

Complaints Management

1. Aim and objective

The process describes the systematic recording and processing of complaints through the individual stages. Complaints are prioritised and processed in a manner that is appropriate to the individual case being handled.

Professional processing of complaints is key to maintaining customer satisfaction. Containment action mitigates further damage and establishes communication with the complainant while suitable corrective actions are derived from the root cause analysis. The individual stages in the process are an important component of continual improvement.

Complaints management is a component of ISO standards ISO 17020 and ISO 17065.

2. Scope

The process is to be applied to all clients of bio.inspecta AG and q.inspecta GmbH as well as their subsidiaries at the complaints stage. The handling process for appeals is not a component of the complaints management process description. The instruction on legal remedies contained in the inspection or certification report respectively forms the basis of an appeal. The procedure for appeals is described in document 12_009.

We also distinguish between complaints from our customers and complaints from third parties about our customers. These are labelled separately.

3. Process responsibility

- The Divisions responsible implement the complaints management process.
- The Head of QM draws up process instructions and evaluations to fulfil the requirements to relevant standards as ISO 17065 cap 7.13.

4. Process indicators

- Number of complaints
- For reaction times through to completion (3 day for containment action – 1 week for root cause analysis and corrective action – 1 month for preventive actions)
- Evaluation of complaints by problem category

5. Related documents

- Intact under client correspondence
- SharePoint List complaints
- KIX-ticketing tool
- Divisions' internal PIs (QM documents)

6. Complaints process sequence

| Activities | Description / responsibility |
|--|---|
| <pre> graph TD subgraph External_handling [External handling] CE[Complaint External -Hotline -E-mail -In writing] end subgraph Internal_handling [Internal handling] CI[Complaint Internal: -SharePoint List or KIX] end CE --> CP[Complaint Problem] CI --> CP CP --> SEP[*SharePoint / KIX entry] SEP --> D[Diagnosis] D --> CA[Containment action] CA --> RCA[Root cause analysis] RCA --> COA[Corrective action] COA --> EC[Effectiveness check] CA --> IWOI[Info: We are working on it] COA --> ID[Info: Decision**] </pre> | <p>Problem (existing deviation of actual state from target state)</p> <p>Complaint could be internal where client complains to inspector who passes on complaint via internal SP</p> <p>Problem entry. Facts only (target state – actual state)</p> <p>Can I/am I allowed to solve the problem myself? Do I know the root cause? Escalation (to QM)</p> <p>Feedback to complainant</p> <p>Where necessary, Head of Division must clarify: Why did the problem arise?</p> <p>Is it a constantly recurring problem? Is the root cause critical for us? Correct problem (normally an individual case)</p> <p>Prevent recurrence of problem and eliminate systemic cause.</p> |

*The entry can be made directly in the SharePoint list (LTD, SHPK, PTY) or in the ticketing system KIX (AG). It is important that all formal and informal complaints, appeals, concerns or objections related to the activities of bi/qi, a certificate holder or a certification applicant are kept in sharepoint or KiX (ISO 17065- 7.13.1). In critical cases (e.g., involving reputational damage, media presence, or claims for damages, etc.), Quality Management must be informed immediately.

** In the case of complaints from third parties about our customers, there is only an acknowledgement of the complaint and information to the complainant that we are investigating the matter. We do not provide detailed feedback to the complainant about our customers (confidential information)

7. Definition of complaints and appeals, standards

A complaint is always an expression of a complainant's dissatisfaction with the provision of a good or service. At the time of a complaint being made, there must be an immediate reaction so as to contain a complaint's potential impacts.. Further handling involves the description of the problem (target state v. actual state), the root cause analysis, and the establishment of corrective actions. In the event of complaints from third parties about our customers, we do not provide detailed information about the measures taken, unless they concern official bodies or labellers.

ISO 17020 - Chapter 3.9 Appeal

Request by the provider of the item of inspection to the inspection body for reconsideration by that body of a decision it has made relating to that item.

ISO 17020 - Chapter 3.10 Complaint

Expression of dissatisfaction, other than appeal, by any person or organisation to an inspection body, relating to the activities of that body, where a response is expected.

