

Solidagro complaints handling procedure

Section 1. Introductory provisions

Definition of the different roles

The reporter submitted the complaint through the website of Solidagro. This can be an employee, beneficiary, or partner of Solidagro. The reporter is not necessarily the victim of the complaint. The reporter can also be a witness of an integrity issue and is responsible for assessing which actions need to be taken. The reporter can also choose to approach the integrity adviser, who will provide confidential advice and discuss the possible follow-up actions.

The complaint manager evaluates the complaint based on the principles described in this procedure. This function should be as independent as possible from operational work.

The integrity officer is responsible for adopting and strengthening the integrity policy. This person makes sure that the integrity action plan is implemented so that a true culture of integrity is maintained.

The integrity adviser consists of being the referrer to whom any employee or volunteer in the organization can turn in confidence for integrity advice. Through active listening, the integrity adviser gives sound advice on the actions that can be taken.

Article 1. Purpose

This complaints handling procedure is intended to ensure an adequate and timely handling of complaints and reports relating to integrity violations. This procedure serves as a guide in treating complaints. However, breaches of integrity and the possible handling of complaints can be very delicate and complex, which should not prevent this procedure from adopting a flexible, customised approach. Proper complaint handling also serves the collective purpose of the sector of international solidarity, in particular the preservation and improvement of the sector's image.

Article 2. Regulations and procedures

This procedure in no way replaces obligations arising from regulations or internal documents such as Solidagro's integrity policy, internal regulations or privacy policy. The complaints handling procedure is complementary and is without prejudice to other established procedures and vice versa.

Article 3. Scope

This procedure applies to complaints or reports relating to integrity violations committed by Solidagro, including its directors, the secretariat and the employees in the performance of their

functions. Breach of integrity means any breach of appropriate financial or moral conduct under the integrity policy or other internal regulations.

Sexual transgressive behavior is defined as:

A. sexual exploitation: any actual or attempted abuse of a person in a position of vulnerability, trust, or unequal power for sexual purposes, including - but not limited to - obtaining economic, social, or political benefits from the sexual exploitation of another.

B. sexual abuse: actual or threatening physical misconduct of a sexual nature, whether by force, or coercion, or by exploitation of unequal power.

C. sexual harassment: unacceptable and unwelcome sexual conduct, including, but not limited to, sexual suggestions or demands, requests for sexual favors, and sexual, verbal or physical conduct or gestures, which are offensive or demeaning or may reasonably be perceived as such.

A complaint or report may be submitted by any interested party. The interested party refers to any employee, partner and beneficiary of Solidagro, including its employees, and any other victim of integrity violations as described in Article 3, paragraph 1. Upon receipt of the complaint, a confirmation of receipt will be sent to the applicant within 5 working days.

Article 4. Other reporting channels

Prior to submitting a formal report or complaint, an informal report can be filed. A reporter may at any time confidentially discuss his/her suspicion of violation with an employee, supervisor, director, complaints manager, the counselor's integrity or board member. If necessary, they may inform and assist in the procedure for formal reports. Reports may also arise from internal audits such as financial audits and controls. If applicable, no submission should be made via the reporting point on the Solidagro website and, if necessary, the complaints manager will initiate a (preliminary) investigation.

A reporter can also contact the [central hotline](#) when:

1. A thorough and proper investigation is unlikely
2. There was no follow-up to a report to the first-line hotline
3. The investigation after report was not thorough or correct
4. Necessary actions were not taken

This can only be done for reports regarding abuse, defined as sexual exploitation, sexual abuse or sexual harassment, and not for financial or integrity violations.

Admissibility is assessed by the central hotline, coordinated by DGD. The central hotline will contact the organization involved in the assessment for verification of:

1. The follow-up of the report
2. The measures that were taken
3. And, if necessary, the integrity procedures

The organization involved has a duty to cooperate. If the organization involved does not meet the requirements, the central reporting point will pass on a report with recommendations.

Section 2. Preliminary Investigation

Article 5. Purpose of the preliminary investigation

The purpose of the preliminary investigation is to determine whether a report requires further investigation. During the preliminary investigation, the complaints manager will assess the admissibility of the complaint and make an initial assessment of the authenticity of the alleged facts and examine their verifiability.

Article 6. Conditions of admissibility

A complaint or notification shall be admissible if:

1. The complaint regards a possible breach of integrity as described in Article 3, paragraph 1. By way of example a wish, suggestion, question or advice would be inadmissible;
2. The complaint was lodged by the party concerned as described in Article 3, paragraph 2;
3. The facts to which the complaint relates did not occur more than 10 years ago. In the case of acts committed over a longer period of time, the most recent fact shall be taken into account;
4. The complaint was submitted via the complaint form on the Solidagro website;
5. The complaint was not submitted anonymously;
6. It is not a complaint about a violation that has already been reported and that has been adequately followed up.

The admissibility will be assessed by the complaints manager. The admissibility decision cannot be appealed. The reporter is free to submit a new complaint or report with the aim of obtaining admissibility.

