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Purpose

This document defines how complaints, appeals and positive feedback shall be received and managed by SAI Global (see definitions).

References:

SAI Global Certification Authority QSM03 – Quality Manual and Promapp

Definitions:

Complaint	<p>A formal expression of dissatisfaction about SAI Global personnel, services, decisions and/or clients.</p> <p>Note:</p> <ol style="list-style-type: none">1. A minor issue dealt with and resolved through the daily working processes is not required to be actioned through this procedure.2. SAI Global Legal Counsel must be consulted in the cases that the legal representative of a 2nd or 3rd Party raises a complaint, appeal or other issue.
Feedback	<p>Information received by SAI Global in reaction to a product, a person's performance or a process which is used as a basis for improvement.</p> <p>Note:</p> <ol style="list-style-type: none">1. Feedback is received from a number of sources for example customer surveys, voice of the customer.2. Feedback does not necessarily result in a complaint and therefore may be handled differently for example via a systems improvement.
Appeal	<p>Formal request by Applicant or Licensee for review of the outcome of a complaint investigation.</p>
Certification Approved	<p>A Person authorised by SAI Global Certification Services Pty Ltd to make a certification decision.</p>
Decision	<p>The result of a review/investigation of the complaint or appeal.</p>

Responsibilities

The Global Head of PRC shall:

- Ensure that a member of staff is appointed to manage the implementation and maintenance of this procedure.

Regional R&C Managers shall:

- Provide reporting of complaints to local, regional or Global Impartiality Committees and Operations as required.
- Escalate an appeal to the Global Head of PRC to review and assign an independent review of the original decision.
- Identify and report complaints open in excess of 90 days to the relevant Accreditation Body (where required).

Each relevant functional area or region/location shall:

- Ensure that appropriate staff are assigned to coordinate management of complaints until closeout,
- Maintain the Feedback Register that is applicable to their functional area and/ or location.

The Feedback Register is accessible from GBP

<http://ourgateway.assurance.saiglobal.com/Client%20Records/Pages/FeedbackRegister.aspx>

Complaint Procedure

The process for complaints and appeals shall be available to the public via the SAI Global website.

Submission, investigation and the decision on appeals shall not result in any discrimination against the Appellant by SAI Global.

Process

Complaints can be received and recorded in the Feedback register by any member of staff.

Each complaint will be assigned a responsible person; this will normally be the person responsible for the client. They will notify the client of receipt of the complaint.

The responsible person will manage the complaint through to completion. This may need assistance from other staff i.e. Technical Manager.

Once a decision on the complaint is received the responsible person will advise the client of this decision.

If the Client wishes they can appeal the complaint decision.

Any additional or scheme specific requirements are outlined in sub-sections of this procedure.

Appeals Procedure

The process for complaints and appeals shall be available to the public via the SAI Global website.

Submission, investigation and the decision on complaints and appeals shall not result in any discrimination against the Appellant by SAI Global.

Process

Following the outcome of the complaint if the client wishes to raise an appeal the responsible person will request this in writing from the client.

Once written confirmation of an appeal request is received this will be sent to the Global Head PRC to review and assign an independent investigation of the original complaint.

Note: All information on the appeal will be added to the original complaint in GBP. The title of the original complaint will be amended to add the word "appeal" at the start; this will ensure SAI can determine appeals from complaints.

Each appeal will be assigned a responsible person. They will notify the client of receipt of the appeal.

Once a decision on the appeal is received the responsible person will advise the Global Head PRC of this decision.

The Global Head or Regional R&C Manager will advise the client of the outcome.

Any additional or scheme specific requirements are outlined in sub-sections of this procedure.

Additional Requirements for Complaints and Appeals involving the ema Accreditations

The Vice President Latin America, Sales and Operations, informs the Appellant of the plan for resolving the appeal within 10 working days of receiving the appeal. A copy of the plan is also sent to ema.

