

Social & environmental policies and procedures

Who is involved?
Chief People Officer

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SOCIAL POLICIES

Social policies & procedures objectives

At Sistema.bio, our social policy outlines Sistema.bio business' aims and principles in relation to managing our employees and the society we are part of. We want to be a responsible business that meets the highest standards of ethics and professionalism.

Our company's social policies fall under two categories: **compliance and proactiveness**. Compliance refers to our company's commitment to legality and willingness to observe community values. Proactiveness is every initiative to promote human rights, help communities and protect our natural environment.

We endeavour to:

- Comply with and exceed all relevant regulatory requirements
- Continually improve and monitor compliance
- Respect the law
- Honor our internal policies
- Ensure that all its business operations are legitimate
- Keep every partnership and collaboration open and transparent

Sistema.bio business mission:

By being a social enterprise and aiming at creating a better and more sustainable world, Sistema.bio at core treats its employees and farmers and communities it impacts with respect.

Sistema.bio is building a culture of employees that care about a more sustainable and ethical world.

International compliance

For our Environmental and Social Management compliance, Sistema.bio engages to comply with the Environmental and Social Requirements; (b) use its reasonable best efforts to comply with the IFC performance standards on social and environmental sustainability (including the technical reference documents known as the World Bank Group's Environmental, Health and Safety Guidelines) ("IFC Performance Standards"); and (c) take all reasonable steps in IFC performance standards: <https://www.ifc.org/en/insights-reports/2012/ifc-performance-standards>

Compliance with country legislations

All environment policies are set at a global level but reviewed with Country People teams and country level lawyers to ensure compliance on a yearly basis. This manual represents

guidelines for our Country People teams to know policies to revise at the country level. Final policies are made and signed at the Country level.

Sistema.bio Business ethics

Sistema.bio intends to operate at the highest level possible of business ethics. **We will always conduct business with integrity and respect for Human Rights.** We'll promote:

- Safety and fair dealing
- Respect toward the customer (farmers)
- Respect toward our employees

Anti-bribery and anti-corruption practices.

The company will have **zero tolerance** for bribery. Sistema.bio strictly prohibits bribery, giving or accepting gifts for business or other improper payments in any of its business operations. This prohibition applies to all business activities, anywhere in the world, whether involving government officials or other commercial enterprises. A bribe or other improper payment to secure a business advantage is never acceptable and can expose individuals and Sistema.bio to possible criminal prosecution, reputational harm or other serious consequences. This Policy applies to everyone at Sistema.bio, including promoters and consultants. Each officer and employee of Sistema.bio has a personal responsibility and obligation to conduct Sistema.bio's business activities ethically and in compliance with all applicable laws based on the countries wherein Sistema.bio does business.

Failure to do so may result in disciplinary action, up to and including dismissal. Improper payments prohibited by this policy include bribes, kickbacks, gifts of any sort, entertainment, or any other payment made or offered to obtain an undue business advantage. These payments should not be confused with reasonable and limited expenditures for gifts, business entertainment and other legitimate activities directly related to the conduct of Sistema.bio's business.

Equal Employment Opportunity

Sistema.bio is an equal employment opportunity employer, employment decisions are based on merit and business needs, and not on race, color, national origin, ancestry, gender, sexual orientation, age, religion, creed, physical or mental disability, marital status, political affiliation, or any other factor protected by law.

Sistema.bio will not discriminate against any qualified Team Member or job applicant with respect to any terms, privileges, or conditions of employment because of a person's physical or mental disability. Sistema.bio will also make reasonable accommodation wherever necessary for all Team Members or applicants with disabilities, provided that the individual is otherwise qualified to safely perform the essential duties and assignments connected with the job and provided that any accommodations made do not impose an undue hardship on Sistema.bio.

Management is primarily responsible for seeing that Sistema.bio's equal employment opportunity policies are implemented, but all Employees share in the responsibility for assuring that by their personal actions the policies are effective and apply uniformly to everyone.

Human Rights and Labor Standards

Sistema.bio supports and strives to continuously improve good corporate governance that contributes to social responsibility and broader sustainable development goals as expected by the international community. To achieve this, Sistema.bio complies at a minimum with all applicable laws, rules and regulations of the countries of operation. Additionally, Sistema.bio's commitment to promote responsible and fair business practices adheres to and draws upon internationally recognised human rights and labour principles and standards.

In this regard, and in consistency with Sistema.bio core values, the United Nations Global Compact's principles-based approach as well as the United Nations Guiding Principles on Business and Human Rights (UNGPs), Sistema.bio supports the respect of relevant principles as contained in the International Bill of Human Rights as well as the respect of relevant provisions and recommendations of International Labour Organization (ILO) instruments and Conventions.

Mutual respect and fair treatment

Sistema.bio believes that each person, including customers, business partners and all stakeholders with whom we interact, deserves to be treated with respect, fairness and dignity. This responsibility lies with every Employee.

