



PURPOSE

The purpose of this procedure is to describe the handling of complaints and/or appeals received from clients, in house and/or other parties. This procedure also explains how a request for information can be made.

SCOPE

This procedure covers all requests for information, complaints and appeals received at Bulletproof. by electronic messaging (including email) in response to assessment actions, recommendations that follow, certification decisions, certified clients, certification personnel, market or other sources, and the role of the Appeal Board in reaching a conclusive settlement on account of an appeal.

RESPONSIBILITY

The members of the Appeal Board can be selected from the following: Senior Management; Compliance Manager; Governance Managers not involved in the audit or the certification decision

In the event that a member or members of the Appeal Board have a conflict of interest, based upon the facts or circumstances of a specific complaint or appeal, the Certification manager shall select a substitute member or members to hear and decide upon that claim. The substitute member or members should be a part of the Bulletproof Senior Management team.

Members of the Board who review, approve and make decisions on the appeal shall not be previously involved in the subject of the appeal.

REQUEST FOR INFORMATION

Should a party verbally request information they will be notified that such a request must be made by electronic messaging (including email). In accordance with ISO/IEC 17021-1 sub-section "8.1.2 – Request for information" the following information is provided to the customers:

- Geographical areas of operation of Bulletproof.;
- The status of a given certification;
- The name, related normative document, scope and geographical location (city and country) for a specific certified client.

Please refer to the "Bulletproof Audit Process" for more details.

COMPLAINT PROCESS

Bulletproof is responsible for all decisions at all levels of the complaints handling process.

COMPLAINTS ABOUT CERTIFIED CLIENTS

When a complaint (or Observation) is received by Bulletproof concerning a certified client (regardless of who the complainant may be) Bulletproof will confirm whether the complaint relates to certification activities that it was responsible for and, if so, handle the complaint. Bulletproof will acknowledge receipt of the complaint (whenever possible) and request that the complainant provide enough information (including a full description of the reasons for the complaint) and supporting documentation to enable Bulletproof to evaluate and validate the complaint. The Appeal Board will study the complaint together with supporting evidence and during the evaluation shall consider the effectiveness of the certified management system. If the complaint is



found to be genuine (i.e. there is an indication of system failure) the complaint is sent to the certified client for a response (this is considered to be the appropriate time to notify the certified client). Adequate time is given to the certified client for a response. However, if required, the Appeal Board will follow up with the client to ensure a response is received. No confidential reports or information will be sent to complainants without written permission from the client. Depending on the response received from the client the Appeal Board may decide to: write to the complainant informing them of the response and asking for them to further respond; ask for further clarification/information from the client; assign an auditor to personally visit the client and investigate for system failure (such visit shall be considered as special visit and charged to client); request a joint meeting with the client, complainant and Bulletproof

The following shall be conducted by a member of the Appeal Board who has not been part of the staff involved in the certification of the client:

- Review of complaints;
- Approval of decision;
- Communicating the final decision to the complainant.

Whenever possible Bulletproof shall ensure the complainant is kept up to date with the progress of the complaint and give formal notice of the end of the complaints-handling process to the complainant.

If necessary, Bulletproof will take appropriate correction and corrective actions.

All Complaints, including actions taken, will be tracked and recorded by Bulletproof.

Bulletproof shall determine, together with the certified client and the complainant, whether and, if so to what extent, the subject of the complaint and its resolution shall be made public.

Submission, investigation and decision on complaints shall not result in any discriminatory actions against the complainant and is subject to requirements for confidentiality, as it relates to the complainant and to the subject of the complaint.

COMPLAINTS ABOUT CERTIFICATION DECISIONS

When the client disagrees with the evaluation/assessment given he or she must declare the reasons for disapproval in writing to Bulletproof at the earliest convenience. The complaint shall be submitted immediately after receiving the re-evaluated decision and no later than 30 working days after receiving the decision.

The complaint shall be submitted in writing using e-mail or another form of electronic messaging. The complaint shall include the personal information of the complainant (full name, address and other contact details). It shall also include the complainant's personal opinion about the assessment and the reasons for disagreeing with the decision reached during the initial decision and second evaluation, as well as the settlement being sought with the complaint. Submission, investigation and decision on complaints shall not result in any discriminatory actions against the complainant. Bulletproof Europe will confirm receipt of the complaint and inform the complainant that the complaint is under investigation.

