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		Issue no.	01
	Complaints and Appeals Procedures	Issue date	15.03.2022
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1.0. Purpose

This procedure establishes the system for handling complaints and appeals associated with Imperial Bio Solutions Pvt. Ltd.

2.0. Scope

This procedure covers and is applicable to all personnel and offices of Imperial Bio Solutions Pvt. Ltd.

Exclusion: This procedure shall not be used by employees or agents to complaint about other departments, personnel and internal services.

3.0. Definition

Complaint: A formal expression of dissatisfaction about personnel, services, and/or clients of Imperial Bio Solutions Pvt. Ltd. The notifications may take many forms e.g., verbal, letters or e-mails. This may be received from any stakeholder like Accreditation Body, Regulatory Body, User Company or any other body/ individual or as feedback to survey.

Appeal: An appeal is a notification received by Imperial Bio Solutions Pvt. Ltd. from a client or a user company, expressing a non-agreement with a decision made or provided by Imperial Bio Solutions Pvt. Ltd.


User Company: A client organization of Imperial Bio Solutions Pvt. Ltd.

4.0. Responsibilities

- a. Certification Head is overall responsible for the managing and monitoring of this procedure.
- b. Quality Manager received and registered complaints and appeals and hand over to Certification Head for further processing of complaints & Appeal.
- c. Passing needful instructions to sub-ordinates or Divisions on allocation of resources as required for completing investigation.
- d. Identifying and deciding course of actions (both corrective and preventive),
- e. Intimating the complainant/ appellant of its status and course of actions through Quality Manager, if he/she is not involved,

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- f. Final authority (Complain & Appeal Committee) to determine the course of actions recommended by the designated investigating officer
- g. Certification Head shall be responsible for first line resolution maintenance and regular updating of complaints and appeals if appellant is convinced. The outcome does not indicate partiality and issue is resolved.
- h. Appeals Committee (as appointed by Certification Head/ Board of Directors) shall be responsible for second line resolution of appeals where appellant is not convinced of the outcome of appeal's review taken up in the first line resolution by Certification Head.

Investigation officer (as designated) shall be responsible for:

- i. conducting investigation,
- ii. root cause analysis,
- iii. suggesting or recommending

Any person, who is part of the complaint/ appeal or its cause (i.e., in case of conflict of interest), shall not be allowed to participate in complaint/ appeal handling process in any way. In case someone connected with the complaint or appeal is appointed due to lack of information, Certification Head shall appoint another suitable person to replace the person involved.

- i. Certification Head and firsthand contact for complaints and appeals
- j. monthly reporting of complaints and appeals summary to management.
- k. Certification Head and maintaining communication with complainant/ appellant

5.0. Procedure of complaints

5.1. General

The complaint in general shall be classified and determined, before being entered into the complaint and appeal registration form by the Quality Manager, whether the complaint relates to Imperial Bio Solutions Pvt. Ltd. (including its employees) or is about its clients. The further course of the investigation, validating information and corrective action shall depend on this classification which is outlined in this procedure.

Imperial Bio Solutions Pvt. Ltd. shall keep the complainant updated throughout the process and Imperial Bio Solutions Pvt. Ltd. shall further determine, in agreement with the client (or complainant), the extent to which the subject of complaint and/or resolution shall be made publicly accessible like publishing on websites, advertising in newspaper etc. keeping the

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confidentiality into consideration. However, this shall be available for reviews by Accreditation Board Audits and reviews for verification as and when demanded.

All the received complaints shall be analyzed during the Management Review to indicate the weaknesses and further shall form a part of corrective actions for process improvement.

In all cases, persons engaged in the complaint-handling process are different from those who carried out the audits and made the certification decisions. Submission, investigation and decision on complaints shall not result in any discriminatory actions against the complainant.

