

## 14.a Introduction

Version: 1.0  
Date: 25th March 2025

### 14.b General

The aim of this procedure is to provide correct and efficient registration, handling and evaluation of complaints, appeals, concerns and claims, to prevent repetition of mistakes and if possible, to satisfy the complainant or appellant. Implementation and follow-up of measures are aimed at improving the quality of CU UK C certification activities.

CU UK C distinguishes between appeals, complaints, concerns and claims.

An **appeal** is a formal notification of disagreement with a (certification) decision within a certification process, or request by the provider of the object of conformity assessment to CU UK C for reconsideration of a decision it has made relating to that object.

A **complaint** is a formal notification of dissatisfaction, other than an appeal, by any person or organisation regarding a CU UK C employee's behaviour, CU UK C methodology, or work executed under contractual responsibility of CU UK C by an L2 office or subcontractor, where a response is expected. Where the dissatisfaction relates to a (certification) decision within a certification process of CU UK C, this must be submitted as an appeal, not a complaint.

A **concern** is either an expression of dissatisfaction by any person(s) within the CU UK C organisation, or a complaint that for some reason cannot be admitted and handled as a complaint (for example because it was submitted anonymously), or allegations. These issues are considered to be of such severity that follow-up is advisable, provided that the concern relates to activities within a certification process of CU UK C. Concerns may be used as starting points of trajectories for internal improvement.

A **claim** is a formal request for a financial or legal settlement, not to be considered as complaints or appeals. Claims are resolved by the Director Certifications and financial and / or legal departments. Elements crucial to CU UK C's procedures, are mentioned in this section.

QM = Quality Manager  
TM = Technical Manager  
SM = Scheme Manager

Some schemes have different processes in how appeals and complaints are handled (e.g. MSC and ASC-MSD Seaweed). Refer to Scheme Specific Documentation / CU UK C Programme Manuals.

### 14.c Appeal

Appeals may be submitted using the A23 Complaint/Appeals/Concern Registration Form, as available on the website. All relevant information regarding the appeal shall be submitted by the appellant. Information to be included in the appeal are:

- Nature of the appeal ("who, what, where, when").
- Subject matter.
- Objective evidence (where applicable).
- Appeals shall be submitted in writing. Appeals by means of a telephonic conversation is not acceptable.



- Appeals shall be submitted in one of the following languages: English/Dutch (unless otherwise agreed between the local office and the appellant).

The appellant does have the option to not use the formal 'A23 Complaint/Appeals/Concern Registration Form' and rather submit the appeal by email. This is allowed on the basis that all relevant information and evidence is included in the email sent by the appellant. To avoid misunderstandings about the nature of the appeal between the appellant and CU UK C, appeals must always be submitted in writing and in English, unless otherwise agreed.

Appeals must be submitted to the responsible CU UK C L2 office within 6 (six) weeks of the (certification) decision that gave rise to the appeal. Appeals submitted before the ongoing certification decision process has been completed will not be construed as appeals but will be included in the rolling certification decision process.

Appeals may be deemed inadmissible and rejected by CU UK C when:

- Insufficiently substantiated or incomplete.
- A (certification) decision for which CU UK C is not responsible.

Appeals received related to some schemes are subject to separate or additional dispute procedures as specified in the applicable contract. These are MSC, ASC-MSC Seaweed (see also their specific organizations websites).

Process:

The appeal will be reported to the Director Certifications, Director L2, TM or SM that has responsibility for the challenged activities (from now on referred to as the manager). They assign employees to investigate the appeal. Employees managing the appeal, including those participating in review, approval and decision-making, shall not have been involved in the assessment process or the certification decision. Employees who have provided advice or were employed by that client in the two years prior to the filing of the appeal are not allowed to take part in the review or approval of the final outcome.

If the appellant and the L2 office are unable to reach an agreement together, or if the L2 office in question cannot handle the appeal due to a potential conflict of interest (e.g. if the only certifier in the L2 office for that specific program is the certifier who took the certification decision) will the appeal be handed to one of the QM managers of the L1 office. Depending on the nature of the appeal, the the QM may be informed, as deemed applicable. They will decide whether it is necessary to involve the Director L2 in the handling process. For very serious appeals, it may be preferred for the Director L2 to handle the appeal themselves.

