



Complaints and Appeals Management for Certification Services

Bureau Veritas Certification Policy - TQR I&F Division



1 Scope

This procedure defines how to manage complaints and appeals, received from customers and other external stakeholders related to all Bureau Veritas Certification Services, to ensure they are handled in a professional and timely manner.

A review of appeal and complaint process is done during annual Management Review.

The content of this Complaint and Appeal Procedure is publicly available for external stakeholders on Bureau Veritas websites, for this purpose appendix 9 can be used. Local country may choose to have a translated version in local language for their websites.

The appendices define additional instructions for the following products:

Appendix 1 - Climate Change disputes

Appendix 2 - SA8000 Services

Appendix 3 - IATF 16949

Appendix 4 - FSC Services

Appendix 5 – Aerospace

Appendix 6 – ASC Farm

Appendix 7 – MSC

Appendix 8 - RSP

Appendix 9 - Publication on BVC website

Appendix 10 – IFS

Appendix 11 – SEDEX Audits

2 Definitions

Complaint:

- (ISO/IEC 17000:2020, 8.7): expression of dissatisfaction, other than appeal (8.6), by any person or organization to a conformity assessment body (4.6) relating to the activities of that body, where a response is expected

Appeal:

- (ISO/IEC 17000:2020, 8.6): request by the person or organization that provides, or that is, the object of conformity assessment (4.2) to a conformity assessment body (4.6) for reconsideration by that body of a decision (7.2) it has made relating to that object

3 . Common process for both complaints and appeals

3.1 Acknowledgement and Record

Upon receipt, complaints and appeals are acknowledged to sender within five working days, unless otherwise specified in Appendices. • They shall be recorded in QESIS; the Recipient of the complaint is either the person who received it directly or the one who entered the information. They are assigned to the validator who will determine the severity and decide actions according to this rating (see corrective actions section for details).

For complaint and appeal received from a complainant or appellant, which is not a BVC client, due consideration shall be given whether it is appropriate to answer, considering potential liability. In such cases, content of the answer is coordinated with client.

This process is subject to requirements for confidentiality.

Bureau Veritas retains the anonymity of the complainant in relation to the client if this is requested by the complainant and shall treat anonymous complaints and expressions of dissatisfaction that are not substantiated as complaints as stakeholder comments and address these during the next audit.

3.2 Responsibility

Personnel who investigate complaints and appeals shall be different from those who carried out the audits and made certification decision, without discrimination against the appellant or complainant.

- If LTM was involved, then a person, internal and independent, shall be appointed
- If LTM was not involved; he or she can carry out the investigation.
- If an appeal concerns one scheme managed by an ICC/Hub, the investigation must be conducted by ICC/Hub, in cooperation with the Head-office and the local country.

Unless otherwise specified in appendices, LTM is the default channel for complaints and appeals. CER Accreditation Manager is notified depending upon severity and is responsible for Complaints/received at I&F TQR. For Complaints/Appeals received at SSC, it is managed by the Accreditation support manager.

Accreditation Managers are informed of complaints related to their product and shall make sure specific requirements are met.

In case of a critical risk (possible litigation, insurance declaration, court summons, loss of image, accreditation) the complaint is transferred to regional or I&F Division legal contact.

3.3 Resolution process

The resolution process includes the following steps.

- Investigation, including business impacts and analysis of the situation,
- Structured response (root cause analysis, correction, corrective action), if the severity is rated high (see corrective actions)
- Implementation of correction and corrective action,

- Information to the client of findings and actions taken,
- Monitoring of results: check if the solution is implemented and effective,
- Record and traceability of documents,
- Follow up on sustainability of results and of resolution.

The timeframe for resolution is four weeks, unless otherwise specified in appendices. However, this may be affected by responsiveness of the client or other third parties.

The closure timeframe in QESIS for CAPA associated to high severity rating is 90 days, after which escalation process is started.

Complaint can be closed only after a final written response is provided to the complainant. Record of this communication shall be maintained.

For all complaints received from an Accreditation Body or a Scheme Owner on an Accreditation held by BVCH SAS or BVCH SAS UK Branch, the effectiveness of corrective actions must be verified at the next internal audit (not by sampling).

Some products require additional instructions, defined in appendices.

4 Complaint process

Complaint can be written (Formal Letter, Email, Website) or verbal (Phone Call, Feedback during sales visit or audit).

The process of management of the complaints registered in our website is the following:

- The acknowledgment of the complaint is done automatically
- On HO level, the dispatch of the email is done. If this is a complaint, this is transferred to a generic mailbox (groupqhseinbv@bureauveritas.com)
- Then the complaint is transferred to the QHSE manager concerned for investigation and actions.