Article 7. Results and report of the preliminary investigation

The complaints manager will draw up a preliminary investigation report. If the preliminary investigation shows that this is a potentially risky situation requiring urgency, this will be stated in the report and the file will be prioritised. The preliminary investigation report shall include the admissibility assessment and an initial assessment of the authenticity and verifiability of the alleged facts. If a complaint investigation should be deemed necessary on the basis of these data, the complaints manager will propose an investigation which will be included in the preliminary investigation report.

The reporter may be requested to provide additional information. If there is no reason to initiate an investigation on the basis of the report of the preliminary investigation, the reporter will be informed of this by means of a concise motivation.

Section 3. Investigation

Article 8. Complaint investigation

An investigation may be initiated if the outcome of the preliminary investigation so requires. This decision is taken by the complaints manager, possibly in consultation with the integrity officer. Based on the facts and data of the investigation, it is decided which persons will be involved in the investigation and whether the investigation will be carried out internally or externally. Maximum discretion and confidentiality are guaranteed and the persons involved only receive information on a need-to-know basis.

This approach is used throughout the entire investigation and in all investigative activities. The directives included in the brochures on integrity and complaint handling were designed by Deloitte and DGD and serve as a guideline for the investigation. Each investigation requires an individual approach and the facts and data specific to the research will always be handled with flexibility.

All investigative actions and steps taken are documented in the file, which also contains background information, the documents received and the conclusions. The investigation file also contains data on the investigator(s) and the parties contacted and involved, anonymously or otherwise.

If the complaint is about sexual transgressive behavior, defined in Article 3, there are four specific obligations:

1. In any case, the organization takes appropriate measures in a timely manner immediately after analyzing the report.
2. The organization provides appropriate assistance to victims.
3. If necessary, the organization provides appropriate assistance to other persons who report abuse. This includes measures to protect reporters and victims against possible reprisals.
4. The organization has an obligation to inform victims of available assistance. It shall provide assistance only if requested by the victim.
5. If, on the basis of the preliminary investigation report, there is no reason to initiate an investigation, the reporter will be informed of this with a brief motivation.

Article 9. Principles and safeguards

A number of principles deserve special attention and must always be respected throughout the investigation. These include confidentiality of information, proportionality, treatment within a reasonable time, absence of bias and protection of the parties concerned. The facts, sensitivity, risk and complexity of the complaint are always measured against these principles when conducting inquiries. Respect for these safeguards, applied, for example, to the confidentiality of the identity of the reporting person, can only be derogated from with the express consent of the parties concerned or when required by law (e.g. in the case of a judicial investigation).

Section 4. Conclusion and follow-up

Article 10. Outcome of the investigation and imposition of measures

If the investigation reveals that criminal offences have possibly been committed, advice can be sought from an internal or external expert, after which judicial authorities will be apprehended. If it turns out that an integrity violation has been committed, appropriate measures will be taken with regard to the offender. Evidently, the appropriate sanction is dependent on the file and can vary greatly from a reprimand or warning to immediate dismissal with formal reference to criminal authorities. The complaints manager will determine the sanction, possibly after internal or external advice.

In addition to sanctions, alternative solutions may be proposed, such as mediation or amicable settlement. This will be determined by the complaints manager, possibly in consultation with the director. If the investigation reveals there has been no breach of integrity, no measures will be imposed.

Article 11. Conclusion of the investigation.

Each investigation is logged upon completion, kept in the Solidagro archive and the investigation file will be kept for a period of 10 years. The outcome of the complaint investigation shall be communicated to the reporter and, if appropriate, to the victim of the violation. The reasonable time must be respected. During the conclusion, due consideration is given to the victim of the report. How the victim will be exactly followed up on depends on the facts, circumstances and the result of the investigation. In any case, the complaints manager will remain vigilant after concluding the complaints procedure.

Article 12. Communication, privacy and transparency

Addressing a complaint in a way which keeps the victim and the reported protected always takes precedence over prioritising other interests, such as communication and other considerations. This means, among other things, that information about a specific complaint or investigation is only communicated to actors who are directly involved or need to be involved.

Communication around specific cases requires careful moral considerations on a case-by-case basis. If, other than the reporter or the victim, parties involved in a publicity-sensitive matter are also at risk of any form of damage, they shall be informed of the situation. These interested parties shall only receive strictly necessary information and communication under the condition that they also guarantee principles such as confidentiality. The appropriateness, timing, tone and content of other external communication is always specific to the circumstances of the individual situation.

Such communication always considers the balance between the interests and rights of the victim, the perpetrator, the public, the sector and possible other stakeholders. In addition to the aforementioned safeguards for confidentiality and protection of victims, perpetrators and reporting persons, Solidagro's internal privacy policy also applies.

All data that was received and handled throughout the procedure will be stored and processed

in accordance with the privacy policy. Every year Solidagro reports to the general meeting on the complaints dealt with. For the purpose of protecting reporters, victims or other interested parties, this report does not contain any sensitive or case-specific data. Based on this annual reporting and analysis of these reports, complaints and integrity violations, this complaints procedure may be updated to improve the quality of complaint handling.

The NGO federation is kept informed about initiated or ongoing complaints procedures. The information passed to the director or officer within the NGO federation is confidential and will always remain confidential.