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1. PURPOSE

This procedure describes the method and responsibilities to deal with appeals, complaints and disputes from clients under ETKO certification programs, or any other related matters. Related parties may object to ETKO decisions.

2. RESPONSIBILITIES

Quality Assurance Manager, Quality Assurance Responsible, Control Division Responsible and Managing Director (MD) are responsible for the proper implementation of this procedure.

3. RECORDS

GP 05 F 01 List of Appeal Committee Members

GP 05 F 02 Register of Sanctions, complaints and appeal form

GP 05 F 03 Application Form for Appeal & Complaint & Appeal

4. REFERENCES

SP 06 Corrective & Preventive Actions Procedure

5. APPLICATION ^{7.13}

ETKO implements this procedure to receive, evaluate and make decisions on complaints and appeals based on the Due Diligence Handbook for Certified Entities and UNGPs and OECD Guidance Documents.

ETKO fully cooperates with investigations conducted by the Program Owner regarding fraud or complaints. ETKO provides all relevant documentation and information, including inspection reports, certificates, material volumes, and related details.

In cases where the Program Owner receives a complaint, ETKO, upon request, provide the Program Owner with all relevant documentation and information necessary to address the issue. This includes all records related to the implementation of the Program Owner's quality Assurance and labelling requirements.

Complaints and appeals and the process undertaken to resolve them are followed by the Quality Assurance Responsible and recorded by using "GP 05 F 02 Recording Appeal & Complaint & Appeal" form. ^{7.13.1.}

All related documents are kept in a file opened for this specific case.

This procedure is kept available on the ETKO web page for access by the interested bodies.

5.1 Acceptance of Appeals, Complaints and Inputs.

• Complaint Receive and Evaluation

Appeals and complaints can be received through various means such as telephone calls, letters, e-mail, in person or person to person. All persons submitting appeals and complaints are treated professionally and their appeals and complaints are taken seriously. The complaining parties are requested to submit their appeals and complaints by filling out the "GP 05 F 03 Dispute & Appeal and Complaint Application Form" on the ETKO website, and forward their appeals and complaints to complaints@etko.com.tr in a clear and detailed manner. Such an appeal and/or complaint must be

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supported by objective and impartial evidence by the customer or party making the appeal and/or complaint.

Customer feedback regarding the following issues are accepted as appeals and/or complaints, and the internal nonconformity is opened and appropriate corrective actions is implemented as specified in the "5.4 Corrective Action" section of this procedure.

- The standard service provided by ETKO (satisfactory / unsatisfactory)
- Failure by ETKO to provide an agreed service
- Failure by ETKO to a respond to a request for a service
- The attitude or conduct of an inspector has been unacceptable
- ETKO has not followed an agreed procedure
- Violation or inequitable application of the ETKO Quality System
- Not accepting decisions taken by ETKO,
- As regards the certified products; The producers, operators and consumers are in a state of contradiction in any quality parameters and / or trade.

ETKO will be responsible for gathering and verifying all necessary information (as far as possible) to progress the complaint or appeal to a decision. 7.13.4

ETKO evaluates the application when the appeal, complaint and dispute notification is made by the person/organization making the application in accordance with this process together with the necessary objective evidence.

If, in the initial evaluation, it is determined that the complaint/appeal is related to valid certification activities (7.13.2), the person/organization who made the application is officially notified in writing that the application has been received and processed. (7.13.3).

