

COMPLAINT HANDLING PROCESS

Document #: GOP216

Release Date: 18-FEB-2020

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Document Owner: L. Poulton

Approver: Global VP, Tech Management & Quality

This process only applies to complaints related to Business Assurance activities.

1. Purpose

To describe the complaint handling process, including receiving, validating, investigating, developing and implementing actions to address the complaint.

2. Scope

This process applies to complaints relating to Intertek's certification/auditing services, and complaints against Intertek's certified/audited clients.

For complaints issued by clients holding JAS-ANZ traceable certifications or complaints against clients holding JAS-ANZ traceable certifications, please refer to section 10 below for additional requirements.

Accreditation requirements, such as ISO17021, ISO17065, rules for IATF16949, all require the following basic steps:

- a) receiving, validating, investigating with clients or non-clients subject of the complaint
- b) determining the root cause
- c) ensuring that any appropriate correction and systemic corrective actions are taken,
- d) notifying and providing progress reports and the outcome to the complainant, and informing of the right to appeal Intertek's decision
- e) maintaining records of appeals, complaints, claims, and actions taken.

- Note: The decision to close the complaint shall be made by, or reviewed and approved by, individual(s) not previously involved in actioning the complaint, in other words a competent individual shall be reviewing the action plan, results and close complaint based on evidence available

The main objective of the complaint process is to ensure that sufficient information is entered in the Complaints Log [here](#) that provides evidence of:

- all issues identified by the complainant are addressed in the investigation,
- root causes for all the issues are recorded and the method used to identify and select relevant/applicable root causes
- issues which are repetitive or systemic are identified and corrective action is raised if required in our [CAPA log](#)
- where required, communication to the complainant of the progress of the investigation,
- communication to the complainant of the outcome of the investigation,
- the person performing the final verification and closure is independent of those that performed the investigation and implemented the actions, and





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- the verification process confirms that the investigation and actions implemented have addressed the issue(s) identified by the complainant

3. Responsibilities

- Technical Manager: In the case where the contracting office is an accredited Business Unit (or Hub), the Technical Manager is responsible for the application of the process
 - The term “Technical Manager” referred to in the above, is equivalent with “Program Manager” or “Account Manager” in the Supplier Management operation, as per below split responsibilities:
 - Program manager: responsible to manage a program, including performance, KPIs, improvements, including first response for complaints, ensures training and calibration of personnel working in the program
 - Account manager: commercial responsibility for the account, working on growing business, maintain/improve relationship with client, involved with complaints when escalated to them. Works closely with program managers and supports with complaint management
- BA General Manager: In the case where the contracting office is an unaccredited business unit, the tasks assigned below to the Technical Manager are assigned to the BA General Manager or a designated staff appointed by the BA General Manager
 - Global Account Manager: In the case of complaints related to global accounts, the Global Account Manager shall work with the Technical Manager or BA General Manager to the resolution of the complaint
 - Global technical team: responsible to manage and coordinate investigations and actions when the complaint has a global impact, it is escalated by Account manager/Technical manager/Program manager or the recommendations involves changes to the BA GMS - Global management system

4. References

GOP216-INFO Information on Complaint Handling Process available on website, which covers the information needed by external parties to file complaints

5. Definition

1. Complaints: Expressions of dissatisfaction made to Intertek **whether oral or in writing**, with regards to its certification/auditing services or its certified/audited clients/facilities, where a response or resolution is explicitly or implicitly expected.
2. Designated investigator: Competent personnel who was not involved with the audit and/or decision-making process related to the complaint.
3. Repetitive and/or systemic issues: issues affecting the entire GMS, multiple countries or across multiple processes, due to a repetitive problem or a problem inherent in the overall system, rather than due to a specific, individual, isolated factor

Notes:

- The complaint handling process is subject to the requirements for confidentiality.



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- This process does not apply in the case of complaints related to financial/commercial matters. Nevertheless, in such cases, the issue is to be directed to the Business Unit BA General Manager
- Where a client's request/concern/question/expectation not met, is resolved in a single interaction with a client (telephone call or replying to a written communication), and doesn't require any investigation, such case shall not be treated as complaint and entered in the Complaints log. Most of the time, client is missing information or doesn't understand the output of our service, hence providing additional information will address client's concern.
- For complaints related to integrity/compliance, the complainant will be acknowledged and the complaint will be forwarded to Local Compliance Officer/Manager to process in accordance with Intertek Integrity Compliance Handling Procedure (WI-QCS-012)
- Submission, investigation and decision on complaints shall not result in any discriminatory actions against the complainant.
- Intertek will take any necessary corrective actions related to the complaint, whether against Intertek certification/auditing activities or against the certified/audited client.
- When the complaint is against a certified/audited client/facility, the subject of the complaint is not to be made public unless Intertek, the complainant, and the client decide together as to what extent the subject of the complaint and the resolution shall be made public
- If the complaint does not relate to Business Assurance activities, Business Assurance personnel receiving the complaint should do its best to identify the party the complaint should be addressed by and then notify the complainant that the complaint has been received and forwarded to the appropriate Intertek business unit. Such complaints are not to be recorded in the Complaints, Disputes & Appeals log.

