

安诺尔认证服务（上海）有限公司

AENOR Certification Services (Shanghai) Ltd.

认证活动申投诉处理控制程序

Management Procedure of the Appeal and Complaint Process

文件编号：AENORC-2019-P13

编写主责部门：总经办

1 目的 Objective

为提高公司服务工作质量，提升评价公信力，保证认证活动申投诉信息得到公正和合理的处理，而制定本程序。

This procedure is developed to improve the quality of the company's services, enhance the credibility of the evaluation, and ensure that the feedback of certification activities complaints and appeal can be handled fairly and reasonably.

2 适用范围 Scope of application

适用于管理体系认证、产品认证、FSC-COC 认证审核过程中反馈信息（申投诉）。

Applicable to feedback information (complaints and appeal) during management system certification, product certification, FSC-COC certification audit.

3 职责 Duty

3.1 客服部：负责接待并收集、核实、汇报认证活动反馈信息（申投诉）。

The Customer Service Department: Responsible for the reception and collect information, verify and report Feedback certification activities (appeal & complaints).

3.2 客服部负责对反馈信息的核实；组织反馈申投诉信息，负责对申投诉予以记录及保存，负责对与申投诉方沟通反馈申投诉处理结果。

The Customer Service Department is responsible for the classification and investigation of feedback information; Organize the complaint handling team to analyze and determine the feedback (complaint, dispute and praise) Responsible for proofread, publish and archive for the documents, forms and announcements; monitoring the handling of feedback (complaints, disputes and praise).

3.3 责任部门：负责对在处理反馈信息（申投诉）中，提出纠正和预防措施以及事实反馈。

Responsible department: Responsible for providing corrective and preventive actions and factual feedback in the handling of feedback (complaints and praise).

3.4 申投诉处理工作组：负责对已调查了解的申投诉问题做出分析与判定。申投诉处理工作组人员由：技术委员会总监、审核部经理其中任一人员进行调查。如果投诉的部门为以上其中一个部门，以上被投诉部门的负责人应回避，特殊情况下，由总经理指定其他与该申投诉无关的部门负责人参与调查。

Complaint handling working group : Responsible for the analysis and judgment of the complaints

3.5 公正性委员会：负责处理申投诉处理工作组未能解决的投诉或争议问题。

Impartiality commission: Responsible for handling complaints or disputes that the complaint handling working group fails to resolve

4 定义 Definition

4.1 申诉：是认证申请人或认证组织就认证机构对其所做出的决定进行重新考虑的请求。

Appeal: A request by a certification applicant or certification organization to reconsider a decision made by the certification body.

4.2 投诉：是任何组织或个人对认证机构的认证活动表达不满意并期望得到回复的行为。

Complaint: The act of any organization or individual expressing dissatisfaction with the certification activities of a certification body and expecting a response.

5 程序 Procedure

5.1 申诉 Appeal

5.1.1 申诉的提出 Present appeal

有关程序的摘要资料，可在 AENOR 的网站（<https://www.aenor.cn>）查阅。认证申请人或认证组织应在接到公司的决定（含申请的受理及评审、审核结论、认证授予、扩大、暂停、撤消、缩小等决定）或措施后 10 日内向公司提出申诉。申诉方应提交书面申请并说明对公司处理意见提出异议的理由，并尽可能提交相关证据。申诉应以书面的方式经申诉方负责人签名盖章后提交给公司，并同时提供申诉人的信息如联系方式等。

Summary information about the procedures can be easily accessible on the websites of AENOR(<https://www.aenor.cn>). Within 10 calendar days after receiving any decision or measure issued by AENOR (including acceptance and review of applications, audit conclusions, certification granting, scope expansion, suspension, withdrawal, scope reduction, and other related rulings), certification applicants or certified organizations may file an appeal with AENOR. The appellant shall submit a written appeal stating the grounds for disputing AENOR' s ruling, and attach supporting evidence where practicable. Appeals must be submitted in writing, signed and sealed by the appellant' s authorized person, and shall include the contact person' s contact information, eg. Email and etc.