Diversity

The variety of employees represents one of Sistema.bio's greatest assets and contributes to its continued success. Sistema.bio expects its employees to value the unique abilities, strengths and skills of each person and to support one another while embracing and respecting cultural diversity and local traditions.

[Our diversity and inclusion policy can be found here.](#)

Freedom of association

Sistema.bio recognises the freedom of association of all employees. All employees shall have the right to join or not to join and form trade unions without fear of intimidation or reprisal, in compliance with applicable laws and regulations.

Forced labor and modern slavery

Forced labor, or slavery - is defined in the 1926 Slavery Convention of the League of Nations, as the "state or condition of persons over whom all or part of the powers attaching to the right of ownership are exercised". When an individual is forced to work against his will, under threat of violence or any other form of punishment, his freedom is restricted and a certain degree of property is exercised over him. Hence, new forms of forced labor and human trafficking are often considered as forms of modern slavery.

Sistema.bio is committed to ensuring the respect of the fundamental human dignity of all its Employees. To this end, Sistema.bio prohibits a person's economic and social exploitation by another for personal and/or commercial gain, forced and compulsory/ involuntary labour as defined in the ILO C029-Forced Labour Convention, 1930 (**No. 29**), the use of prison labour and any forms of slavery or servitude, including bondage labour and human trafficking.

Child labour and protection of young workers

Child labor is work performed by minors under 18 years of age in conditions that are mentally, physically, socially or morally dangerous or harmful, and detrimental to their schooling.

Sistema.bio strictly prohibits the use of child labour and adheres to relevant international standards related to children's rights, such as the ILO C138-Minimum Age Convention, 1973 (**No. 138**), the ILO C182-Worst Forms of Child Labour Convention, 1999 (**No. 182**) and the United Nations Convention on the Rights of the Child (UNCRC). **When differences or conflicts in standards arise, Sistema.bio applies the highest standards.**

Community and stakeholders engagement

Sistema.bio has built its reputation by establishing and maintaining relationships at all levels with its customers, business partners, local communities and its wide range of stakeholders based on shared values, loyalty and mutual trust.

With a view to contributing to inclusive positive social and economic impacts in the long term, Sistema.bio is strongly committed to conducting a responsible business that respects the fundamental rights of local communities, including those of indigenous peoples as well as those of other vulnerable and disadvantaged groups.

Supporting human rights

Sistema.bio encourages employees to contribute to socially responsible practices that can advance the realization of human rights, when deemed appropriate and in line with international standards and/or national development plans, through:

- country or region-specific initiatives and philanthropy
- public policy engagement and advocacy
- partnerships and collective actions

Complaints and grievances policies

Working for Sistema.bio, we constantly ensure that we protect our employees, through:

- Protecting the health and safety of our employees and community.
- Avoiding harming the lives of local and indigenous people.
- Supporting diversity and inclusion.
- NOT tolerating any discrimination or harassment within their team
- Having grievance and complaint reporting in place for employees

1. Purpose of this complaint & grievance policies

The purpose of this policy and procedure is to manage all complains at Sistema.bio effectively and efficiently. This means both internal (employees, board members, shareholders, etc) and externals (clients, suppliers, etc). All attempts should be made to resolve the issue informally, and as soon as feasible in practice. **Sistema.bio will deal with grievances expeditiously, impartially and fairly.**

2. Scope

This policy and procedure applies to anyone that comes in contact with Sistema.bio.

3. What is Sistema.bio's work environment?

A work environment in which every employee is treated fairly, is respected and is supported by his or her manager to grow. Additionally, Sistema.bio provides its employees with a workplace that is free from harassment or discrimination of any kind including harassment based on race, creed, colour, national origin, sex, sexual orientation, disability or any other status protected by law.

All employees from Sistema.bio are responsible for complying with this policy, which is an action protocol to reach stability and productivity, as well as to preserve trust and harmony at Sistema.bio, and are agree to conduct their actions in strict adherence at all times to the policies.

This policy extends to all services provided to either employees or customers of the company.

The Human Resources Department called **The People Team** shall be responsible for:

- Ensuring that reports of discrimination or harassment are subject to investigation as soon as practical and taken very seriously.

- Coordinating investigative processes with other leadership team members and/or external resources as appropriate.

4. Global definitions for this policy

- Complainant: The person making the complaint.
- Complaint: An expression of dissatisfaction or discomfort with an action, decision or omission within the control or responsibility of Sistema.bio. Complaints may be made in writing or verbally.
- Grievance: Complaints that are not able to be resolved through informal processes or mediation, and matters relating to allegations of misconduct affects the work of other employees.
- 'High Risk' complaint: A complaint that has the potential to involve significant risk to Sistema.bio or its employees. A significant risk means a high probability that is likely to create an impact of some size financially, physically and/or to the health and welfare of employees.
- Local level: the area of Sistema.bio, such as a Department, Division and location, within which the complaint is being made.
- Natural Justice: the natural justice principles including: The respondent shall have a right to be heard before the decision is made; all parties to a complaint shall have the right to be heard; all relevant submissions and evidence shall be considered.