Receipt of the appeal will be acknowledged in writing to the appellant within 10 (ten) calendar days of receipt of the appeal. This acknowledgement must include, at a minimum, the following:

- an intended timeline for handling the matter;
- an initial proposal for steps to be taken to follow up on the issue;
- whether the appeal relates to (certification) decisions for which CU UK C is responsible and therefore admissible;
- CU UK C may provide suggestions on how to proceed, will strive to resolve the appeal in a timely manner and will take all follow-up actions necessary to resolve the appeal.

Assigned employees will gather and verify all necessary information (to the extent possible), including the root cause analysis, corrections and corrective actions, if any. A24 Complaint, Appeal and Concern Investigation Report may be used for this purpose.

The manager will review the outcome of the investigation. They may decide to consult the L1 office; the L1 office may decide to consult its Advisory council. Then the Director Certifications, Director L2, TM or SM, makes a decision after careful consideration of all information. The decision shall be approved by the QM.

Following the approval of the decision, the assigned employees will formally notify the appellant of the outcome at the end of the handling process within the previously indicated time frame, and preferably within 3 (three) months of receipt of the appeal.

The outcome of the appeal will be communicated to the appellant, in writing. Assigned employees will record:

- the appeal,
- its outcome,
- all relevant communications
- any action taken to resolve the appeal, including any identified correction and corrective action, with the appeal in the relevant information system.

Depending on the solution(s) provided, the manager will notify relevant parties of the outcome of the appeal, implement the identified corrections and corrective actions, and handle follow-up on the appeal as necessary.

CU UK C will keep the appellant informed of the progress of the appeal review, especially if there is a risk of exceeding the specified deadline.

Submission, investigation and decision on appeals shall in no case result in discriminatory action against the appellant.

See the end of the document for visual depiction of the appeal process.

#### **14.d Complaint**

Complaints may be submitted using the A23 Complaint/Appeals/Concern Registration Form, as available on the CU UK C website. The form is designed to obtain all relevant information from the complainant, specifying as best as possible the nature of the complaint ("who, what, where, when"), clearly defining the subject matter and gathering relevant objective evidence where applicable. However, if the customer does not use the form, but instead provides the complaint for instance by mail, with all relevant information and evidence, failure to use the form is not grounds for rejecting the complaint.

To avoid misunderstandings about the nature of the complaint between the complainant and CU UK C, complaints must always be submitted in writing and in English or Dutch, unless otherwise agreed. Complaints submitted by telephone are not acceptable. This also to avoid an appearance of self-interest on the part of CU UK C afterwards.

Complaints must be submitted to the relevant L2 office of CU UK C within 6 (six) weeks of the event giving rise to the complaint. Complaints that are insufficiently substantiated or incomplete may be deemed inadmissible and rejected by CU UK C. Some programs are subject to separate or additional

dispute procedures as specified in the applicable contract. These are MSC, ASC-MSC Seaweed (see also their specific organizations websites). Complaints not related to certification activities for which CU UK C is responsible will also be deemed inadmissible.

If the complaint is submitted anonymously, CU UK C must conduct an assessment to determine whether the complaint still contains elements that are of such serious nature that follow-up is required. In these scenarios, the complaint is registered as a 'Concern' and the management becomes an exclusively internal exercise; informing and coordinating with external parties is normally no longer relevant.

Complaints filed on behalf of a group, such as a community or union organization, will have at least one relevant contact person to manage communications and further investigations.

CU UK C will ensure confidentiality of the identity of the complainant, unless confidentiality of the identity of the complainant precludes valid handling of the complaint. In such case, this will be discussed with the complainant. If the complainant insists on the confidentiality of his/her identity, CU UK C may have to come to the conclusion that it cannot properly resolve the complaint and will declare the complaint inadmissible. Confidentiality of the complainant's identity is lifted by the complainant's authorization of the CB to share the information or when the complainant him-/herself shares the information publicly.