5.1.2 申诉的调查和处理 Investigation and handling of appeals

5.1.2.1 信息接收部门有责任必须在当天内将接到的申诉信息传递给客户服务部。

The information discovery department is responsible for transmitting the received appeal information to the Customer Service Department within 1 hour.

5.1.2.2 客户服务部必须在当天内与申诉方进行联系，进一步核实申诉信息是否与认证活动有关。如核实确实为申诉信息，客户服务部必须在当日内填写《检验、检测、认证以及检查活动反馈信息处理单》，并于当日内立即上报公司管理者代表审核，并经总经理审批。

Customer Service Department must contact the complainant within 1 hour to further verify the complaint information. If it is verified that it is the complaint information, Customer Service Department must fill in the processing form of feedback information of inspection, testing, certification and inspection activities within the same day, and immediately report it to the management representative of the company for review and approval by the general manager within the same day.

5.1.2.3 申投诉调查小组人员将依据审批意见启动调查程序。参与申诉处理过程的人员应保证没有实施申诉涉及的审核，也没有做出申诉涉及的认证决定，参与人员应与申诉事项无关。且在 1 周内形成初步意见，包括针对申诉提出的后续行动方案。

The customer service department will start the investigation procedure according to the approval opinions. If necessary, an appeal handling working group can be formed. The personnel involved in the appeal handling process shall ensure that they have not implemented the audit involved in the appeal and have not made the certification decision involved in the appeal. The participants shall have nothing to do with the appeal.

5.1.2.4 客服部在收到申诉后的 2 周内，应向申诉方提供初步反馈，包括针对申诉提出的后续行动方案。调查过程中随时与申诉方保持沟通，确保其了解处理进程。

The customer service department will notify the complaining party in writing of the approval opinion within the next day, and inform the complaining party of the processing process of the complaint, and start the investigation process at the same time. Initial feedback should be provided within 2 weeks of receipt of the grievance, including a proposed follow-up action plan for the grievance. Communicate with the complaining party at any time during the investigation process to ensure that it understands the processing process.

5.1.2.4 申投诉调查小组自收到申诉事件之日起，在 60 日内完成对申诉事件的调查、取

证及核实，并形成申诉调查报告。申诉调查报告默认以中文书写，如申诉方有要求，协商一致后可采用其他商定语言。

The Customer Service Department shall complete the investigation, evidence collection and verification of the appeal within 60 calendar days upon receipt of the appeal case, and prepare an appeal investigation report. The appeal investigation report shall be prepared in Chinese by default. If requested by the complainant, other agreed languages may be adopted upon mutual consensus.

5.1.2.5 调查方式可包括召集听证会议、听取双方提供陈述、现场调查、调取书面文件等。认证机构应尽可能收集所有必要信息，以作为处理证据支撑。针对 FSC 认证项目的所有申诉，无论申诉是否成立，客服部均应在申诉受理后向 FSC 进行登记，并保存登记记录。

The investigation method may include calling a hearing meeting, hearing the statement provided by both parties, on-site investigation, obtaining written documents, etc. The certification body shall collect all necessary information as far as possible to serve as supporting evidence for handling. For all appeals related to FSC certification projects, regardless of whether the appeal is valid or not, the Customer Service Department shall register the appeal with FSC in accordance with FSC requirements after acceptance, and keep the registration record.

5.1.2.6 申诉处理工作组（如有）在收到客服部提交的申诉调查报告 60 天内应做出有根据的分析与判断，并提出书面处理意见，提交管理者代表审核，并经总经理批准。

The Appeal Handling Working Group (if applicable) shall conduct substantiated analysis and judgment within three days upon receipt of the appeal investigation report submitted by the Customer Service Department, put forward written handling opinions, submit them to the Management Representative for review, and obtain approval from the General Manager.

