

<b>PINOY<sub>385</sub></b>	<b>COMPLAINTS MANAGEMENT PROCESS</b>	DP SMETA
		revision: 1
		date: 01.09.2025.

## 1. Purpose and objective of the procedure

The purpose of this procedure is to ensure a transparent, efficient, reliable, and secure system for receiving and resolving complaints that can be submitted by:

- workers (including foreign workers - migrants)
- job candidates
- clients and business partners
- recruitment partners
- local community
- any other interested party

The objective of the procedure is to ensure:

- timely resolution of problems
- prevention of recurrence of irregularities
- improvement of the quality of our services
- protection of workers' rights and human dignity
- strengthening trust and responsibility in business
- compliance with SMETA 4-pillar standards

All workers and job candidates are provided with accessible channels for communication and filing complaints in a language they understand.

## 2. Principles of the complaints system

PINOY 385 d.o.o. operates according to the following principles:

- Zero tolerance for retaliation

No one should suffer consequences for filing complaints.

- Anonymity

Complaints can be filed anonymously, without stating their identity.

	COMPLAINTS MANAGEMENT PROCESS	DP SMETA
		revision: 1
		date: 01.09.2025.

- Independence

Complaints are resolved objectively and without conflict of interest.

- Confidentiality

All data and details are kept strictly confidential.

- Fairness and impartiality

All parties involved have the right to a fair trial.

- Accessibility

The system is accessible to everyone, free of charge.

- Transparency

Each complaint is documented, processed, and closed with written feedback.

### 3. Who can file a complaint?

- Employees of PINOY 385 d.o.o.
- Assigned workers (domestic and foreign)
- Migrant workers before and after arrival in the Republic of Croatia
- Candidates in the selection and recruitment process
- Clients and users of our services
- Partner recruitment agencies
- Suppliers
- Community and citizens
- Families of workers

Complaints can refer to:

- labor rights and working conditions
- ethical/unfair treatment
- discrimination or harassment
- retention of documents

	COMPLAINTS MANAGEMENT PROCESS	DP SMETA
		revision: 1
		date: 01.09.2025.

- partner's unethical behavior
- safety and protection at work
- employee behavior
- environmental issues
- business ethics (corruption, conflicts of interest)

#### 4. Available channels for submitting complaints

Filipino workers can file a complaint via email: [support@pinoy385.hr](mailto:support@pinoy385.hr).

Internal employees of the Agency, as well as domestic outsourced workers, can submit a complaint via email [info@pinoy385.hr](mailto:info@pinoy385.hr).

The authorized representative for the protection of the dignity of workers appointed by PINOY 385 d.o.o. is Marina Vlahović Karajić.

#### 5. Complaints handling procedure

##### 5.1. Receipt and registration of a complaint

- The complaint is received through any available channel.
- It is recorded in the centralized complaint register.
- A unique case identification number is assigned.
- Confirmation of receipt is sent to the applicant within 48 hours (if contact exists).

##### 5.2. Assessment of the seriousness of the case

Complaints are classified into three levels:

- Low level (Level 1) – administrative issues, minor misunderstandings
- Medium level (Level 2) – violations of procedures, poor communication, unprofessional behavior
- High level (Level 3) – threats, coercion, discrimination, violation of labor rights, safety or modern slavery

The assessment is carried out within 5 working days.

	COMPLAINTS MANAGEMENT PROCESS	DP SMETA
		revision: 1
		date: 01.09.2025.

### 5.3. Investigation and analysis

If necessary, an investigation is carried out, which may include:

- interviews with the parties involved
- review of documentation
- visit to the client/work location
- cooperation with partner recruitment agencies
- additional checks

The aim is to gather facts to make an objective decision.

### 5.4. Decision-making

After the investigation:

- A decision is made on the merits of the complaint
- Corrective and preventive measures are determined
- Partners or institutions are involved if necessary
- Everything is documented in the case register

Standard resolution deadline: 30 days, except in the case of complex investigations.

### 5.5. Feedback to the complainant

- The complainant receives a conclusion to the case (except for anonymous complaints)
- The result of the investigation and the actions taken are stated
- The complainant can request additional clarification
- The case is closed only after confirmation of receipt of the information

### 5.6. Recording and archiving

- All cases are kept for at least 5 years
- The archive is protected and accessible only to authorized persons
- Statistics are kept for SMETA and internal analyses

### 5.7. Monitoring and re-verification

If necessary, the following is carried out:

- control of the implementation of corrective measures

	COMPLAINTS MANAGEMENT PROCESS	DP SMETA
		revision: 1
		date: 01.09.2025.

- monitoring the behavior of the partner after the violation
- additional interviews with workers
- analysis of the recurrence of similar problems

## 6. Protection of the complainant

PINOY 385 ensures:

- Strict prohibition of retaliation
- No one may be punished, demoted, fired, or intimidated for reporting a problem.
- Right to anonymity
- The complainant can hide his identity at any time.
- Complete confidentiality
- Data is protected in accordance with the GDPR; it is accessible only to authorized persons.
- Fair treatment

All parties are treated equally and professionally.

## 7. Publication of the procedure

This procedure is publicly available at [www.pinoy385.hr](http://www.pinoy385.hr) and is part of:

- onboarding process and employee training
- communication with partner recruitment agencies
- SMETA audit

## 8. Responsibility and supervision

The following are responsible for implementing the procedure:

- The Commissioner for the Protection of Workers' Dignity
- Director of PINOY 385 d.o.o.
- Responsible persons in Croatia and the country of origin of the worker

The management conducts an annual review of the effectiveness of the complaints system.