Complaints are handled at contracting entity level. An audit may be initiated to proceed with investigation, and the client shall be notified with reasons for the audit.

4.1 Responsibilities

Certification Manager is responsible overall for the effective management of the complaint and shall

- Consider customer feedback
- Take vital role for the corrective action

Local Technical Manager (LTM) is the main person involved in the resolution of the complaint and shall

- Consider customer feedback and initiate corrective action for the complaint
- Record and maintain the customer complaint in QESIS with full evidence of acknowledgment and final response to the complainant
- Take vital role for the corrective action
- Communicate the action taken to complainant, if not previously involved in the subject of the complaint.
- Ensure the effectiveness and timely manner of customer complaint process

All sector specific databases shall be updated with necessary records in stipulated timeframe.

On case-by-case basis, BVC, the Complainant and the Client shall decide if information needs to be made public. There must be formal authorization from Complainant and Client when the decision is to make the complaint public.

Any instances where failure to publicly disclose the complaint could affect other stakeholders, should be made public.

Examples of these instances are complaints about:

- Defects that could have catastrophic consequences (injuries, death, etc.),
- Failures in environmental management systems that could cause severe damage to environment and stakeholders.
- Quality of food products; etc.

The decision on making the complaint public or not shall be recorded.

5 Appeal process

Appeals are dealt at the level where certification decision making was done (Critical Location, Hub, ICC).

Appeals related to QHSE schemes are communicated to CER Accreditation Manager and included in the preparation of BVCH Impartiality meeting.

See appendices for specific Appeal Panels.

Appendix 1 - Climate Change disputes, complaints & appeals

CDM accreditation standard, Version 07.0, 14.2

1 Disputes

A dispute is a disagreement between a DOE and a client, regarding the DOE recommendation, and / or opinions/ decisions made at various stages in the course of its validation and/or verification /certification activities.

. The procedure consists of the following steps:

- Acknowledgment receipt is sent to the disputant
- Upon receipt LTM/CDM Quality Manager gathers and verifies necessary information to evaluate validity of the dispute,
- LTM/CDM Quality Manager investigates if the dispute raised is valid (the criteria would be to determine if there was any deficiency in BV's service to the client) and then decides what actions are to be taken
- Disputes will be tracked and recorded, including actions undertaken in response to them
- Results of investigations, outcome are communicated to the disputant in an appropriate time. The disputant will be informed of the closure of dispute handling process.
- Appropriate correction and corrective action shall be taken.

Persons engaged in the disputes handling process are different from those who carried out the validation, verification, or certification activities.

Disputes and subject of disputes shall be kept confidential.

In case the appellant is not satisfied with the appeals panel decision, appellant has the option of making a complaint to the concerned accreditation body.

Copy of Dispute procedure shall be made available to the client on request

Complaints related to Climate Change, received from a customer, certification body, or an auditor for CDM/GS/VCS activity are recorded in QESIS with the respective country product manager being the primary contact and CDM Quality Manager as an additional contact.

The dispute handling procedure will be reviewed by the CDM Quality Manager on an on-going basis and in the following cases:

- Revision in the accreditation standard for CDM
- Revision in the accreditation procedure for CDM
- Decisions of the impartiality committee that are related to CDM
- Decisions of the CDM Management Review that necessitate a review of this procedure

The dispute handling procedure must be read in conjunction with the web hosted procedure for handling of Complaints, Appeals and Disputes which is made available publicly at https://www.bureauveritas.co.in/sites/g/files/zypfnx556/files/media/document/India%20website%20Complaints%20and%20Appeals%20Procedure%20r1_c.pdf. In case of any difference, the web hosted procedure will prevail.

2 Complaints

The resolution process includes the following steps.

- Investigation, including business impacts and analysis of the situation,
- LTM/CDM Quality Manager/internal person not involved in the matter will review if the complaint is valid, based on defined criteria (i.e., if there has been any deficiency in BV's service)

- Structured response (root cause analysis, correction, corrective action), if the severity is rated high (see corrective actions)
- Implementation of correction and corrective action,
- Wherever feasible, providing the complainant a report on the progress of actions on the complaint
- Information to the client of findings and actions taken and the outcome of the investigation,
- Monitoring of results: check if the solution is implemented and effective,
- Record and traceability of the complaint will be through QESIS,
- Follow up on sustainability of results and of resolution.

The timeframe for resolution is four weeks, unless otherwise specified in appendices. However, this may be affected by responsiveness of the client or other third parties.

The closure timeframe in QESIS for CAPA associated to high severity rating is 90 days, after which escalation process is started.

Complaint can be closed only after a final written response is provided to the complainant. Record of this communication shall be maintained.