ISO 17020 – Chapter 7.5 Complaints and appeals - Procedural requirements

7.5.1 The inspection body shall have a documented process to receive, evaluate and make decisions on complaints and appeals.

7.5.2 A description of the handling process for complaints and appeals shall be available to any interested party upon request.

7.5.3 Upon receipt of a complaint, the inspection body shall confirm whether the complaint relates to inspection activities for which it is responsible and, if so, shall deal with it.

7.5.4 The inspection body shall be responsible for all decisions at all levels of the handling process for complaints and appeals.

7.5.5 Investigation and decision on appeals shall not result in any discriminatory actions.

7.1 Differentiation between complaints and appeals at bio.inspecta

Complaints are handled by the Divisions, using KIX-Ticketing tool and for Ltd/SHPK/Pty a SharePoint List "Complaints".

Typical complaints include:

- Incorrect invoicing
- Dissatisfaction with inspection
- Disagreeing with certification decision
- Response time for enquiries, feedback etc. is too long

Appeals are handled in accordance with the definitions set out in the instruction on legal remedies contained in the inspection or certification report respectively.

8. Recording and processing of complaints

The individual Divisions are free to assign tasks, responsibilities and competencies within the Division.

Internal communication should be kept brief and limited to known facts. Under no circumstances should there be any speculation as to why a complaint may have arisen.

8.1 Complaints input

Complaints may reach us in the following ways:

- in writing by post,
- by e-mail (to info address or directly to a member of staff),
- by telephone (hotline, switchboard or directly to a member of staff),
- through social media,
- verbally (for example during an audit)
- information given anonymously

All correspondence with the complainant is to be filed in Intact. Additionally, the complaint is to be recorded for processing in the KIX-Ticketing tool and for daughter companies in the SharePoint List under "Complaints". Only the issue at hand (facts) is to be listed in SharePoint (where necessary, reference can be made to the correspondence filed in Intact). Where a complaint raises more than one issue, each issue is to be recorded as an individual complaint.

Complainants may be clients, authorities, label schemes, third parties etc. Complaints about bio.inspecta clients raised by third parties are also to be recorded in KIX.

8.2 Monitoring the processing status

The Divisions are responsible for processing complaints within set timeframes.

If a complaint is deemed critical, or in case of doubt, the Head of Division is to immediately involve the Head of QM. In the event of complaints involving claims for damages, the Quality Management (QM) lead must be informed immediately so that the case can be reported to the insurance provider via the finance department.

The processing of complaints is handled as follows, depending on the topic:

- Technical questions are handled by the hotline
- Personnel questions and financial competence lies with the head of department or his deputy
- Certification decisions are passed on to the head of certification or department in case a certification was done by the head of certification.
- Complaints third parties, also standard holders, are handled by the responsible PM
- General criticism goes to the CEO/QM
- French-speaking Switzerland: all types of complaints unless they concern him or her, or financial issues are handled by the CEO French-speaking Switzerland or the employee in consultation with head of departement
- Complaints in the subsidiaries are handled by the CEO of the subsidiary

When allocating the processing of the complaint, it has to be ensured in all cases that the complaint is not processed by the person directly affected by the complaint. In this case, the case must be passed on to an employee or manager.

8.3 Implementation of containment action

The objective of a containment action is to prevent further damage, to confirm to the complainant that the complaint has been received, and to inform the complainant of the further course of action. In most cases no further damage is to be expected. Monitoring is necessary nonetheless. Examples of situations that could arise: Goods are currently being produced that may potentially be unusable

(stop production if necessary). False documents continue to be sent out (put a stop to mailings for the time being).

The complainant must be contacted within **three working days**:

- We confirm that we have received the complaint (we take the issue very seriously indeed, even if we do not agree with the interpretation presented).
- We explain the steps we have already taken with regard to the issue and outline further steps to be taken (Example: The Division in charge is assessing the complaint and will contact you within the next few days.)
- In the case of reports from third parties about our customers (other than official bodies or labelling bodies), the complainant will not be informed of the measures taken. In this case, there is only an acknowledgement of receipt with the note that further action is a matter for the certification body. In this case, the complainant will not be given any information on the matter.
- If the containment action resolves the issue to the complainant's satisfaction, the status can be set to "Completed" without the need for any further entries. Where further activities are required, set the status to "an Bereichsleitung (Attention Head of Division)" and "Vearantwortlich Bereichsleitung (Responsibility Head of Division)".

