



APPEAL AND COMPLAINTS PROCEDURE

1. Purpose

The purpose of this procedure is to define the actions to be taken if a complaint or appeal is received from a client, other external bodies or other parties concerning decisions associated to the certification process or certificate program to ensure they are handled in a professional and timely manner.

2. Scope

The complaints and appeals addressed to PECB about an auditor, Lead Auditor, senior auditor and or expert, i.e., for breaching the code of ethics, and/or in specific schemes/programs for breaching the code of conduct, or to the certification/certificate program process, i.e., activities by which a certification body determines that a person fulfills certification requirements, including the application, assessment, decision on certification, recertification and use of certificates and logos/marks, or to the certification program.

***This procedure is not applicable for complaints related to alleged illegal, financial, or regulatory issues, which will be handled by proper authorities.**

3. Responsibilities

Managing Director
Certification Manager
Quality Manager
Appeal Member(s) / an Investigator

4. Definition

APPEAL: Request by applicant, or certified person for reconsideration of any decision made by the certification body related to desired certification status.

COMPLAINT: A complaint is an expression of dissatisfaction or concern raised by any person or organization, other than an appeal, directed towards the Certification Body concerning its certification activities, services, or the absence thereof.

5. Procedures

5.1 General Rules

- By submitting a complaint or an appeal, any complainant commits to reporting facts completely and truthfully.
- Any complainant who provides any proven false statements will see their entire complaint or appeal terminated.
- Any unsubstantiated elements — not supported with real evidence — of a complaint or an appeal (hearsay, rumors, unproven accusations, etc.) will not be taken into consideration in any complaint or appeal.
- The Complaint and Appeal procedure does not deal with alleged illegal, financial, or regulatory issues.
- The Complaint and Appeal procedure does not deal with issues for which the deadlines to submit complaints and/or appeals have been reached (30 calendar days after last days from certification or re-certification initial decision)
- No complaint will be processed if it is made anonymously. Complainants must provide personal



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information.

- If applicable, all complaints need to be shown to the individuals being complained against so that they can have an opportunity to respond. If the complainant does not give the authorization for the complaint to be shown to the person or function being complained against, the complaint will not be processed.
- All reports, findings, and materials created, collected, or submitted in connection with the Complaint and Appeal procedure, including but not limited to information submitted by a Complainant or a Respondent, are NGCL confidential property. Materials submitted to NGCL in connection with a Complaint or an Appeal will not be returned unless agreed to prior by the Complainant or Respondent and NGCL.
- NGCL will take reasonable measures to ensure that any files resulting from implementation of this Complaint and Appeal procedure shall be and remain confidential except as required by law, or as necessary to fully investigate a complaint and appeal. Parties are encouraged to maintain confidentiality.

5.2 Acknowledgement of Receipt

Upon receiving complaints and appeals, the sender will be acknowledged within five working days, if received via e-mail and immediately if received via website. The Managing Director (MD) will then collaborate with the relevant party to resolve the matter. When addressing complaints and appeals from individuals not affiliated with NGCL, careful consideration will be given to whether it is appropriate to respond, taking potential liability into account. In such instances, the response content will be coordinated with the client.

5.3 Appeal & Complaint Handling Processes

When client disagree with the decisions made by NGCL related to their certification process / or have any complaint, they must declare in writing the reasons for disagreement to NGCL, and ask for a re-evaluation, via email or website, within 30 calendar days from receiving NGCL initial decision. Re-evaluation requests received after 30 days will not be processed. Re-evaluation requests are not considered complaints.

***The submission, investigation, and decision on certification/certificate program complaints will not result in any discriminatory actions against the complainant.**

5.3.1 Review Appeal Document:

MD, CM and QM responsible for:

- Carefully examine the appeal document to understand the specific concerns raised by the appellant and identify key points, relevant facts, and any supporting documentation provided.

5.3.2 Verify Information

MD, CM and QM responsible for:

- Cross-check the information provided in the appeal with the records and relevant documentation available and ensure accuracy and completeness of the information.
- Determine the policies, procedures, or regulations that are relevant to the issues raised in the appeal.
- Assess whether the appeal complies with established guidelines.



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5.3.3 Assign Appeal Member(s) / an Investigator:

The members of the Appeal are qualified, independent, and impartial members / investigator to handle the appeal investigation assigned by NGCL. If a member or members of the Appeal have a conflict of interest, based upon the facts or circumstances of a specific appeal, including employment or other affiliations of the appellant, NGCL management in conjunction with the Appeal will select a substitute member or members to hear and decide upon that claim.

5.3.4 Gather Additional Information

- If needed, Appeal Member(s) / an Investigator gather additional information from involved parties, witnesses, or other relevant sources and,
- Document all information obtained during the investigation.

5.3.5 Interview Involved Parties:

- Appeal Member(s) / an Investigator Conduct interviews with the appellant, relevant staff, and any other individuals with pertinent information and,
- Encourage open communication and ensure all perspectives are considered.

5.3.6 Document Findings:

- Appeal Member(s) / an Investigator Clearly document the findings of the investigation, detailing the facts, statements, and evidence gathered and,
- Identify any areas where policies or procedures may not have been followed (Identify the root cause).

5.3.7 Evaluate Compliance:

- Appeal Member(s) / an Investigator Assess whether the actions or decisions in question comply with applicable policies, laws, or regulations.
- Determine if any corrective actions are necessary.

5.3.8 Draft a Report:

- Appeal Member(s) / an Investigator prepare a comprehensive report summarizing the investigation, findings, and recommendations include a clear and objective analysis of the situation.

5.3.9 Provide Opportunity for Response:

- Appeal Member(s) / an Investigator share the investigation report with the appellant and other relevant parties within 30 working days and allow them an opportunity to respond to the findings and provide additional information if necessary.

5.3.10 Review and Decision

- Appeal Member(s) / an Investigator Review the responses received and consider any additional information and make a fair and informed decision based on the investigation findings.

5.3.11 Communicate the Decision

- Appeal Member(s) / an Investigator communicate the decision to the appellant and other parties involved and provide a clear explanation of the decision and any recommended actions.



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5.3.12 Implement Corrective Actions and Follow-up

- If necessary, implement corrective actions based on the investigation findings.
- Monitor and ensure compliance with any recommendations or changes.
- Follow-up the corrective action to ensure the effectiveness of the action.
- All evidence, including documents, meeting minutes, findings, and reports, must be preserved and retained for traceability purposes.

Appeals are addressed at the decision-making level and are considered in the NGCL's Impartiality meeting.

5.3.13 Clouser timeframe

NGCL allows a max. timeframe of 90 calendar days from the receipt of the appeal/complaint for closure. If the client is dissatisfied or if the complaint remains unresolved, the client is granted the freedom to approach the Accreditation Board.

***Throughout the appeal investigation process, it's crucial to maintain transparency, fairness, and thorough documentation to ensure a credible and well-documented outcome.**