Process:

The complaint is initially reported to the Director Certifications, Director L2 or SM that has responsibility for the challenged activities (hereafter referred to as the manager) . Only if the complainant and the L2 office cannot reach an agreement together, or if the complaint concerns a matter that directly affects the L1 office's management system, including means and methods, will the complaint be handed over to a QM or TM.

The manager initially handling the complaint determines whether the complaint is admissible.

1. If it is determined not to be admissible, the complainant and, if applicable, other interested parties will be notified and the handling process will end.
2. If the complaint is deemed admissible, the handling manager determines whether the complaint has affected or could affect the validity of a client's certification decision process. If it does not, the QM / operations manager hands the complaint to the appropriate scheme manager or certifier for further management, including communication with the client, evaluation, decision making and recording the complaint in the relevant information system.

If the complaint does affect, or can reasonably be expected to affect, the validity of a client's certification decision process, then the manager will handle the complaint and decide whether it is necessary to involve the Director, as applicable, of the L1 or L2, in the handling process. For very serious complaints, it may be preferable for the Director L2 to handle the complaint him-/herself. The manager will assign employees to investigate the complaint.

- Complaints directly relating to means and/or methods are assigned to the TM.
- Complaints directly relating to management system procedures are assigned to the QM.

Employees managing the complaint, including those participating in review, approval and decision-making, may not have been involved in the assessment process or the certification decision. Employees, including executives, who have provided advice or were employed by that client in the two

years prior to the filing of the complaint are not allowed to take part in the review or approval of the final outcome.

The assigned employees acknowledges receipt of the complaint in writing to the complainant within 10 (ten) calendar days of receipt of the complaint. This acknowledgement must include, at a minimum, the following:

- a proposed timetable for addressing the issue.
- an initial proposal for steps to be taken to follow up on the issue. Records the complaint in the relevant information system.
- Gather and verify all necessary information (to the extent possible), including a root cause analysis, and make suggestions on how to proceed, including corrections and corrective actions, if any.
- CU UK C will strive to resolve the complaint in a timely manner and will take all follow-up actions necessary to resolve the complaint.
- If the complaint involves a customer who is certified for a management system scheme, the investigation of the complaint should include consideration of the effectiveness of the certified management system.

Assigned employees will gather and verify all necessary information (to the extent possible), including the root cause analysis, corrections and corrective actions, if any. A24 Complaint, Appeal and Concern Investigation Report may be used for this purpose.

The manager reviews the outcome of the assessment and informs the MD, if relevant. The Director L2 office may decide to consult the L1 office; the L1 office may decide to consult its Advisory Council. Then the manager makes a decision after careful consideration of all information. The decision shall be approved by the QM.

Following the approval of the decision, the assigned employees will formally notify the complainant of the outcome and the end of the handling process within the previously indicated time frame, and preferably within 3 (three) months of receipt of the complaint.

The outcome of the complaint will be communicated to the complainant, in writing. Assigned employees will record:

- the complaint,
- its outcome,
- all relevant communications
- any action taken to resolve the complaint, including any identified correction and corrective action, with the complaint in the relevant information system.

Depending on the solution(s) provided, the manager will inform relevant parties of the outcome of the complaint, implement the identified corrections and corrective actions and handle the follow-up of the complaint if necessary.

CU UK C will keep the complainant informed of the progress of the review of the complaint, especially if there is a risk of exceeding the specified time limit.

Complaints about a certified client that have gone through the complaint procedure must be referred by CU UK C to that certified client within an appropriate period. If requested by the complainant, the anonymity of the complainant will be preserved. CU UK C will work with the certified client and the complainant to determine whether, and if so to what extent, the subject of the complaint and its resolution will be disclosed.

Filing, investigation and decision on complaints shall in no case result in discriminatory action against the complainant.

If CU UK C decides and substantiates that CU UK C or any of its employees, officers, agents or subcontractors are not at fault to the extent specified in the complaint, CU UK C may elect to charge all costs and expenses to the complainant.

CU UK C will make every effort to settle any complaint amicably. If no amicable settlement can be reached, all disputes that may arise between CU UK C and the client shall be submitted to the competent court in the Netherlands, which has exclusive jurisdiction in the matter, unless the parties mutually agree in writing on another competent court.

See the end of the document for visual representation of the complaints process.