5.2. Processing of complaints

On receiving a complaint, the relevant details are recorded on a complaint and appeal registration form by Quality Manager within 1 day of receipt of complaint. The details of complaint are then apprised to Certification Head who shall, determining the seriousness of the complaint, appoint or designate or assign an independent investigator (one who is not connected with content of complaint) within a timeline of another 3 days from intimation by Quality Manager. Certification Head shall decide on resource allocation for completing investigation into complaints and as such shall be responsible for directing or instructing all departments/personnel as required to complete investigation.

The investigation shall be used to establish a trail of events using following ways (not an exhaustive list) –

- Identify the cause of the problem and gather and verify all necessary information for verifying the chain of events
- Recording of statements of the employees (the subject of complaint)
- Recording of statements of complainants


Designated investigator shall investigate into complaint and find out the reasons and root-cause within minimum possible time. Upon completion of investigation, designated investigator shall submit a detailed investigation report along with recommendations (which can be in any format) to Certification Head. Certification Head shall have discretionary power to accept and implement recommendations in *toto* or in partial. However, there shall be a written justification for ignoring recommendations. Investigation report together with recommendations shall form the basis for course of redressal and future course of preventive actions.

Once agreement has been reached on satisfactory resolution of the complaint, the Quality Manager shall:

- Update the complaint form,

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- Provide written confirmation of the action to complainant that will be or has been taken to resolve complainant’s grievance.

Apart from confirming to the complainant what action has been taken to resolve their complaint, the complainant must be advised of their right to appeal against the handling of their complaint before Appeals panel. That is, if the complainant is not happy with the resolution of their grievance with Imperial Bio Solutions Pvt. Ltd. they may lodge a written appeal with Appeals panel.

5.3. A- Processing of Complaints about Imperial Bio Solutions Pvt. Ltd.’s Clients

On receiving a complaint, complaints can be received in writing only-either by letter, email or web portals etc. Upon receiving it is required to be recorded with unique number identification and an acknowledgement is required to be sent to the client. Certification Head then reviews the significance of complaint and then assigns an investigation officer. Wherever, conditions permit, Certification Head shall be investigation officer for complaints relating to violation of certification norms by any certified client. If a decision is taken to investigate a complaint; the method and resources allocated to the investigation is left to the discretion of Certification Head. Progress of such investigations shall be reported as described above.


At the discretion of the Certification Head, client which is the subject of a complaint, may be informed that Imperial Bio Solutions Pvt. Ltd. is investigating a complaint made against it within 2-4 weeks of taking the decision for investigation based on the severity of the complaint. The client under the purview of complaint may also be informed of the outcome of the investigation. However, the content of disclosure shall be mandatorily be governed by the following terms:

- Degree and type of information given to a third-party is governed by Imperial Bio Solutions Pvt. Ltd. Rules relating to confidentiality.
- Identity of the complainant shall not be disclosed without the complainant’s expressed permission to do so.

If the complaint is solely about lack of service or a commercial dispute, the investigating officer shall organize a letter, over the signature of a Manager, outlining Imperial Biosolutions Pvt. Ltd.’s role to the complainant within seven (7) days from receiving the complaint. Once required action has been implemented, Quality Manager completes the entries and updates Complaint and Appeal Handling Registration Form. If the complainant is not satisfied with complaint resolution, procedure allows complainant to further file appeal in accordance to appeals procedure outlined in *para 7*. In cases related to complaint against

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certified client, continuity of the effectiveness of the implemented system for organic certification shall be verified by Imperial Bio Solutions Pvt. Ltd.

If the complaint is solely about partially resolved / issue un resolved. After investigation, such cases will be informed to affected parties, inform to concern CB & NAB through APEDA by written official communication. Such cases records to be highlighted separately in IBSPL database.

IBSPL make sure that records are kept available for all complaints are recorded in the complaint & Appeal handling register (IBSPL-CD-FRM-21).

Also records to be maintained Precedents, Exceptions, Disciplinary measures.

