present/involved?)
- to make an initial assessment of the case,
- if necessary, in consultation with the management and a person trained in investigations, to decide on the further course of action and, if necessary, to initiate investigations.

### **Protection of whistleblowers**

humedica makes every effort to ensure the protection of whistleblowers. This applies both to the confidential treatment of sources and information provided, as well as in the event that a suspicion expressed ultimately proves to be unfounded. If, for example, in the context of a planned initiation of formal investigations or due to a planned involvement of the law enforcement authorities, implications for the anonymity of the informant are foreseeable, the further procedure will be coordinated with the informant.

### **False accusations**

humedica's goal is to actively encourage its employees, partners, and beneficiaries to report employee behaviour that is inconsistent with the Code of Conduct. Accordingly, great efforts are made to establish and maintain a culture that leaves no room for misconduct and encourages the reporting of suspicions. The fact that

humedica also takes disciplinary action against deliberate false accusations by employees is intended to prevent abuse of the reporting and investigation system described above.

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