5. INTERNAL Complaints and grievances policies and processes at Sistema.bio

A. Complaints and grievances policies

1. Employees complaints and grievances policy

Any employee that feels they need to submit a **grievance** or **complaint (see definitions)** about another employee or group of employees need to feel empowered and free to do so.

At Sistema.bio, on top of having clear values and behaviors, we have taken the time to define what is considered good management and what we will not tolerate as behaviors. Employees are allowed to submit grievances and complaints about other employees that do not respect our definitions below.

	WHAT IS GOOD MANAGEMENT	WHAT WE WILL NOT TOLERATE
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		AT SISTEMA.BIO
Being a leader	<ul style="list-style-type: none"> • Being respectful to everyone in the team regardless of their position or status • Treating others the way you'd like to be treated 	<ul style="list-style-type: none"> • Spreading rumors about employees in general, • Laughing at people, • Talking down on people in front of others, • Talking about people to others in their back
Communication with your reports	<ul style="list-style-type: none"> • Giving positive feedback in public and always negative feedback in person. • Training, coaching, guiding your employees. • Giving behaviour-based feedback compared to ("I'm upset with behaviour X that I've observed on Y date and Z date" • Focusing on facts and not emotions 	<ul style="list-style-type: none"> • Belittling, humiliating, yelling in public • Disrespecting and devaluing the individual, often through disrespectful and devaluing language or verbal abuse • Managing by threat and fear • Impulsive destructive behaviour • Spreading gossip • Insulting or offensive remarks made about the target's person (i.e. habits and background), attitudes or private life • Using informal communication means (whatsapp or sms) to discuss contract or anything personal related to anyone employment • Giving individual-based feedback ("I'm upset with you.") • Not listening to your direct report feedback and do not give them the space to express opinions, concerns and questions
Communication with your peers and managers	<ul style="list-style-type: none"> • Giving positive feedback • Giving negative feedback in person, one on one, in the quickest instance possible. We are responsible to give feedback on what is important to us. 	<ul style="list-style-type: none"> • Spreading gossip • Insulting or offensive remarks made about the target's person (i.e. habits and background), attitudes or private life

		<ul style="list-style-type: none"> • Threatening or blackmailing • Complaining about peers or managers to others or in public but without addressing the issue with the person concerned in a one on one discussion • Taking others' ideas and making them your own • Using informal communication means (whatsapp or sms) to discuss any employment-related matters
Workload and performance management of your employees	<ul style="list-style-type: none"> • Discussing with each employee what is manageable workload, which is challenging, but achievable 	<ul style="list-style-type: none"> • Giving unmanageable workload • Ignoring opinions and views from anyone in the team • Being given tasks with unreasonable or impossible targets or deadlines • Being ordered to do work below competence • Monitoring excessively a person's work (micromanagement) • Having key areas of responsibility removed or replaced with more trivial or unpleasant tasks. • Preventing access to opportunities
Motivation		<ul style="list-style-type: none"> • Using other managers, directors or peers names to scare people or intimidate them. Ex: "Thomas is watching you, Thomas has concerns about you, Jennifer is thinking of firing you"

2. Whistle blowing policy

Sistema.bio requires directors, officers and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As

employees and representatives of the Sistema.bio, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

Also, we intend to encourage and enable employees and others to raise serious concerns internally so that Sistema.bio can address and correct inappropriate conduct and actions. It is the responsibility of all board members, officers, employees and volunteers to report concerns about violations of Sistema.bio's code of ethics or suspected violations of law or regulations that govern Sistema.bio's operations.

3. Misconducts and violation of code of conducts

A code-of-conduct violation or misconduct can occur when an employee doesn't follow company policies. Our company policies are done at the Global level and Country level. In both cases, all employees are trained and informed during onboarding before signing their employee handbook. All policies are then stored on our internal HR platform, BambooHR.

All staff (both full time employees and externals) are required to follow our internal policies and we encourage employees and others to raise serious concerns internally so that Sistema.bio can address and correct inappropriate conduct and actions. It is the responsibility of all board members, officers, employees and volunteers to report concerns about violations of Sistema.bio's code of conduct.

4. Safeguarding Policy

a) Purpose of the safeguarding policy

The purpose of this safeguarding policy is to protect people from abuse, exploitation and neglect, particularly children, but also at-risk adults and farmers, from any harm that may be caused due to their coming into contact with Sistema.bio. This includes harm arising from:

- The conduct of staff or personnel associated with Sistema.bio
- The design and implementation of Sistema.bio's programmes and activities

The policy lays out the commitments made by Sistema.bio and informs staff and associated personnel of their responsibilities in relation to safeguarding. This policy does not cover:

- Sexual harassment in the workplace (already covered below)
- Safeguarding concerns in the wider community not perpetrated by Sistema.bio or associated personnel - we will cover this in our external complaints and grievances section.

b) Definition - what is safeguarding?