4. Input

Complaints received from clients through the Global BA Complaint email, complaint.ba@intertek.com or through the Intertek personnel (auditors, sales, account managers, others) or in person at the office, or via telephone, email, or other type of communication.

5. Output

Investigation result, updated Complaints, Disputes and Appeals Log and notification letter to client

6. KPIs

Mailbox Administrator/Complaint Recipient forward Complaint to the appropriate person within same business day, Technical Manager/Account manager/Program manager (depending if systems certifications or supplier management) acknowledges receipt of Complaint within 2 business days and responds to the complainant with solution(s) within 10 working days.

7. Process Flow:



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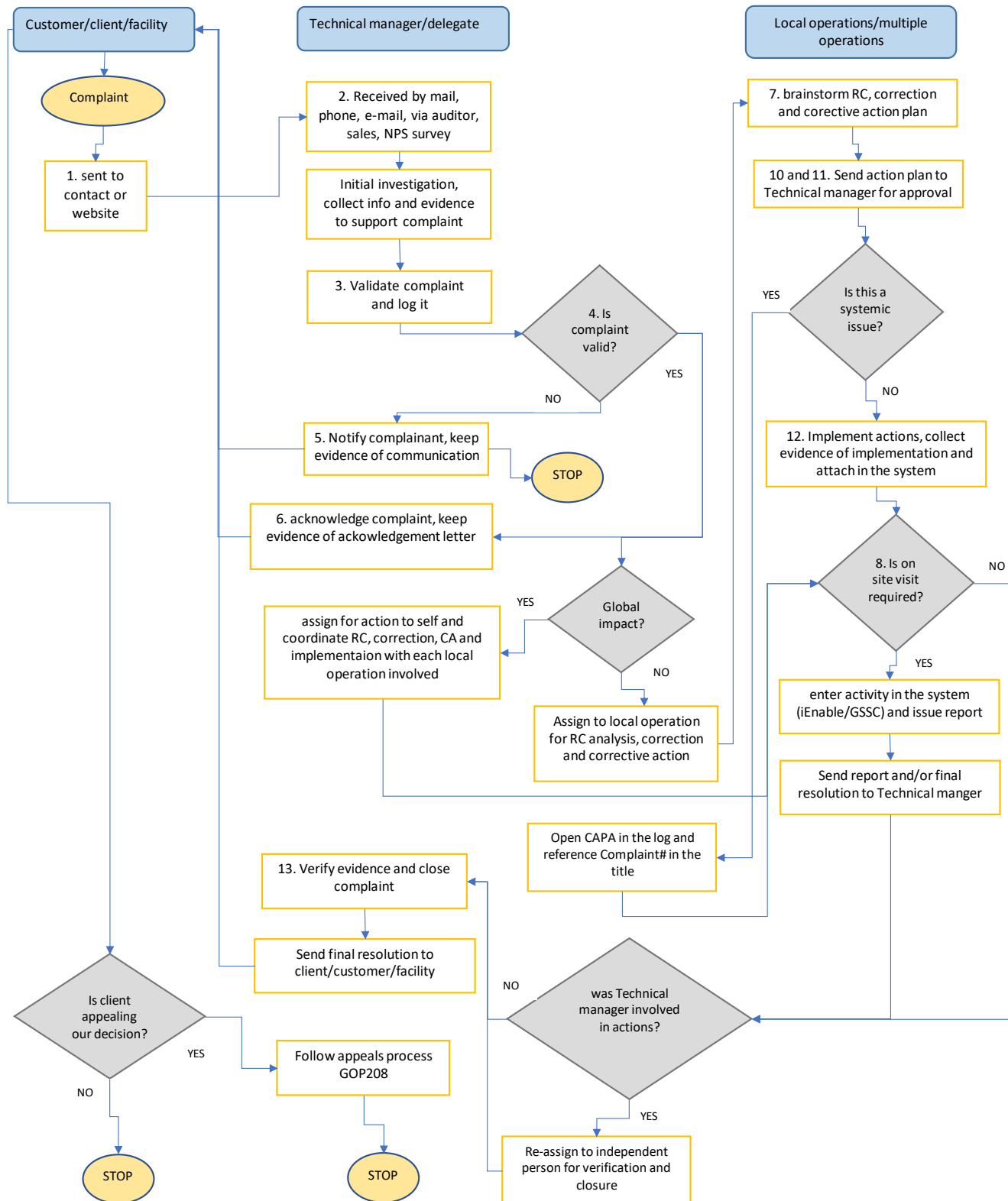
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8. Process Description

