

1.0 PURPOSE

The purpose 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/Program Owners/Authorized Bodies
- Compliance criteria defined by legal regulations
- Quality and compliance criteria defined in USB Certification's own standards, policies, procedures and guidelines

2.0 SCOPE

This procedure covers the receipt, documentation, and review of disputes, objections, and complaints that may arise from organizations or relevant parties regarding control activities/inspections and certification decisions conducted under USB Certification's Food and Agriculture Certification Department; the implementation of corrective and preventive actions if necessary; and the notification of relevant parties regarding the outcome.

3.0 RESPONSIBILITY

The Quality Manager (QM) and, when necessary, the Complaints Committee are responsible for the implementation of this procedure, the handling of complaints, and the decision-making process.

The Quality Manager is responsible for recording complaints and objections, tracking the personnel who receive complaints and the processes involved, and monitoring and coordinating corrective and preventive actions following the resolution of issues. The Appeal Committee is responsible for resolving appeals.

4.0 PROCEDURE

4.1 Definitions

Complaint: In cases where it is directed against USB Certification, this refers to written or verbal negative feedback received from individuals or legal entities regarding our company's policies, procedures, activities, performance, personnel, certified producers/producer organizations/entrepreneurs, etc., from the time the application is received until the issuance of the entrepreneur's certificate/certification, submitted to our company, the accreditation body, and the competent authorities (Turkish Ministry of Agriculture and Forestry, BRCGS, IFS, Rainforest Alliance, etc.).

Appeal: Appeals submitted to USB Certification constitute a situation where the relevant parties do not accept certification decisions and/or certificate levels. If the appeal is to be filed by USB Certification against the accreditation body, it constitutes a formal disagreement regarding a non-conformity issued by an auditor of the accreditation body during any audit activity concerning USB Certification or a change in the accreditation status.

4.2 Handling Incoming Complaints and Appeals

4.2.1 All complaints and appeals may be submitted in writing or verbally via the "*Complaint and Appeal Form*", through the website, by email to feedback@usbcertification.com , or by calling the phone number listed on the website.

¹ USB-PPS: USB Policy and Principals System

4.2.2 When complaints are received, the name of the individual or organization filing the complaint is also recorded. Complaints submitted on behalf of a group, such as a community or labor organization, must have at least one contact person to manage communications and other inquiries.

4.2.3 USB Certification will conduct an assessment regarding the risk of anonymous complaints; however, it is not obligated to investigate the complaint if sufficient preliminary evidence or information is not provided.

4.2.4 Upon receipt of the complaint, the person receiving it notifies the Quality Manager in writing or by completing the *“Complaint and Appeal Form.”* The Quality Manager verifies whether the complaint relates to certification activities under their responsibility. If the complaint relates to certification activities, the Quality Manager addresses it. If the *“Complaint and Appeal Form”* was not completed at the time of notification, it is completed.

4.2.5 If the complaint concerns a certified customer, the effectiveness of the certified product or management system is taken into account when investigating the complaint.

4.2.6 Any complaint regarding a certified client is immediately forwarded to the said certified client by the relevant Operations Responsible.

4.2.7 If complaints made to Accreditation Bodies or Program Owners are forwarded to USB Certification for investigation or follow-up, the complaint and objection process is applied as specified in the relevant section of this procedure.

4.2.8 All incoming notifications (complaints and objections) are recorded and transferred by the Quality Manager to the USB Pruva System and the *“Complaint and Appeal Monitoring Form”* for documentation.

4.2.9 The Quality Manager ensures that all stages of the process, from the submission of the *“Complaint and Appeal Form”* until the resolution of the complaint, are documented in a manner that allows for traceability. If the complaint is submitted in writing, the notification letter (e-mail, etc.) is also attached to this form.

4.2.10 BRCGS is routinely informed about complaints by the Quality Manager. Details can be found in the *“BRCGS040 BRCGS Certification Body Quarterly Report”*.

4.2.11 The Quality Manager reports received complaints and appeals to the Founder/CEO. When necessary, the Quality Manager appoints a Complaints Committee to address the matter for complaints. Appeals are referred by the Quality Manager to the Appeal Committee, and a decision is made following a meeting of the Appeal Committee.

4.2.12 The Quality Manager consults with the parties involved in the complaint (including inspectors, auditors, certifiers, and decision-makers) and any other individuals deemed appropriate. The Quality Manager ensures that the complainant is informed in writing of the outcome and, if necessary, of the actions to be taken regarding the complaint.

- For complaints related to IFS, a written confirmation acknowledging receipt of the complaint is sent to the complainant within a maximum of 5 business days.
- For complaints related to the Rainforest Alliance, a letter informing the complainant that their views have been received, the next steps in the process, and the expected timeframe for a resolution is sent within 10 calendar days.

4.2.13 Additionally, it reviews the audit and certification stages of the parties involved in the complaint and objection retroactively and ensures that any data regarding improper practices or areas requiring improvement is used for corrective actions.

