

COMPLAINT HANDLING PROCESS

Document #: GOP216- SA 8000

Release Date: 05-April-2024

Page 1 of 16

Document Owner: Karthikeyan.S

Approver: Global VP, Tech Management & Quality

This process only applies to complaints related to Business Assurance activities for system certifications and supplier management

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 Intelx system/Complaint Reporting application 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 Intelx system/CAPA application.
- where required, communication to the complainant of the progress of the investigation,
- communication to the complainant of the outcome of the investigation,





COMPLAINT HANDLING PROCESS

Document #: GOP216

Release Date: 17-NOV-2023

Page 2 of 16

Document Owner: L. Poulton

Approver: Global VP, Tech Management & Quality

- the person performing the final verification and closure is independent of those that performed the investigation and implemented the actions, and
- 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
- **Intelex user:** designated personnel with Full access to Intelex system, responsible to record complaint/dispute, assign tasks, update status, and ensure record is move through the process flow towards completion and evidence are attached in the system. User can be any of the above roles or can be a local administrative person who maintains Intelex system up to date (country decision).

4. References

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

[Intelex system/Complaint Reporting application/APPS](#) – Production environment for Intelex system

[WI216 Work instructions for inputting of a Complaint or Dispute in Intelex system.docx](#)



COMPLAINT HANDLING PROCESS

Document #: GOP216

Release Date: 17-NOV-2023

Page 3 of 16

Document Owner: L. Poulton

Approver: Global VP, Tech Management & Quality

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.
- 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 Complaint reporting application in Intelex. 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) . These types of complaints are to be entered in Intelex/Complaint reporting application and identified as Confidential. In this case only the person who reported the complaint and a limited number of designated personnel will have access and visibility.
- 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 Intelex system/Complaint reporting application.



COMPLAINT HANDLING PROCESS

Document #: GOP216

Release Date: 17-NOV-2023

Page 4 of 16

Document Owner: L. Poulton

Approver: Global VP, Tech Management & Quality

4. Input

Complaints received from clients through the Global BA Complaint email, complaints.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, Complaint record in Intelex, including final disposition, evidence supporting communication, investigation and actions implemented, and notification letter to client and acceptance/rejection of our final disposition by the client.

6. KPIs

Mailbox Administrator/Complaint Recipient forward Complaint to the appropriate person (country's user identified as Complaint Management role within Intelex) within same business day, Technical Manager/Account manager/Program manager (depending on type of work - systems certifications or supplier management). The acknowledgement in Intelex shall be completed within 2 business days and response sent to the complainant with solution(s) within 10 working days.



