



Perry Johnson Registrars, Inc.

Complaint Procedure

This procedure outlines the process for handling customer complaints and the subsequent corrective action process. This procedure is available on request or accessible on the client access page at www.pjr.com.

COMPLAINT PROCEDURE

1 General

- 1.1 Purpose: To set forth the process for receiving, documenting and resolving customer complaints (including root cause analysis and systemic corrective action).
- 1.2 Scope: Applies to complaints about PJR or complaints about organizations certified by PJR.

2 Related Procedures, Exhibits

- 2.1 ISO/IEC 17021
- 2.5 ISO/TS 22003
- 2.6 ANAB Criteria for Accreditation
- 2.7 ANAB Criteria For Bodies Operating Registration of Environmental Management Systems
- 2.8 Any other applicable Accreditation Body materials that may apply to PJR through our accreditation agreements
- 2.9 PJR-0 By-Laws
- 2.10 PJR-1(series) Quality Manual
- 2.11 F-3(series) Registration Agreement
- 2.12 F-121 Client Issues Form
- 2.13 PRO-1(series) Registration Procedure
- 2.14 PRO-8 Corrective Action Procedure
- 2.15 PRO-10 Dispute Procedure
- 2.16 PRO-11 (as applicable): Procedure for Suspension or Withdrawal of Registration Certificates
- 2.17 WI-44 Differences Between Inquiry and Complaint
- 2.18 R2 Code of Practices
- 2.19 ISO/IEC 17065 Latest Revision
- 2.20 Certification Procedure, PRO-01.17065

3 Complaints about PJR

- 3.1 All PJR employees can accept client inquiries and complaints. If an inquiry the employee responds to the client and records the inquiry and response in PJView notes so that any other employee that has contact with the client can review a record of interaction with the client. All complaints are forwarded to the International Client Services Manager to be documented on an F-121 and assigned for investigation and resolution. Investigation team is to be assigned within 24-48 hours of receipt of complaint. Formal communication of investigation findings and response to be sent to the client within 30 days of the complaint filing. Negative feedback from clients received on F-18 Customer Satisfaction Surveys will be logged on spreadsheet by Customer Service and updated in PJ View profile under client notes along with response to client by employee.
 - 3.1.1 A Customer Complaint is defined as:
 - a) Any query or complaint that the client identified as a complaint;
 - b) Any query, inquiry, or statement that occurs as a result of a system failure as determined by Management;
 - c) Anything submitted formally in writing to the Customer Service Department.

PJR WI-44 (Differences between Inquiry and Complaint) provides further direction on distinguishing between an inquiry and complaint.
 - 3.1.2 Personnel, including management, should not be employed to investigate any appeal, complaint, or dispute if they have been directly involved in the appeal, complaint or dispute in the past two years or if there are any relationships that may compromise the impartiality of the investigation.
- 3.2 PJR Managers and the Customer Service Department are responsible for classifying the

complaint to determine if the President and/or Program Manager (PM) need to be involved in its resolution.

In Japan, CEO has the responsibility of President provided herein.

- 3.3 The Customer Service Department is responsible for documenting, resolving and following up on all complaints directed to them using the F-121. All customer complaints require root cause analysis and implementation of corrections and corrective actions. All complaints are logged on a matrix, the F-122, and periodically reported to management for preventive action and quality improvement purposes.
- 3.4 In Japan, the Director of Administration and appropriate personnel will review all customer complaints and determine if corrective action is necessary and what the deadline will be. Complaints, root cause and corrective action (if necessary) will be recorded for Japan on the F-121J.
- 3.5 In Mexico, the Mexico Division Manager and appropriate personnel will review all customer complaints and determine if corrective action is necessary within 10 business days. Complaints, corrections, root cause and corrective action (if necessary) will be recorded for Mexico on the F-121mex.
- 3.6 In India PJCPL, any employee can accept a client inquiry or complaint. In the event of a complaint (refer to WI-44), all formal complaints will be referred to the Customer Service Representative in the Bangalore office to be forwarded to the ICSM, or submitted directly to International Client Services Manager (customerservice@pjr.com) for completion of F-121, and assignment of team for complaint investigation and resolution. The Director of PJCPL will be included on all complaint filings and formal resolution, as well as CC'ed on communications to clients. Complaints, root cause, and corrective action (if necessary) will be recorded for India at World Headquarters in USA and a copy maintained at the Bangalore Office for Director's review.
- 3.7 If PJR receives a complaint about its R2 Program, then the results of the complaint investigation must be e-mailed to SERI within 30 days by the responsible Program Manager. This includes complaints which PJR deemed invalid.
- 3.7.1 For R2v3 per COP: PJR shall record, investigate and report to SERI any complaints received related to the R2 Certification Program (e.g. Auditor, CB or R2 Facility) incorporating the actions and timeframes in the table from COP (Table 1) copied below.

