

Policy on Handling Grievances, Complaints and Appeals

1. Scope and Purpose

- 1.1 The purpose and scope of Abet Management Consulting Private Limited's (the Company), complaints and appeals procedure outline the process to address complaints and appeals submitted by Client against any Certification/Approval Decisions made or any Nonconformities (NCs) raised by Certification body (CB).
- 1.2 Expressions of dissatisfaction related to Certification Body's personnel or performance (adherence to IFWCS Procedures / Scheme Owners' Requirements)
- 1.3 Grievance, Complaints and/or Appeals against decisions made CBs shall be addressed to and handled by the Appeal Committee (AC).
- 1.4 This mechanism applies to:
 - Clients of the Certification Body (CB)
 - Stakeholders affected by the CB's certification decisions
 - Internal or external personnel involved in certification activities

2. Terms and Definitions

- 2.1 **Client (Certification Applicant):** An entity such as a forest division, forest department or forest corporation, Individual, farmers' organization or a business organization at any stage of the wood / NTFP value chain that seeks to receive IFWCS certification.
- 2.2 **Certification Bodies (CB):** Independent organizations who are accredited to issue and manage IFWCS certificates. They manage the entire certification process from pre-certification evaluation and issuing of certificates, through audits and investigations, to suspension or termination of certificates, if necessary.
- 2.3 **Appeal Committee (AC):** Committee appointed by CB to conduct an investigation for appeals and complaints.
- 2.4 **Appeal:** Request made by a client for reconsideration of a Nonconformity (NC) or any adverse accreditation/Approval Decision made by CB.
- 2.5 **Complaint:** An expression of dissatisfaction by any person or organization relating to CB personnel or performance, or to the activities of an accredited/approved CB.
- 2.6 **Direct Dialogue (DD):** Facilitative resolution process proposed by CB, in which the Client is invited to present their views via a call.

3. Establishing Appeal Committee

The Company is committed to maintaining impartiality in all its certification activities. To ensure objectivity and prevent undue influence, the company has established a structured Appeal Committee Mechanism, which allows significantly interested parties—such as producers, suppliers, users, consumers, and conformity assessment experts—to provide input on key matters affecting impartiality.

Key Functions of the Appeal Committee:

a) Oversight of Policies and Principles

- The committee will review and provide guidance on the policies and principles that govern the impartiality of the Company certification activities.
- It will ensure that the certification body (CB) adheres to international best practices and maintains neutrality in decision-making.

b) Prevention of Bias and Commercial Influence

- The committee will counteract any tendency for commercial, financial, or other considerations to influence certification decisions.
- Safeguards will be implemented to ensure that certification remains an objective process, free from conflicts of interest.

c) Maintaining Public Confidence and Openness

- The committee will oversee mechanisms that uphold transparency and inspire public trust in the certification process.
- It will address concerns related to openness, ensuring that certification activities remain accessible and credible to all stakeholders.

d) Balanced Representation of Interests

- The committee will be structured to ensure that no single interest group (internal or external) dominates decision-making within the CB.
- A diverse representation of stakeholders will be maintained to promote fairness and inclusivity in all impartiality-related decisions.

4. Complaint/Appeal Submission**4.1 Grievances/ Complaint/ Appeal can be raised concerning:**

- i. Certification Decisions: Disagreements related to the grant, suspension, withdrawal, or modification of certification.
- ii. Conduct of CB Personnel: Issues with CB personnel, auditors, or contractors, such as unprofessional behavior or bias.
- iii. Alleged Bias or Impartiality: Concerns about conflicts of interest or biased decisions.
- iv. Procedural Errors: Complaints about errors or irregularities in the certification process.

4.2 To be accepted and classified as a Complaint/Appeal/Grievance, a submission shall:

- i. be submitted to CB within 30 days of receipt of the final Assessment Report or upon notification of an Accreditation/Approval Decision.
- ii. be submitted via the online form on the Abet Management Consulting Private Limited website. In the case of technical or accessibility issues, the Complaint/Appeal Submission Form attached in [Appendix 1](#) can be used and sent to bivash.ranjan@gmail.com;
- iii. be complete and in English;
- iv. be limited to the scope as per clause 1.1 and 1.2;
- v. include appropriate evidence to substantiate the Grievance/Complaint/Appeal.

4.3 Grievances must include the following:

- a. Complainant's Contact Details: Full name, email, phone, and address.
- b. Description of the Issue: Clear details of the grievance, including relevant dates, personnel involved, and the specific decision or action being challenged.
- c. Supporting Documents or Evidence: Relevant documents (e.g., reports, emails) to substantiate the grievance.

