

## 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-PPS<sup>1</sup> and process and operations under the scope of Textile and Recycling Certification Department, 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 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

Technical and Quality Manager of relevant department and Complaint Committee are responsible for the implementation of this procedure, handling complaints and making decisions. The Technical and Quality Manager is responsible for recording complaints and appeals, and for monitoring and coordinating corrective and preventive actions following the relevant procedures. Appeals Committee is responsible for resolving 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, Textile Exchange, Better Cotton Initiative (BCI), SFA).

**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 appeal.

### 4.2 Handling Incoming Complaints and Appeals

**4.2.1** All kinds of complaints and appeals can be made in writing or verbally with the "*Complaint and Appeal Form*", via the website or to the e-mail address [feedback@usbcertification.com](mailto:feedback@usbcertification.com) by calling the phone number listed on the website.

**4.2.2** While receiving complaints, the name of the person/organization of complainant is also recorded. With proof of legitimate representation, complaints submitted on behalf of a group such as a community or a workers' organization must have at least one contact person to manage contact details and other enquiries.

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<sup>1</sup> USB-PPS: USB Policy and Principals System

**4.2.3** USB Certification will assess the risk associated with anonymous complaints; however, it is under no obligation to investigate the complaint unless sufficient preliminary evidence or information is provided.

**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 organization, then examination of the complaint shall consider the certified product/management system effectiveness.

**4.2.6** Complaints subject to an investigation obligation shall be handled by the USB Certification Technical and Quality Manager. Complaints shall be forwarded without delay to the certified company in question by the Technical and Quality Manager or the relevant program manager.

**4.2.7** If complaints submitted to Accreditation Bodies or Program Owners are forwarded to USB Certification for investigation or follow-up, the complaint and appeal process shall be carried out as specified in this procedure.

**4.2.8** All complaints and appeals received are recorded and forwarded to the Technical and Quality Manager; they are then transferred to the Complaint Management Module within the USB Pruva system, where they are logged and monitored.

**4.2.9** Technical and Quality Manager ensures that all stages until the conclusion of the complaint are recorded in a traceable manner with the Complaint Management Module. If the complaint is in verbal form, the organization letter is also attached to this form.

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

**4.2.11** The members of the Complaints Committee or Appeals Committee responsible for assessing the complaints or appeals in question, or for taking decisions on them, shall consist of persons who have not been involved in the activities of the certification process that is the subject of the complaint. Furthermore, these persons must not have provided any consultancy services to the certified organization that is the subject of the complaint or appeal within the last two years, nor must they have been employed by that company.

**4.2.12** Technical and Quality Manager interviews the parties involved in the complaint (including auditors, certifiers and decision-makers) and any other persons deemed appropriate. Based on the outcome, and where necessary, Technical and Quality Manager ensures that the complainant is informed in writing or, if the complainant lacks access to written communication channels or has difficulty accessing them, informs them verbally of the actions to be taken in relation to the complaint.

**4.2.13** In addition, Technical and Quality Manager retrospectively reviews the audit and certification stages of the parties involved in complaints and appeals, and ensures that any findings of non-conformity or areas requiring improvement are used as data for corrective action.

**4.2.14** The acceptance or rejection of complaints and appeals submitted to USB Certification, as well as the investigation and decision-making process, must not be conducted in a manner that involves threats, retaliation, intimidation, harassment or discrimination against the complainant or appellant.

**4.2.15** Where the complainant or appellant belongs to a vulnerable group, such as women or migrant workers, and/or has a disability, such as a language barrier, physical disability or reading difficulty, reasonable adjustments must be made to ensure that the complaints or appeals process can proceed.

**4.2.16** USB Certification will protect the complainant's privacy unless the complainant authorises USB Certification or the programme owner to share the information, or unless the complaint is made public.

**4.2.17** USB Certification must keep the complainant or appellant informed at every stage regarding the progress, outcome and current status of the complaint or appeal.

### 4.3 Evaluation of Complaints and Decision Making

**4.3.1** Technical and 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"> <li>• Inability to reach the relevant persons,</li> <li>• Late offer,</li> <li>• Inadequate or inaccessible documents that shall be known by the producer/producer organization/entrepreneur/company,</li> <li>• Late issuance and sending period of the certificate, etc.</li> </ul>	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"> <li>• Attitude and behavior of the control/audit team,</li> <li>• Unethical behavior of the control/audit team.</li> <li>• Any difference in the interpretation of standards</li> <li>• Failure to use appropriate methods in control/audit,</li> <li>• Failure to comply with the control/audit plan,</li> <li>• Control/audit does not provide added value, etc.</li> </ul>	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.