The complaint handling procedure will be reviewed by the CDM Quality Manager on an on-going basis and in the following cases:

- Revision in the accreditation standard for CDM
- Revision in the accreditation procedure for CDM
- Decisions of the impartiality committee that are related to CDM
- Decisions of the CDM Management Review that necessitate a review of this procedure

The complaint handling procedure must be read in conjunction with the web hosted procedure for handling of Complaints, Appeals and Disputes which is made available publicly at https://www.bureauveritas.co.in/sites/g/files/zypfnx556/files/media/document/India%20website%20Complaints%20and%20Appeals%20Procedure%20r1_c.pdf. In case of any difference, the web hosted procedure will prevail.

3 Appeals

A documented procedure for appeals will be maintained and made publicly available. The appeal will be dealt with by an independent appeals committee of 3 persons who are different from those who conducted the validation, verification, technical review, or final decision. The appeal panel will be formed in response to the appeal received from the client. It will be ensuring that the submission, investigation, and decision on appeals do not result in any discriminatory actions against the appellant.

The procedure for handling appeals will be as follows:

- The appeal will be acknowledged by the LTM/CDM Quality Manager, and a receipt provided to the appellant
- Appeals panel will be constituted as above
- The validity of the appeal made will be ascertained after considering all the information available and gathered as a part of the investigation
- The appeal will be duly recorded and tracked, including any action taken to resolve the same
- If the appeal investigation points to a systemic deficiency or a non-conformity, appropriate correction and corrective actions will be taken to eliminate the gaps in the system
- The confidentiality of the appellant and the subjects of the appeal will be protected subject to the requirements for confidentiality
- The appellant will be kept informed of the progress on the appeal and the final decision on the same
- The appeals committee will have the final say in deciding on the appeal and will function independently in that regard
- The appellant will be informed of the independent appeals committee's final decision on the appeal. However, if not satisfied with the decision, the appellant will be informed of their option to raise a complaint with the CDM EB.

The appeals handling procedure will be reviewed by the CDM Quality Manager on an on-going basis and in the following cases:

- Revision in the accreditation standard for CDM
- Revision in the accreditation procedure for CDM
- Decisions of the impartiality committee that are related to CDM
- Decisions of the CDM Management Review that necessitate a review of this procedure

The appeals handling procedure must be read in conjunction with the web hosted procedure for handling of Complaints, Appeals and Disputes which is made available publicly at https://www.bureauveritas.co.in/sites/g/files/zypfnx556/files/media/document/India%20website%20Complaints%20and%20Appeals%20Procedure%20r1_c.pdf. In case of any difference, the web hosted procedure will prevail.

4 Legal records

BV India Legal Department maintains a record of judicial processes pending against BV India, as well as information of any judicial cases held in the past.

If the subject matter of a judicial process pending, or instituted against BV India, is such that it is incompatible with its functions as a DOE, BV India shall promptly report the matter to UNFCCC secretariat.

Appendix 2 – SA8000 Services

SAAS Procedure 201A:2015

In addition to the company's system to redress complaints, BV and SAAS headquarters provide two additional levels where workers or interested parties can file complaints.

Auditors shall confirm that workers and other interested parties understand and have access to all hierarchy levels of the complaints and appeals process, and that workers are trained in how to use that access.

1 Company Level

Complaints can be filed directly with the factory in question and may be resolved without the involvement of third-party auditors. SA8000 companies are required to establish a complaint procedure that provides workers the option to file a complaint anonymously. Companies are encouraged to establish suggestion boxes or a free mail-in system to facilitate workers expressing their concerns. These complainants shall be able to lodge a complaint anonymously. If names are given, no repercussions shall result. This may encourage an internal discussion and resolution prior to, or instead of, a formal complaint.

The company's Social Accountability Manager shall ensure there is a confidential, accessible, and free system for workers to lodge complaints or appeals regarding the company's conformance to SA8000. Also, the corrective Action taken to rectify the complaint shall be communicated to the workers filing the complaint or, in cases of anonymous complaints, to the worker elected SA8000 representative. In companies where a trade union is present, trade union representatives shall be involved in the complaint processing and settlement procedures.

In some cases, workers may feel the need to take their complaint to the certification body. Such cases include situations where: a) the complaint resolution is not satisfactory to workers; or b) workers feel too intimidated to lodge a complaint directly with management.

2 Bureau Veritas Level

If the company's complaint hierarchy does not satisfactorily address and resolve complaints, workers have access to the appeals procedure, enabling them to bring an appeal before local certification entity that verified the company's compliance with SA8000. Workers' ability to file an appeal shall not rely on their meeting auditors during surveillance visits.

