Complaints procedure for stakeholders, external contacts and Network Offices staff

At Wetlands International Global Office, we value transparency and strive for excellence. If you have concerns about our actions or staff, this procedure outlines how to file a formal complaint. All contact details are to be found in Chapter 9.

1. Who are stakeholders, external contacts and Network Offices staff?

- **Stakeholders** – Individuals or groups who **work with or are affected by** Wetlands International but are not employees. This includes partners, donors, volunteers, consultants, and local communities.
- **External Contacts** – People or organizations **outside** Wetlands International who may interact with it, such as government agencies, suppliers, or the general public, but do not have a direct role in its operations.
- **Network Offices Staff** – People who work **directly** for Wetlands International offices as employees. They have a formal contract with that organization.

2. Definition misconduct

Misconduct includes, but is not limited to:

- Discrimination
- Verbal or physical aggression
- Bullying
- Sexual harassment
- Intimidation or assault
- Fraud, corruption, or financial misconduct
- Violations of laws or regulations
- Breaches of Wetlands International's code of conduct
- Serious breaches of workplace policies, including health and safety violations
- Unauthorized disclosure of confidential information
- Misuse of company resources or technology
- Any other behavior that undermines the ethical standards of the organization

3. Definition complaint

A complaint is a written grievance from a stakeholder, external contact or Network Offices staff (so not being Wetlands International Global Office staff) regarding:

- Our working methods.
- Actions or omissions by staff, management, or Supervisory Council members.

3.1 Informal approach before filing a complaint

The goal of an informal approach is to resolve the issue **quickly and amicably** without the need for formal investigation or documentation. If this approach does not lead to a satisfactory outcome, then a formal complaint can be submitted following the official process.

An **informal resolution** may include:

- **Direct communication** with the person or department involved to discuss concerns and seek a solution.
- **Seeking clarification** or mediation through a manager, HR representative, or other appropriate personnel.
- **Internal discussions** with colleagues or relevant stakeholders to find an amicable resolution.
- **Providing feedback** informally through emails, meetings, or verbal discussions.

3.2 Formal reporting of a complaint for stakeholders or external contacts

If the informal approach does not resolve the issue, individuals can file a formal complaint.
Severe cases (such as fraud, corruption, financial misconduct, or serious breaches of laws) may require **formal reporting** immediately.

To file a complaint:

- Submit a letter or email to the **Complaints Coordinator** at HR@wetlands.org or send a written report to:
  Complaints Coordinator (Director of Resources of Wetlands International Global Office)
  email: HR@wetlands.org or
  Stichting Wetlands International
  P.O. Box 471
  6700 AL Wageningen
  The Netherlands

The letter or email of the complaint must include:

- Full name and contact details of the person reporting*
- Date of the report
- A clear description of the issue
- Reasons why you believe it is a problem

*See 7 for anonymously reporting of a complaint

4. What happens next?

a) **Acknowledgment:**
We will confirm receipt of your complaint within **5 working days**. Your complaint will also be logged in our register by the Complaints Coordinator.

b) **Processing Timeline:**
   - The Complaints Coordinator aims to resolve your complaint within **6 weeks**.
   - If an extension is necessary, we will inform you, with reasons, within this period. Extensions will not exceed **4 additional weeks**.

c) **Investigation:**
   - The Complaints Coordinator investigates the matter unless the complaint concerns them. In that case, the CEO will handle it.
   - Both you and the person(s) involved can present your case in writing or verbally. An impartial staff member will be present during any hearings to ensure fairness.
   - An investigation report will summarize the findings and be shared with you, the involved party, and relevant decision-makers.

5. Resolution and support for involved parties

5.1 Decision and notification

Following the investigation, the Management Team will review the investigation report and make a decision within **two weeks**. If the complaint concerns a member of the Management Team (including the CEO), it must be escalated to the Chair of the Supervisory Council, who will decide which member of the SC will be involved in the handling of the case. If the complaint concerns a member of the SC, the Chair or a non-involved SC member will appoint an independent external authority to ensure impartiality.
You will receive a written explanation of the decision and any actions taken.
The decision and hearing report will also be shared with relevant parties and recorded in our complaints register, maintained by the Complaints Coordinator.

5.2 Support for the complainant

Wetlands International is committed to supporting the well-being of complainants throughout and after the complaint-handling process.

Support measures may include:

- Access to the External Confidential Advisor for emotional and procedural support.
- Adjustments to the working relationship, collaboration, or roles (if applicable) to ensure a safe environment.

- Referral to professional counselling or external support services, if necessary.
- Clear communication throughout the process and regular updates on status and outcome.

5.3 Support for the accused
Any person who is the subject of a complaint will be treated with fairness and dignity throughout the process. Support measures may include:

- Presumption of innocence until the process concludes.
- The opportunity to respond to the complaint in writing or verbally.
- Access to the External Confidential Advisor for guidance and support.
- Referral to professional counselling or other support if needed.

5.4 Measures for both parties

- A neutral and impartial investigation process will be ensured for all involved.
- Retaliation is strictly prohibited against any party participating in a complaint procedure.
- Both parties will be informed about the steps in the procedure, timelines, and potential outcomes.

5.5 Restorative and corrective actions
Routing & measures rule: If the subject of the complaint is Global Office staff, disciplinary measures will be applied under the Handling and reporting misconduct for Global Office staff policy; if the subject is a consultant or other external contractor, measures (including termination or non-renewal of the consultant's contract) will be applied under this procedure and coordinated with the contract owner/procurement.