In all countries where Sistema.bio operates, safeguarding means protecting peoples' health, wellbeing and human rights, and enabling them to live free from harm, abuse and neglect. In the development sector, we understand it to mean protecting people, including children and at-risk adults, from harm that arises from coming into contact with our staff or programs.

Further definitions relating to safeguarding are provided in the definitions section.

c) Scope

- All directors and board members of Sistema.bio.
- All staff contracted by Sistema.bio.
- Associated personnel whilst engaged with work or visits related to Sistema.bio, including but not limited to the following: consultants; volunteers; contractors; programme visitors including journalists, celebrities and politicians.

Sistema.bio responsibilities

Sistema.bio will:

- Ensure all staff have access to, are familiar with, and know their responsibilities within this policy
- Design and undertake all its programs and activities in a way that protects people from any risk of harm that may arise from their coming into contact with Sistema.bio. This includes the way in which information about individuals in our programmes is gathered and communicated
- Implement stringent safeguarding procedures when recruiting with the culture interview, managing and deploying staff and associated personnel.
- Ensure staff receive training on safeguarding at a level commensurate with their role in the organization
- Follow up on reports of safeguarding concerns promptly and according to due process

Staff responsibilities

- Child Safeguarding
Sistema.bio and associated personnel must not:
 - Engage in sexual activities with anyone under the age of 18
 - Sexually abuse or exploit children
 - Subject a child to physical, emotional or psychological abuse, or neglect
 - Engage in any commercially exploitative activities with children including child labour or trafficking
- Adult safeguarding
Sistema.bio staff and associated personnel must not:
 - Sexually abuse or exploit at risk adults
 - Subject an at risk adult to physical, emotional or psychological abuse, or neglect
- Protection from sexual exploitation and abuse

Sistema.bio staff and associated personnel must not:

- Exchange money, employment, goods or services for sexual activity. This includes any exchange of assistance that is due to beneficiaries of assistance
- Engage in any sexual relationships with beneficiaries of assistance, since they are based on inherently unequal power dynamics

Additionally, Sistema.bio staff and associated personnel are obliged to:

- Contribute to creating and maintaining an environment that prevents safeguarding violations and promotes the implementation of the Safeguarding Policy
- Report any concerns or suspicions regarding safeguarding violations by an Sistema.bio staff member or associated personnel to the appropriate staff member

d) Policy statement

Sistema.bio believes that everyone we come into contact with, regardless of age, gender identity, disability, sexual orientation or ethnic origin has the right to be protected from all forms of harm, abuse, neglect and exploitation. Sistema.bio will not tolerate abuse and exploitation by staff or associated personnel.

This policy will address the following areas of safeguarding: child safeguarding, adult safeguarding, and protection from sexual exploitation and abuse. These key areas of safeguarding may have different policies and procedures associated with them.

Sistema.bio commits to addressing safeguarding throughout its work, through the three pillars of prevention, reporting and response.

5. Anti-harassment and anti-discrimination policy

a) What Is Harassment?

Sexual harassment includes any one or more of the following acts or behavior, whether directly or by implication, committed in person, on print, or via computer, phone, or other media:

- A. Physical contact or advances;
- B. Demands or requests for sexual favours;
- C. Making sexually coloured remarks or engaging in pranks, teasing, and jokes of a sexual nature;
- D. Showing pornography;
- E. Any other unwelcome physical, verbal or non-verbal conduct of a sexual nature;
- F. Presence or occurrence of circumstances of implied or explicit promise of preferential treatment in employment;
- G. Implied or explicit threat of detrimental treatment in employment;
- H. Implied or explicit threat about present or future employment;

- I. Interference with work or creating an intimidating or offensive or hostile work environment;
- J. Humiliating treatment likely to affect an employee's health or safety and is likely to be hostile; or
- K. Eve teasing, innuendos and taunts, physical confinement against one's will and likely to intrude upon one's privacy.

b) Sexual harassment - code of conduct

1. Sexual harassment may occur not only in a situation where a person uses sexually tinted behaviour or actions to control, influence, or affect the career, salary, or job of another person but also between co-workers or between an employee of Sistema.bio and someone the employee deals with during her course of work and who may or may not be an employee of Sistema.bio.
2. Regardless of whether the conduct results from maliciousness, thoughtlessness, or misguided good will, harassment in the workplace is unacceptable and will not be tolerated.
3. No employee, either male or female shall:
 - Make unwelcome sexual advances, or other verbal or physical conduct of a sexual nature or use an employee's submission to or rejection of such conduct as the basis for or a factor in any employment decision affecting the individual or create an intimidating, hostile, or offensive work environment by engaging in such conduct.
 - Be subjected to unsolicited or unwelcome sexual conduct; verbal, physical, or non-verbal.
4. No person shall threaten or insinuate, either explicitly or implicitly, that an employee's refusal to submit to sexual advances will adversely affect the employee's employment, evaluation, wages, career growth, assigned duties, or any other condition of employment or career development.
5. No person shall threaten or insinuate, either explicitly or implicitly, that an employee's refusal to submit to sexual advances will adversely affect the employee's employment, evaluation, wages, career growth, assigned duties, or any other condition of employment or career development.
6. Conduct or actions that arise out of a personal or social relationship and that are not intended to have a discriminatory effect on employment may not be viewed as harassment.
7. Anyone undertaking work in an official capacity on behalf of the company must be made aware of this policy to ensure that they do not endure insulting, degrading, or exploitative sexual treatment.
8. Any supervisor who becomes aware of a behaviour that may constitute discrimination or harassment is responsible for reporting the matter to the Human resources department as soon as practical.