#### **14.e Concern**

Concerns are normally internal by nature and are submitted to either the MD, TM or QM of the applicable L2 office. Such a concern of internal nature must always be submitted in writing and clearly identify the person or entity voicing the concern. Concerns may be submitted using the A23 Complaint/Appeals/Concern Registration Form, as available on the website. Concerns can also have external sources, like an allegation. In these cases the concern does not have to be formally submitted, but if enough information is available, the same procedure as is followed for internal concerns, should be followed for external concerns.

Process:

The concern is reported to the Director Certifications, Director L2, SM, TM or QM responsible for the activities on which the concern is raised (from now on referred to as the manager). The validity of the concern shall then be determined by establishing whether the concern does or may affect the validity of the certification process or not. Only valid concerns will be processed. The manager shall assign employees to investigate the concern. All employees engaged in the concern-handling process, including those in review, approval and decision making, shall be different from those who carried out the assessments and made the certification decisions. Any employee, including those acting in a managerial capacity, who have provided consultancy for the client in question, or been employed by that client, within two years prior to submission of the concern, shall not be involved in the review or approval of the resolution of the concern for that client.

The assigned employees will confirm receipt of the concern in writing within ten (10) calendar days of receiving the concern. This confirmation must at least state:

- a timeframe of handling the concern;
- a first proposal of course of action to follow up on the concern;
- whether the concern relates to certification activities for which CU UK C is responsible and therefore is admissible.

The appointed employees will gather and verify all necessary information (as far as possible), including a root cause analysis, and propose how to proceed, including corrections and corrective actions where applicable. May use A24 Complaints, Appeals and Concerns Investigation Report for this purpose. CU UK C will endeavour to seek a timely resolution of the concern and will take any subsequent action needed to resolve the concern. If the concern relates to a client certified for a management system, examination of the concern must also consider the effectiveness of the certified management system.

The manager will review the outcome of the assessment and inform relevant parties. The manager may decide to consult the Advisory Council and will take a decision after careful consideration of all information. The decision may include the necessity to perform an assessment at the client immediately or to verify concerns at the next assessment. The decision shall be approved by a QM.

After approval, the assigned employees will, where applicable, give the concerned party formal notice of the outcome and the end of the concern handling process and the motivation of the decision in writing within 3 (three) months after receipt of the concern. The assigned employee will record the concern, its outcome and any action undertaken to resolve it in the relevant information system under unique identification, including any established correction and corrective action.

The Manager will implement the established corrections and corrective actions and handle the follow-up of the concern.

See the end of the document for a visual representation of the concern process.

#### **14.f Claim**

A claim must always be submitted in writing and clearly identify the person or entity submitting the claim. Only claims in English will be accepted, unless otherwise agreed in writing.

The liability that CU UK C carries in respect of any claims for loss, damage or expense of whatsoever nature and howsoever arising in respect of any breach of contract and/or any failure to exercise due skill and care by CU UK C shall in no circumstances exceed a total aggregate sum equal to 10 (ten) times the amount of the fee or commission payable for the specific services required under the applicable contract with CU UK C. CU UK C will not be held liable for any claims for indirect or consequential loss including loss of profit and/or loss of future business and/or loss of production and/or cancellation of contracts entered into by the client.

Upon receipt of a claim, the Director Certifications or Director L2 will be informed immediately. The Director Certifications or Director L2 will appoint an employee to handle the claim, who may be assisted by the certifier or the assessor concerned. The claim, including all information on how it was handled, is registered in the relevant information system under unique identification. The Director Certifications or Director L2 may decide to send a written rejection of the claim with reference to the terms of contract to the claimant. The Director Certifications or Director L2 may also decide to find a commercial solution.