4.2.14 The acceptance, investigation, and resolution of complaints and appeals submitted to USB Certification do not result in any discriminatory actions against the complainant.

4.2.15 USB Certification protects the confidentiality of the complainant unless the complainant authorizes USB Certification or the program owner to share the information, or the complainant publicly discloses such information.

4.2.16 For Rainforest Alliance activities, commercial or intellectual property information related to the audited activity shall not be disclosed in any public document related to the complaint without the written consent of the certificate holder.

4.3 Evaluation of the Complaint and Decision-Making

4.3.1 After the Quality Manager has fully understood the reasons for the complaint and the related issues and events, they will determine an action plan for resolving the complaint.

4.3.2 Possible reasons for complaints, as well as the timeframes and methods for resolving them, are outlined 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, • Inadequate or inaccessible documents that shall be known by the producer/producer organization/entrepreneur/company, • Late issuance and sending period of the certificate, etc. 	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.
2	Complaints that may affect the impartiality, independence and efficiency of the control/audit include, but are not limited to: <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	Support requested from USB Certification in order to resolve the complaints received by the program owners;	Required support in matters such as information/research/audit is provided according to the following documents: <ul style="list-style-type: none"> - Regarding BRCGS, "BRCGS005: BRCGS Complaints Investigation Process" - Regarding GOTS, "Approval Procedure and Requirements for Certification Bodies" - Regarding Textile Exchange, "Accreditation and Certification Procedures" - Regarding Rainforest Alliance, "Grievance Procedure" - Regarding IFS, "Framework Agreement on the auditing and certification of the International Featured Standards (IFS)"

4.3.3 The specific notification periods defined by the Program Owners regarding complaints are listed below.

- BRCGS requires that complaints be resolved and the parties are informed within 30 business days.
- For the Rainforest Alliance, complaints must be resolved within 30 calendar days. If an audit

investigation is conducted recomplete complaint, this period includes the process up to the issuance of the certification decision within the specified 30 days. If additional time is required, the relevant Program Manager will notify the Rainforest Alliance in a timely manner.

- For IFS complaints, an initial response will be provided within ten (10) business days of receiving the complaint. A complete and comprehensive written response will be provided once a full investigation into the complaint has been completed.

4.3.4 To evaluate such complaints, a meeting is convened by the Quality Manager, and the process is resolved with the participation of relevant staff. The decisions made are communicated in writing to the complainant.

- For complaints related to Rainforest Alliance certification, if the complaint record does not include contact information for a response, USB Certification defines the process and records the information in the Rainforest Alliance Assurance Platform.

4.3.5 If the parties involved deem the outcome of the decision insufficient, the matter is referred to the Complaints Committee by the Quality Manager.

4.3.6 Complaints regarding certified organizations may pertain to non-compliance with the rules governing the use of certificates and logos. Adherence to the principle of confidentiality is fundamental in the evaluation of such complaints. In special cases where public disclosure is necessary, the form and details of the announcement are the responsibility of USB Certification, and actions are taken in accordance with legal requirements.

4.3.7 If a complaint regarding products within the scope of certification is received, the certified organization must submit the content and reason for the complaint to USB Certification. It is required that individuals directly involved in the complaint not be included among those proposing corrective actions or addressing the cause and resolution of the complaint. The certified organization must ensure that relevant authorities are notified as required by law regarding the corrective actions to be taken, ensure compliance, and prevent the recurrence of such complaints.

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 the Appeal and Decision-Making

4.4.1 USB Certification has established an Appeals Committee to effectively evaluate all appeals listed below. The Appeals Committee consists of members of the Independence Committee who are knowledgeable about the subject of the appeal. The membership criteria and operating principles of the committee are outlined in the *“Procedure for the Operating Principles of Committees.”*

N	Appeal	Decision
1	Appeal to the control/audit result or to the decisions made after the complaint.	<p>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 filling form to them.</p> <p>The Appeal Committee meets within five (5) working days and makes its decision. The decision is sent to the relevant parties in writing (referring to the relevant regulation, standard or procedure, sending a copy if necessary), together with its reasons. The decision is recorded to the <i>“Complaint and Appeal Record Form.”</i></p> <p>As a result of the evaluation, if it is determined that there is a fault caused by USB Certification, the relevant Department/Unit 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	Appeal to the non-conformity / observation decision identified by the inspector after the control/audit	<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 decide 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>Appeller also has a right to appeal the decision of the Certification Manager. In this case, evaluation is made according to Article 1.</p>
3	Appeal to inspectors who will perform the control/audit	<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 writing. 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>

N	Appeal	Decision
		<p>If the appeal is found 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 writing to the party to be controlled/audited and further confirmation for the control/audit is requested.</p>
4	Appeal to the certification decision	<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 of the appeal. The Committee takes its decision within five (5) working days. The decision is sent to the relevant parties in writing (referring to the relevant regulation, standard or procedure, sending a copy when necessary), together with its reasons. The decision is recorded with the <i>“Complaint and Appeal Record Form.”</i></p>

4.4.2 In appeals related to Rainforest Alliance certification, appeals will not be resolved by modifying the scope of the certificate to address an issue within the scope of the certificate. The appeal is resolved within 30 calendar days and is recorded in the RACP by the relevant program manager, updating the process as the “appeal process.”

