

XVIII. AURA GRIEVANCE POLICY AND PROCEDURES

A. POLICY

In an effort to foster and maintain a productive and respectful workplace, AURA employees who feel they have a grievance or formal complaint regarding any of its policies, practices, managers or supervisors have the opportunity to have such grievances and complaints heard and responded to fairly and promptly. Accordingly, the procedures under Section B below have been developed to assure timely and equitable resolution of employee complaints and also to assure that neither shyness nor fear of reprisal should inhibit any employee seeking a remedy.

Except for communications with or initiated by the complainant, participants in the grievance process will treat as confidential any information gained during participation. This includes all aspects of handling, investigating, reviewing and making final decisions on complaints or grievances.

Unless there are extenuating circumstances, complaints or grievances must be stated within 15 working days of the occurrence giving rise to the complaint or, if involuntary termination is involved, within five working days of receipt of notice. If there are extenuating circumstances, the grievance must be submitted as soon as possible.

For grievance policy applied in Chile refer to B-XXIII - Unique Policies and Procedures (Chile).

B. GENERAL PROCEDURE GUIDELINES

1. An employee is encouraged to first discuss any complaint or grievance with his or her immediate supervisor, orally or in writing. The supervisor will endeavor to render a decision or an interim reply within the next five working days that he or she is present for duty. An interim reply will include a reason for delay (such as referral to higher levels of supervision) and an estimate of the time expected to render a decision.
2. If the employee does not feel he or she can voice a grievance or complaint to his or her supervisor, or if the employee is not satisfied with the answer received, or if there has been no reply within the five working days of the issue being presented to the supervisor, the employee may refer the matter, **in writing**, to the next level supervisor, who will respond as above. This process may be repeated through the employee's line of management. All individuals involved will provide copies to the Human Resources Manager and to supervisors who previously have been included in the process.

3. If the employee does not feel he or she can voice a grievance or complaint to his or her supervisor or line of management, or if the employee is not satisfied with the answer received, or if there has been no response within the time frames outlined above, the employee may refer the matter, **in writing**, to the Human Resource Manager. The Human Resources Manager will obtain all available information, including statements from supervisors and others named or having knowledge of the matter and will prepare a written summary. Depending on the Center and/or nature of the matter, the Human Resources Manager may either provide the summary to Senior Management and/or the Director for resolution of the issue or, at the discretion of the Director, the Human Resources Manager, may be charged with the responsibility of determining the resolution. The outcome will be reported to the employee and to any supervisors who previously have been included in the process within five working days of obtaining all required information and statements. Advice of legal counsel will be obtained, if needed.
4. If all other avenues are considered unacceptable or inappropriate based on the employee's assessment, the final level of referral will be to the Director. The grievance or complaint should be made **in writing**, to the Director. The Director may designate a member of management to oversee the investigation of the matter. The Director may request, if not already completed, that the Human Resources Manager obtain all available information, including statements from supervisors and others named or having knowledge of the matter, and prepare a written summary. If the complaint involves the Human Resources Manager, the Director will designate another to perform these functions. The Director will notify the complainant and all others concerned of the final determination on the case within five working days after receiving the recommendations
5. With the exception of the staff appointed by direct authorization of the AURA Board of Directors, the Center Director's decision is final. The Board of Directors will be the final authority on complaints by staff members appointed by authority of the Board of Directors. Appeals to the Board of Directors will be routed through the President of AURA.
6. If the grievance is against the Human Resources Manager or Director, the complaint should be reported to a Corporate Officer.
7. Advice of legal counsel will be obtained, if needed.
8. If at any time the employee feels it necessary, he or she may bypass a level listed above. This may be the case if:
 - a. the matter to be discussed personally involves the individual on that supervisory level; or
 - b. the employee may be concerned about repercussions with that individual based on the issue; or

- c. the subject matter is personal and would be embarrassing or inappropriate if discussed with that individual.

C. RETALIATION

Any employee is encouraged to use this policy when appropriate. No employee will be subject to reprimand or retaliation as a result of initiating a complaint which is made in good faith, or as a result of assisting a fellow employee in the grievance process by providing testimony.

D. CONFIDENTIALITY

Confidentiality will be maintained throughout the investigatory process to the extent practical. Individuals bringing forth allegations of inappropriate conduct to management, as well as those who may be involved in the investigation, are expected to maintain appropriate levels of confidentiality with respect to those allegations among co-workers at all times.

E. COMPLAINTS INVOLVING IMPROPER ACTIVITIES

There may be times when the nature of the issue or complaint involves such things as improper activities, ethics violations, discrimination, fraud, etc. and the individual does not feel that the general grievance/complaint process as the appropriate reporting mechanism. AURA maintains a confidential resource called IntegrityLine that can be accessed for the purpose of registering a complaint or concern. Access is available online and via telephone. Additionally, pursuant to our Federal contracts, our contracting agencies maintain a confidential fraud hotline which may be used by employees to report improper acts.

AURA IntegrityLine: <https://secure.ethicspoint.com/domain/media/en/gui/32723/index.html>
Or Toll Free at **855-257-4106**.

F. FALSE COMPLAINTS

A complaint based upon false or inaccurate information will be handled according to its merits. Individuals making false or misleading statements will be subject to AURA's disciplinary process.