5. Anti bullying policy

Bullying will not be tolerated by any employee at Sistema.bio. Sistema.bio will not tolerate any bullying behavior as part of the work culture. Any form of bullying will be considered as a serious transgression and can lead to let the employee go without warning.

What is bullying?

"Bullying at work means harassing, offending, socially excluding someone or negatively affecting someone's work tasks. In order for the label bullying (or mobbing) to be applied to a particular activity, interaction or process it has to occur repeatedly and regularly (e.g. weekly) and over a period of time (e.g. about six months). Bullying is an escalated process in the course of which the person confronted ends up in an inferior position and becomes the target of systematic negative social acts."

B. Complaints and grievances procedure for response

1. Complaints & Grievances Response Rules

- Confidentiality

It is essential that confidentiality is maintained at all stages of the process when dealing with safeguarding concerns. Information relating to the concern and subsequent case management should be shared on a need to know basis only, and should be kept secure at all times.

Any staff reporting concerns or complaints through formal whistleblowing channels (or if they request it) will be protected by Sistema.bio's Disclosure of Malpractice in the Workplace (Whistleblowing) Policy.

- No Retaliation

It is contrary to the values of Sistema.bio for anyone to retaliate against any board member, officer, employee or volunteer who in good faith reports an ethics violation, or a suspected violation of law, such as a complaint of discrimination, or suspected fraud, or suspected violation of any regulation governing the operations of Sistema.bio. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment.

- Acting in Good Faith

Anyone filing a written complaint concerning a violation or suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. Any allegations that prove not to be substantiated and which prove to

have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

- Empowering employees to speak up

Victims of unethical behavior must be encouraged to speak up and report to their employer about the kinds of misconduct taking place at work. Unfortunately, bullying/harassment most of the time is not reported by the victim because of fear. Hence, to create a safe working environment for each employee, we must encourage everyone to be aware of unethical behavior and their right to speak up against it and get support from peers that can help to report as well. Unethical behavior can be noticed by other colleagues of the victims and therefore can be reported as well by colleagues of someone being bullied. Reporting unethical conduct is the right thing to do, but speaking up can be awkward and sometimes scary for employees.

2. How to report any complaint or grievance at Sistema.bio

Sistema.bio has an open-door policy and suggests that employees share their questions, concerns, suggestions, reports, or complaints with us. Staff members who have a complaint or concern relating to safeguarding should report it immediately. Here are the 3 options to report a safeguarding concern

1. The line manager of the employee
2. The People team (HR) in your country
3. The Global Head of People Team : hrcontact@sistema.bio
4. [An anonymous complaints and grievances form](#) that is directly link to the Global Head Of People team and CEO. The contact or email of the person reporting the safeguarding issue is not asked and therefore the complaint is fully anonymous.

The staff member who has a complaint or concern to report, chooses the option based on who they feel they are comfortable with reporting.

Here is our complaint matrix:

COMPLAINT TO BE LODGED AGAINST	COMPLAINT TO BE LODGED TO
Peer, colleague, team member	The employee's manager
Peer from another area or another team	The employee's manager
The employee direct manager	HR team and / or country director
The head of a department	HR team and / or country director
People team or People head	Country director and / or Chief People

	Officer
Country or Regional Director	Chief People Officer

3. Reporting & Enforcement

- The Chief People Officer is responsible for ensuring that all complaints about unethical or illegal conduct are investigated and resolved, also will advise the CEO of all complaints and their resolution and will report at least quarterly to the Leadership global team. Chief People officer: chiefpeopleofficer@sistema.bio
- On an informal basis, the People team will review each month the incidents occurred and make sure to follow up with the corresponding manager, adding it in the country's incident excel sheet.
- On a formal basis, the People team will record each incident/accident in People Analytics for each Q to show the country managers the results, as well as how the incident/accident was resolved.
- The People team will ensure that all versions told by employees are written in an employee's complaints file.
- Sistema.bio Chief People officer will notify the person who submitted a complaint and acknowledge receipt of the reported violation or suspected violation. All reports will be entered into an incident register, promptly notified to appropriate stakeholders e.g. donors, promptly investigated and appropriate corrective action will be taken if warranted by the investigation.