5.1.2.7 客服部在 60 天内将最终处理意见以书面形式通知申诉方和公司责任部门，并将最终处理意见记录在《客户申诉和投诉处理登记表》，所有申诉均需登记，无论是有效或无效。

The Customer Service Department shall notify the complainant and the responsible department of the company of the final handling opinions in written form within the next day. The decision will be recorded in the "Record of Customer Appeals and Complaints

Settlement ". All of appeals should be recorded regardless valid or invalid.

5.1.2.8 申诉方对最终处理意见表示满意时，客服部负责监督对最终处理意见的落实
When the complainant is satisfied with the final opinion, the compliance Technology Department shall be responsible for supervising the implementation of the final opinion.

5.1.2.9 申诉方如对最终处理意见不满意时，认为认证机构未遵守认证相关法律法规并导致自身合法权益受到严重侵害，可直接向相关认可机构、所在地认证监管部门或国家认证认可监督管理委员会进行申诉或投诉。针对 FSC COC 认证项目，若问题未能通过全面实施本公司自身的申诉处理程序得到解决，或申诉人不同意本公司得出的结论和 / 或对处理方式不满意，申诉人有权将其申诉提交至 ASI (Assurance Services International, FSC 指定的认可机构)。ASI 的投诉程序及联系方式可在 ASI 官方网站 (www.asi-assurance.org) 查询；

If the appellant is dissatisfied with the final decision and believes that the certification body has failed to comply with certification-related laws and regulations, causing serious infringement of their legitimate rights and interests, the appellant may file an appeal or complaint directly with the relevant accreditation body, local certification regulatory authority or the Certification and Accreditation Administration of the People's Republic of China. For the FSC CoC certification programme, if the issue cannot be resolved through full implementation of the Company's internal appeal handling procedure, or if the appellant disagrees with the conclusions reached by the Company and/or is dissatisfied with the handling method, the appellant has the right to submit the appeal to ASI (Assurance Services International, the accreditation body designated by FSC). ASI's complaint procedures and contact information are available on the official ASI website (www.asi-assurance.org).

5.1.2.10 在申诉的提出、调查和决定等处理的全过程中，机构涉及人员（例如客户服务部、合规技术部及其他任何可能接触申诉处理的人员）必须公平公正，不得对申诉人进行任何区别对待，如有任何有可能造成针对申诉人的歧视行为，机构将由最高管理层指派调查小组处理此类事件。

Throughout the entire process of filing, investigating, and deciding on complaints, the personnel involved in the institution (such as the customer service department, compliance technology department, and any other personnel who may come into contact with the complaint handling process) must be fair and impartial and must not discriminate against the

complainant in any way. If there is any behavior that may cause discrimination against the complainant, the institution will appoint an investigation team from the highest management level to handle such incidents.

5.2 投诉 Complaint

5.2.1 投诉的提出 Present Complaint

任何组织或个人均可以通过电话、函件等任何途径向本公司投诉认证实施的有关问题（对公司的方针、运作过程和认证结果及认证人员的表现不满意或对获证组织的产品、认证证书与认证/认可标志的使用不满意），原则上应在该事件发生以后 30 日内，须提供所投诉事件的细节情况、证明材料，并提供投诉人的姓名和联系方式。如投诉人有要求，本公司应保留投诉人与客户的关系的匿名性。

Any organization or individual may file a complaint with the Company regarding matters related to certification implementation via telephone, written correspondence or other means (including dissatisfaction with the Company ' s policies, operational processes, certification results, performance of certification personnel, or dissatisfaction with products of certified organizations as well as the use of certification certificates and certification/accreditation marks). In principle, the complaint shall be submitted within 30 days after the incident occurs. The complainant shall provide detailed information and supporting evidence of the incident, together with the complainant ' s name and contact information. AENOR shall retain the anonymity of the complainant in relation to the client, if this is requested by the complainant.

