

1.0 AIM

The aim of this procedure is determining of assessment principals of written or verbal complaints and appeals arising from organizations or interested sites regarding all programs of USB-PPS¹, which includes the entire quality system of USB Certification, and the management of the submission of official complaints and appeals regarding the accreditation decisions and general inner workings of the accreditation bodies that USB Certification receive accreditation services for the schemes accredited for.

USB-PPS includes the following requirements;

- Requirements defined by accreditation bodies
- Requirements defined by scheme owners
- Requirements defined by authorized bodies
- Compliance criteria defined by legal regulations
- Quality and compliance criteria defined in the policies and procedures of USB Certification
- Authorization requirements

2.0 SCOPE

This procedure covers the disputes that may come from organizations or related parties regarding the control activities / audits and certification decisions carried out by USB Certification, appeal and complaint, if necessary, documenting, implementing the corrective, preventive action and informing the related parties about the result.

3.0 RESPONSIBILITIES

Quality Manager (QM), Certification Manager of relevant department and Complaint Committee are responsible for the implementation of this procedure, handling complaints and making decisions. Quality Manager is responsible for recording complaints and appeals, and monitoring and coordination of corrective and preventive actions after transactions. Appeal Committee is responsible for the resolution of appeals.

4.0 PROCEDURE

4.1 Definitions

Complaint: If the complaint is submitted against USB Certification, at all steps from application to certification decision, written or verbal negative feedback about USB's policy, procedures, regulations, activities, performances, personnel and certified clients or dissatisfaction statements made to the accreditation body or authorized bodies (T.R. Ministry of Agriculture and Forestry, GOTS, TE, UTZ, BRCGS, IFS, RA).

Appeal: The situation in which the parties concerned do not accept the certification decisions. In case of accreditation bodies, it is any formal disagreement for a decision taken by the accreditation body for an official objection.

4.2 Handling Incoming Complaints and Appeals

4.2.1 All kinds of complaints about USB Certification audit and certification activities can be informed as written or verbal with "*Complaint and Appeal Record Form*" or through USB Certification web page.

4.2.2 While receiving complaints, the name of the person/organization of complainant is also recorded. Complaints submitted on behalf of a group, such as a community or labor organization, must have at least one suitable contact person to manage communications and further inquiries.

¹ USB-PPS: USB Policy and Principals System

4.2.3 USB Certification applies an appraisal to assess risk of anonymous grievances, but it is under no obligation to investigate the complaint if there is no sufficient preliminary evidence or information.

4.2.4 Upon receipt of a complaint, USB Certification confirm whether the complaint relates to certification activities that it is responsible for and, if so, deal with it.

4.2.5 If complaint relates to a certified producer/producer organization/entrepreneur/company, then examination of the complaint shall consider the the certified product/management system effectiveness.

4.2.6 Any valid complaint about a certified producer/producer organization/entrepreneur/company also be referred by the relevant Certification Manager or Program Manager to the certified client as soon as possible.

4.2.7 All incoming complaints and appeals are recorded and forwarded to the Quality Manager to transfer into the "*Complaint and Appeal Monitoring Form*".

4.2.8 Quality Manager ensures that all stages until the conclusion of the complaint are recorded in a traceable manner with the "*Complaint and Appeal Record Form*". If the complaint is in verbal form, the producer/producer organization/entrepreneur/company letter is also attached to this form.

4.2.9 BRCGS is routinely informed about complaints and appeals by the relevant Program Manager. Details can be seen in the "*BRCGS040 BRCGS Certification Body Quarterly Report*" document.

4.2.10 Quality Manager notifies the General Manager of the complaint and appeal received. Quality Manager assigns the Complaint Committee in relation to the complaint when necessary. Appeal Committee is informed about appeals by the Quality Manager and decision is made with the meeting held by the Appeal Committee.

4.2.11 Quality Manager interviews with parties involved in the complaint (including controllers, auditors, certifiers, and decision makers) and other persons it deems appropriate. Quality Manager ensures that the result and if necessary, the activities to be carried out regarding the complaint is informed to complainant in writing form.