If the appellant does not agree with the decision issued, they may report this in writing to ema, attaching documents supporting the complaint. ema will send a copy to enable SAI Global to justify its decision taken. This must occur within 5 working days.

On completion of a review of the SAI Global report, ema may request SAI Global to reconsider its decision.

If a report is not issued by SAI Global, it will be considered that we have accepted the appeal from the customer and ema and SAI Global will proceed accordingly.

FSC Complaints, Disputes and Appeals

(Based on FSC-STD-20-001 V3-0)

The generic procedures apply in all cases except for the specific requirements of FSC as described in this Appendix

1.0 RESPONSIBILITY:

- 1.1 The Technical Manager- Forestry program is responsible for coordinating all activities relating to complaints, disputes and appeals. Also the maintaining of any associated records. If the Technical Manager- Forestry program was involved in the certification audit, then in this case the Vice President, Corporate Operations, Accreditation and Quality will designate a replacement.
- 1.2 The Vice President, Corporate Operations, Accreditation and Quality, Assurance Americas is responsible for the final resolution of complaints, disputes or appeals.
- 1.3 SAI Global is responsible for all decisions at all levels of the appeals and complaints handling processes. SAI Global ensures that the persons engaged in the appeals, complaints and disputes handling processes are different from those who carried out the audits, made the certification decisions. SAI Global will offer to a party making a complaint the opportunity to refer their complaint to FSC's dispute resolution process if the issue has not been resolved through the full implementation of its own procedures.

2.0 INVESTIGATION AND RESOLUTION OF COMPLAINTS or APPEAL:

- 2.1 Upon receipt of the complaint, dispute or appeal the Technical Manager of the Forestry program will arrange for this to be entered in the Feedback Register and provide an initial response, including an outline of the proposed course of action to follow up on the complaint, within two (2) weeks of receiving a complaint, dispute or appeal.
- 2.2 The Technical Manager-Forestry program or designee shall keep the complainant(s) informed of progress in evaluating the complaint, and shall have investigated the allegations and specified all its proposed actions in response to the complaint within three (3) months of receiving the complaint

- 2.3 Full implementation of actions and confirmation of implementation (e.g. correction and closing out of non-compliances that may have been identified as a result of the complaint) shall be completed in compliance with the respective FSC standards.
- 2.4 In the case of a certified company if the review or any other additional information indicates that the certified organization no longer complies with SAI Global requirements as defined in the Terms and Conditions (Form No. M025), the organization shall be re-audited or their certification terminated as per Guidance to suspension and reregistration process.

3.0 RECORDS:

Records of all of the above actions are attached in the Feedback Register.

SFI Public inquiries and official complaints

(Based on SFI 2015-2019 Program Section 11)

The generic procedures apply in all cases except for the specific requirements of SFI as described in this Appendix

1.0 RESPONSIBILITY:

- 1.1 The Technical Manager- Forestry program is responsible for coordinating all activities relating to complaints, disputes and appeals. Also the maintaining of any associated records. If the Technical Manager- Forestry program was involved in the certification audit, then in this case the Vice President, Corporate Operations, Accreditation and Quality will designate a replacement.

2.0 Official Complaints Questioning the Validity of a Certification to SFI 2015-2019 Forest Management Standard or SFI 2015-2019 Fiber Sourcing Standard

A complaint does not challenge the credibility or the content of the SFI 2015-2019 Forest Management Standard or SFI 2015-2019 Fiber Sourcing Standard, but rather it challenges the audit findings and the decision to grant the certification, or events that have happened since the last audit that questions the maintenance of the certification.