	ACTION	BY WHOM	RELATED DOCS	COMMENT
	Complaint Handling Process		GOP 216	
1	Complaints received	Mailbox Administrator/Complaint Recipient	Office, Email, telephone, NPS, other type of communication	Any party wishing to submit a complaint contacts the Intertek office via telephone, email, or other type of communication or by sending an Email at complaints.ba@intertek.com. A detractor comment received via the NPS process is to be treated as a complaint.
2	Information forwarded to the appropriate individual	Mailbox Administrator/Complaint Recipient	email	<p>Information forwarded to the appropriate Technical Manager/Program manager/account manager (depending if systems certifications or supplier management and depending on the severity of the complaint and impact – local or global) for action within 2 days (acknowledgement to client and assignment for action to the relevant personnel).</p> <p><i>How do I know who to allocate the complaint to?</i></p> <p>If the complaint is about an individual, allocate the item to their manager.</p> <p>When the complaint is about the delivery of our service for a country, allocate to local Operations for immediate action</p> <p>If complaint is issued by a global client, evidence shows global impact, and actions need implemented in multiple countries, assign the complaint to Technical manager or a member of the Global technical team for systems certifications and to the Account manager/Global team for supplier management, who will coordinate activities with multiple countries.</p> <p>When you are unsure, contact Business Improvement and Quality for support</p>



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3	Verify the validity of the complaint	Technical Manager/Program manager/Account manager for SM		Within 2 working days review the nature and content of the complaint and determine whether this is a valid complaint or not.
4	Complaint invalid	Technical Manager/delegate /Account manager for SM		If concluded as not valid, then inform complainant within 2 days Update the Complaints, Disputes & Appeals log accordingly Process ends.
5	Log complaint	Technical Manager Program manager or Account manager – see responsibilities split	Complaints, Disputes and Appeals Log	Upload Complaint into SharePoint Complaints, Disputes and Appeals Log For data entry into the Complaints, Disputes & Appeals Log SharePoint, please refer to the document WI216 “Work Instruction for Inputting a Complaint or Dispute from Customer into the Complaints, Disputes & Appeals Log”. Enter minimum mandatory information: complainant contact information, detailed complaint, Project number or activity number, GSSC number, facility and client. Attach evidence cited in support of the complaint, attach acknowledgement letter sent to client for valid complaints, and document any direction/advice for the local Operations/relevant department or manager.
6	Acknowledge receipt, client’s notification	Technical Manager/Program manager/Account manager for SM	Complaints, Disputes and Appeals Log	If concluded as valid acknowledge receipt of the complaint to the complainant within 2 working days and start investigation. Update the Complaints, Disputes & Appeals log accordingly
7	Perform investigation	Depending on severity and impact (local vs. global): Technical Manager/ Program manager/ Account manager Local operations	Complaints, Disputes and Appeals Log	Investigate or assign the task of investigating the complaint to a designated investigator who has not been previously involved with the subject of the complaint. Special on-site visit will be arranged if needed. Manage investigation to completion, facilitate discussions with the assigned



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		Global technical team		investigator, local operations, client or other personnel, as required
8	Perform on site visit (refers to systems certifications)	Lead Auditor	Report	Complaints received from Accreditation Bodies, Sector Authority Organizations, or clients' customers may require an on-site investigation review visit Report submitted within five working days of completion of the visit. Continue with off-site investigation.
9	Continue investigation (applies to both SC and SM)	Technical Manager or designated investigator (Program manager/Account manager/Global technical team)		Resolve complaint through an investigation and validation process, document root cause, corrections and/or corrective actions to be taken in response to the complaint.
9a.	Initiate a CAPA (if need it)	Global technical team	CAPA log	If repetitive and/or systemic issues identified, open a CAPA in the CAPA log and reference the complaint # in the title of the non-conformity. Follow CAPA process to implementation of actions and effectiveness verification.
10	Recommendation	Technical Manager or designated investigator	Complaints, Disputes and Appeals Log	Document the recommendation in the Complaints, Disputes & Appeals log. (See note 2)
11	Review and approval	Technical Manager or General Manager Global technical team if this is a high-level governance procedure change, not client specific	Complaints, Disputes and Appeals Log Correspondence	Review and approve results of the investigation (See note 3) Certification suspension or withdrawal will be processed accordingly if investigation concludes it. Inform the complainant of the results and the decision of the investigation within 10 working days of receipt of the complaint (see note 4 and note 5). Keep an evidence of such communication and attach it in the complaint. Inform complainant they have the right to appeal Intertek's decision. Update results in the Complaints, Disputes and Appeals Log.