COMPLAINT HANDLING PROCESS

Document #: GOP216

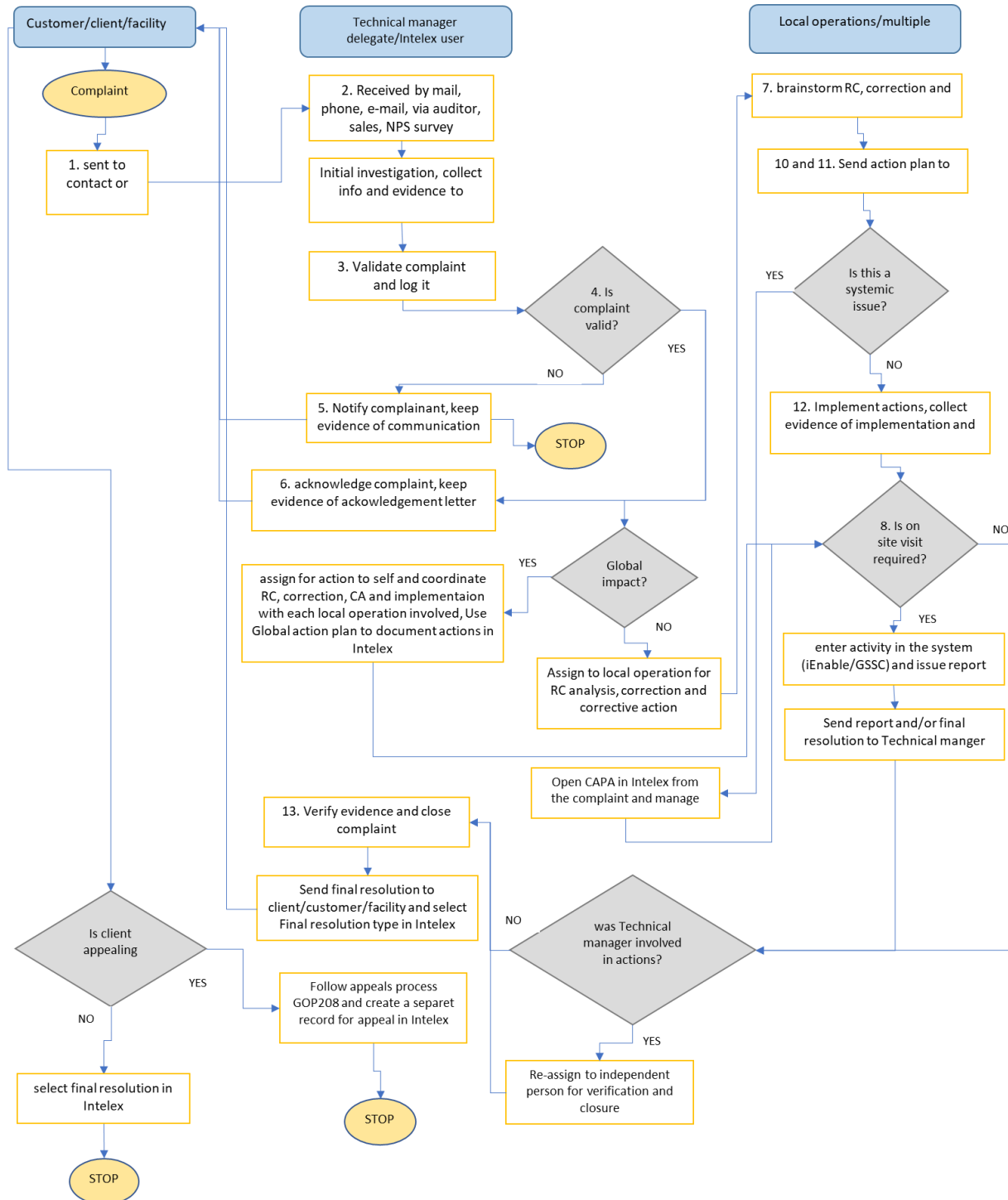
Release Date: 17-NOV-2023

Page 5 of 16

Document Owner: L. Poulton

Approver: Global VP, Tech Management & Quality

7. Process Flow:



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GT001-P / Rev. 1



COMPLAINT HANDLING PROCESS

Document #: GOP216

Release Date: 17-NOV-2023

Page 6 of 16

Document Owner: L. Poulton

Approver: Global VP, Tech Management & Quality

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/user in Intelex with the Complaint management role for that country	Mailbox Administrator/Complaint Recipient Intelex user	email	<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> <p>See list of Intelex users by country that are responsible to manage Intelex application for Complaints, appeals, disputes.</p>



COMPLAINT HANDLING PROCESS

Document #: GOP216

Release Date: 17-NOV-2023

Page 7 of 16

Document Owner: L. Poulton

Approver: Global VP, Tech Management & Quality

3	Verify the validity of the complaint	Technical Manager/Program manager/Account manager for SM Intelx user with Complaint management role for that location/country		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 Intelx user with Complaint management role for the country		If concluded as not valid, then inform complainant within 2 days Update the Intelx application accordingly Process ends.
5	Log complaint	Technical Manager Program manager or Account manager – see responsibilities split Intelx user with Complaint management role for the country	Intelx/Complaint reporting application	Intelx system/Complaint reporting APPS For data entry, please refer to the document WI216 “Work Instruction for Inputting a Complaint or Dispute from Customer into Intelx/Complaint reporting application”. 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, by completing investigation tasks section
6	Acknowledge receipt, client’s notification	Technical Manager/Program	Intelx/Complaint reporting application	If concluded as valid, acknowledge receipt of the complaint to the