4. Complaints & Grievances procedure of response

- Minor complaint
 1. Cases of minor misconduct or unsatisfactory performance are usually best dealt with informally. A quiet word of caution or advice and encouragement is often all that is required to improve an employee's conduct or performance. The informal approach may be particularly helpful in dealing with problems quickly and confidentially. However, there will be situations where matters are more serious or where an informal approach has been tried but is not working.
 2. When a potential disciplinary matter arises, the employer should make necessary investigations to establish the facts promptly before memories of events fade. It is important to keep a written record for later reference.
 3. In certain cases, for example in cases involving alleged gross misconduct, where relationships have broken down, consideration should be given to a brief period of suspension whilst an unhindered investigation is conducted.

4. Where, following a disciplinary meeting, an employee is found guilty of misconduct, a first step would be to give him/her a formal oral warning or a written warning depending on the seriousness of the misconduct. When such a warning is issued the employee should be informed, either orally where a formal oral warning has been given or in writing where a written warning has been given:

- that the action is part of the formal disciplinary procedure;
- of the nature of the misconduct;
- of the level of the disciplinary action being taken;
- of the change in behaviour required; and
- of the consequences of failing to correct behaviour.

- Formal complaint

1. Inform the employee of the problem

The first step in any formal process is to let the employee know in writing the nature of what they are alleged to have done wrong. The letter or note setting out the allegation can also be used to explain the basis for making the allegation. It is important that an employee is given sufficient information to understand the basis of the case against them. If applicable, it would normally be appropriate to provide copies of any written evidence, which may include any witness statements, with the notification.

There may be exceptional occasions where an employer may decide not to provide copies of witness statements, and possibly other documents and information, particularly if a witness has expressed genuine fears. If information on the basis of the allegation is not provided in writing, this should be conveyed orally to the employee before any meeting takes place.

2. Hold a meeting to discuss the problem

At the meeting the employer should begin by restating the complaint against the employee and going through the evidence that has been gathered. The employee should be allowed to set out his/her case and answer any allegations that have been made. The employee should also be allowed to ask questions, present evidence, call witnesses and be given an opportunity to raise points about any information provided by witnesses. However, this does not mean that witnesses will normally be subject to cross-examination in the disciplinary hearing.

3. Decide on outcome and action

Following the meeting, and after a period of reflection, the employer must decide whether the allegations are upheld and if disciplinary action is justified or not. Where it is decided that no action is justified the employee should be informed.

Where it is decided that disciplinary action is justified the employer will need to consider what form this should take. Before making any decision the employer should take 15 account of the employee's disciplinary and general record, length of service, actions taken in any previous similar case within the organization, the explanations given by the employee and – most important of all – whether the severity of any intended disciplinary action is proportionate and reasonable in all the circumstances.

In considering the circumstances employers should take account of, in particular, the extent to which policies have been breached.

4. Dismissal or other penalty

If the employee's conduct or performance still fails to improve, the final stage in the disciplinary process might be dismissal. A decision to dismiss should only be taken by a manager who has the authority to do so. The employee should be informed as soon as possible of the reasons for the dismissal, the date on which the employment contract will terminate and the appropriate period of notice.

Reporting Responsibility

Our internal complaints and grievances policy is intended to encourage and enable employees and / or any person to raise serious concerns internally so that Sistema.bio can address and correct inappropriate conduct and actions. It is the responsibility of all board members, officers, employees and volunteers to report concerns about violations of Sistema.bio's code of ethics or suspected violations of law or regulations that govern Sistema.bio's operations.

6. EXTERNAL Complaints and grievances policies and processes: Community and stakeholders engagement

Sistema.bio has built its reputation by establishing and maintaining relationships at all levels with its customers, business partners, local communities and its wide range of stakeholders based on shared values, loyalty and mutual trust.

With a view to contributing to inclusive positive social and economic impacts in the long term, Sistema.bio is strongly committed to conducting a responsible business that respects the fundamental rights of local communities, including those of indigenous peoples as well as those of other vulnerable and disadvantaged groups.

Purpose

The purpose of this complaint management policy is to protect and strengthen the relationship with Sistema.bio shareholders.

Scope

This policy and procedure applies to all clients of Sistema.bio to gather information which helps us to improve what we do. All complaint information will be handled sensitively, telling only those who need to know and following any relevant data protection requirements.

Definitions

- **Complaint:** We regard a complaint as an expression of dissatisfaction about our organization, our staff, our partners, our contracted service providers or anyone else acting on our behalf. A complaint can be received verbally, by phone, by email or in writing.

Complaints & Grievances Response Rules

- **Confidentiality**

It is essential that confidentiality is maintained at all stages of the process when dealing with safeguarding concerns. Information relating to the concern and subsequent case management should be shared on a need to know basis only, and should be kept secure at all times.

Any stakeholder reporting concerns or complaints through formal whistleblowing channels (or if they request it) will be protected by Sistema.bio's Disclosure of Malpractice in the Workplace (Whistleblowing) Policy.