4.2.12 In addition, Quality Manager retrospectively reviews the control/audit and certification stages of the parties concerned with complaints and appeals and ensures that any issue that need improvement are used as data for corrective action.

4.2.13 Submission, investigation and decision on complaints and appeals submitted to USB Certification do not result in any discriminatory actions against the complaint.

4.2.14 USB Certification ensures the confidentiality of the complainant unless the complainant authorizes USB Certification or the program owner (Rainforest Alliance (RA)) to share the information or the complainant publicly shares information.

4.3 Evaluation of Complaints and Decision Making

4.3.1 Quality Manager determines the action plan for the solution of the complaint, after fully getting the reasons, related issues, and events.

4.3.2 Possible reasons of complaints, completion durations and methods for these complaints are laid out in the table below

N	Complaint	Decision
1	Complaints about office services include, but are not limited to: <ul style="list-style-type: none"> • Inability to reach the relevant persons, • Late offer, 	It is concluded within a maximum of five (5) working days and the complainant is informed. Corrective action is initiated to prevent its recurrence and to eliminate the root cause, and its effectiveness is measured.

	<ul style="list-style-type: none"> Inadequate or inaccessible documents that shall be known by the producer/producer organization/entrepreneur/company, Late issuance and sending period of the certificate, etc. 	
2	<p>Complaints that may affect the impartiality, independence and efficiency of the control/audit include, but are not limited to:</p> <ul style="list-style-type: none"> Attitude and behavior of the control/audit team, Unethical behavior of the control/audit team. Any difference in the interpretation of standards Failure to use appropriate methods in control/audit, Failure to comply with the control/audit plan, Control/audit does not provide added value, etc. 	
3	<p>Support requested from USB Certification in order to resolve the complaints received by the program owners;</p>	<p>Required support in matters such as information/research/audit is provided according to the following documents:</p> <ul style="list-style-type: none"> - Regarding BRCGS, "BRCGS005: BRCGS Complaints Investigation Process" -Regarding GOTS, "Approval Procedure and Requirements for Certification Bodies" -Regarding TE, "Accreditation and Certification Procedures" - Regarding RA, "<i>Grievance Procedure</i>"

4.3.3 The specific notification periods defined by Program Owners regarding Complaints are shown below.

- BRCGS requests that complaints shall be concluded within 30 working days and be claimed.
- RA asks that USB Certification responds to the persons submitting RA complaints and inquiries within 10 calendar days to acknowledge their submissions, and to provide them with information about the next steps in the process and when they can expect an outcome. RA gives 30 calendar days to resolve a complaint. If additional time is needed, Program Manager informs RA on time.

4.3.4 Evaluation of such complaints the Quality Manager organizes a meeting and is decided with the participation of the relevant personnel. The decisions taken are notified to the complainant in written.

- For complaints about RA, if the submission did not include contact information for responding, then the USB Certification completes the process and record the information in the Rainforest Alliance Assurance Platform.

4.3.5 If the results of the decision are not satisfactory by the relevant parties, the subject of the complaint is forwarded to the Complaint Committee by the Quality Manager.

4.3.6 Complaints about the certified organization; It may be related to the failure to comply with the usage rules of the certificates and logos. Compliance with the principles of confidentiality is essential in the evaluation of such complaints. In special cases where the subject needs to be announced to the public, the form and detail of the announcement is the responsibility of USB Certification, and the legal requirements are followed.

4.3.7 In case of complaints about the products under certification, the certified organization must submit the content and reason of the complaint to USB Certification. It is requested that there are no persons directly related to the complaint within the corrective action proposed by the certified organization and among the persons dealing with the cause and solution of the complaint. Certified organization shall ensure that the relevant authorities are informed about the corrective actions to be carried out, ensure compliance, and prevent repetition of this complaint.