The mechanism for receiving complaints and appeals from workers and interested parties is described also in the General Condition of Services. The following information is given to client and other interested parties:

- address, phone, fax, e-mail of local certification entity
- time for BV reply and action: 30 days

The auditor shall verify that this mechanism and information are known to workers and other interested parties, during SA8000 audits. Local certification entity investigates and sends records of verification details to ICC.

Interested parties including workers unions, trade unions and NGOs can appeal the decision to certify a facility, if it presents objective evidence of serious violation of any element of SA8000.

For example: a community group with evidence that workers are being fired for unionizing could appeal against the company's certification by contacting BVC that approved the certification.

BVC local office records the complaints/appeal, investigates, and sends the details to ICC for further actions, (if any) are warranted. ICC may decide to conduct unannounced audits and/or off-site interviews with workers to assess the situation in a more objective way.

All such complaints are dealt as defined in the SAAS procedure 201A:2015 Clause No. 1.13.1

3 SAAS - Accreditation level

Any interested party can also file a complaint or appeal with SAAS about accreditation of Bureau Veritas. The complainant, however, shall first seek to exhaust the complaints and appeals process at the company and certification body levels.

All such complaints will be dealt as defined in the SAAS Procedure 201A:2015 Clause No. 1.13.2 and 1.13.3

Appendix 3 - IATF 16949

IATF Automotive certification scheme for IATF 16949, 5th Edition, 2.9

Appeal decision shall be done by the Appeal Panel with involvement of Global Product Manager, an independently assigned POV or Technical advisor and CER Technical Director.

For unusual cases, the Appeal committee will ask another independent POV to challenge the Appeal committee decision and in case of any remaining doubt, a clarification is asked to IAOb. Timing if a major nonconformity is appealed, BVC appeal committee to meet within 14 days to provide first feedback to the client.

- Appeal Panel reviews the case, to decide based on appeals and reports submitted by Technical Manager
- Appeal Panel decision is communicated to appellant. It shall be noted that this decision is absolute and final.

The submission, investigation and decision on appeals do not result in any discriminatory actions against the appellant.

Upon request, BVC can inform the appellant that he or she can question decision of Appeal Panel, by raising same appeal to Accreditation Body.

Detailed process is described below:

BVC Appeal Management Process_IATF				
Step	What	When	Who	Business rules / procedure
1	Receipt of Appeal	Within 2 days	IATF Accreditation Manager	IATF Accreditation manager sends acknowledgement to respective contracting office
2	Independent POV review	Within 6 days	POV	IATF Accreditation Manager requests SSC to initiate independent POV Review. SSC to assign the file to independent POV by email. SSC to communicate decision received from independent POV to IATF Accreditation Manager by email Important Note: SSC to ensure POV decision has been received for all NCs for which Appeal has been raised Important Note: Independent POV review to ensure to take into account only evidence available at the date of the closing meeting Important Note: Independent POV reviewer shall: <ul style="list-style-type: none"> - Review the appeal request along with other documents (reports, NC report, score cards...) - Provide a recommendation to accept or reject the appeal request - Justify the recommendation based on rules, SI...
3	Raise QESIS Incident & assign for Validation	Within 6 days	SSC	SSC raises QESIS incident and update internal appeal tracker. SSC keep themselves as Owner and Contracting

				Country responsible as Recipient. SSC sends Appeal to IATF Accreditation Manager for Validation
4	Appeal Committee Meeting	Within 14 days	BV Appeal Committee	
5	Appeal Decision			If appeal is accepted proceed step 7 to 13 if not 7, 7 and 13
6	Communication of Decision to contracting office	Within 14 days	IATF accreditation Manager	
7	Communication of Decision to Client	Within 14 days	Contracting Office	Country to upload evidence of communication to the client in QESIS
8	Correction Action - Update of Audit reports/Upload into system/Update of IATF DB	Within 17 days	Contracting Office/SSC	Country to inform SSC / IATF Accreditation Manager once updated audit report is uploaded in CMX. • SSC to ensure IATF database has been updated accordingly & Update Appeal Log Important Note: SSC to ensure clearly in comments section of the IATF database why this change was made
9	Creation of CAPA in QESIS	Within 20 days	IATF Accreditation Manager	Creation of CAPA in QESIS by IATF Accreditation Manager where he/she updates the CAPA Owner as Contracting Country responsible, CAPA Approver as IATF Accreditation Manager and CAPA Verifier as TQR Quality Manager.
10	First Response in QESIS	Within 80 days	Contracting office	The evidence of communication of appeal committee decision to the client also needs to be uploaded in QESIS (correction section). Note: Contracting office will need to co-ordinate with performing office (for investigation/actions) in case the auditor is not sponsored by them
11	Review of response in QESIS	Within 85 days	IATF Accreditation manager	CAPA Approver (IATF Accreditation Manager) reviews and gives decision on the CAPAs and route it forward to Contracting Country person for Implementation (if approved) and send it back (if rejected).
12	Upload Implementation evidence in QESIS	Within 90 days	Contracting office	
13	Verification & Closure of Appeal incident	Within 90 days	TQR Quality Manager	

Appendix 4 – FSC Services

1 Filing

The FSC global procedure for the management of complaint and appeal is available on BV HO Website, in English, and several additional languages.