Depending on the findings and severity of the issue, the Management Team may implement one or more of the following:

- No further action, if no misconduct is found.
- Mediation or facilitated dialogue, for resolving interpersonal issues.
- Training or coaching on relevant topics (e.g., ethics, respectful behavior).
- Workplace adjustments to prevent recurrence or to support recovery.
- Formal measures, such as warnings, termination or non-renewal of contract (for consultants), or removal from collaboration (for stakeholders or partners), in serious cases.

5.6 Appeal options
If you are unsatisfied with the outcome or process, you may:

- Escalate the matter to the Supervisory Council via its Chair, who will determine the appropriate course of action.
- Only if the complaint concerns the Supervisory Council itself, or if due process cannot be guaranteed internally, may you file a complaint with the Partos Complaints Committee at klachtencommissie@partos.nl. They will assess whether due process was followed.

Note: Complaints concerning the Management Team (including CEO) must first be escalated to the Chair of the SC before approaching any external party.

6. Network office procedures and escalation
Each Network office should follow its own established **local procedures** for filing and handling complaints, in accordance with national regulations and Wetlands International's Code of Conduct. Local HR teams or designated Complaints Coordinators should ensure fair, transparent, and timely resolution of reported misconduct.

If a complainant is not satisfied with the outcome of the local process, or if the issue requires further review due to its severity or complexity, they may escalate the matter to the **Complaints Coordinator of the Global Office** at **HR@wetlands.org**.

To ensure consistency and uphold organizational integrity, all Network Office procedures must meet a minimum standard aligned with Wetlands International's Code of Conduct. This includes:

- A defined process for submitting and investigating complaints
- Clear roles and timelines for handling cases
- Protection from retaliation for all parties involved
- Access to the External Confidential Advisor

The Global Office is available to support local offices in aligning their procedures with this standard. Any gaps identified during escalated reviews may result in recommendations for improvement.

7. Anonymous reporting of a complaint

The External Confidential Advisor will act as an intermediary and may represent the complainant throughout the complaint-handling process, if requested. This role includes providing procedural guidance, emotional support, and facilitating communication with relevant parties. The advisor is fully independent of Wetlands International management and ensures confidentiality and impartiality.

How to report a complaint anonymously:

Submit a letter or email to the **External Confidential Advisor**:
External Confidential Advisor: Ms. Ingrid van Wezel
Phone: +31 (0)6 5532 6539
Email: ivanwezel@chello.nl
Your letter or email should include:

- A clear description of the issue.
- Reasons why you believe it is a problem.

Anonymous reports will be handled with strict confidentiality, and no retaliatory actions will be taken against individuals making such reports.

8. Whistleblower Protection

Wetlands International ensures protection for whistleblowers who report corruption, serious misconduct, or legal violations. In line with Dutch whistleblower law (**Huis voor Klokkenluiders**), an employee or stakeholder is protected against retaliation if:

- The misconduct is reported internally (to the employer) or externally to a competent authority authorized to handle such complaints.
- The report is based on reasonable grounds at the time it is made.
- The whistleblower has first-hand knowledge of the misconduct and can provide supporting evidence (e.g., documents, emails, photos).

Employers are legally prohibited from taking retaliatory actions against whistleblowers, such as:

- Dismissal or demotion.
- Intimidation, bullying, or exclusion.
- Any form of coercion, intimidation, or pressure to discourage or prevent reporting misconduct.

How to report:

Reports can be made anonymously via the **External Confidential Advisor**:
Ms. Ingrid van Wezel
Phone: +31 (0)6 5532 6539
Email: ivanwezel@chello.nl

Reports can be escalated externally to the **Dutch Whistleblowers Authority**:
Email: contact@huisvoorklokkenluiders.nl
Website: huisvoorklokkenluiders.nl

9. Contact information

Complaints Coordinator (Director of Resources of Wetlands International Global Office): HR@wetlands.org
External Confidential Advisor: Ms. Ingrid van Wezel
Phone: +31 (0)6 5532 6539
Email: ivanwezel@chello.nl
Dutch Whistleblowers Authority: contact@huisvoorklokkenluiders.nl
Complaints committee Partos: klachtencommissie@partos.nl

10. Transparency

A summary of all complaints and decisions is recorded in our complaints register, maintained by the Complaints Coordinator of Wetlands International Global Office.

11. Accountability

Wetlands International is committed to ensuring accountability in handling complaints and reports of misconduct. Regular reviews of complaint-handling processes will be conducted to maintain transparency and integrity. Accountability measures include:

- Periodic review and updates of complaint-handling procedures.
- Monitoring compliance with Dutch legal and regulatory requirements.
- Ensuring impartiality in investigations and decision-making.
- Safeguarding complainants and whistleblowers from retaliation.

Any concerns about the complaint-handling process can be escalated to the **Supervisory Council** or external oversight bodies.

12. Right to external legal remedies

Wetlands International acknowledges that individuals have the right to pursue legal or regulatory remedies outside the organization. This includes reporting to national human rights institutions, labour authorities, or law enforcement agencies in the country where the issue occurred. The organization's internal processes are intended to provide fair, transparent resolution but do not restrict any legal rights.

Colophon
Wetlands International
P.O. Box 471
6700 AL Wageningen
The Netherlands

Email:	post@wetlands.org
Website:	www.wetlands.org
Document:	Complaints procedure for stakeholders, external contacts and Network Offices staff
Author:	Director of Resources
Modified:	September 2025
Available at:	www.wetlands.org
Adopted by:	Management Team / Supervisory Council/ WoCo