1	Using the logo and the right to use documents outside of the specified scope	Corrective action is requested within a maximum of 10 days. If the result is negative, the certificate is suspended for one month. If it is negative again, the certificate is canceled. (If the accreditation body/program owner has rules regarding the relevant situation, these rules are taken as basis. Details can be seen in the relevant external document.)
2	Misuse of the logo of the accreditation body / program owner	
3	Complaints / feedback from the relevant chambers or professional groups affiliated to or a member of the certified organization	
4	Complaints / feedbacks from relevant parties benefiting from the certified organization's product	In case of a justified complaint, the continuation of customer satisfaction is maintained by: <ul style="list-style-type: none"> • Unannounced audit is performed within a month, • Corrective action is requested within a maximum of 1 month. If the result is negative, the certificate is suspended for one month. If it is negative again, the certificate is canceled. • Taking this situation into consideration in the next control/audit (such as surveillance, document renewal).
5	Complaints from accreditation body, ministries, standard owners	The necessary investigations are made within a maximum of 10 days and the corrective action plan is sent to the relevant party. (If the accreditation body / program owner has rules regarding the relevant situation, these rules are taken as basis. Details can be seen in the relevant external document.)

4.4 Evaluation of Appeals and Decision Making

4.4.1 USB Certification has established a Appeal Committee to effectively evaluate all appeals stated below. The Appeal Committee consists of the members of the Impartiality Committee who are experienced about the subject of the appeal. Membership criteria and working principles of the committee are specified in "*Committee Principal Procedure*".

N	Appeal	Decision
1	Appeal to the control/audit result or to the decisions made after the complaint.	Quality Manager firstly ensures that the " <i>Complaint and Appeal Record Form</i> " is filled, and with this form, the appeal and all its stages are recorded in a retrospectively traceable way until the appeal is fully concluded. If applicable, the letter of the appealing party about the matter can also be attached to the form. The Quality Manager requests for an approval from the appealing party after sending filled form to them. The Appeal Committee meets within five (5) working days and makes its decision. The decision is sent to the relevant parties in written (referring to the relevant regulation, standard or procedure, sending a copy if

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N	Appeal	Decision
		<p>necessary), together with its reasons. The decision is recorded to the "Complaint and Appeal Record Form."</p> <p>As a result of the evaluation, if it is determined that there is a faulty caused by USB Certification, the relevant Certification Manager is responsible for the preparation of corrective actions, while the Quality Manager is responsible for the implementation of corrective actions as well as follow-up.</p>
2	<p>Appeal to the non-conformity / observation decision identified by the inspector after the control/audit</p>	<p>In this case, the inspector/auditor explains to the appealing party that he/she has the right to appeal and prepares a report. In this report, it is stated that the subject and the party to be controlled/audited have refused to sign. The person who is controlled/audited is asked to sign the report, if not, the report is signed unilaterally. Relevant Quality Manager is informed about the situation.</p> <p>Quality Manager initiates the necessary work to examine the appeal and inform the Appeal Committee to make a decision within five (5) working days. Quality Manager is sent the decision of Appeal Committee to the relevant parties in written with detailed justifications. As a result of the evaluation, the following decisions may be taken:</p> <ul style="list-style-type: none"> • Approval of the inspector's/auditor's recommendation, • Replacement of inspectors/auditors, full or partial control/audit again, <p>Appealer also has a right to appeal the decision of the Certification Manager. In this case, evaluation is made according to Article 1.</p>
3	<p>Appeal to inspectors who will perform the control/audit</p>	<p>The curriculum vitae of the assigned inspectors/auditors to perform the control/audit are forwarded in advance to the party to be controlled/audited. The party to be controlled has the right to appeal to the inspectors/audits.</p> <p>The party sends the appeal together with its justification to the Quality Manager in written. The Quality Manager initiates the necessary work for the evaluation of the appeal. Evaluation is made in a way that it does not hinder or delay the control process, its impartiality, independence, and consistency.</p> <p>If the appeal is found as justified, the inspectors/auditors are replaced, and background information of newly appointed inspectors/auditors is sent to the party to be controlled/audited for confirmation.</p> <p>In case the appeal is not justified, this situation is communicated in written to the party to be controlled/audited and a further confirmation for the control/audit is requested.</p>
4	<p>Appeal to the certification decision</p>	<p>The inspected/audited party has the right to appeal the certification decision.</p> <p>It sends the appeal together with its justification to the Quality Manager in written. The Quality Manager informs the Appeal Committee for the evaluation of the appeal. The Committee takes its decision within five (5) working days. The decision is sent to the relevant parties in written (referring to the relevant regulation, standard or procedure, sending a copy when necessary), together with its reasons. The decision is recorded with the "Complaint and Appeal Record Form."</p>

4.4.2 For appeals about RA certification will not be resolved by changing the scope of the certificate to resolve a problem within the scope of the certificate.