B- Processing of Complaints about Imperial Bio Solutions Pvt. Ltd.'s from FSSAI

Action Plan

Immediate Control Measures, Depending on severity:

- Hold on further TC issuance.
- Block affected lots.
- Initiate additional inspection.
- Request explanation from operator.
- Inform APEDA (if integrity risk identified).
- Coordinate with FSSAI authority where applicable.
- If product recall initiated, Ensure corresponding TC status review.
- Suspend organic claim where required.

5.4. Corrective and Preventive action

Where complaint pertain to certification activities of Imperial Bio Solutions Pvt. Ltd. and further validated from investigations, corrective and preventive actions shall include-


- Counselling and training of the concerned employees or all,
- Provisioning of resources to bring improvement in transparency and compliance
- Other corrective/ preventive action as required depending upon the course of investigation

Where complaint pertain to certified clients regarding violation of certification norms and further validated from investigation, Corrective and preventive actions shall include-

- Suspension and withdrawal of certificate,
- Fines

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- Other corrective/ preventive action as required depending upon course of the investigation

6.0. Procedure of Appeals

6.1. General

In the event that a Appellant disagrees with a certification decision of Imperial Bio Solutions Pvt. Ltd. or issues as referred in section 6 of this procedure, they are entitled to respond in writing giving reasons and appeal within 15 days of being officially informed of certification decision/ outcome of complaint investigation process. The client shall be guided by Quality Manager/ Certification Head on the process of the appeals. In the first line response to appeal filed by complainant (referred as Appellant), Certification Head shall first try to resolve the matter in the manner explained in para 6.2.1 of the appeals procedure.

Resolve the appeal within 1 month from the date of receiving of appeal

Should the outcome of this first line resolution (or review) still be unacceptable to the client, appellant have recourse to the appeals panel process defined as second line resolution in paragraph 7.2.2. The procedure of appeals shall be made accessible to general public (either through public website or by making the hard printed copy of the procedure available on request) and if required Quality Manager shall further guide the appellant to file appeal by making available appeal application forms Annex A10 Complaints and Appeals Registration Form.

In all cases, persons engaged in the appeals-handling process and decision-making process (taking the decision, review of the decision and approval of the decision) are different from those who carried out the audits and made the certification decisions.

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


6.2. Procedure of Appeals

The appeal procedure is forwarded to the operators vide document IBSPL-CD-FRM-23 Certificate Forwarding Letter. Appeal procedure also available on company website

Appeals can be received in writing only-either by letter, email or web portals etc. Upon receiving it is required to be recorded with unique number identification and an acknowledgement is required to be sent to the appellant. Further, a preliminary review is required to be conducted to confirm the validity of the appeal. Every appeal is required to be responded in writing to the appellant in timely manner (less than 30 calendar days, in general) after investigation. If investigation is expected to take more than 1 month, an

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interim progress report is required to be sent to the appellant. Action is required to be decided based on the result/ outcome of investigation. While taking action, it is required to take into account the result of any previous similar appeals. Recurring issues or serious issues related to the system shall trigger the requirement for correction, root cause analysis and corrective action to prevent the recurrence as per the procedure of corrective and preventive action IBSPL-CD-PR-03 and clause 6.2.6 and 6.4 of this procedure.

Following steps are taken for the resolution of the appeal:

6.2.1. First Line Resolution

In the first line response to appeal filed by the complainant (hereafter referred as appellant), Certification Head shall first try to resolve the issue by further investigation in the similar process as explained in section 6 of this procedure. The appellant shall be kept apprised of the ongoing appeals investigation taken up by Imperial Bio Solutions Pvt. Ltd. The outcome of this investigation and final decision shall be informed to the appellant by Certification Head in writing within 3 days of conclusion of investigation.