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GT001-P / Rev. 1



COMPLAINT HANDLING PROCESS

Document #: GOP216

Release Date: 17-NOV-2023

Page 8 of 16

Document Owner: L. Poulton

Approver: Global VP, Tech Management & Quality

		manager/Account manager for SM Intelex user with Complaint management role for the country		complainant within 2 working days and start investigation. Update Intelex application accordingly
7	Perform investigation	Depending on severity and impact (local vs. global): Technical Manager/ Program manager/ Account manager Local operations Global technical team Intelex user with Complaint management role for the country	Intelex/Complaint reporting application	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 investigator, local operations, client or other personnel, as required Update Intelex application with all tasks performed
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) Intelex user with Complaint management role for the country		Resolve complaint through an investigation and validation process, document CAPA as needed including root cause, corrections and/or corrective actions to be taken in response to the complaint.
9a.	Initiate a CAPA (if need it)	Investigative team	Intelex/Complaint reporting	If repetitive and/or systemic issues identified, open a CAPA in Intelex

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GT001-P / Rev. 1



COMPLAINT HANDLING PROCESS

Document #: GOP216

Release Date: 17-NOV-2023

Page 9 of 16

Document Owner: L. Poulton

Approver: Global VP, Tech Management & Quality

		Intelex user with Complaint management role for the country	application/CAPA section	directly from the complaint. Follow CAPA process to implementation of actions and effectiveness verification. You must close CAPA first to complete the complaint
10	Recommendation	Technical Manager or designated investigator Intelex user with Complaint management role for the country	Intelex/Complaint reporting application	Document the recommendation in Intelex. (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 Intelex user with Complaint management role for the country, different person than the person who recorded and completed the investigation section	Intelex/Complaint reporting application	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 Attachments section of the Complaint record in Intelex. Inform complainant they have the right to appeal Intertek's decision.
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 Personnel who update Intelex with action plans,	Intelex Complaint reporting application/CAPA section or Intelex CAPA application Correspondence Updated documents, processes or forms Personnel development plans,	A complaint is always assigned to the Person responsible for Complaint management at that location. This role could be assigned to multiple or to one person only. If assigned to multiple Intelex users for that location, then it is the responsibility of one designated user to ensure actions are properly assigned. Intelex user works with technical manager and local Operations to document



COMPLAINT HANDLING PROCESS

Document #: GOP216

Release Date: 17-NOV-2023

Page 10 of 16

Document Owner: L. Poulton

Approver: Global VP, Tech Management & Quality

		<p>completion and attaches evidence – Intelx user with Quality manager role for the location</p>	<p>improvement achievements</p>	<p>actions, assign tasks, and update the system with completion of tasks.</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	<p>Close complaint in Intelx</p>	<p>Technical manager or delegate or Account manager or General manager Intelx user with Complaint management role for the country, different person than the person who recorded and completed the investigation section If CAPA is initiated, Intelx user with Quality manager role for the location</p>	<p>Intelx/Complaint reporting application</p>	<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, - a determination has been made as to whether the issues are repetitive or systemic (and a CAPA created if required and closed - that root causes for all the issues are documented and actions address all root causes - the communication of the outcome to complainant which includes a statement they have the right to appeal. - All evidence are available as attachments - The verification and closure of a complaint performed by a person different than the person who implemented actions and final disposition is identified



COMPLAINT HANDLING PROCESS

Document #: GOP216

Release Date: 17-NOV-2023

Page 11 of 16

Document Owner: L. Poulton

Approver: Global VP, Tech Management & Quality

<p><i>Outside of the process flow:</i> Trend Analysis</p>	<p>Director – Internal Auditing</p>	<p>Analysis report</p>	<p>Use Intelx Report and dashboards application to monitor performance 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. An Intelx user with the Complaint management role different than the one who reported and investigated the complaint must update the final approval and closure of the complaint. The Intelx user who closes the complaint must document the name of the approver



COMPLAINT HANDLING PROCESS

Document #: GOP216

Release Date: 17-NOV-2023

Page 12 of 16

Document Owner: L. Poulton

Approver: Global VP, Tech Management & Quality

in the comments section, if this is different than the Intelex user (due to limited number of local Intelex user licenses)

Note 4: If the investigation cannot be completed within 10 working days, the complainant will be notified of a new date of completion and the due date of the actions must be updated in Intelex application. When due dates of the actions are updated, the due date for the complaint is automatically updated to reflect the last action due date.