4.5 Actions to be Taken Regarding Complaints and Appeals

4.5.1 All complaints and appeals received are recorded and kept in the complaints-appeals file. Along with the records, any document or evidence obtained about this subject is attached and kept.

4.5.2 Based on the fact that the party making the complaint and appeal has rights, the complaints and appeals are handled within its own procedure and in the form of revealing the right. All kinds of measures are taken to ensure that the complaint and appeal are not negatively reflected in other transactions of the producer/producer organization/operator/company.

4.5.3 In this context, the ongoing actions of any complaint and appeal holder are not handled by any personnel subject to complaint and appeal until the complaint and appeal is concluded. The person who worked in the company that made complaints and appeals in the last 2 years is not included in the evaluation of the complaint and appeals.

4.5.4 While evaluating the complaints and appeals, the complaints and appeals made before regarding the subject of complaint and appeal are also taken into consideration, and the information contained herein is kept as part of the evaluation. Receiving, processing, and concluding decisions of complaints and appeals are notified to the complainant and appellant in written.

4.5.5 According to the decision taken as a result of the complaint and appeal (generally in cases where the complaint and appeal is justified), corrective and preventive action is initiated regarding the subject of the complaint and appeals. Quality Manager and Certification manager are responsible for initiating this activity.. According to the corrective action to be taken, if necessary, activities such as restriction in the appointment of the personnel, providing extra training, etc. are carried out.

4.5.6 In case of an appeal to the decisions taken by the Complaint Committee and Appeal Committee, the related party shall be notified of the matter to be referred to TR courts.

4.5.7 Quality Manager evaluates all information about the complaints and appeals statistically and brings up these evaluations to the Management Review meetings.

4.5.8 In case that there is still continuation of appeal to the decision taken by the Complaint Committee and Appeal Committee and/or to USB Certification as a result of the complaint or appeal, the solution point is TR Courts. In the event of an appeal against the decisions taken by the USB Certification, the appellant is informed that they can appeal to a higher authority.

- For RA certification appeals, when the client disputes a certification decision or related matter it must agree to first follow "*Complaint and Appeal Procedure*" of USB Certification. In the event that the disagreement continues, client can submit the dispute to the RA grievance procedure. Client which have an appeal must agree that it will only take legal action against the RA upon the final disposition of its dispute through the USB Certification and the RA grievance procedures

4.5.9 Professional liability insurance is activated if the complainant and appellant suffer damage and is justified in its complaint and appeal.

4.6 Management of Complaints and Appeals Regarding Accreditation Bodies and Program Owners

4.6.1 The complaints regarding the professional conduct of employees or subcontractor that provide services for an accreditation body and program owners or regarding the general inner workings excluding the accreditation decisions of an accreditation body and certification decision of program owners are submitted according the policy and procedures provided by the accreditation bodies and program owners.

4.6.2 The methods, durations and processes for the complaints and appeals that will be submitted to accreditation bodies and program owners are specified in the table below