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12	Assignment of actions and Implement actions	Personnel who is assigned actions: local operations, technical managers, GMs If not client specific in SM, Global technical team	Complaints, Disputes and Appeals Log Correspondence Updated documents, processes or forms Personnel development plans, improvement achievements	<p>If a complaint is assigned to you for action and you think you are not the appropriate person to action the complaint, contact the technical manager to confirm reasons for assigning the action to you and, if agreed to re-assign (by removing your name from the "Assigned to" and replacing with another name), update the log and re-assign as required. <u>You can assign a case to yourself.</u></p> <p>Complete all actions as assigned, attach evidence of implementation. Inform complainant of the completed actions. This must be done by e-mail or formal letter. If you confirm verbally with the client, a follow-up e-mail must be sent to confirm discussion. NOTE: The communication, e-mail or letter, must indicate that they have the right to appeal if they are not satisfied with the resolution of the complaint.</p>
13	Close complaint in the log	Technical manager or delegate or Account manager or General manager	Complaints log	<p>Verify that all the steps defined above have been properly completed including:</p> <ul style="list-style-type: none"> - that all issues identified by the complainant are addressed in the investigation, - that root causes for all the issues are covered, - a determination has been made as to whether the issues are repetitive or systemic (and a CAPA created if required) - the communication of the outcome to complainant which includes a statement they have the right to appeal. - All evidence available as attachments - The verification and closure of a complaint performed by a person different than the person who implemented actions



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<p><i>Outside of the process flow:</i> Trend Analysis</p>	<p>Director – Internal Auditing</p>	<p>Analysis report</p>	<p>Perform trend analysis quarterly Summary submitted to the Regional Certification Managers and the Global Vice President – Technical Management & Quality Quarterly, review the trend analysis with Global technical team and document/track proposed actions (global or local impact) using 10X cockpit. Ensure actions implemented are monitored for effectiveness and lack of effectiveness is flagged for further actions</p>
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Note 1: In the case of investigation of complaints related to certified/audited clients (refer to systems certifications), the special visit (short Notice or unannounced) is to be recorded in the system and a report, supported by objective evidence, shall be uploaded in the system within 5 working days. If complaint is related with audit previously conducted, and a special audit is required, this shall be conducted in accordance with the requirements of GOP103 – Audit Execution Process or the appropriate customer specific requirements.

Note 2: For Systems certifications: investigation may lead to the reduction of scope, suspension or withdrawal of the certification of a certified client. In such cases, the recommendation is to be processed in accordance with the requirements of GOP209 - Suspension and Withdrawal Process.

The investigation may lead to performance evaluation and need of improvement plans for Intertek's personnel (auditors or non-auditors). In such cases, action shall be assigned to direct managers of such personnel

The investigation may lead to changes of Intertek's processes/procedures: follow GOP218 for processing of changes in system certifications and with Global technical team for Supplier management

Note 3: If the Technical Manager/Program manager/Account manager has been previously involved with the subject of the complaint, the review and closure approval will have to be made by the General Manager or higher-level management

Note 4: If the investigation cannot be completed within 10 working days, the complainant will be notified of a new date of completion.

Note 5: In case the result of the complaint investigation is "Claims" from the customer, the maximum liability of the company is refund of the certification/audit fee. If any claim is more than the certification/audit



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fee received, then the Intertek Group Notification of Incidents and Claims ([Notification of Incidents and Claims](#)) shall be followed.

9. JAS-ANZ Specific requirements for systems certifications

The following requirements apply in the case of complaints:

- Issued by clients holding JAS-ANZ certifications
- Against clients holding JAS-ANZ certifications

As specified in GOP216-INFO, the complainant may refer the complaint to JAS-ANZ if dissatisfied with the outcome of Intertek's complaint handling process.

When a complaint is not resolved within the agreed timeframe with the client, the complaint must be escalated to the Global Vice-President Technical Management & Quality.

When a complaint is not resolved within three (3) months of the agreed timeframe with the client, the complaint shall be referred to JAS-ANZ. In such a case, the following information is to be provided to JAS-ANZ:

- A copy of the original complaint
- records of the review of the complaint
- a copy of the response to the complainant
- any other records that inform the background to the complaint.

10. Records

All records relative to Disputes/Appeals shall be entered into the Complaints, Disputes & Appeals log and maintained per GOP202 - Records Control Process.

REVISION LOG

Revision #	Description of Change	Release Date
10	Complaints, Disputes & Appeals Log URL updated	04-OCT-2019
11	Clarify steps and responsibilities – add details New process flow	18-FEB-2020