After the appeal and/or complaint is received, it is forwarded to the Quality Assurance Responsible and the subject of the complaint/appeal is forwarded by the Quality Assurance Responsible to the person(s) who were not involved in the certification activities that are the subject of the complaint or application for evaluation. ~~The decision resolving the complaint or appeal is made or reviewed and approved by the person(s) who were not involved in the certification activities that are the subject of the complaint or application. This task is carried out by ISAK.~~ The decision resolving the complaint or appeal shall be made, or reviewed and approved, by competent person(s) who have not been involved in the certification activities that are the subject of the complaint or appeal, who have no conflict of interest with the complainant or appellant, and who have not provided consultancy to or been employed by the complainant or appellant for at least two (2) years following the end of such consultancy or employment. The decision may be made by an appropriately qualified and authorized ETKO certifier or, where necessary due to the nature, complexity or circumstances of the case, by ISAK. Where the complaint or appeal cannot be resolved through this process, the Appeal, Complaint and Dispute Committee shall be established in accordance with Section 5.2 of this procedure.

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Documents and information submitted regarding the complaint, corresponding correspondence, transactions carried out and resolution status are recorded by the Quality Assurance Responsible. (7.13.1).

In cases where the appeal and/or complaint cannot be resolved, the Appeal, Complaint and Dispute Committee is established and the decision of the committee is implemented.

ETKO informs related official bodies such as Ministry of Agriculture, Accreditation body, or other certification bodies when necessary, regarding the appeals, appeal and/or actions taken regarding the complaint.

In addition, ETKO; will submit annually to GOTS a summary of the corrective/preventive actions showing the appeals and complaints received and the action taken in this regard. GOTS Approval Procedures and Req. for Approved CBs

5.1.6

5.1.1 Additional Requirements for FSC Complaints and Appeals

For complaints and appeals related to the FSC certification program, ETKO applies the following additional requirements.

Submission and Initial Assessment

ETKO provides the aggrieved party with the opportunity to submit and present its complaint or appeal to a person, group or committee that is under ETKO's contractual or organizational control.

The opportunity to present a complaint or appeal does not necessarily constitute a right to hold an in-person or remote meeting with the ETKO personnel responsible for handling the complaint or appeal.

The submission may be presented and evaluated based on written information and evidence.

The complainant or appellant shall provide, at a minimum:

- a) a clear description of the complaint or appeal;
- b) objective evidence supporting each element or aspect of the complaint or appeal; and
- c) the name and contact information of the complainant or appellant.

ETKO shall acknowledge receipt of the complaint or appeal and determine whether the submission contains sufficient information and evidence to be processed under this procedure.

Persistent or Vexatious Complaints

ETKO may establish and apply a specific process for handling persistent or vexatious complaints. Any such process shall conform to the applicable requirements of FSC-PRO-10-008 Processing Complaints in the FSC Certification Scheme.

Any exception to the complaint-handling timelines due to a complaint being classified as persistent or vexatious shall be justified, documented and handled in accordance with that process.

Registration and Reporting to FSC

ETKO shall register all FSC-related complaints in the FSC complaints management system.

Where the FSC complaints management system is unavailable, ETKO shall:

- a) prepare an annual overview of all FSC-related complaints received, using the template provided by FSC; and
- b) submit the annual overview to FSC at dispute.resolution@fsc.org once per calendar year, during the first quarter of the following calendar year.

ETKO shall retain records demonstrating the registration of complaints in the FSC complaints management system or, where applicable, the submission of the annual overview to FSC.

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Language and Anonymity

ETKO shall respond to the complaint or appeal in the same language used in the applicable public summary certification report unless ETKO and the complainant or appellant agree to use another language.

Where requested by the complainant, ETKO shall protect the complainant's identity and maintain their anonymity in relation to the organization that is the subject of the complaint.

Anonymous complaints and expressions of dissatisfaction that do not contain sufficient substantiation to be processed as formal complaints shall be recorded and treated as stakeholder comments. ETKO shall address such comments during the organization's next evaluation, as applicable.

Processing Timelines

ETKO shall seek the timely resolution of FSC-related complaints and appeals and shall:

- a) acknowledge receipt of the complaint or appeal;
- b) provide an initial response within two (2) weeks of receiving the complaint or appeal, including an outline of ETKO's proposed course of action for following up on the matter;
- c) keep the complainant or appellant informed of the progress made in evaluating and resolving the complaint or appeal; and
- d) investigate the allegations and communicate its conclusions and all proposed actions within three (3) months of receiving the complaint or appeal.