**4.3.3** Where accreditation bodies or programme providers specify how and within what timeframe complaints are to be addressed, USB Certification shall follow these guidelines. However, for complaints received from programme providers or accreditation bodies that do not provide any such guidelines, the procedure set out in 4.3.4.2 shall be followed.

**4.3.4** In the case of complaints received from accreditation bodies or programme providers, the following requirements must be met.

**4.3.4.1 Textile Exchange:** An initial response must be provided to Textile Exchange within 14 calendar days of the complaint being received. USB Certification will conduct its own review/investigation and submit its resolution to Textile Exchange within 30 calendar days. Should Textile Exchange request additional information from USB Certification (e.g. audit reports, supporting documents for a transaction certificate issued) or information regarding the status of the matter, such information must be provided.

**4.3.4.2 Global Standard:** Within 5 days of the complaint being received, confirmation must be provided that the complaint has been received; within 10 days, information must be provided regarding the investigation being conducted in relation to the complaint. If information regarding the

investigation cannot be provided within 10 days, a realistic timeline must be submitted to Global Standard.

**4.3.4.3 Other:** Within 1 business day of the complaint being received, confirmation must be provided that the complaint has been received. This confirmation should also include an indication of the timeframe required to resolve the complaint or to provide feedback on it.

**4.3.5** In order to evaluate such complaints, a meeting is organized by Technical and Quality Manager and the process is decided with the participation of the relevant personnel. The decisions taken are communicated to the complainant in writing.

**4.3.6** 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 Technical and Quality Manager.

**4.3.7** 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.

**4.3.8** 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.

**4.3.9** USB Certification may decide to conduct an audit at the certified organization in order to investigate complaints concerning that organization. The audit report must clearly state the findings regarding the examination of the matter that is the subject of the complaint.

**4.3.10** The activities that USB Certification will carry out with the certified body, depending on the complainant or the nature of the complaint, are set out in the table below.

<b>1</b>	Using the logo and the right to use documents outside of the specified scope	<p>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.</p> <p>(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.)</p>
<b>2</b>	Misuse of the logo of the accreditation body / program owner	
<b>3</b>	Complaints / feedback from the relevant chambers or professional groups affiliated to or a member of the certified organization	
<b>4</b>	Complaints or feedback from individuals working for a certified organization or associated with a certified organization	
<b>5</b>	Complaints / feedbacks from relevant parties benefiting from the certified organization's product	<p>In case of a justified complaint, the continuation of customer satisfaction is maintained by:</p> <ul style="list-style-type: none"> <li>• Unannounced audit is performed within a month,</li> </ul>

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		<ul style="list-style-type: none"> <li>• 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.</li> <li>• Taking this situation into consideration in the next control/audit (such as surveillance, document renewal).</li> </ul>
6	Complaints from accreditation body, ministries, standard owners	<p>The necessary investigations are made within a maximum of 10 days and the corrective action plan is sent to the relevant party.</p> <p>(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.)</p>

### 4.4 Support Requests for the Handling of Complaints

**4.4.1** The necessary support regarding matters such as information, investigations and audits requested by accreditation bodies and programme owners from USB Certification in order to resolve submitted complaints is provided in accordance with the following documents.

Regarding BCI, “General Certification Requirements for Certification Bodies”

Regarding Global Standard, “Approval Procedure and Requirements for Certification Bodies”

Regarding Textile Exchange, “Accreditation Certification Procedures for Textile Exchange-Standards” and “Complaints Policy”

Regarding IOAS, “Complaints Against Accredited Certification Bodies”

Regarding SFA, “CAB Oversight Manual”.

### 4.5 Evaluation of Appeals and Decision Making

**4.5.1** USB Certification has established an 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.	<p>Technical and Quality Manager first ensures that the appeal form is completed in the USB Pruva Complaint Management Module and that the form, along with the appeal and all stages up to its resolution, are recorded in a manner that allows for full traceability. 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.</p> <p>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 necessary), together with its reasons. The decision is recorded in the USB Pruva Complaint Management Module.</p> <p>As a result of the evaluation, if it is determined that there is a faulty caused by USB Certification, the relevant Department/Unit Manager is responsible for the preparation of corrective actions, while Technical and Quality Manager is responsible for the implementation of corrective actions as well as follow-up.</p>

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N	Appeal	Decision
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. Technical and 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"> <li>• Approval of the inspector's/auditor's recommendation,</li> <li>• Replacement of inspectors/auditors, full or partial control/audit again,</li> </ul> <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	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 Technical and Quality Manager in written. Technical and 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	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 Technical and Quality Manager in written. Technical and 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>

**4.5.2** Any objection received by the BCI must be resolved within 30 calendar days. If this is not possible, a written explanation and a revised timeline must be shared with the objector.