6.2.2. Second Line Resolution


Where appellant files for re-appeal, Certification Head shall refer the matter to Appeals Committee appointed by Technical Committee Chairman in accordance to rules laid down in constitution of Appeals committee in 6.2.3 of this procedure. Representatives of Imperial Bio Solutions Pvt. Ltd. and the appellant shall be entitled to be heard in confidence by the Appeal Panel. The Appeal Panel's decision, based on the majority of the Appeal Panel as declared by its Chairman, shall be final and will be communicated to the Appellant in writing within 7 days of the panel meeting and decision. The findings of Appeals Committee shall be binding on both Imperial Bio Solutions Pvt. Ltd. and the appellant. Both Appellant and Imperial Bio Solutions Pvt. Ltd. shall be required to take corrective action as outlined in para 6.2.6 of this appeals procedure. Resources for organizing meeting and appeals investigation shall be arranged by Certification Head as explained in paragraph in 6.2.3 on Appeals Cost.

6.2.3. Appeals Committee Constitution

Chairperson of the Management Committee shall appoint a panel to hear the appeal. The panel referred as Appeals Committee shall comprise a Chairperson and two members, none of whom shall have any interest or direct association with the subject of the appeal or have been involved with the related audit or certification

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process. The Panel shall meet within 30 days of the receipt of the request for appeal. The appellant shall be given at least 14 clear days' notification of the constitution of the Appeal Panel, the time and place of the meeting.

The appellant has the right to state objections to the Appeal Panel's constitution. Such objections shall be in writing and shall be communicated to Imperial Bio Solutions Pvt. Ltd. at least 7 clear days before the scheduled date for the Panel meeting. If this would lead to a period of longer than 30 days between the appeal communication and the Panel's meeting, upon which the Board will decide whether or not to accept the appellant's objections and amend the constitution of the Panel accordingly. The appellant will be informed in writing of the Board's decision and of a new date for the hearing of the appeal in cases of such reconstitution.

6.2.4. Appeals Cost

Imperial Bio Solutions Pvt. Ltd. India reserves the right to charge the Appellant, reasonable costs for this second line of independent appeals resolution through invoicing as defined in paragraphs 6.2.2. Levy of charges will be notified in advance at the time of second line resolution and may be charged to the appellant ahead of any review commencing. CERTIFICATION HEAD, in the meantime, shall arrange for resources necessary for constitution and meeting of the Appeals Committee which shall then be used for determining the charges to be invoiced.

6.2.5. Liabilities

Under no circumstances shall Imperial Biosolutions Pvt. Ltd. or its employees or agents be liable for any losses, damages, charges, costs or expenses of whatever nature which any approved producer, applicant or scheme member may suffer or incur by reasons of or arising from the administration or the performance of their respective obligations in connection with the Certification Scheme, except where costs arise as a result of the gross negligence or willful default of such persons.


6.2.6. Corrective Action

In cases where appeal outcome requires, CERTIFICATION HEAD shall authorize for suitable corrective action as per of this procedure depending upon nature of outcome of review of Appeals Committee.

7.0. Complaints & Appeal record

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IBSPL shall maintain a **record of all complaints** received relating to certification, including details of the **investigation, remedial actions taken, and final resolution.**

Once a complaint is resolved, a **documented resolution report** shall be prepared and **communicated to both the complainant and the concerned party.** These records shall be retained as part of the quality management system to support continual improvement and transparency in the certification process.

8.0. Records

i. Record Management and Retention

The Certification Body (CB) shall establish and maintain a comprehensive **record system**—either in digital or physical format—sufficient to **demonstrate effective implementation** of the certification program in line with regulatory and accreditation requirements.

ii. IBSPL shall keep records of:

- a. Complaints
- b. Violations
- c. Precedents
- d. Exceptions
- e. Disciplinary measures

iii. This will normally mean that such information shall be available both in the Operator’s file as well in a separate record, or registered in a database system of IBSPL

- a. Inspection reports, certification decisions, certificates and other relevant records shall be signed by the authorized person.
- b. The record keeping system shall be transparent and enable easy retrieval of information.
- c. IBSPL shall make the record system open for inspection by the Evaluation Committee, as and when required.

All records shall be safely stored and held secure and in confidence, for a minimum period of five years.

9. Reference

IBSPL-CD-FRM-21-Complaint & Appeal Handling Register

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