Exceptions to these timelines may apply where a complaint is classified as persistent or vexatious and is handled under ETKO's documented process established in accordance with FSC-PRO-10-008. Any exception and its justification shall be recorded, and the complainant shall be informed accordingly.

Closure of Complaints

ETKO shall consider a complaint closed when it has:

- a) gathered and verified all information necessary for evaluating the complaint;
- b) investigated the allegations;
- c) taken a decision on the complaint;
- d) determined and, where applicable, initiated the necessary follow-up actions; and
- e) responded formally to the complainant.

ETKO shall notify the complainant in writing when the complaint is considered closed and shall retain evidence of this notification.

Escalation to ASI and FSC

Where a complaint or appeal has not been resolved through the full implementation of ETKO's complaint and appeal procedure, or where the complainant or appellant:

- a) disagrees with the conclusions reached by ETKO; or
- b) is dissatisfied with the manner in which ETKO handled the complaint or appeal,

ETKO shall inform the complainant or appellant of their right to refer the matter to Assurance Services International (ASI).

As the ultimate escalation step, following consideration by ASI, the complainant or appellant may refer the matter to FSC.

The notification of ETKO's final decision shall include information on the applicable ASI and FSC complaint submission channels.

5.2. Appeal Committee Function

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The establishment and functioning of the Appeal Committee is as follows;

- 5.2.1 The chairman of Appeal Committee (APC) is the management Director. APC is consisting Other than the ETKO Impartiality Committee Members of at least 3 members including the chairman (executive). Decisions made are only valid if there are at least 3 members. ETKO ensures that no party is dominant. The members are selected by chairman.
- 5.2.2 ISAK members are selected from among the members of the ETKO Impartiality Committee, who have the ability to make objective and impartial decisions in the relevant fields and processes and are experts in the relevant areas. In some cases, a change in any member of the committee may be possible. None of the members will have a direct relationship with the organization that objects/complains/disputes. In such a case, the opinion of that member will not be taken for the relevant dispute, objection or complaint. In case a sufficient majority cannot be reached in the committee due to the objection/complaint/dispute, external expert support will be taken. ISAK Member List will be delivered to the customer in writing and the customer will be officially informed. The customer has the right to reject a member based on the Conflict of Interest agreement.
- In the process of adding or removing members, the status of the membership structure explained in this procedure is checked and the necessary member invitation and/or procedure update is made.
- 5.2.3 APC members review the relevant file prepared by the Quality Assurance Responsible and the relevant evidence provided by the client before the committee convenes.
- 5.2.4 During the appeals meeting the client and head inspector has the right to present verbal/written evidences based on the documents or any other objective evidences submitted previously. Minutes of meeting is taken appropriately and maintained. When necessary APC has the right to call upon the services of experts in the relevant field. Such experts shall be independent of ETKO and the client. The appeals committee decides either TO ACCEPT or NOT TO ACCEPT the appeal.
- 5.2.5 The decision is taken anonymously by majority vote-
- 5.2.6 Appeal Committee decision is final. For FSC-related complaints and appeals, the Appeal Committee's decision represents ETKO's final internal decision. This does not restrict the complainant's or appellant's right to refer the matter to ASI and, as the ultimate step, to FSC in accordance with Section 5.1.1 of this procedure.
- 5.2.7 ETKO formally notifies the complainant or appellant in writing of the outcome and closure of the complaint or appeal process. For FSC-related complaints and appeals, the notification and escalation requirements specified in Section 5.1.1 of this procedure shall apply. 7.13.7 - 7.13.8

The results will be reported to the relevant ministry within one month at the latest. The producer, producer organization, or entrepreneur reserves the right to appeal to the relevant official authorities within one month of the notification date. ETKO will undertake any subsequent actions necessary to resolve the complaint or appeal. 7.13.9

5.3. Costs

Cost of the appeal, complaint and dispute is borne by ETKO if appeal, complaint and dispute is succeeds. Otherwise the cost is at the decision of ETKO if the client fails.