Any FSC complaints and appeals can be recorded on-line by using the link designed for that purpose. The local countries can also have on their own websites another way to record any complaint or appeal received, but the link to the BV HO complaint management must be mentioned.

FSC Complaints and appeals are acknowledged to sender within two weeks. Initial response to the client includes a proposed course of action, within two weeks. Information is sent to the complainant(s) regarding evaluation the complaint and or appeal.

2 Responsibility

Timeframe for resolution of both complaints and appeals is three months.

FSC	Complaint	Appeal
Contact client	LTM	FSC Hub Manager
Registration	LTM	I&F TQR – Forestry
Decision	LTM	I&F TQR FSC Technical Expert
Support	FSC Hub Manager	I&F TQR – Forestry, FSC Hub Manager and LTM

The owner of the compliant has to upload any record generated by the resolution of the complaint (email with the complainant, internal email).

The monitoring of all the FSC complaints and appeals is made by I&F TQR accreditation manager.

3 Discrimination

The submission, investigation and decision on appeals and complaints shall not induce any discriminatory actions against the complainant or appellent.

4 End of the process

The owner of the compliant shall send a final answer to the complainant, using the form Notification letter, and the complainant is invited to refer it to FSC or ASI in case of appeal.

1 Complaints

Complaints related to Aerospace certification scheme, coming from a customer, certification body, OASIS feedback or an auditor, for Aerospace activity are recorded in QESIS with the ICC Operations Manager being the primary contact and International Aerospace Business Director as an additional contact.

The procedure shall ensure:

- All requests for corrective action are responded to within 30 calendar days from receipt of complaint if response requested, the response is provided within 30 calendar days from receipt of complaint by the accredited entity.
- If the CB determines that a short notice audit is necessary, this audit shall be completed within 90 calendar days from receipt of the complaint; and
- An effective corrective action process that provides for containment activities, conformance to the applicable standard is re-established, completion of root cause analysis, corrective actions addressing all root causes, and a completion date for the implementation of all corrective actions is defined. The CB shall be responsible for the resolution of all complaints. Complaints that cannot be resolved by the CB shall be referred to the AB.

2 Appeals

An Appeal decision shall be made by the Independent Appeal Panel/individual specifically agreed to deal with the appeal with the support and involvement of the ICC Operations Manager. The person conducting the appeal must be an independently assigned POV or Technical advisor, the CER Global Accreditation Manager and a representative of I&F TQR. Timing if a major nonconformity is appealed, BVC appeal committee to meet within 5 days to provide first feedback to the client.

- Appeal Panel reviews the case, to make a decision based on appeals and reports submitted by ICC Operations Manager
- Appeal Panel decision is communicated to appellant. It shall be noted that this decision is absolute and final.

The submission, investigation and decision on appeals do not result in any discriminatory actions against the appellant.

Upon request, BVC can inform the appellant that he or she can question decision of Appeal Panel, by raising same appeal to Accreditation Body or IAQG/EAQG.

3 Timeframe

Requests for corrective action are responded to within 30 calendar days from receipt of complaint.

If response to feedback is requested, the response is provided within 30 calendar days from receipt of complaint.

If a short notice audit is necessary, this audit shall be completed within 90 calendar days from receipt of the complaint.

Appendix 6 – ASC Farm

ASC Certification and accreditation V2.2

All formal and informal complaints, appeals, concerns or objections related to BV ASC Farm activities, a certificate holder or a certification applicant are kept on file and logged in QESIS.

4 Complaints

The complaint is managed by the BV entity, and if necessary, by the Hub manager, or the accreditation manager.

BVC encourages the complainants to submit copies of their complaints to directly to the ASC at:

- Email: complaints@asc-aqua.org
- Mailing Address: Aquaculture Stewardship Council, Daalseplein 101, 3511 SX Utrecht, The Netherlands

5 Appeals

An Appeal decision is managed by the hub manager, or the accreditation manager if needed.

6 End of the process

The owner of the complaint shall send a final answer to the complainant, using the form Notification complaint and appeal, and the complainant is invited to refer it to ASC or ASC appointed accreditation body in case of appeal.

