

PROCEDURE P9

Complaints Procedure

CERTIFYING EXCELLENCE IN ANTI-CORRUPTION COMPLIANCE

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ETHIC Intelligence® is an independent certification agency within The Red Flag Group®.

1. Handling concerns at ETHIC Intelligence

ETHIC Intelligence attaches the utmost importance to integrity in its business practices and has designed three processes to handle concerns that anyone – within or outside the company – may wish to raise:

- **Alert Procedure** when the concern relates to the behavior of employees or auditors, including suspected conflicts of interest
- **Complaint Procedure** when the concern relates to the way ETHIC Intelligence operates including but not limited to breaches of ISO 17021.1 or ISO 17021.9 which governs the way Certification Bodies certify ISO 37001
- **Appeals Procedure** when the concern relates to a certification-related decision taken by the Certification Committee: awarding, denying, suspending, etc. a certificate

The following document details the **Complaints Procedure**.

2. Objectives of the Complaints Procedure

The objective of the Complaints Procedure is to allow anyone to raise a concern related to the way ETHIC Intelligence, its clients or partners operate or any other issue they deem unsatisfactory. This includes but is not limited to breaches of ISO 17021.1 or ISO 17021.9 which govern the way Certification Bodies certify ISO 37001.

3. Principles of the Complaint Procedure

Submission, investigation and/or decision on a complaint shall not result in any discriminatory actions against the complainant.

The decision communicated to the complainant shall be made, approved and reviewed by individuals not previously involved in the subject of the complaint.

Records must be registered in the file: “EI R32 Complaints Reporting”. All steps taken during the complaint process must be appropriately filed.

4. Modalities of the Complaints Procedure

1. Every complaint shall be addressed, in writing, to the Chairman of the Impartiality Committee.
2. If the complaint is admissible, and depending on the case, the Chairman decides on the most appropriate way to deal with the complaint while ensuring that there is no conflict of interest i.e. that no one dealing with the complaint is involved in the matter. He/she can call on external expertise for assistance: members of the Impartiality Committee, lead auditors, lawyers....

3. The Chairman informs the complainant on how he is going to deal with the complaint.
4. When dealing with the submission, investigation and decision on complaints the Chairman ensures that it shall not result in any discriminatory actions against the complainant.
5. After investigation, the Chairman takes the appropriate decision and communicates it to the complainant.
6. If the complaint relates to the Chairman of the Impartiality Committee or a member of the Committee, the complaint is handled by the CEO of the company, according to the above-mentioned modalities.
7. ETHIC Intelligence, in consultation with both the complainant and the certified company or other object of the complaint, decides whether the object/subject of the complaint will be made public.
8. The report is filed in the “EI R32 Complaints Reporting” document.