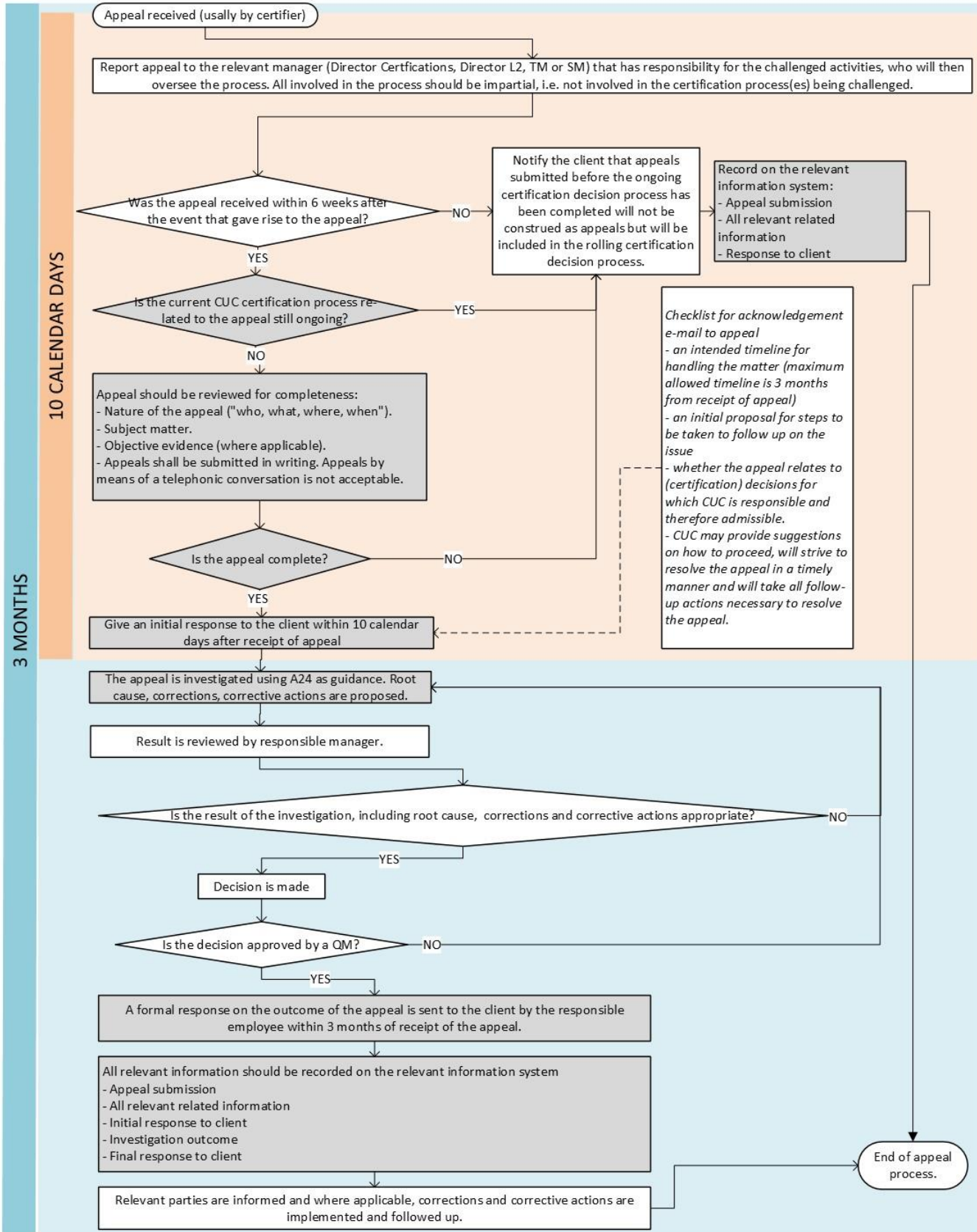
The Director Certifications or Director L2 makes sure that no statements will be made and nothing will be done by which recognition of liability or any obligation to compensation may be concluded.

The Director Certifications or Director L2 may decide to inform the insurance company without delay (within 30 days) of all relevant details of the claim and circumstances. All relevant correspondence with regard to the claim is copied to the insurance company.