Contact is normally established by telephone, or by email or post if so requested by the complainant. At all times stick to the facts and do not speculate in any way regarding the complaint by passing on information that is unsubstantiated or outside of your area of competence (e.g. "I'm sure the invoice will be corrected.")

9. Determination of root causes, corrective action

If, following the completion of the containment action, the matter is passed on to the Head of Division, the HoD is in charge of determining why the issue has occurred and what corrective action is to be taken. The HoD coordinates the assessment internally, i.e. with other units within the organisation, decides on the corrective measure to be taken, and contacts the complainant within one week to inform her/him of the corrective measure to be taken. If the corrective measure has not yet been decided upon, the HoD contacts the complainant and informs her/him on the current status and planned steps.

Where the root cause of a complaint may result in further adverse impacts on bio.inspecta which it is essential to examine more closely, the HoD must the Head of QM.

9.1. Complaint information to related operators

Complaint of operators shall be respected for the future activities (i.e. preparation for audits). Therefore, it needs to be checked if a Pop-up/Memo in Intact for a better transparence is required. Is no value of a Pop-up/Memo in Intact visible, no Pop-up need to be created.

9.2. Information an Labelgeber

Several label owner require an inforamtion in case of complaints and appeals for the relevant service. In the Share Point Liste under «Betroffene Label» (affected label) label owners which require a information are listed. The PM is to inform and responsible for contact the label owner.

10. Implementation of case of major impact

Where prompted by the HoD, the Head of QM takes over the further coordination and conducts a systematic investigation by means of an 8D Report. The process, including the definition of preventive measures aimed at the systematic elimination of root causes and prevention of recurrence, is to be completed within a period of **one month**.

10.1. Effectiveness check

The QM department does a monthly effectiveness check over the closed complaints in the Share Point list. The target is to detect repeated complaints in there systematic and the definition of preventive actions. Moreover, the corrective action shall be check case by case if they are adequate and if required to do additional action.

11. Impartiality and confidentiality

This section is to serve as a reminder that:

- no confidential information whatsoever (see Process 1000003) must be released to a complainant or a third-party (this is especially pertinent when it comes to complaints made against third parties);
- there must not be a conflict of interest with regard to the complaint in question (for example, where a complainant is dissatisfied with an inspector). Where a member of staff who is handling a complaint notes that a conflict of interest exists s/he must immediately notify this fact using the "Conflicts of interest 1000001" form and pass the case on to another member of staff.

12. Label specific guidelines

12.1 ASC-CAR-7.7.

In case of an objection, the product manager is called in via the procedure 25_010, so that the ASC specific requirements are incorporated.

Complaints for ASC are entered in the Share Point list of bi Pty Ltd as described in chapter 8.1. An independent member of the bio.inspecta/ q.inspecta management is responsible for handling complaints and reports to top management. Bi/qi is responsible for appeals related to certification activities.

For normal complaints and appeals bi/qi is responsible. However in case the complaint process escalates beyond the authority of bio.inspecta AG/q.inspecta GmbH the ASC appointed accreditation body and ASC can be engaged. In this case, the complainant can submit his or her concerns directly to ASC via the e-mail address disputes@asc-aqua.org. For further information see <http://www.accreditation-services.com/dispute-management/complaints>

The information from the list for ASC must be transferred annually to ASC's [FORM 4](#) form for complaints and sent to ASC and ASI 30 days before the annual audit.

The [FORM 4](#) form is also used for reporting in the event of suspension or withdrawal of ASC accreditation and is sent to ASI and ASC no later than the end date of accreditation.

12.2 MSC

Complaints are recorded in the Share Point list of bi Pty Ltd "Complaints" described in ca. 8.1.

12.3 MSC CoC

Based on complaints received about a particular company (from customers or from MSC/MSCI, ASI or other involved bodies) or in case of suspected discrepancies, major changes in relevant personnel, relocation of operations, or management, the PM or QM may decide to conduct an unannounced audit or additional documentation review at the customer's premises.