| Due Date | Action |
|--------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 7 days from receipt of the complaint | Notification: The CB shall document the complaint and notify SERI within seven days of receipt of the complaint. |
| 21 days from receipt of complaint | <p>Preliminary Review: The CB shall complete a review of whether there is merit to the complaint. Merit can be determined with information provided in the complaint, the source of the complaint, and review of publicly available information. Complaints without merit need not be further investigated provided a record is maintained of the reason why the complaint was not with merit.</p> <p>Reviews shall not rely solely upon asking an Auditor or the R2 Facility to respond to the complaint. This may be one source of information, but does not eliminate the responsibility of the CB to conduct their own independent review using:</p> <ul style="list-style-type: none"> • Information from the Complainant, R2 Facility or Auditor • Communication with the Complainant, R2 Facility or Auditor • Public business records |

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| | <ul style="list-style-type: none"> • Public websites, including the R2 Facility’s websites • Online sales websites used by the R2 Facility • Previous audit report and records • Records requested from the R2 Facility • Information available from SERI |
| 30 days from receipt of the complaint | <p>Investigation: The CB shall identify the course of action and appropriate timeframes to investigate, if necessary, and address the complaint. Recommended actions may include:</p> <ul style="list-style-type: none"> • Records Review • On-site or remote audit • Issuance of a major or minor NC to the R2 Facility • Suspension of an R2 Facility’s certificate • Withdrawal of an R2 Facility’s certificate • CB Auditor/employee training and correction <p>The CB shall inform SERI of the action(s) to be taken and timeframe.</p> |
| 60 days from receipt of the complaint | <p>Resolution: The CB shall complete the investigation and send the following information to SERI:</p> <ul style="list-style-type: none"> • A summary report documenting the investigation and action taken • If a minor NC has been issued – R2 Facility’s evidence of correction and corrective action plan • If a major NC has been issued – R2 Facility’s CA Plan and evidence of implementation of correction and progress on corrective action • Any change of status in certification • Any change in Auditor status or competencies <p>If evidence of correction cannot be obtained from the R2 facility and verified by the CB within 30 days of issuance of NCs, the CB shall suspend the R2 certificate. The timing for corrective actions should follow requirements as specified in Section 8.6 in this document.</p> |
| Monthly | <p>Status Updates: The CB shall provide a monthly status report to SERI for any open complaints until they are satisfactorily closed.</p> |

4 Complaints about PJR Certified Companies

- 4.1 Upon receipt of a complaint about an organization certified by PJR, appropriate personnel elicit all pertinent information in writing.
- 4.2 The PM and/or President forwards the information regarding the complaint to the Certified Company and requests written comment.
- 4.2.1 Complaints regarding a certified company represent a source of information as to possible nonconformity. The certified company should investigate the complaint and report to PJR the results of the investigation. Where appropriate, the certified company should determine and report to PJR the cause of the nonconformity, including any predetermining (or predisposing) factor within the organization’s QMS, any corrections and corrective actions taken.
- 4.3 If the Certified Company does not respond within 30 days (10 days for Mexico), and/or if the President or Program Manager, having reviewed the matter, finds that the organization has violated the terms of its agreement with PJR, the President must invoke the PJR Procedure for Suspension or Withdrawal of Registration Certificates (PRO-11 as applicable).

- 4.4 After any feedback from the certified company is reviewed, the President or Program Manager may determine that the complaint does not violate the PJR Registration Agreement or By-Laws. S/he may, at his/her discretion, may declare the matter closed without taking further action.
- 4.5 In any event, the PM/President notifies the Complainant and/or the certified company, in writing, of his decision in the matter. S/he also advises both parties that his/her decision may be disputed per PJR's Dispute Procedure (PRO-10).
- 4.6 The PM/President must determine, together with the certified company and complainant, if, and to what extent, the subject of the complaint and its resolution will be made public.
- 4.7 During surveillance audits, PJR should review any outstanding complaints to verify corrective/preventive action. In certain circumstances, PJR may determine that a short notice audit is required to investigate/close the complaint. If this is the case, then the short notice audit shall be completed within 90 calendar days from receipt of the complaint.
- 4.8 The International Client Services Manager and EHS Program Management staff must work together to ensure that details of a complaint about an R2-certified client are understood. The EHS Program Manager is responsible for communicating complaint details, including the investigation and resolution, to SERI within 30 days.
 - 4.8.1 For R2v3 per COP: PJR shall record, investigate and report to SERI any complaints received related to the R2 Certification Program (e.g. Auditor, CB or R2 Facility) incorporating the actions and timeframes in the table from COP (Table 1) copied in section 3 above.
- 4.9 PJR is responsible for all decisions at all levels of the complaints-handling process.
- 4.10 Submission, investigation and decision on a complaint shall not result in any discriminatory action against the complainant.

5 Records

- 5.1 Records of all aspects of complaint processing are maintained by the International Client Services Manager or designee under strict security, in accordance with PRO-5.

6 Accreditation Body Involvement

- 6.1 PJR will refer any complaints that cannot be adequately resolved to the appropriate accreditation body.