



Complaints Policy

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The Instituto Escolhas Complaints Policy aims to create a communication channel by which those interested in reporting irregularities can be assured that they will be protected against retaliation.

This policy is intended to address serious situations of conduct that:

- Characterize illegality
- Are not in accord with the Institute's internal policies
- Compromise the veracity of any financial reports
- Correspond to serious improper behavior

Protection rules

- The harassment of any person making a complaint will not be tolerated.
- Every effort will be made to protect the identity of the whistleblower and the victim.
- The policy encourages the whistleblower to identify himself/herself at the time of making the complaint in order to facilitate clarification and investigation. Anonymous complaints will be investigated, but in doing so the following aspects will be taken into account:
 - The seriousness of the matter raised
 - The credibility of the complaint
 - The probability of confirming the allegation based on pertinent sources

Procedure

Any situation that gives rise to a complaint by an entity that is outside the Institute must be reported to the Executive Board.

In such cases, complaints must be sent by email to: diretoria@escolhas.org.



Complaints made by any member of the Institute must be communicated to the whistleblower's immediate superior or, if the occurrence happens to involve that particular person, then to the superior of that person.

In cases where the Chairman of the Board of Directors needs to be involved, he/she can be contacted by email at: Conselho@escolhas.org.

To ensure the factual accuracy of all complaints, and to take the necessary measures for lessening or mitigating them, they must be filed as soon as possible.

While the whistleblower is not expected to prove the allegation, they will need to demonstrate that they have a reasonable basis to justify such an allegation.

Dealing with complaints

The measures will depend on the nature of the allegation.

Once the receiver of the complaint has been reached, they must analyze the complaint and those involved and inform the person who made the complaint of the steps that will be taken to resolve the situation.

In cases where the receiver of the complaint does not start investigating and dealing with the deviant behavior, the whistleblower may seek a higher instance to which to report the case.

When deemed necessary by the receiver of the complaint, they may involve their superior for help in resolving the deviant behavior in question. In this case, they must prepare a report that will be the basis for analyzing the ramifications of the complaint.

With the report in hand, appropriate actions for correcting the deviant behavior and dealing with those responsible for it will be determined.

Within the period established, those responsible must submit an interim monitoring report and a final report on the case.



In summary, the process must obey the following steps:

Initial analysis

This is the stage that will analyze whether the complaint should be investigated and what the most appropriate procedure is for the case.

Some complaints may be resolved by immediate action without the need for an investigation.

Report to the complainant

The whistleblower will receive feedback on their complaint within two weeks of filing it. The feedback communication (via email or a specific document) must:

- Acknowledge receipt of the complaint
- Indicate the way in which the matter is going to be dealt with
- Provide an estimate of the time necessary for giving a final response
- Inform the whistleblower if any initial inquiries have been made
- Inform the whistleblower if there is going to be an investigation, and if not, the reasons for such a decision

Additional information

The need for contact between the complainant and the person responsible for the investigation will depend on the nature of the issue and the clarity of the data initially provided. Additional information may be requested to facilitate the investigation and ensure that all factors are considered in solving the deviant behavior.

Solution

Respecting any necessary legal restrictions, the whistleblower will receive information about the outcome of any investigations.



Violations

Violations of this policy and these procedures may result in appropriate disciplinary sanctions, and may even include termination of employment.

Responsibilities

The Executive Director of Instituto Escolhas is responsible for implementing the complaints policies and procedures and those for protecting whistleblowers against retaliation. This includes ensuring that the policy and procedures set out herein:

- Are available on the network where every team can readily access them
- Are made available to any member of the team on request
- Are presented to all new employees

Officers, managers, and supervisors are responsible for ensuring that procedures are fully complied with and implemented in their areas of responsibility.

Alterations

Instituto Escolhas reserves the right to modify or change this policy whenever it deems necessary.