The monitoring of all the ASC complaints and appeals is made by I&F TQR accreditation manager.

7 Submission during the annual surveillance assessment

The complaints and appeals are logged on form 4. This form is submitted annually no less than 30 days prior to the annual surveillance by the ASC appointed accreditation body's visit, with copies sent to the ASC.

8 Suspension or withdrawal of BVC ASC accreditation

In this case, all logged issues are sent to the ASC appointed accreditation body and ASC as part of the suspension or withdrawal process using FORM 4 no later than the final date of accreditation.

1 Complaints and appeal acknowledgement

Within 10 working days of receiving a complaint or an appeal, BV will provide an initial response to the complainant or appellant, including an outline of the proposed course of action to follow up on the complaint or appeal.

BV will keep the complainant or appellant informed of progress in evaluating the complaint or appeal until it is closed.

BV will investigate the allegations and specify all proposed actions in response to the complainant or appellant within 3 months of receiving the complaint or appeal.

2 End of the process

The owner of the complaint shall send a final answer to the complainant, using the form Notification complaint and appeal, and the complainant is invited to refer it to MSC or MSC appointed accreditation body in case of appeal.

In cases where the subject of the complaint or appeal is also being considered through an objections process, this 3-month timeline may be deferred until completion of the objection process.

A summary of any complaint evaluated in relation to the MSC Fisheries Program is sent to the MSC via complaints@msc.org within 20 days of closure of the complaint.

The monitoring of all the MSC complaints and appeals is made by I&F TQR accreditation manager.

Appendix 8 – RSPO SCCS

RSPO-PRO-T05-002 V2

1. Bureau Veritas Impartiality Committee for RSPO

1.1 Bureau Veritas National Office may, whenever relevant, consult or refer the formal complaint to Bureau Veritas' Impartiality Committee for RSPO, such as complaints related to conflict of interest, Bureau Veritas' independence, etc.

1.2 The Committee shall be informed of the complaint and of all the steps taken by Bureau Veritas to resolve the complaint as well as the response provided by the affected stakeholder.

1.3 Bureau Veritas Impartiality Committee will review all the information provided and will make a proposal to the affected Bureau Veritas National Office on how to resolve the dispute.

1.4 Bureau Veritas National Office shall report to the Committee on the outcome once the dispute has been resolved or of any action taken to resolve the dispute.

2. Responding to a formal complaint or grievance

2.1 Once the formal complaint has been investigated, the CER Director or CER Manager from the relevant Bureau Veritas national Office shall respond to the complaint or grievance indicating whenever relevant and appropriate the preventive and/or corrective measures that will be implemented to address the issue raised.

2.2 For all the formal complaints, grievance or disputes received, the relevant Bureau Veritas Certification National Office shall handle the complaint within 60 days of receiving the formal complaint.

2.3 Whenever a complaint cannot be resolved within 60 days, Bureau Veritas shall inform the RSPO Secretariat, including information as to why the complaint cannot be resolved within an appropriate time frame.

3. Referring a formal complaint to RSPO

3.1 A certified operation has the right to raise a formal complaint with RSPO or directly to the RSPO Executive Board, in line with RSPO Grievance Procedure, if it is not satisfied with Bureau Veritas Certification's final response.

4. Recording a formal complaint or grievance

4.1 All formal complaints or grievances received shall be recorded together with all the steps taken to resolve the complaint and all communication with interested and/or directly affected parties. Records shall be kept in Bureau Veritas Qesis system.

5. Appeals

5.1 An appeal may only be made by a client of Bureau Veritas for RSPO certification against a RSPO certification decision made by Bureau Veritas Certification.

5.2 An appeal raised by a client of Bureau Veritas for RSPO certification against a RSPO certification decision made by Bureau Veritas Certification may only be related to:

- Refusal by Bureau Veritas Certification to proceed with an RSPO audit.
- Disagreement with a nonconformity raised by Bureau Veritas Certification during an RSPO audit.
- Changes in scope of RSPO certification proposed by Bureau Veritas Certification.
- A decision to reduce, suspend or terminate the RSPO certification of the certified operation.

5.3 The grounds for an appeal are limited to:

- An appeal based on the fact that Bureau Veritas Certification has not followed its own procedures for RSPO certification or RSPO certification requirements; or
- An appeal based on the fact that Bureau Veritas Certification has incorrectly interpreted the RSPO certification requirements.

5.4 Notifications of appeal shall be received by the Director or Manager of the relevant Bureau Veritas Certification National Office within 30 days of the relevant RSPO certification decision being received by the certified operation.