5. Other Considerations**5.1 The grounds for a Challenge/Appeal are limited to the allegations that the Company:**

- I. Has not followed or correctly interpreted its own procedures; and/or
- II. Has not followed or correctly interpreted the Scheme Owner's (SO's) Requirements.

5.2 The NC or the Accreditation/Approval Decision that is the subject of a Challenge/Appeal will remain valid during the Challenge/Appeal process unless a change is required as a result of the process.**5.3 Complaint/Appeal decisions shall be one of the following:**

- a) Agreed (LC decision is overturned and agrees to make all changes to the NC that were requested by the Client).
- b) Partly agreed (LC agrees to make some changes to the NC that were requested by the Client).
- c) Rejected (LC decision is maintained and does not agree to make any changes to the NC).

- 5.4 The Client may withdraw the Challenge/Appeal at any time during the process and by doing so, formally end the process. In such a case, the Client shall cover incurred costs until the moment of withdrawal.
- 5.5 Evidence used in the evaluation of the Challenge/Appeal shall be treated as confidential by the Parties and the appointed investigator(s).
- 5.6 Any document (draft or final) produced to present the Challenge/Appeal decision remains the property of the company. These documents shall be distributed to the Client for their reference only and shall not be published in the public domain. If a Client wishes to share a redacted version of this report with another Client or CH, this shall be first approved by the company.

6. Dispute Resolution

- 6.1 The Dispute Resolution System (DRS) at the Company will be regulated through the Complaints/Appeals redressal procedure under the IFWCS. It adheres to ISO regulations and gives stakeholders the opportunity to express any concerns they may have with certification decisions, the performance of CB, or other aspects of the scheme.
- 6.2 The company encourages stakeholders to first try to resolve disputes informally through dialogue, before submitting a complaint or appeal.
- 6.3 A key principle of the Company DRS is that disputes should be addressed at the lowest level possible, meaning between the parties most directly involved in the issue. Only when resolution fails at the lowest level should the next highest level be engaged. This implies that complaints against CB should first be sent to the CB.
- 6.4 If the complainant is not satisfied by the CB's response, the complaint can be elevated and submitted to the IIFM that issued the certificate.
- 6.5 Complaints against a CB, are dealt with accordingly and can be elevated to IIFM respectively. As a consequence, CBs are required to have their own DRS and to make this publicly available. The DRS procedures and online complaint/appeal submission form are accessible through the website.

7. Challenge/Grievance/ Complaint/ Appeal Process

- 7.1 Complaints are reviewed by the Company personnel through Direct Dialogue (DD), investigation or a combination of both.
- 7.2 Challenge/Appeals are reviewed by the Appeals Committee (AC).
- 7.3 The individuals appointed to review a Challenge/Appeal (our company personnel) are referred to in this procedure as investigators.
- 7.4 For Challenges/Complaints, the Company may propose a DD call with the Client and the company Executive Director (ED), or any other personnel of the Company appointed by the ED. The goal of the DD call is to discuss the Challenge and to better understand the arguments and views of both parties.
 - a. When applicable, a resolution may be agreed among the parties as a result of the call. In such cases, no further internal investigation will be started, the agreed results will be recorded by the company, summarized via email to Client and the Challenge/Complaints will be closed.
 - b. If no resolution is achieved via DD, the Challenge may be escalated to an internal investigation and the Challenge review deadline will be restarted (see 9.8.1 below).
- 7.5 To review any Grievance/Challenge/Appeal, the Company shall appoint one or more investigator(s) who have no Conflicts of Interest (COI) and who are familiar with the applicable requirements and processes needed to investigate the Challenge/Appeal.
 - a. For Challenges, at least one the Company internal investigator will be appointed.
 - b. For Appeals, the AC will consist of at least 2 to maximum 3 members, with one external member appointed as Chair and one member from the company personnel acting as technical expert (TE). The AC Chair is responsible for a) determining the

methodology to evaluate the Appeal, b) ensuring a timely and impartial review, and c) leading all discussions and meetings.

Note: The AC acts as a representative of the company and the decision is consequently attributed to the company.