- **No Retaliation**

It is contrary to the values of Sistema.bio for anyone to retaliate against any board member, officer, employee or volunteer who in good faith reports an ethics violation, or a suspected violation of law, such as a complaint of discrimination, or suspected fraud, or suspected violation of any regulation governing the operations of Sistema.bio. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment.

- **Acting in Good Faith**

Anyone filing a written complaint concerning a violation or suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

Policy statement

Sistema.bio aims to provide a high quality service which meets the highest expectations of the public, customers and partners. It welcomes constructive feedback on experiences of its activities, whether positive or negative, and understands that, from time to time, external people or organizations may be dissatisfied or concerned with the way the Sistema.bio or its staff have acted.

Sistema.bio will respond, where necessary, by improving procedures, correcting mistakes and learning from experience. Making a complaint will not exclude nor prejudice the outcome for the complainer of any Sistema.bio activity that they may be engaged in now or in the future. There will be no reduction in the quality of service experienced by any complainer.

Procedure

How to report a complaint?

The first step is for it is best to speak to someone in the responsible department who may be able to solve the problem directly with the client.

If this cannot be done, stakeholders can directly follow up with one of these two options.

Two things have been put in place to report complaints:

1. [An anonymous form](#) has been created for external stakeholders to be able to share their complaints. The Chief People Officer is in charge of reviewing complaints and transmitting to head of departments regarding a complaint.
2. A country customer care number in each of the countries we operate. The customer care team is in charge of reviewing complaints and taking action by reporting to the head of departments in charge.

What information should the concern/complaint contain?

1. The background to the concern/complaint including dates and times of any particular incidents and the names of any people against whom you are complaining or who can provide evidence in support of your concern/complaint.
2. Any specific issues which you want to be addressed.
3. What outcome(s) you hope to achieve from the concern/complaints process.

Health and safety policies and procedures

[Standalone policy here.](#)

Sistema.bio is committed to the sustenance of a safe and healthy workplace for all employees by acting positively where it can to eliminate hazards, and prevent injury, ill health, damage and loss arising from its operations. We consider Health and Safety of our employees to be an integral part of our day to day operations.

Safety and emergency policies are designed at the global level and adapted to country requirements and requirements.

Risk identification and assessment - Social policies

Sistema.bio shall conduct social and risk audits every year.

Sistema.bio and gender

[The standalone policy can be found here.](#)

Monitoring and improvement of Sistema.bio social performance

- We will comply with and exceed all relevant regulatory requirements.
- We will continually improve and monitor social performance.
- We will incorporate business ethics into business decisions.
- We will increase employee awareness through training.
- We will review this policy and any related business issues at our monthly management meetings.

Social policy - Glossary of terms

- **Beneficiary of Assistance**
Someone who directly receives goods or services from [ORGANIZATION NAME]'s program. Note that misuse of power can also apply to the wider community that the NGO serves, and also can include exploitation by giving the perception of being in a position of power.
- **Child**
A person below the age of 18

- **Harm**

Psychological, physical and any other infringement of an individual's rights
- **Psychological harm**

Emotional or psychological abuse, including (but not limited to) humiliating and degrading treatment such as bad name calling, constant criticism, belittling, persistent shaming, solitary confinement and isolation
- **Protection from Sexual Exploitation and Abuse (PSEA)**

The term used by the humanitarian and development community to refer to the prevention of sexual exploitation and abuse of affected populations by staff or associated personnel. The term derives from the United Nations Secretary General's Bulletin on Special Measures for Protection from Sexual Exploitation and Abuse (ST/SGB/2003/13)
- **Safeguarding**

In the UK, safeguarding means protecting peoples' health, wellbeing and human rights, and enabling them to live free from harm, abuse and neglect[1]
In our sector, we understand it to mean protecting people, including children and at risk adults, from harm that arises from coming into contact with our staff or programs. One donor definition is as follows:
Safeguarding means taking all reasonable steps to prevent harm, particularly sexual exploitation, abuse and harassment from occurring; to protect people, especially vulnerable adults and children, from that harm; and to respond appropriately when harm does occur.
This definition draws from our values and principles and shapes our culture. It pays specific attention to preventing and responding to harm from any potential, actual or attempted abuse of power, trust, or vulnerability, especially for sexual purposes.
Safeguarding applies consistently and without exception across our programs, partners and staff. It requires proactively identifying, preventing and guarding against all risks of harm, exploitation and abuse and having mature, accountable and transparent systems for response, reporting and learning when risks materialise. Those systems must be survivor-centred and also protect those accused until proven guilty.
Safeguarding puts beneficiaries and affected persons at the centre of all we do.
- **Sexual abuse**

The term 'sexual abuse' means the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.
- **Sexual exploitation**

The term 'sexual exploitation' means any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another. This definition includes human trafficking and modern slavery.
- **Survivor**

The person who has been abused or exploited. The term 'survivor' is often used in preference to 'victim' as it implies strength, resilience and the capacity to survive, however it is the individual's choice how they wish to identify themselves.
- **At risk adult**

Sometimes also referred to as vulnerable adult. A person who is or may be in need of care by reason of mental or other disability, age or illness; and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant.