5.5 The Director or Manager of the relevant Bureau Veritas Certification National Office shall review and respond to an appeal within 60 days of receiving the appeal. In its response, Bureau Veritas Certification shall clearly indicate whether the original decision is maintained or whether based on the elements presented in the appeal that the initial decision has been modified to take into account any new and relevant information provided.

5.6 A certified operation has the right to raise an appeal with RSPO or directly to the RSPO Executive Board, in line with RSPO Grievance Procedure, if it is not satisfied with Bureau Veritas Certification's final response.

Appendix 9 – publication on BVC website



Complaints and Appeals Management for Certification Services

Bureau Veritas Certification Policy - TQR I&F Division

Move Forward with Confidence



INTRODUCTION

The purpose of this Bureau Veritas Certification policy is to establish a standard and structured process for the management of Complaints and Appeals received by Bureau Veritas Certification. The purpose of this policy is to communicate the standard process to all operations to ensure that all appeals and complaints are handled in a professional and responsible manner.

1. Definitions

The definitions used by Bureau Veritas Certification are the following:

Complaint

(ISO/IEC 17000:2020, 8.7): expression of dissatisfaction, other than appeal (8.6), by any person or organization to a conformity assessment body (4.6) relating to the activities of that body, where a response is expected.

Appeal

(ISO/IEC 17000:2020, 8.6): request by the person or organization that provides, or that is, the object of conformity assessment (4.2) to a conformity assessment body (4.6) for reconsideration by that body of a decision (7.2) it has made relating to that object.

2. Complaints

Common Process Steps

2.1 Receipt and Acknowledgement

Complaint can be written (Formal Letter, Email, Website) or verbal (Phone Call, Feedback during sales visit or audit). The process of management of the complaints registered in our website is the following:

- The acknowledgment of the complaint is done automatically
- On HO level, the dispatch of the email is done. If this is a complaint, this is transferred to a generic mailbox (groupqhseinbv@bureauveritas.com)
- Then the complaint is transferred to the QHSE manager concerned for investigation and actions.

Complaints are handled at contracting entity level. An audit may be initiated to proceed with investigation, and the client shall be notified with reasons for the audit.

The complaint form and the complaint/appeal process are publicly available in the same languages as the public certification summaries published by Bureau Veritas Certification.

Upon receipt, complaints and appeals are acknowledged to sender within five working days, unless otherwise specified.

The Recipient of the complaint is either the person who received it directly or the one who entered the information. They are assigned to the validator who will determine the severity and decide actions according to this rating

2.2 Responsibility

Personnel who investigate complaints and appeals are always different from those who carried out the audits and made certification decision, without discrimination against the appellant or complainant.

- If (LTM) Local Technical Manager was involved, then a person, internal and independent, is appointed
- If Local Technical Manager was not involved; he or she can carry out the investigation.

Unless otherwise specified, LTM is the default channel for complaints and appeals.

2.3 Resolution process

The resolution process includes the following steps.

- Investigation, and analysis of the situation,
- Structured response (root cause analysis, correction, corrective action) if the severity is rated high
- Implementation of correction and corrective action,
- Information to the client of findings and actions taken,
- Monitoring of results: check if the solution is implemented and effective,
- Record and traceability of documents,
- Follow up on sustainability of results and of resolution.
- The timeframe for resolution is four weeks, unless otherwise specified in appendices. However, this may be affected by responsiveness of the client or other third parties.

Bureau Veritas retains the anonymity of the complainant in relation to the client if this is requested by the complainant and shall treat anonymous complaints and expressions of dissatisfaction that are not substantiated as complaints as stakeholder comments and address these during the next audit.

On case-by-case basis, BVC, the Complainant and the Client shall decide if information needs to be made public. There must be formal authorization from Complainant and Client when the decision is to make the complaint public.

Any instances where failure to publicly disclose the complaint could affect other stakeholders, should be made public.

Examples of these instances are complaints about:

- Defects that could have catastrophic consequences (injuries, death, etc.).
- Failures in environmental management systems that could cause severe damage to environment and stakeholders.
- Quality of food products; etc.
- A final written response is provided to the complainant
- Specific complaints and appeals handling procedure are applied for following schemes based on scheme owner requirements and a copy of these can be made available on request from LTM
 - IATF 16949
 - SA8000
 - CDM

3. Appeal Process

Appeals are dealt at the level where certification decision making was done (Critical Location, Hub, ICC) and coordinated by Local Technical Manager with concerned Accreditation Manager and CL, Hub, or ICC to maintain impartiality.

Appeals related to QHSE schemes are communicated to CER Accreditation Manager.

PS: for ASC, MSC and FSC, the complainant can refer the complaint to ASI, if the issue has not been resolved through the full implementation of BVCH 's own procedures, in case of disagreement with the conclusions or dissatisfaction by the way BVCH handled the complaint. As the ultimate step, the complaint or appeal may be referred to the scheme owner.

