

Complaints Policy

1. Purpose

The purpose of this policy is to define the process for receiving, evaluating, and resolving complaints related to certification activities of ICB International Certification Body LLC. This policy ensures that complaints are handled fairly, transparently, and in compliance with Clauses 9.8.1, 9.8.2, 9.8.3, 9.8.4, 9.8.5, 9.8.6, 9.8.7, 9.8.8, 9.8.9, 9.8.10 and 9.8.11 of ISO 17021.

2. Scope

This policy applies to all complaints submitted by clients, stakeholders, and other interested parties concerning certification activities of ICB International Certification Body LLC, including certification decisions, audit practices, and certified entities. This policy does not apply to complaints and requests from stakeholders and other interested parties that are manifestly unfounded or excessive, in particular because of their repetitive character.

3. Responsibility, and Submitting a Complaint (Clause 9.8)

We are responsible for all decisions at all levels of the complaints handling process, starting with deciding on the purposes and means regarding the implementation of our complaint submission form, ending with the decision on each complaint.

Complaints may be submitted by any interested party who has concerns about the certification process or decisions made by ICB International Certification Body LLC. Complaints must be submitted in writing, using the webform on our website, and shall include:

Description of the Complaint: A clear and detailed description of the issue, including the specific activities or decisions in question.

Supporting Evidence: Supporting documentation or evidence related to the complaint.

3.1 Timeframe for Submitting Complaints

Complaints shall be submitted within 10 days following the event that triggered the complaint. Complaints submitted after the specified timeframe may not be considered or reviewed unless extenuating circumstances are demonstrated.

4. Non-Discrimination and Acknowledging and Logging Complaints

The submission, investigation and decision on complaints will not result in any discriminatory actions against the complainant.

Additionally, we will not discriminate against anyone on the grounds of gender, race, skin color, ethnic or social origin, genetic characteristics, language, religion or ideology, political or other beliefs, membership of a national minority, property, birth, disability, age, sexual orientation, nationality or any other legally defined grounds.

Upon receipt of a complaint, ICB International Certification Body LLC acknowledges, where possible, the complaint in writing and logs it in the complaints register. The acknowledgment includes:

Confirmation of Receipt: The complainant is, where possible, informed within 10 days after receipt of the complaint that their complaint has been received and is under review.

5. Examination of Complaint and Complaints Handling Process

Upon receipt of a complaint, we confirm whether the complaint relates to certification activities that we are responsible for and, if so, we will deal with it. If the complaint relates to a certified client, then examination of the complaint will consider the effectiveness of the certified management system of the certified client. Where the complaint is not related to certification of a certified client, the complaint is dismissed without further notice.

Complaints are handled in a structured and impartial manner. The process includes:

Independent Review: The complaint is reviewed by individuals who were not involved in the subject of the complaint and have no conflicts of interest.

Investigation by the Complaints Committee: The complaints committee conducts a thorough investigation of the issues raised in the complaint, including a review of relevant records, audits, and, where required, personnel interviews, or interviews of clients or the complainant.

5.1 Confidentiality

All information related to complaints is treated confidentially. Only personnel directly involved in handling the complaint have access to the details of the case.

6. Compliant Referral to Certified Client, and Decision on the Complaint

Any valid complaint about a certified client will also be referred by us to the certified client in question at an appropriate time. All communication with the client, including submitting information regarding the complaint, will be handled by email. The client has to respond in writing, by email.

After the investigation is completed, ICB International Certification Body LLC issues a decision on the complaint. The decision includes:

Outcome of the Investigation: A clear statement of whether the complaint has been upheld or rejected, along with the reasons for the decision.

Actions to be Taken: If the complaint is upheld, any corrective actions required to resolve the issue and prevent recurrence are clearly outlined.

6.1 Notification to the Complainant

Where possible, the decision on the complaint is communicated to the complainant in writing.

7. Documented Process, Confidentiality

This policy supports our documented process to receive, evaluate and make decisions on complaints. Our process is subject to requirements for confidentiality, as it relates to the complainant or to the subject of the complaint. Only people that are subject to confidentiality agreements or that are under a legal

obligation of professional secrecy (e.g., lawyers, attorneys, solicitors etc.), and that are employed or engaged by us, may access the data of the complainant or the information regarding the complaint.

8. Elements of and Methods for the Complaint Handling Process and Appeals against Complaint Decisions

Our complaints-handling process does include an outline of the process for receiving, validating and investigating the complaint, and for deciding what actions need to be taken in response to it, tracking and recording complaints, including actions undertaken in response to them, ensuring that any appropriate correction and corrective action are taken. We validate and investigate every complaint, and take appropriate action, including correction and corrective action, regarding justified complaints.

