

PROCEDURE P12

Appeals 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 procedures to handle concerns that anyone within or without the company may wish to raise:

- **Alert Procedure** when the concern relates to the behavior of employees or auditors, including suspected conflicts of interest
- **Complaints Procedure** when the concern relates to the way ETHIC Intelligence operates including 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 Technical Committee: awarding, denying, suspending, etc. a certificate

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

2. Objective of the Appeals Procedure

The objective of the Appeals Procedure is to allow an ETHIC Intelligence client to challenge a decision which concerns the client – and only the client – related to a non-conformity, the denying, suspending, or scope reduction of a certificate.

3. Principles of the Appeals Process

Any person engaged in the appeals-handling procedure is separate from those who carry out audits and make the certification decisions.

Submission, investigation and decisions on appeals shall not result in any discriminatory actions against the appellant.

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

Records must be registered in the file: "EI R4 Appeals Reporting". All steps taken during an appeal must be filed appropriately.

No one can challenge an ETHIC Intelligence certification decision if he/she does not represent the client under a certification process.

4. Modalities of the Appeals Process

1. Every appeal shall be addressed, in writing, to the Head of Certification, who will examine if the appeal is admissible i.e. if it is made by a client challenging a decision

that concerns itself exclusively. The client is the person who signed the contract with ETHIC Intelligence.

2. If the appeal is admissible, the Head of Certification informs the client that an appeals process will start within a maximum of four weeks.
3. The Head of Certification communicates the appeal to the Chairman of the Technical Committee who nominates three Lead Auditors that have had no relation with said client and which constitute the Appeals Board.
4. The three auditors nominate a Chairman of the Appeals Board.
5. The Appeals Board decides how the case will be investigated. Investigations include:
 - Interview of the appellant by telephone, in person or via WebEx depending on time zone and/or availability.
 - Interview of the Technical Committee.
 - Interview with the auditor
 - Thorough investigation of documents and internet sites (depending on the cause of suspension) to evaluate the appeal. If necessary, a site visit to interview local staff and verify allegations which led to the suspension.
6. Prior to the investigation, each auditor receives from the Chairman of the Technical Committee an assignment sheet for the investigation detailing their mission and stating that all the costs, including their remuneration, will be borne by ETHIC Intelligence.
7. The Chairman of the Appeals Board transmits in writing the Board's conclusion to both the Client and the Chairman of the Technical Committee.
8. No appeal is possible following an Appeals Board decision.
9. If requested by the Client, ETHIC Intelligence will publish a press communiqué after consultation with said client.
10. The report is filed in the "EI R4 Appeals Reporting" document.