### 4.6 Actions to be Taken Regarding Complaints and Appeals

**4.6.1** All complaints and appeals received are recorded and kept in USB Pruva Complaint Management Module. Along with the records, any document or evidence obtained about this subject is attached and kept.

**4.6.2** 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.

**4.6.3** 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.

**4.6.4** 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.

**4.6.5** 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. Technical and Quality Manager is 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.

**4.6.6** Technical and Quality Manager statistically analyses information relating to complaints and objections received and raises these analyses at Management Review meetings.

**4.6.7** Should an appeal against a decision taken by the Complaints Committee, the Appeals Committee and/or USB Certification following a complaint or appeal lodged with USB Certification continue, the appellant shall be informed that they may appeal to a higher authority (accreditation body, programme owner, etc.). Should the objection remain unresolved with the higher authority and the objection is continued, the relevant party is informed that the matter may be referred to the courts of the Republic of Türkiye.

**4.6.8** Professional Liability Insurance comes into effect if the complainant or objector has suffered a loss and their complaint or objection is found to be justified.

### **4.7 Management of Complaints and Appeals Regarding Accreditation Bodies and Program Owners**

**4.7.1** 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.

**4.7.2** 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

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"> <li>• 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.</li> <li>• The complaints are submitted to IOAS in writing. In all possible cases, relevant evidence is also submitted together.</li> <li>• The complaints against IOAS are submitted to the Executive Director. Any complaints against Executive Director is submitted to President.</li> </ul>

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N	Accreditation Body / Program Owner	Relevant Document	Subject of Complaint/Appeal and the Method of Notification
2	Textile Exchange	Complaints and Feedback Policy	<ul style="list-style-type: none"> <li>The complaints regarding certified entities, other certification bodies and the other relevant parties are submitted to <a href="mailto:assurance@textileexchange.org">assurance@textileexchange.org</a> with the Textile Exchange Complaint Form together with the relevant evidence.</li> </ul>
3	GOTS	Complaint Procedure	<ul style="list-style-type: none"> <li>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 <a href="mailto:mail@global-standard.org">mail@global-standard.org</a> is sent.</li> <li>A complaint letter should include the following: <ul style="list-style-type: none"> <li>Name and contact details of the complainant</li> <li>Name and contact details of the addressee of the complaint</li> <li>Subject, description and substantiation of the complaint</li> <li>Any further relevant information.</li> </ul> </li> </ul>
4	BCI	General Certification Requirements for Certification Bodies - GCR	<p>USB Certification will notify <a href="mailto:safeguarding@bettercotton.org">safeguarding@bettercotton.org</a> within 48 hours of any safeguarding incident that relates to or may affect or impact Better Cotton.</p> <ul style="list-style-type: none"> <li>Where appropriate, the CB will share information on whistleblowing events with Better Cotton by email to <a href="mailto:whistleblowing@bettercotton.org">whistleblowing@bettercotton.org</a>.</li> <li>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 <a href="mailto:Compliance@bettercotton.org">Compliance@bettercotton.org</a>.</li> </ul>
5	SFA	Complaints & Disgutes Resolution Procedure	<p>USB Certification will report any incident relating to SFA or that may affect SFA via the <a href="#">SFA Open Feedback Portal</a> as complaint.</p>

### 5.0 RELATED DOCUMENTS AND RECORDS

Document Number	Title or Description
UQMS-F-EN-2070	Complaint and Appeal Record Form
UQMS-P-EN-2070	Committee Principals Procedure
PL0504	Objections and Appeals Policy
PL0511a	Policy for Handling Complaints against IOAS
PL0511b	Complaints Against Accredited Certification Bodies
ASR-110	Complaints and Feedback Policy
GOTS	Complaint Procedure

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BCI	General Certification Requirements for Certification Bodies – GCR
SFA	CAB Oversight Manual
SFA	Complaints & Disputes Resolution Procedure