For ASC: email: complaints@asc-aqua.org - Mailing Address: Aquaculture Stewardship Council, Daalseplein 101, 3511 SX Utrecht, The Netherlands

Appendix 10 – IFS

All IFS complaints should be handled according to the IFS Annex 4, version 3 of the Framework Agreement:

If the complaint relates to the quality of the content of IFS audits or IFS audit reports, IFS MANAGEMENT will ask the certification body to provide a statement on the cause and the measures introduced to rectify the problem within 2 weeks.

If the complaint relates to administrative errors, e.g., in IFS certificates and/ or IFS reports based on typing mistakes or in the IFS database based on an oversight or by accident, IFS MANAGEMENT will ask the certification body to provide a statement and rectify the problem within 1 week. The certification body may ask IFS MANAGEMENT providing an argumentation to extend this period. The statement must be issued in writing by email or post.

Appendix 11 – SEDEX Audits

Templates – SMETA Appeal form

1 Purpose

The purpose of the Appeal Procedure is to provide our Suppliers / Clients with unbiased, fair, and rationally prompt resolution process about the disputes raised by the Supplier / Client during or post the SMETA audit / Sedex Virtual Assessment. The appeal procedure can be made available to clients on request

2 Appeal Process Steps

This procedure defines the Appeal process steps for SMETA audits / Sedex Virtual assessments.

- If there is a disagreement between the Site Management and Auditor during the closing meeting on all the non-conformities or any of the non-conformities raised by the Auditor, the site management signs in the dispute box of the CAPR and states their reasons why agreement was not reached with the corresponding non-conformity serial number against which they have a dispute.
- The concerned Technical Reviewer (during the technical review process) would bring such disagreement noted in the CAPR to the attention of Global Social and Customized Audits Manager / Technical Expert (herein after referred as Technical Governance Team).
- Alternatively, in case above process is not followed viz. reason is not mentioned in the dispute box of Signed CAPR by the Site Management, the Supplier / Client can raise objections about any of the non-conformities raised by the Auditor after the Audit is carried out.
- Technical Governance Team would forward Appeal Form to the Auditor. Post Auditor and Supplier incorporates the respective comments in the Appeal Form along with Audit information, the same will be forwarded to the Technical Governance Team for their review.
- Based on the comments made by both parties viz. Auditor and Supplier and the local law / ETI Base Code Requirement in the Appeal form, the duly filled Appeal form is reviewed by the Technical Governance team. In case, there are any clarifications which needs to be sought from the Auditor, the same is being put forward to the local network country / Auditor prior to arriving at the decision. Post getting the necessary clarifications, appeal decision is being made by the Technical Governance Team as to whether the concerned non-conformities are valid or need to be removed / downgraded to observation.
- The final decision is let known to the Network Country who in turn forwards the same to the Supplier. In case, the NCs are downgraded / removed, the Revised CAPR is being sent to the Supplier through the Network Country / Auditor for their acknowledgment / signature. Revised CAPR shall be uploaded on Sedex Advance platform along with the Audit Report.
- Further, in case, the Final Appeal Decision of the Technical Governance Team is not agreeable to the Supplier, they can raise their grievance to the Sedex Grievance Team. On receiving the grievance, Sedex will get the

comments / explanation as to the situation on the day of Audit from both the parties and then take a final decision on the issue raised.

Audit Team will clearly communicate to the Site Management Representatives during the audit that our company has an “Appeals Procedure” in place. Should they or the Client wish to challenge any or all the findings raised during the audit, their appeal would be considered, and the due process would be followed.

3 Appeal Handling

The Appeal would be handled by Technical Governance Team who will have no role to play in the audit including auditing / reviewing the report under dispute. Global Accreditation Director – Social Audits would approve the appeal decision and Global Social and Customized Audits Manager would be the back-up in his absence.

In no case, the Appeal decision would be made and approved by the same personnel.

4 Timeline for Appeal process

Stage	Action	Timeline
1	Technical Governance Team receives an appeal from the Supplier / Client challenging any or all the findings raised during a said audit	Initiation date
2	Technical Governance Team may request any further clarifications / details from the Auditor with respect to the filled Appeal form. Clarifications would be put across by Auditor within 5 working days of the clarifications being sought by Technical Governance Team	Within 30 calendar days of initiation date.
3	Technical Governance Team will relay the Appeal decision post approval from Global Accreditation Director – Social Audits / Global Social and Customized Audits Manager to the local network country / Auditor.	Within 30 calendar days of initiation date.

Technical Governance Team shall log all appeals /disputes and records will be duly maintained for future reference.