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 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. FSC Specific requirements based on *FSC-STD-20-001 V4-0 EN General requirements for FSC accredited certification bodies Section 1.9 Complaints and Appeal*

Upon receipt of a complaint or appeal, the Intertek will confirm whether the complaint or appeal relates to certification activities for which it is responsible and, if so, shall address it.



COMPLAINT HANDLING PROCESS

Document #: GOP216

Release Date: 17-NOV-2023

Page 13 of 16

Document Owner: L. Poulton

Approver: Global VP, Tech Management & Quality

Intertek will respond to complaints and appeals in the same language that is used in the public summary certification report or shall agree with the complainant on the language used.

Intertek will retain the anonymity of the complainant in relation to the client if this is requested by the complainant.

Intertek will treat anonymous complaints and expressions of dissatisfaction that are not substantiated as complaints as stakeholder comments and address these during the next audit.

Intertek will register all complaints with FSC.

Intertek will be responsible for gathering and verifying all necessary information (as far as possible) to progress the complaint or appeal to a decision.

Intertek has the duty of seeking a timely resolution of complaints and appeals, in particular to:

- a) acknowledge receipt of a complaint or appeal;
- b) provide an initial response, including an outline of the CB's proposed course of action to follow up on the complaint or appeal, within two (2) weeks of receiving a complaint or appeal;
- c) keep the complainant(s)/ appellant(s) informed of progress in evaluating the complaint/ appeal;
- d) investigate the allegations and specify all its proposed actions in conclusion to the complaint or appeal within three (3) months of receiving the complaint or appeal;
- e) notify the complainant when the complaint is considered to be closed, meaning that the CB has gathered and verified all necessary information, investigated the allegations, taken a decision on the complaint and responded to the complainant.

The decision resolving the complaint or appeal shall be made by, or reviewed and approved by, person(s) not involved in the evaluation related to the complaint or appeal.

Intertek will record and track complaints and appeals, as well as actions undertaken to resolve them.

A complainant shall be offered the opportunity to refer their complaint to ASI NA, if the issue has not been resolved through the full implementation of the Intertek's own procedures, or if the complainant disagrees with the conclusions reached by the Intertek and/ or is dissatisfied by the way the Intertek handled the complaint. As the ultimate step, the complaint may be referred to FSC.

11.SA 8000 Specific requirements

[Reference Saas procedures 201A.2015 point.1.13](#)

11.1 Complaints Sent Directly to INTERTEK:



COMPLAINT HANDLING PROCESS

Document #: GOP216

Release Date: 17-NOV-2023

Page 14 of 16

Document Owner: L. Poulton

Approver: Global VP, Tech Management & Quality

1.13.1.1 Upon receipt of a complaint within the scope of SAAS accreditation, the INTERTEK SHALL, at minimum:

- a) Initiate its complaints procedure.
- b) Acknowledge receipt of the complaint to the complainant within 5 working days.
- c) Determine the acceptability of the complaint based on evidence received.

11.2 If the complaint is accepted by the INTERTEK, the INTERTEK SHALL conduct an investigation as detailed below.

11.2.1 If the complaint is not accepted, the INTERTEK SHALL notify the complainant of why it was not accepted, and provide instructions on the INTERTEKs appeals process. The complainant SHALL also be given the opportunity to provide additional evidence to support the complaint.

11.2.2 Complaints SHALL be reviewed by designated INTERTEK staff to determine their relevance to provisions of SA8000 or SAAS audit requirements or accreditation procedures, and determine if the INTERTEK should record the information as documented evidence of an SA8000 client's non-compliance (if applicable).

- a) The INTERTEK SHALL conduct an investigation, which may be aided by an unannounced audit and through interviews with outside stakeholders, such as: trade unions, NGOs, and the complainant.
- b) The investigation SHALL cover all elements identified in the complaint.
- c) If the complaint relates to a specific audit, the INTERTEK SHALL assign personnel to the complaint investigation who were not a part of the relevant audit team.