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5.4 Corrective Action

As soon as the non-conformity is published, the unit where the non-conformity was opened is notified in writing by ETKO Quality Assurance Department and is asked to complete the root cause analysis within 15 days. The completed root cause analysis is checked by the Quality Assurance Manager and, if found appropriate, extended analysis, correction and corrective actions are requested to be completed within 15 days. If the 30-day period, which includes root cause analysis, extended analysis, correction and corrective actions, coincides with ETKO personnel's annual leave period or public holidays, the number of lost days will be added to the process. Corrective actions, extended analysis and corrections are reviewed by ETKO Quality Assurance Manager to determine whether their impact on the problems encountered is appropriate. If they are approved, notification that the nonconformity is closed is sent to the relevant ETKO Department by the ETKO Quality Assurance Department. 7.12.9

5.5 Confidentiality and preventing Conflict of Interest

Any document or any other evidence related with the appeals is strictly confidential.

ETKO shall not disclose any information or samples, materials, document to other parties, unless it is enforced by the law of the land and accreditation bodies.

All Members of APC signs relevant documents for confidentiality and conflict of interest, as described in GP 08 Confidentiality and Conflict of Interest Procedure.

To ensure that there is no conflict of interest, the personnel including those acting in a managerial capacity who have provided consultancy for, or been employed by a client, is prevented from being used by ETKO to review or approve the resolution of a complaint or appeal for that client within two years following the end of the consultancy or employment. 7.12.6

6. Investigations for the Issues which is not an Appeal, Complaint or Dispute Notified by Program Owners

Practices to be carried out by ETKO when it is necessary to carry out an investigation that is transferred to us from other certification bodies or delivered to us from program owners and is not within the scope of complaints, appeals or disputes;

- ETKO meets internally and evaluates the situation deeply.
- Contacts the relevant customer, informs him/her about the issue and requests the necessary information and documents, specifying the deadline.
- A second meeting is held in line with the documents received, and it is decided that an on-site inspection is or not necessary during this investigation process.
- The decisions taken will be clarified at the meeting to be held after the on-site inspection, if necessary.
- Feedback is given to the customer and the party who contacted us for research.

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UPDATES TABLE

SECTION CONTENT	SECTION NR	REV. NR	REV. DATE
"Quality Management Responsible Assistant (QMRA)", " QMS Responsible" and Changes Table were added(Due to the non-conformance written by TURKAK).	2,5.1, Changes Table	02	29.09.2018
or any other related matters	1.Purpose	03	01.12.2019
As a result of QMS internal audit NC, the method of recording the matters of who made the decision to resolve the complaint or who reviewed the complaint and whether it was resolved or not, and by whom and by which method the result of the complaint will be notified to the relevant persons was explained.	5.1, 5.2	04	07.07.2022
Updated according to "GOTS Approval Procedures and Req. for Approved CBs 5.1.6"	5.1	05	08.12.2022
It has been updated as corrective action for internal nonconformity numbered 2024_Turkey_11.	5.1	06	14.05.2024
The action to be taken in case the personnel's annual leave and public holidays coincide with the process determined to close the non-conformance was stated.	5.1, 5.4	07	31.05.2024
Corrections were made for the non-conformities numbered 2024.4_5, 2024_10,14_15 detected during the TÜRKAK inspection.	5.1, 5.2	08	14.02.2025
Updated against "Approval Procedure and Requirements for Certification Bodies Version 4.0"	5	09	27.10.2025
Updated against ASI findings.	5.1, 5.2	10	03.08.2026
Updated against FSC requirements.	5.1	11	08.09.2026

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