Complaints will be reviewed by a member of the Appeal Board who has not been part of the staff involved in the initial assessment. The Complaint reviewer should consider the complainant's explanation and supporting information. The review may include discussion with concerned client, respective auditor / lead auditor and review of audit report. The Appeal Board may also direct any other lead auditor to visit the site and determine



the validity of the complaint. If the complaint is found to be valid, corrective actions shall be taken and documented as per the Corrective Action procedure.

The reviewer of the complaint should provide a written response within 30 working days after receiving a complaint. The complainant will receive an answer on the decision reached in writing (via email). The answer will include clear explanation (or a repeated explanation) of the assessment decision following a re-evaluation of the evidence.

If the Complainant agrees with the outcome, then the complaint does not proceed to further stages. If the Complainant is not satisfied with the outcome, then he or she may file an Appeal. If necessary, Bulletproof will take appropriate correction and corrective actions.

All Complaints, including actions taken, will be tracked and recorded by Bulletproof.

OTHER COMPLAINTS

When a complaint (or Observation) is received by Bulletproof from any other source or party, he or she must declare the reasons for disapproval in writing to Bulletproof at the earliest convenience. The complaint shall be submitted immediately after having observed the fact and no later than 30 working days.

The complaint shall be submitted in writing using e-mail or another form of electronic messaging. The complaint shall include the personal information of the complainant (full name, address and other contact details). It shall also include the complainant's personal opinion about the fact and the reasons for disagreeing with it, as well as the settlement being sought with the complaint. Submission, investigation and decision on complaints shall not result in any discriminatory actions against the complainant. Bulletproof will confirm receipt of the complaint and inform the complainant that the complaint is under investigation.

Complaints will be reviewed by a member of the Appeal Board who has not been part of the staff involved in the observation cited in the complaint. The Complaint reviewer should consider the complainant's explanation and supporting information. The review may include discussion with concerned parties. If the complaint is found to be valid, corrective actions shall be taken and documented as per the Corrective Action procedure.

The reviewer of the complaint should provide a written response within 30 working days after receiving a complaint. The complainant will receive an answer on the decision reached in writing (via email). The answer will include clear explanation (or a repeated explanation) of the decision following a re-evaluation of the evidence.

If the Complainant agrees with the outcome, then the complaint does not proceed to further stages. If the Complainant is not satisfied with the outcome, then he or she may file an Appeal. If necessary, Bulletproof will take appropriate correction and corrective actions.

All Complaints, including actions taken, will be tracked and recorded by Bulletproof.

APPEAL PROCESS

Steps to be followed by the appellant:

- The Appeal shall be submitted soon after receiving the complaint decision and no later than 90 days (three months) after receiving the decision
- The Appeal shall be submitted in writing by e-mail



- The Appeal shall include the Appeal Fees (if applicable)
- The Appeal shall include the personal information of the complainant (full name, address and other contact details). It shall also include the appellant’s personal opinion about the assessment and the reasons for disagreeing with the first and second evaluation plus why the appellant disagrees with the review carried out after the complaint

Steps to be followed by Bulletproof:

- Bulletproof appoints an Appeal Board which is in charge of the appeal process and is accountable for safeguarding the impartiality with respect to the appeal and the operations of the organization
- Appeal Board will respond to an appellant in writing (via email) within 60 days after receiving the appeal. It should be noted that this decision is absolute and final
- Submission, investigation and decision on Appeals shall not result in any discriminatory actions against the appellant
- Bulletproof management will decide if the appellant is to be charged a fee. Should the appeal decision be in favor of the appellant, any fees paid will be reimbursed to the appellant
- If necessary, Bulletproof will take appropriate correction and corrective actions
- All Appeals, including actions taken, will be tracked and recorded by Bulletproof

CLOSING A COMPLAINT AND APPEAL

Depending on the nature of the complaint and/or appeal a member of the Appeal Board may follow up with requests for corrective actions. If the investigation of complaint and appeal determines which factors contributed to the complaint and appeal, the member of the Appeal Board will provide the appropriate parties with all relevant information.

Every complaint and appeal is recorded. The records are maintained in accordance with Bulletproof’s Record Management procedures. This includes any records of the corresponding corrective action. The records of investigations that concern product quality or other test characteristics are also maintained by Bulletproof’s Record Management procedures.

Based on analysis of the complaint and appeal (and when necessary actions are taken) the member of the Appeal Board identifies the need for taking corrective action to prevent such a complaint and appeal happening in future and will inform all affected parties.

Revision History

Version	Change Description	Date
1.0	Initial Release	2021-12-14