4.4.3 Objections related to IFS are resolved within 20 business days after information is obtained from the audited company.

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 is responsible for initiating this activity. According to the corrective action to be taken, if necessary, activities such as restrictions 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 Rainforest Alliance 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 Rainforest Alliance grievance procedure. Client which has an appeal must agree that it will only take legal action against the Rainforest Alliance upon the final disposition of its dispute through the USB Certification and the Rainforest Alliance 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 Objections Regarding Accreditation Bodies and Program Owners

4.6.1 Complaints regarding the professional conduct of individuals working for accreditation bodies or providing services to them as subcontractors, or regarding the operations of accreditation bodies other than their accreditation decisions, are handled in accordance with the policies and procedures provided by the accreditation bodies.

4.6.2 The methods, timeframes, and processes for submitting complaints and appeals to accreditation bodies are outlined in the table below.

No.	Accreditation Body / Program Owner	Relevant Document	Subject of Complaint/Objection and Method of Submission
1	RA	Grievance Procedure	<ul style="list-style-type: none"> • A complaint is submitted to Rainforest Alliance through the online grievance form • The Rainforest Alliance will inform the submitter within 10 working days after receiving the complaint if the complaint is found eligible. Within 10 working days after informing the submitter that 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 Rainforest Alliance through the online grievance form • 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 Rainforest Alliance appeal process.
2	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

COMPLAINT AND APPEAL PROCEDURE

No.	Accreditation Body / Program Owner	Relevant Document	Subject of Complaint/Objection and Method of Submission
			<p>handled with the "BRCGS Complaints Investigation Process" procedure.</p> <ul style="list-style-type: none"> 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.
3	IFS	<p>Framework Agreement on the auditing and certification of the International Featured Standards (IFS)</p> <p>IFS Food Standard Version 7 Clause 2.3</p>	<ul style="list-style-type: none"> IFS Management can receive complaints from retailers and complaints and information from certification bodies, employees of IFS certified companies or other real or legal entities. For this purpose, the official IFS complaint form on the website is used or emailed directly to IFS Quality Assurance. IFS decides whether the complaint is reasonable or not, based on a comparison between the content of the complaint and the information available through the IFS portal. If the complaint is unreasonable, IFS Quality Assurance Management will be contact with the complainant and informed of the final outcome of the investigation and the decision to close the case. The content of a reasonable complaint is usually communicated to the certification body with a request for internal review and a statement. If the complaint concerns the quality of the content of IFS audits or IFS audit reports, IFS Management will ask the certification body to provide an explanation of the cause of the problem and the actions taken to correct the problem within 10 working days. If the complaint is about administrative errors, IFS Management will ask the certification body to submit a statement and correct the problem within 5 working days. After the declaration of the certification body, if no additional information is requested and the reason for the complaint seems to be resolved, an agreement will be requested from the complainant to close the case. If the cause of the complaint cannot be definitively verified, or if the problem cannot be corrected after checking the statement, IFS Management will arrange an Integrity on-site Check. The complaint file is closed when the complainant receives the final summary of Integrity Check from IFS Management.

COMPLAINT AND APPEAL PROCEDURE

No.	Accreditation Body / Program Owner	Relevant Document	Subject of Complaint/Objection and Method of Submission
4	BCI	General Certification Requirements for Certification Bodies - GCR	<ul style="list-style-type: none"> • USB Certification will notify safeguarding@bettercotton.org within 48 hours of any safeguarding incident that relates to or may affect or impact Better Cotton. • Where appropriate, the CB will share information on whistleblowing events with Better Cotton by email to whistleblowing@bettercotton.org. • If a CB identifies a conflict of interest or perceived conflict of interest, the CB shall complete the Better Cotton Conflict of Interest Declaration available on the Better Cotton website and send it to Compliance@bettercotton.org.

5.0 RELATED DOCUMENTS AND RECORDS

Document Number	Title or Description
UQMS-F-EN-2070	Complaint and Appeal Form
UQMS-AGF-F-EN-2080	Complaint and Appeal Monitoring Form
BRCGS005	BRCGS Complaints Investigation Process
UQMS-P-EN-2070	Committee Principals Procedure
SA-R-GA-2	Rainforest Alliance Rules for Certification Bodies
SA-PR-GA-1	Grievance Procedure
BRCGS028	BRCGS Audit Result Appeal Process
---	IFS Food Version 8 (Clause 2.3)
---	Framework Agreement on the auditing and certification of the International Featured Standards (IFS)
	General Certification Requirements for Certification Bodies - GCR
BRCGS028	BRCGS Audit Result Appeal Process