2.1 Complaint Process

The complainant outlines their concerns in a letter to SAI Global. SAI Global may request additional specifics associated with the concerns and will investigate the issue in accordance with its procedures that were approved by their accreditation body. If SAI Global finds a sound basis for the complaint then it would require the *Program Participant* to take corrective action to address the complaint and advise the complainant accordingly. If SAI Global did not find a sound basis for the complaint and felt the certification was appropriately granted and performance has not changed since the certification, SAI Global will inform the complainant of this. If the findings of SAI Global do not satisfy the complainant then they can move to the higher authority which is the body that accredited SAI Global, which is ANAB (www.anab.org). The accreditation body would then conduct its own investigation into the complaint as the highest authority. In the event litigation is involved between the external party and *Program Participant*, the complaint process shall be suspended pending resolution of the litigation. It shall be re-started following resolution of the litigation if SFI nonconformity issues remain.

3.0 Public Inquiries Regarding Inconsistent Practices and the ILO Core Conventions (87, 98 and 111)

Any party with information or claims about a *Program Participant's* individual practices that may be in nonconformity may seek to have those claims investigated. The complainant shall present specific claims of nonconformity in writing and in sufficient detail to the *Program Participant*. Within 45 days of receipt of the complaint, the *Program Participant* shall respond to the complainant and forward a copy of the complaint and its response to SAI Global for future review via surveillance or certification audits.

4.0 Challenges or Complaints regarding SFI On-Product Label Use (Section 5)

4.1 The *Office of Label Use and Licensing* will hear challenges or complaints regarding SFI on-product label use.

4.2 Any party with information or claims about the practices of an *SFI Program Participant* or *label user*, or questions about the validity of an SFI Section 3 or 4 (in the SFI requirements documents) certification and or SFI label use may seek to have those claims investigated, as outlined below.

1. The complainant should outline concerns in a letter to the certificate holder or *label user*.

2. Within 45 days, the certificate holder or *label user* shall respond to the complainant, and forward a copy of the complaint and response to SAI Global

3. SAI Global shall investigate the validity of the complaint based on the seriousness of the claim, and respond no later than the next annual assessment.

4. If the complainant is not satisfied, they may provide the original documentation and response to the SFI *Office of Label Use and Licensing*, which shall investigate and respond within 45 days.

5.0 RECORDS:

Records of all of the above actions are attached in the Complaint Register.

Complaints and Appeals for Global Food Programs

Appeals

Standard	Notification of Appeal from Client	Finalise Appeal
BRC Global Standards	7 calendar days from receipt of the certification decision	30 calendar days from receipt of the Appeal
IFS Standards	7 calendar days from receipt of the certification decision (SAI requirement, no specific IFS requirement)	20 working days from receipt of the Appeal

Client Complaints

Standard Owner	Acknowledge Complaint	Initial Response	Final Response
BRC Global Standards	No specific requirements		
IFS Standards	5 working days from receipt of the complaint	10 working days from receipt of complaint	After full investigation of complaint

Complaints about SAI Global (BRC referrals / IFS Integrity Program or complaints management)

Standard Owner	Timescales / Actions
BRC Global Standards	A report to be submitted to BRC within 28 calendar days of notification of complaint / referral
IFS Standards	<p>If the nature of the complaint is in relation to the quality of the IFS audit or audit report, the certification body must provide a response detailing the cause and measures put in place to rectify the issue within 2 weeks of notification of complaint</p> <p>If the complaint relates to an administrative error e.g. IFS audit report, certificate or database, the certification body must provide a response detailing the cause and measures put in place to rectify the issue within 1 week of notification of complaint</p>

RSPO Program Complaints and Appeals

1.0 RESPONSIBILITY:

- 1.1 The Certification Manager, Indonesia is responsible for coordinating all activities relating to customer complaints, appeals and nonconformance's raised against SAI Global Indonesia RSPO Certification Program, management systems and processes. Also the maintaining of any associated records. The Certification Manager, Indonesia is also responsible for ensuring that complaints and appeals are followed up in accordance with RSPO Grievance Procedure.
- 1.2 The complainant is responsible for providing the recipient of the complaint / nonconformance with the objective evidence to substantiate the complaint / nonconformance in writing. The complainant would be required to provide all of the following information to RSPO before a legitimate approach to raise a grievance can be considered:
1. Details and background on complainant, including information pertinent to demonstrate legitimacy as legal entity and also on issues raised, as well as contact person and information.
 2. Name of RSPO Member grievance made against.
 3. Nature of grievance described in detail and which of the four RSPO articles is being broken.
 4. Supporting evidence, including all possible documentation, etc. to directly support the complaint.
 5. Details of previous steps that where undertaken to seek resolution directly, prior to turning to this procedure.