If the complainant is a client of ours and is dissatisfied with the decision on their complaint, they have the right to appeal. The appeal must be submitted in writing and will follow the appeals process outlined in the Appeals Policy. If the complainant is not a client but a stakeholder or other interested party, they have no right to appeal.

9. Responsibility and Ensuring Impartiality

As the receiver of the complaint, we are responsible for gathering and verifying all necessary information to validate the complaint. After we have received a complaint relating to a certified client or its certification, we gather all evidence regarding the complaint, which may include Stage 1 and Stage 2 audit reports, documented evidence provided to us during, before and after Stage 1 and Stage 2 audits and the certification decision, including (if applicable) former certification decisions, evidence provided to us by the complainant, and review this information. Furthermore, we verify if all information was gathered. When we are satisfied with the gathered evidence, and after a thorough review, we validate the complaint.

ICB International Certification Body LLC ensures that all individuals involved in the complaints process are impartial and free from conflicts of interest. This includes:

Complaints Committee: A complaints committee was established to review complaints. The complaints committee consists of one or more members. Members of the committee must not have been involved in the subject of the complaint and must have no vested interest in the outcome. Where a member of the complaints committee was involved in auditing the client, or made the certification decision, the member shall be excluded from the complaints committee for the specific decision.

The general members of the complaints committee are:

Prof. Dr. iur. Tinatin Erkvania, LL.M., Managing Director, info@cert-authority.com

Gevorg Tovmasyan, VP Certification, info@cert-authority.com

Prof. Dr. h.c. Heiko Maniero, LL.B., LL.M. mult., M.L.E., Main Shareholder, info@cert-authority.com

9.1 Conflict of Interest

Any potential conflicts of interest are identified and addressed before individuals are assigned to the specific complaints committee to ensure impartiality and objectivity in the complaints process.

10. Acknowledgement of Receipt, Progress Report, and Corrective and Preventive Actions

Whenever possible, we acknowledge receipt of the complaint within 10 days after receiving the complaint and provide the complainant with a progress report every 30 days thereafter and the result of the complaint within 10 days after the complaint decision was made.

If the complaint is upheld, ICB International Certification Body LLC implements corrective and preventive actions to address the issues raised and prevent recurrence. These actions are documented and monitored to ensure their effectiveness.

11. Segregation of Duties and Communication of the Complaints Process

The decision to be communicated to the complainant will be made by, or reviewed and approved by, individual(s) not previously involved in the subject of the complaint.

ICB International Certification Body LLC ensures that all interested parties are informed of their right to submit a complaint and the process for doing so. This includes:

Stakeholder Awareness: The complaints process is communicated to clients, stakeholders, and the public through appropriate channels, such as our website.

12. Formal Notice to Complainant, and Monitoring Complaints for Continuous Improvement

Whenever possible, we give formal notice of the end of the complaints-handling process to the complainant. The formal notice is made in writing, by email.

Complaints are monitored as part of ICB International Certification Body LLC's continuous improvement process. The analysis of complaints is used to identify trends, root causes, and opportunities for improving the certification process.

13. Publication of the Complaint and its Resolution

We determine, together with the certified client and the complainant, whether and, if so to what extent, the subject of the complaint and its resolution will be made public. However, the complainant and the client may participate in the discussion but cannot decide, co-decide or vote on, if the subject of the complaint and its resolution is made public. This decision will be made by us.

14. Documentation and Record Keeping

ICB International Certification Body LLC ensures that all documentation related to complaints is maintained and retained as part of the certification record. This includes:

Complaint Submission: Submissions by interested parties detailing the nature of the complaint and any supporting documentation.

Complaints Decision: Documented evidence about the outcome of the complaint and any actions required by ICB International Certification Body LLC.

15. Supervision

Overall Supervision is carried out by the following person:

Prof. Dr. iur. Tinatin Erkvania, LL.M., Managing Director, info@cert-authority.com

Supervision over responsiveness to complaints and appeals is carried out by the following person:

Nare Petrosyan, Lead Auditor and CFO, info@cert-authority.com

16. Review and Updates

This policy is reviewed annually by top management to ensure compliance with ISO 17021 and to reflect any updates regarding the complaints process. Any changes to the policy are communicated to relevant personnel.

17. References

ISO 17021 – Conformity assessment – Requirements for bodies providing audit and certification of management systems