11.2.3 The INTERTEK SHALL submit a report to the complainant regarding the conclusion of its investigation.

- a) The report SHALL present the resolution of the complaint and the reasons for that conclusion.
- b) The report SHALL summarize the documented evidence submitted and the response, if there is any, from the certified organisation's management. If the certified organisation has agreed to corrective action, its commitment SHALL be included in the report. When the INTERTEK confirms that the certified organisation has implemented the corrective action, this information SHALL be included in the report as well.
- c) The certified organisation's management SHALL have the right to submit a written response to the allegations. This response, or a summary of it, SHALL be included in the report. The report SHALL be written according to any relevant confidentiality agreements, and SHALL be issued within 10 days of rendering the decision.



COMPLAINT HANDLING PROCESS

Document #: GOP216

Release Date: 17-NOV-2023

Page 15 of 16

Document Owner: L. Poulton

Approver: Global VP, Tech Management & Quality

11.3 Complaints Received by SAAS Regarding INTERTEKs and INTERTEK Clients:

11.3.1 Any complaints received by SAAS regarding INTERTEKs and INTERTEK clients SHALL be forwarded to INTERTEK for further action and investigation. INTERTEKs SHALL follow the process as detailed above.

11.3.2 In addition, the INTERTEK SHALL at a minimum:

a) Acknowledge receipt of the complaint from SAAS.

b) Report its plan of action to SAAS within 10 days, and submit subsequent reports every 30 days after that point.

c) Establish contact with the complainant as part of the investigation.

d) Complete the investigation within 90 days or less, unless otherwise agreed upon with the SAAS Executive Director.

11.3.3 SAAS may elect to investigate the INTERTEK's actions in investigating the complaint by conducting an additional audit of the INTERTEK and/or certified organisation.

11.4 Other Types of Complaints Received by SAAS:

11.4.1 SAAS may receive information regarding a INTERTEK or a INTERTEK's certified client from a stakeholder with whom SAAS or SAI, the owner of the SA8000 standard, has a relationship. This stakeholder may have information that raises issues of concern about the certified organisation, which then requires investigation by the INTERTEK. SAAS SHALL require INTERTEKs to treat such issues of concern as formal complaints and undertake an investigation as noted in the points above, and correspond directly with the stakeholder.

11.4.2 The relevant complainant may wish to remain anonymous. In such cases, SAAS SHALL act as the intermediary; the INTERTEK SHALL send all correspondence to SAAS, which shall liaise with the complainant.

11.4.3 All complaints SHALL be logged and actioned, with records maintained. The INTERTEK SHALL provide the SAAS auditor with this information during accreditation audits. All INTERTEKs in the SAAS accreditation system SHALL keep records of complaints, appeals and responses for a minimum of 10 years after the resolution of the complaint. Non-confidential information about complaints is published on the SAAS website:

<http://www.saasaccreditation.org/complaints>

11.4.4 INTERTEK SHALL provide a detailed report to SAAS of all complaints received every 6 months. This report SHALL include details of the complaint, outcome, root cause analysis and corrective action, as necessary.



COMPLAINT HANDLING PROCESS

Document #: GOP216

Release Date: 17-NOV-2023

Page 16 of 16

Document Owner: L. Poulton

Approver: Global VP, Tech Management & Quality

11.4.5 The INTERTEK complaints process SHALL include statutes covering whistleblowers which protects such whistleblowers from retaliation. This SHALL include protection for personnel within the certified organisation as well as other stakeholders within the SA8000 process.

11.4.6 SAAS has developed a confidential complaints system for stakeholders to use. This can be found at:

<http://www.saasaccreditation.org/complaints>.

11. Records

All records relative to Complaints/Disputes/Appeals shall be entered In Intelx/Complaint reporting application and maintained per GOP202 - Records Control Process

REVISION LOG

Revision #	Description of Change	Release Date
0	Initial release	14-Mar-2019
1	Intelx- a new complaint Reporting application and correcting the email address of complaints channel	05-April-2024