6. Clear, concise and specific actions, activities that are needed to correct problems raised in complaint.

1.3 All SAI Global, Indonesia employees are responsible for immediately submitting complaints / nonconformance's received in the Feedback Register with appropriate objective evidence.

1.4 All SAI Global, Indonesia employees, partners, affiliates and contractors are responsible for handling all complaints / nonconformance's.

1.5 SAI Global, Indonesia is responsible for all decisions at all levels of the appeals, complaints and disputes handling processes. SAI Global, Indonesia ensures that the persons engaged in the appeals, complaints and disputes handling processes are different from those who carried out the audits, made the certification decisions and the day to day implementation of SAI Global policies. SAI Global, Indonesia will inform the body laying the complaint that Accreditation Services International (ASI) and /or the RSPO Secretariat is the final level of Appeal should SAI Global, Indonesia not be able to resolve the complaint to the satisfaction of the complainant.

2.0 COMPLAINT / NONCONFORMANCE RECORDING AND PROCESSING:

2.1 Complaints / nonconformance's are to be logged in the Feedback Register and assigned to the Certification Manager, Indonesia for review and;

a) Provide an initial response, including an outline of the proposed course of action to follow up on the complaint, within four (4) weeks of receiving a complaint if it's from an external party.

b) Based on the nature and complexity of the complaint / nonconformance the Certification Manager, Indonesia may set up a complaint resolution committee comprised at a minimum of 3 persons, one of them being the Certification Manager, Indonesia or designee. In addition to the Certification Manager, Indonesia or designee the complaint resolution committee may be comprised of the Managing Director of SAI Global Indonesia and/or RSPO Auditor(s).

c) If it is from an internal party, review the complaint / nonconformance with the complainant, and based on the seriousness and complexity of the issue, will determine the timeline required to clear the complaint / nonconformance.

3.0 INVESTIGATION AND RESOLUTION OF COMPLAINTS / NONCONFORMANCES:

3.1 Based on the due date the assigned individual (or the complaint resolution committee) performs a timely investigation to determine the root cause.

3.2 The Certification Manager, Indonesia or designee shall keep the complainant(s) informed of progress in evaluating the complaint, and shall have investigated the allegations and specified all its proposed actions in response to the complaint within six (6) months of receiving the complaint, extendable to twelve (12) months in exceptional circumstances.

3.3 Once the investigation is complete the result of the investigation is recorded in a written report.

3.4 Full implementation of actions and confirmation of implementation (e.g. correction and closing out of non-compliances that may have been identified as a result of the complaint) shall be completed in compliance with this procedure.

3.5 In the case of a certified company if the review or any other additional information indicates that the certified organization no longer complies with SAI Global requirements as defined in the Terms and

Conditions (Form No. QGD17IDN), the organization shall be re-audited or their certification terminated.

- 3.6 Upon effective resolution of the complaint, the person investigating and resolving the complaint / nonconformance, or the complaint resolution committee sends the written report to the initiator of the complaint / nonconformance to inform them of the results of the investigation and measures taken to address their concerns/issues. If the person or organization is not satisfied with the findings and measures taken to address their concerns/issues and dispute the findings it is then referred to RSPO Grievance Panel.
- 3.7 The complaint is considered closed once the initiator of the complaint and SAI Global, Indonesia agrees with the resolution of the complaint.

4.0 RECORDS:

Records of all of the above actions are to be saved to the Feedback Register.