

FSC Chain of Custody certification

Complaints & Appeals procedure

General Principles

Complaints and Appeals in relation to FSC certification decisions rendered by Cotecna will be handled in accordance with this FSC Complaints & Appeals Procedure ("Procedure"). The Procedure is available to the following situations where the issues have not been resolved through less formal means, e.g. discussions with either Cotecna or the Client directly:

1. Client Complaint about how Cotecna performs its FSC certification services,
2. Client Appeal about a certification decision that Cotecna made,
3. Third party Complaint about a Cotecna FSC Chain of Custody certificate holder.

All Complaints and Appeals will be handled within a reasonable timeframe and as transparently as possible, whilst fully respecting principles and requirements of confidentiality and impartiality and will not result in any discriminatory actions.

This Procedure is applicable to any formal decision rendered by Cotecna or actions taken by a Client where such decision or actions are believed to conflict with FSC requirements.

Definitions

Appeal: A request by a Client for formal reconsideration of a decision made by Cotecna in relation to FSC certification services provided by Cotecna.

Client: Entity which at the time of the Complaint or Appeal is party to a certification contract with Cotecna (FSC certificate holder or certification applicant).

Complaint: A written expression of dissatisfaction by a Client or third party relating to FSC certification services provided by Cotecna, where a response from Cotecna is requested in accordance with this procedure.

Investigative Procedure

Complaints and Appeals should be submitted via email to: fsc@cotecna.com.

Any Complaint or Appeal shall include all information, including but not limited to:

- Clear description of the issue;
- Evidence to support each element or aspect of the Complaint or Appeal (documents, locations, persons, dates etc.);
- An explanation as to how the action is alleged to violate or be inconsistent with a FSC requirement, being as specific as possible with respect to the applicable requirements;
- Description of any effort taken to resolve the matter directly with Cotecna or the Client, as the case may be;
- Contact details and name of the complainant or appellant; Cotecna will retain the anonymity of the complainant in relation to the Client during its investigation, if so requested; and
- Proposal of what actions would rectify the matter.

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

In the case of Appeals, the Client must lodge its Appeal with Cotecna within 14 days after notification of the adverse decision.

Upon receipt of a Complaint or Appeal, Cotecna will undertake the following actions:

- Confirm whether the complaint or appeal relates to certification activities for which Cotecna is responsible and, if so, shall address it;

- Register the Complaint or Appeal with FSC;
- Open a Complaint or Appeal file in which all materials and correspondence associated with the Complaint or Appeal will be maintained;
- Acknowledge receipt of the Complaint or Appeal, informing the complainant or appellant that its Complaint or Appeal is being reviewed;
- Inform the complainant or appellant as to whether or not the Complaint or Appeal qualifies for investigation under this procedure;
- Should the Complaint or Appeal qualify for an investigation, select an individual to investigate who is independent of the:
 - certification evaluation at issue; and
 - associated certification decision.
- The assigned investigator will undertake the following tasks:
 - Solicit and collect any additional information necessary to investigate the Complaint or Appeal. The investigation will be based primarily upon written documentary evidence supplied by the complainant or appellant. It is the complainant's or appellant's burden to establish that there has been an action taken in contravention of a requirement. Typically, the investigator will supplement the documentary evidence submitted by the complainant or appellant with telephone and email interviews. The investigator may elect to conduct a field inspection to supplement the documentary evidence;
 - Prepare a written report in which the findings and recommendations are presented. Under normal circumstances, the report will be completed within 90 days of receipt of the Complaint or Appeal; and
 - Submit the report to the Cotecna Group Quality Senior Manager (or designee).
- The Cotecna Group Quality Senior Manager (or designee) will then:
 - Review the report to determine if further information is required.
 - Inform in writing the complainant or appellant and other relevant parties (e.g., certificate holder, relevant external parties) of the disposition of the Complaint or Appeal and, where appropriate, provide the report, or a summary thereof, to all parties along with the final decision.
 - Inform the complainant or appellant in writing that the Complaint or Appeal is deemed closed, or resolved, by Cotecna.
 - Issue internal non-conformity reports and/or recommendations, where appropriate;
 - Instruct issuance of non-conformity reports to the Client under investigation, where applicable.

If the complainant or appellant accepts the proposed decision or action, then the decision or action is carried out and recorded. In the event that no response is received from the complainant or appellant within 3 months after the last communication, the Complaint or Appeal will be deemed closed.

If the issue has not been resolved through the full implementation of Cotecna's own procedures, or if the complainant or appellant disagrees with the conclusions reached by Cotecna and/ or is dissatisfied by the way Cotecna handled the Complaint or Appeal, the complainant or appellant will be offered the opportunity to refer its complaint to ASI. As the ultimate step, the complaint may be referred to FSC.

In case a procedure is being employed by a "vexatious litigant", Cotecna reserves the right to turn the matter immediately over to ASI or FSC for further disposition or, as appropriate, to reject the Complaint as without merit.

Costs of Investigation

Costs associated with investigating a Complaint or Appeal cannot be borne solely by Cotecna and may, depending on the nature of the Complaint or Appeal, be recharged at a fee to the Client to cover at least a portion of the costs of the investigation.