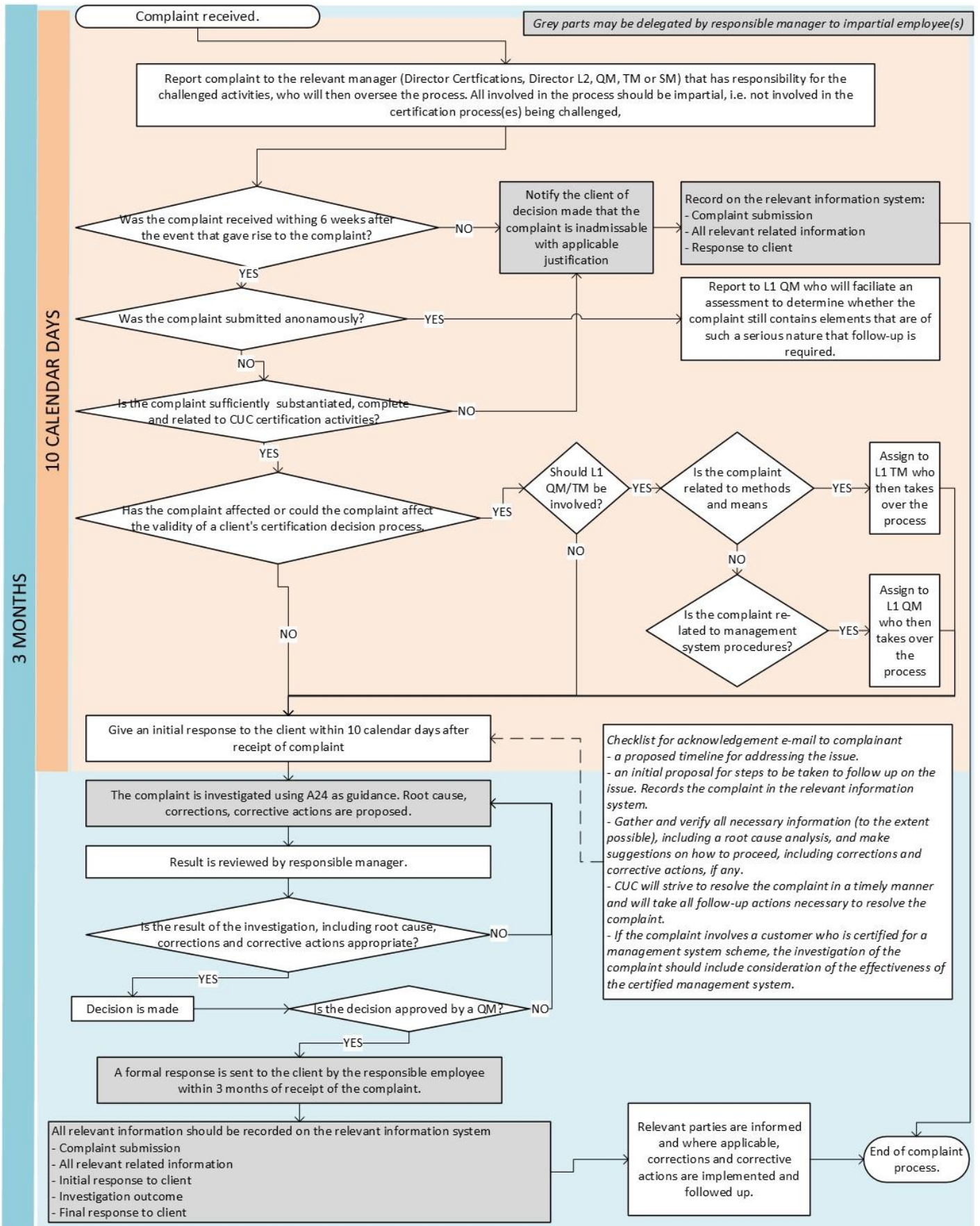
## GENERAL APPEAL PROCEDURE TO BE FOLLOWED IN CASE SCHEME DOES NOT SPECIFY STRICTER REQUIREMENTS

Grey parts may be delegated by responsible manager to impartial employee(s)





## GENERAL COMPLAINT PROCEDURE TO BE FOLLOWED IN CASE SCHEME DOES NOT SPECIFY STRICTER REQUIREMENTS



**GENERAL CONCERN PROCEDURE TO BE FOLLOWED IN CASE SCHEME DOES NOT SPECIFY STRICTER REQUIREMENTS**

Grey parts may be delegated by responsible manager to impartial employee(s)