Environmental policy

Environmental policy objectives

At Sistema.bio, our environmental policy outlines Sistema.bio business' aims and principles in relation to managing the environmental effects and aspects of its operations. It can include laws and **policies** addressing water and air pollution, land conservation and management, and wildlife protection.

We endeavour to:

- Comply with and exceed all relevant regulatory requirements
- Continually improve and monitor environmental performance
- Continually improve and reduce environmental impacts
- Incorporate environmental factors into business decisions
- Increase employee awareness and training being more sustainable

Sistema.bio business mission:

Every employee and leader of Sistema.bio is responsible for ensuring that the environmental policy is implemented.

Sistema.bio is building a culture of employees that care about a more sustainable world:

- Our first value is “we are environmental activists” - we believe that is part of who we are and always strive to be more of.
- We involve staff in the implementation of this policy, for greater commitment and improved performance.
- We will update this policy at least once annually in consultation with staff and other stakeholders where necessary.
- We will provide staff with relevant environmental training where necessary.
- We will work with suppliers, contractors and sub-contractors to improve their environmental performance.

- We will use local labour and materials where available to reduce CO2 and help the community.

Basics of our environmental policies

Sustainability of our products

- We will make biodigesters in the most sustainable way possible.
- Sistema.bio products aim at using the minimum resources possible.
- Our products are packaged in recycled material (“geotextile”) made from recycled PET.
- Our products are sent by land and sea, rather than air (barring emergencies) and generally in the most sustainable way possible.
- We are focused on delivering an almost infinite product lifespan, by teaching best practices to clients and providing them with quality repairs and replacements when needed.

Offices sustainability

- We will regularly meet to assess how to be more sustainable in our offices. We will include all employees from these meetings and implement the best ideas on how to improve sustainability at the office.
- We will minimise the use of paper in the office. We will reuse and recycle all paper where possible.
- We will reduce packaging as much as possible.
- We will seek to buy recycled and recyclable products that we need for our offices.
- We will evaluate the environmental impact of any new products we intend to purchase or sell. We will favour more environmentally friendly and efficient products wherever possible.
- We will reuse and recycle everything we are able to.
- Materials used in office refurbishment will be as environmentally friendly as possible.
- We will seek to reduce the amount of energy used as much as possible.
- Lights and electrical equipment will be switched off when not in use.
- Heating will be adjusted with energy consumption in mind.
- The energy consumption and efficiency of new products will be taken into account when purchasing.
- We plan our operations in order to maximize our actions and clients’ visits while minimizing the distances of our employees’ trips.
- We are implementing a maintenance plan for any equipment and working tools costing more than 500 USD to have a sustainable and long term use of equipment.

Transportation

- We optimize trips and travel distances, restricting to necessity trips only.
- We will promote the use of travel alternatives such as e-mail or video and phone conferencing.

- We will make additional efforts to promote and favour using public transport or bicycles in every office of Sistema.bio.
- We favour 'green' vehicles when possible and maintain them rigorously to ensure ongoing efficiency.

Implementation of our environmental policies

Risk identification and assessment

Sistema.bio shall conduct environmental audits once a year.

The principle environmental risks are included in the table below:

Risk	Likelihood	Impact	Mitigation
Over application of biofertilizer which can temporarily damage crops	Medium	Low	Sistema.bio trains each client on biofertilizer handling, and provides them with a manual.
Release of methane gas through release filter (due to under consumption of gas)	Low	Low	Sistema.bio technicians and commercial staff size the digesters according to the clients' needs. If there is extra gas (for large farms) Sistema.bio recommends flaring with the provided burner.
Over consumption of water in stressed areas	Low	Medium	Sistema.bio teaches farmers to reduce water consumption in droughts by reducing the manure.

Fires due to biogas igniting	Low	Medium	<p>Sistema.bio training session includes biogas safety, including</p> <ul style="list-style-type: none"> -Do not smoke near the biodigester. -Ensure that the system is free of biogas leaks by repairing them as they occur. -Ensure that the biogas valves in the stove are closed. -Do not have bonfires near the biodigester.
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Monitoring and improvement of Sistema.bio environmental performance

- We will comply with and exceed all relevant regulatory requirements in the countries we operate in.
- All environment policies are set at a global level but reviewed with country People Team and country level lawyers to ensure compliance.
- We will continually improve and monitor environmental performance.
- We will continually improve and reduce environmental impacts.
- We will incorporate environmental factors into business decisions.
- We will increase employee awareness through training.
- We will review this policy and any related business issues at our monthly management meetings.

Expectations from Sistema.bio partners and suppliers

Sistema.bio favours partners and suppliers that follow the same environmental guidelines. We will incorporate social and environmental awareness to our suppliers when developing them and throughout our commercial relationship between 2021 and 2022.