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N	Accreditation Body / Program Owner	Relevant Document	Subject of Complaint/Appeal and the Method of Notification
1	IOAS	Policy for Handling Complaints against IOAS	<ul style="list-style-type: none"> The reasons for a complaint must be related to the issues that are under the control of IOAS, and includes, not being limited by them, arbitrary decisions, unprofessional conduct, financial mismanagement, discrimination, unethical conduct, untimeliness, violation of conflict of interest and violation of confidentiality. The complaints are submitted to IOAS in writing. In all possible cases, relevant evidence is also submitted together. The complaints against IOAS are submitted to the Executive Director. Any complaints against Executive Director is submitted to President.
2	Textile Exchange	Complaints and Feedback Policy	<ul style="list-style-type: none"> The complaints regarding certified entities, other certification bodies and the other relevant parties are submitted to assurance@textileexchange.org in writing with relevant evidence. Response to the complaints regarding USB Certification, its certified entities and the other relevant parties are sent within 10 days with requested investigation results, information and corrective actions are/will be taken after after receipt of the complaint from Textile Exchange.
3	GOTS	Complaint Procedure	<ul style="list-style-type: none"> In cases of unauthorized, false or misleading use of the GOTS logo or other claims related to GOTS (certification), failures or omissions in the course of the GOTS certification procedure, any other abuses of the GOTS quality assurance or the signs system, an email to mail@global-standard.org is sent. A complaint letter should include the following: <ul style="list-style-type: none"> Name and contact details of the complainant Name and contact details of the addressee of the complaint Subject, description and substantiation of the complaint Any further relevant information.
4	RA	Graviance Procedure	<ul style="list-style-type: none"> A complaint is submitted to RA through the online grievance form The Rainforest Alliance will inform the submitter within 10 working days after receipt of the complaint if the complaint is found eligible. Within 10 working days after informing the submitter that the grievance is found eligible, the subject of the complaint sends in a written reaction and supporting evidence within 10 working days. Within 30 days following the deadline for receipt of information the Rainforest Alliance will inform the parties understanding of the situation and the proposed resolution. Either party may appeal the decision by the Rainforest Alliance on a complaint, or any other decision by the Rainforest Alliance, by submitting an appeal within 30 days after the notification of the decision. An appeal is also submitted to RA through the online grievance form

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N	Accreditation Body / Program Owner	Relevant Document	Subject of Complaint/Appeal and the Method of Notification
			<ul style="list-style-type: none"> The decision of the appeal panel shall be binding on all parties and no further grievance or appeal on the same matter will be accepted. Submitters and Rainforest Alliance retain the right to pursue other forms of remedial action after the conclusion of the RA appeal process.
5	BRCGS	BRCGS Complaints Investigation Process BRCGS Audit Result Appeal Process	<ul style="list-style-type: none"> For complaints, BRCGS can be contacted confidentially through: tell.brcgs.com Concerns regarding the status of a company's BRCGS certification or performance of a Certification Body or auditor are handled with the "BRCGS Complaints Investigation Process" procedure. Where sites believe that their Certification Body has not handled their appeal against raised non-conformities correctly, following discussion with your Certification Body in the first instance, an appeal may be raised with BRCGS in accordance to the appeal process outlined in "BRCGS Audit Result Appeal Process". BRCGS have a target to action complaints within 28 calendar days, however complaints may take up to 90 days to conclude, particularly where sites visits need to be arranged. If the site still has concerns regarding the non-conformities raised or the way the appeal has been handled, they may contact the Compliance Manager for BRCGS Standards at enquiries@brcgs.com or +44 (0) 207 854 8935. For this case, a summary of the investigation report and action taken by BRCGS and the Certification Body will be provided by the BRCGS to the person originally submitting the grievance within 30 calendar days of the original contact.

5.0 RECORDS

Document Number	Title or Description
UQMS-F-EN-2070	Complaint and Appeal Record Form
UQMS-F-EN-2080	Complaint and Appeal Monitoring Form
BRCGS005	BRCGS Complaints Investigation Process
UQMS-P-EN-2070	Committee Principals Procedure
UQMS-P-EN-2050	Complaint and Appeal Procedure
SA-R-GA-2	Rainforest Alliance Rules for Certification Bodies
PL0504	Objections and Appeals Policy
PL0511a	Policy for Handling Complaints against IOAS
ASR-110	Complaints and Feedback Policy
GOTS	Complaint Procedure
SA-PR-GA-1-V3	Grievance Procedure

BRCGS028	BRCGS Audit Result Appeal Process
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