COMPLAINTS HANDLING AND REPORTING MECHANISM

REPORTING OF POSSIBLE IRREGULARITIES AND MISCONDUCT IN DIGNITY

Why does DIGNITY have a complaint mechanism?

DIGNITY strives to ensure that all its activities meet the highest standards for financial accountability, anti-corruption, good administrative behaviour, transparency, and for prevention of sexual exploitation, abuse, and harassment (PSEAH). Therefore, beneficiaries, partners, staff, and other stakeholders must be able to express criticism and submit complaints to ensure that cases of maladministration and Code of Conduct breaches are identified and acted upon in a timely and fair manner.

The objective behind DIGNITY's complaints handling and reporting mechanism (CRM) is provide all stakeholders accessible and transparent access to report *irregularities and misconduct* perpetrated by DIGNITY staff or staff of collaborating organisations.

What grievances can be submitted as complaints?

If you have experienced or are aware of *serious misconduct* committed by a DIGNITY staff member or a staff of a collaborating organisation you can use the CRM to submit a formal complaint to DIGNITY. Serious misconduct includes criminal offences and serious breaches of legislation, contracts, and DIGNITY's Code of Conduct.

If you have less serious complaints such as dissatisfaction with the work of DIGNITY, wages, collaboration difficulties etc. these must be handled via management lines and dialogue. For DIGNITY staff members, minor complaints are handled via the organisational channels for grievance handling and conflict management described in the staff handbook as well as via staff/union representatives. For external stakeholders, complaints that do not constitute irregularities or serious misconduct must be raised and addressed via the relevant manager in DIGNITY.

How do I submit a complaint?

Complaints about irregularities and misconduct can be addressed to DIGNITY's HR Director and Complaints Coordinator, Lene Høg Jensen, by email: lhie@dignity.dk. DIGNITY is working on a future technical solution for submitting anonymous complaints via the website.

If your report concerns the HR Director or if you for other reasons do not want to submit a complaint directly to a staff of DIGNITY, you may direct the complaint to the CEO Mr. Rasmus Grue Christensen through mail rgc@dignity.dk or the current chairman of the board Mrs. Dea Seidenfaden through mail des@dp.dk.

All complaints or inquiries sent to DIGNITY through the website are treated confidentially by the HR Director and other managers or employees who may be involved in the follow-up actions.

Can I be anonymous?

Complaints can be submitted anonymously. However, anonymity may weaken a report, as it can be difficult to use anonymous information in a concrete case.

If you wish to be anonymous, you must remember never to reveal your identity, as the one who receives the report is obligated to record all relevant information, including the name of the person submitting the report. It is therefore important to make it clear from the onset that you wish to remain anonymous. You can always choose to reveal your identity at a later point.

If DIGNITY has received information about your identity, we may in certain situations be obliged to pass on the information to the person in question, because the rules on data protection and other legislation obligate us to do so.

Investigation procedure

Reporting

When you submit a complaint, please describe all facts about the incident, including factors that may be considered unimportant. Your report must, to the greatest extent possible, provide documentation of your claim. Any written documentation in the form of documents or similar should be submitted. Your report may contain the following:

- Information about the person/collaborator/department which your report concerns
- Brief description of the alleged offence
- Brief description of concrete observations (with documentation, if possible)
- Contact information unless you wish to remain anonymous.

All persons submitting a complaint to DIGNITY will receive a confirmation of receipt of the inquiry within 7 days, as well as feedback on the case within 3 months.

Investigation

DIGNITY will investigate all cases of violations made by its staff or persons covered by the Code of Conduct. Investigations will be conducted in close collaboration and dialogue with the person submitting the complaint. Complainants will be informed of the steps taken but not necessarily the results of the investigation.

DIGNITY has a duty to investigate cases where there is a fair, factual basis for suspecting staff and persons covered by the Code of Conduct of serious irregularities, which makes it relevant to launch an investigation. Typically, the investigation process is as follows:

• The complaint is received and the relevant manager decides how the case should be investigated Complaint is •The accused is informed of the complaint and possible outcomes recieved •The manager prepares the investigation (e.g., by reviewing and checking the documentation) Investigation •The relevant donor is informed, where necessary (including cases concerning corruption is prepared • The management conducts a thorough investigation •Staff and collaborators are involved, where necessary Investigation •In special cases the case is assigned to an external auditor, lawyer, or similar is conducted • A memo is written and conclusions are implemented •The person who submitted the complaint and, where relevant, authorities are informed Case is •In case of suspicion of a criminal offence, a police report is made completed

You can get more information and advice by contacting either the HR Director, the chairman of the board, the CEO, or the department Director.