

# Oikocredit

## Third Party Complaint Procedure

September 2023

### **Complaint mechanism:**

#### **Objective and scope.**

This third party complaint procedure describes the process for receiving, treating, monitoring and reporting complaints originating from outside Oikocredit and ensures that they are treated in a fair, prompt, efficient and effective manner. The complaint procedure applies to complaints about Oikocredit, its services, employees and products. And describes the way complaints will be received, treated, remedied and reported. For grievances of Oikocredit staff, Oikocredit has a grievance policy <https://oikocredit.sharepoint.com/sites/Oikonnnect-Peoplehub/SitePages/Grievance-policy.aspx> (owned by HR, only internal use) and procedures are in place and advised to be followed. And for cases of whistleblowing, <https://oikocredit.sharepoint.com/sites/Oikonnnect/SitePages/Whistleblower-policy.aspx> (owned by Compliance, only internal use) and procedure are in place and advised to be followed.

Any complaint received through the complaint mechanism will be considered and evaluated on its admissibility based on the criteria explained below.

The complaints and their follow up assist Oikocredit to draw lessons for current and future operations. Oikocredit strives to implement a robust complaint mechanism and to communicate transparently on complaints to its stakeholders.

#### **Good faith.**

Oikocredit will handle all complaints with respect and an appropriate level of confidentiality.

Oikocredit will take the value of good faith as a fundamental pillar throughout the process. Both, the complaining party and Oikocredit are expected to be respectful and open to finding viable remedies for both parties.

For this reason, the complaining party will not be treated less favorably or suffer any mistreatment during any moment of the process. If the complaint is deemed not admissible because it sees to matters beyond Oikocredit's control or influence sphere or is not made in good faith, a letter will be sent to complainant indicating why the complaint is deemed to be not admissible and Oikocredit will make the procedure and its outcomes publicly available.

#### **Process:**

##### **Where to present a complaint.**

Complaints can be submitted using the Online form located in our website (link) (the complaints send by our website will be received by our Company Secretary and the Deputy Company Secretary) or by mail in the physical office address: Oikocredit International, p/a Company Secretary, PO Box 2136, 3800 CC, Amersfoort, The Netherlands. If the complaint is submitted in English, the confirmation of receipt will be presented in five working days via email - or five working days after receipt of the physical mail. Complaints submitted in another language than English may require additional handling time for translation.

Complaints received via other communication channels and/or that are anonymous need to be shared with the Company Secretary to be processed.

##### **Who can make a complaint.**

Any person, company, institution or stakeholder who can demonstrate that they were affected by the activities of/or impacts of the operations of Oikocredit and/or its employees. As well as a person, company, institution or stakeholder that can represent the affected party.

##### **Information needed to present a complaint**

The form will ask for the following information:

- Name (Required),
- Contact Information (Required) (Email, Phone number or Address),
- Confirmation from the name or contact information can be shared publicly. If needed, the complainant's information can be anonymized for reporting purposes. The name and contact information of the complainant are needed to be able to adequately respond to the complaint concerned; complaints without name and contact information of the complainant will not be taken into consideration..
- If the complaint is on behalf of another person or institution it will be necessary to provide the information of the affected party (Optional),
- Information of the project related with the complaint (Optional),
- Explanation of the complaint (Required),
- Supporting documents (Optional).

##### **Eligibility criteria to admit a complaint.**

### **Admissible complaints.**

- Complaints must be related to Oikocredit, its services, employees, products or active partners. Otherwise, or if the complaint is related in an indirect way with an active partner, additional evidence will be necessary.
- The complaint must provide context and information that demonstrates a direct or indirect adverse impact or a potential risk about:
  - Non-compliance with Oikocredit's internal policies and procedures,
  - Non-compliance with international, national and/or local laws or regulations,
  - Human rights abuses,
  - Negative environmental impact,
  - Any other adverse effect that Oikocredit's employees or operations may cause to the people or communities where Oikocredit operates.

### **What could be an inadmissible complaint.**

- Complaints with malicious content, exaggerations, and/or if they are repetitive or frivolous.
- Complaints about matters beyond Oikocredit's control or influence sphere.

### **Who will review the complaint.**

The form will be received at an institutional email address or by mail at the physical office address. This email or mail is under the responsibility of Oikocredit's Company Secretary. Upon the receipt of the email or mail by the Company Secretary, the following tasks will be performed:

- Confirm the receipt of the complaint to the third party, (please see the title "Where to present a complaint" for receipt confirmation details.)
- Obtain and complete any missing pertinent information to evaluate the complaint.
- Determine admissibility of the complaint, based upon the admission criteria indicated previously in this document.
- If the complaint is inadmissible, elaborate the inadmissible notice and send it to the complainant. (See below on this document how the complainant will be informed on the inadmissibility of the complaint).
- And if the complaint is Admissible, suggest ways to resolve the complaint.
- Work on a possible action plan for the resolution of the complaint and include the resources and possible internal staff members that can contribute to resolve the complaint.
- Record the admissible and inadmissible complaints and report to Oikocredit Managing Board and Supervisory Board (and/or external auditor) on a semi-annual basis to assess – validity of the complaints and adequate follow up by Oikocredit.
- Inform, on a quarterly basis, the status of the complaints to the Managing Board.
- Every six months complaints will be reported to the Supervisory Board (and/or external auditor) to assess validity of the complaints and adequate follow up by Oikocredit.

### **How will inadmissible complaints be managed.**

The Corporate Secretary will do a check of the validity of the complaint. If it is determined that the complaint is not admissible, a resolution with the arguments will be presented to the Exco to have a secondary check before sending a formal response to the complainant.

The response needs to provide an explanation of the inadmissibility.

And will be sent to the complainant by email or physical mail, the response time will be defined case by case, and will be informed to the complainant.

### **How will admissible complaints be managed.**

The Company Secretary will do a check of the validity of the complaint. If it is determined that the complaint is admissible, a resolution with the arguments will be presented to the Exco to have a secondary check before sending a formal response to the complainant.

In a first step, the Company Secretary will deliver the party issuing the complaint a confirmation of the validity of the complaint, and a tentative timeline of the expected next step(s).

Afterwards, the Company Secretary will start an investigation and will inform the Exco and Supervisory Board about the complaint and a possible Action Plan.

Subsequently, when they have enough information and feedback from the Exco and Supervisory Board, the Company Secretary will disseminate the tentative action plan to solve the complaint.

### **How will the investigation and resolution of the complaint be managed.**

The action plan will be elaborated in a specific way that responds to the complexity of each complaint.

The investigation process will be decided by the Company Secretary, and Oikocredit staff needs to prioritize resolving the matter concerned a priority.

The Company Secretary will decide if it is necessary to call for an (internal or external) mediation process and/or if is necessary to include in the process and External Advisor, and select and appropriate one, depending on the action plan presented.

### **Resolution Process.**

The complaint will be deemed as resolved or remedied upon receipt from a confirmation from:

- The complainant.
- Or the Supervisory Board.

On the same. Only after this confirmation, Oikocredit can consider the complaint case closed.

### **Case closure.**

After the confirmation of the complainant and Oikocredit, an executive summary of the complaint and resolution will be published on Oikocredit's web page.

The Company Secretary will provide the information to Communication department, they will be on charge to elaborate the executive summary and publish it in the Oikocredit web page.