- 7.6 The Client may submit a written objection against the appointed investigators in case of a potential COI within 7 days of notification of the investigators and shall include objective evidence to support any claims made. The company shall review the objection and may propose different investigator(s) if deemed appropriate.
- 7.7 The Parties shall be given the opportunity to present their case and may be asked to provide evidence to the investigation.
- 7.8 Challenge/Appeal reviews shall be completed, and the Client informed of the decision in writing within the following deadlines, from the date that the Challenge/Appeal is accepted:
 - a. 60 days for Challenges (DD/investigation). However, if a Challenge is escalated from DD to internal investigation, this deadline will be restarted.
 - b. 90 days for Appeals.

Note: If an interpretation request is needed to resolve a Complaint/Challenge/Appeal, all deadlines indicated in this section are put on hold until the interpretation is formally issued.

- 7.9 Before the end of the Grievance/Challenge/Appeal investigation, our company shall share the draft investigation report with the Client, allowing 14 days for comments.
 - a. The investigator(s) shall respond to all comments.
 - b. The report may be modified based on the comments, subject to the investigator's discretion.
 - c. The company may grant a deadline extension for comments, if requested in writing by the Client, before the deadline is reached. The request shall contain a justification.
- 7.10 The company shall circulate the final Challenge/Appeal investigation report to the Client, after which the Complaint/Challenge/Appeal investigation will be closed.
- 7.11 If the outcome of a Complaint/Challenge/Appeal entails modification of an NC or Accreditation/Approval Decision, the relevant changes shall be made in the Company system within 14 days of the Client accepting the Company decision.
- 7.12 After a Complaint/Challenge is closed (via DD or investigation), the Company shall ensure that the Client has adequate time to address the NCs that remain.
 - a. The Client shall have a minimum of 30 days to provide the initial responses in the case of Minor NCs.
 - b. The Client shall have a minimum of 2 months to provide closure responses.

8. Acknowledgement and Review

- a. Acknowledgement: Grievances/Complaints/Appeals will be acknowledged in writing within 5 working days of receipt.
- b. Preliminary Review: The Quality Manager or an impartial officer will assess the grievance's nature and validity to determine if further investigation is needed.
- c. Conflict of Interest: If a conflict of interest is identified, an independent member of the Impartiality Committee will oversee the resolution process to ensure impartiality.
- d. Next Steps: Based on the review, appropriate action will be taken, either through further investigation or immediate resolution.

9. Investigation and Resolution

- A formal investigation will be initiated within 10 working days of acknowledging the grievance.

- Both the complainant and the subject of the grievance will be given the opportunity to present their case.
- The resolution process will be completed within 30 working days, unless further time is justified and communicated to the complainant.

10. Decision and Communication

The outcome of the grievance will be documented, along with any corrective actions (if applicable), and communicated to the complainant in writing. If the complainant disagrees with the decision, they have the option to escalate the matter to the **Appeals Committee**, whose ruling will be final and binding.

11. Confidentiality and non-retaliation

- All grievances will be handled with strict confidentiality.
- No person shall suffer retaliation or adverse consequences for submitting a grievance in good faith.

12. Record Keeping

All complaints received related to the certification process, certified entities, or the conduct of auditors must be recorded, acknowledged, and investigated promptly. A dedicated complaints register shall be maintained, capturing details such as date, complainant, nature of complaint, actions taken, resolution, and closure date.

All grievance records, including investigations and resolutions, will be maintained for a minimum of **five years** and reviewed periodically as part of the management review process.

Grievance/Complaint/Appeal Submission Form

1. Complainant Name:
2. Complainant Email Address:
3. Complainant Phone Number:
4. Type of organization / Company you represent
Individual Person / NGO/ Other

Details of organisation / company that you represent

5. Name of Company / Organisation:
6. Address:
7. Type of Concern:
Dispute/ Compliant / Appeal
8. Description of Complaint:
9. Details of evidence:
10. Relevant standard or procedure matter of the complaint, if applicable

The CB/Personnel you are complaining about:

11. Name of Contact Person:
12. Email:
13. Phone:

- ☐ By submitting this complaint, I confirm that I will treat all information and data, including personal data contained within any communications or documents shared with me as part of this dispute process as confidential.
- ☐ By submitting this complaint, I confirm and acknowledge that Abet Management Consulting Private Limited's has a legitimate interest in processing any personal data provided in the course of this complaint, including sharing that data with relevant parties, including relevant Scheme Owner/s, in accordance with Abet Management Consulting Private Limited's complaint procedure/s.
- ☐ I furthermore confirm that all necessary permissions, consents and/or authorizations have been obtained and confirmed from all relevant data subjects for any personal data that I provide and will cooperate in full with any verification activities requested by Abet Management Consulting Private Limited's during the course of this investigation.