5.2.2 投诉的调查和处理 Investigation and handling of complaints

5.2.2.1 信息发现部门有责任必须在 1 天内将接到的投诉信息传递给客户服务部。

The information discovery department is responsible for transmitting the received complaint information to Customer Service Department within 1 hour.

5.2.2.2 客户服务部必须在 1 天内与投诉方进行联系，进一步核实投诉信息是否与认证活动有关。如核实确实为投诉信息，客户服务部必须在当日内填写《检验、检测、认证以及检查活动反馈信息处理单》，并于当日内立即上报公司管理者代表审核，并经总经理审批。针对 FSC 认证项目的所有投诉，无论投诉是否成立、无论投诉人是否提供充分证据，客服部均应在投诉受理后向 FSC 进行登记，并保存登记记录。匿名投诉也应按 FSC 要求进行登记。

Customer Service Department must contact the complainant within 1 hour to further verify the complaint information. If it is verified to be the complaint information, Customer Service Department must fill in the processing form of feedback information of inspection, testing, certification and inspection activities within the same day for approval by the general manager. For all complaints related to FSC certification projects, regardless of whether the complaint is valid or not, and regardless of whether the complainant provides sufficient evidence, the Customer Service Department shall register the complaint with FSC in accordance with FSC requirements after acceptance, and keep the registration record. Anonymous complaints shall also be registered with FSC as required.

5.2.2.3 如投诉的事由与认证活动无关，客户服务部依据审批意见撤销投诉。

If the reason for the complaint is not valid, Customer Service Department shall cancel the complaint according to the approval opinion.

5.2.2.4 申投诉调查小组人员将依据审批意见启动调查程序。参与投诉处理过程的人员应保证没有实施投诉涉及的审核，也没有做出投诉涉及的认证决定，参与人员应与投诉事项无关。且在 1 周内形成初步意见，包括针对投诉提出的后续行动方案。

Members of the Complaint and Appeal Investigation Team shall initiate the investigation procedure in accordance with the approved instructions. Personnel involved in complaint handling shall ensure that they have not conducted the audit subject to the complaint nor made the relevant certification decision, and shall have no conflict of interest in the complaint matter. A preliminary opinion, including the follow-up action plan for the complaint, shall be formulated within one week.

5.2.2.5 申投诉调查小组应负责收集和核实所有必要信息（尽可能），以推进投诉处理直至做出决定。调查方式包括但不限于：

- a) 听取投诉方和被投诉方的陈述和申辩；
- b) 调取相关文件、记录和证据材料；
- c) 必要时进行现场核查；
- d) 组织听证或专家论证。

对于投诉人未能提供充分证据的投诉或匿名投诉，不得直接驳回，应做到：

- a) 完整留存投诉记录，包括投诉时间、投诉内容、投诉渠道等信息；
- b) 根据投诉线索开展力所能及的核查，如查阅相关记录、询问相关人员、现场抽查等；

- c) 核查结果及无法核实的原因应记录在案;
- d) 无法立即核实的, 纳入下次审核计划作为审核关注点。

Complaint and Appeal Investigation Team shall be responsible for gathering and verifying all necessary information (as far as possible) to progress the complaint to a decision.

Investigation methods include but are not limited to:

- a) Listening to the statements and defenses of the complainant and the complained party;
- b) Retrieving relevant documents, records and evidence materials;
- c) Conducting on-site verification when necessary;
- d) Organizing hearings or expert demonstrations.

For complaints where the complainant fails to provide sufficient evidence or anonymous complaints, they shall not be rejected directly. The following shall be done:

- ① Complete complaint records shall be kept, including complaint time, complaint content, complaint channel, etc.;
- ② Conduct verification as far as possible based on complaint clues, such as reviewing relevant records, interviewing relevant personnel, on-site spot checks, etc.;
- ③ The verification results and reasons for inability to verify shall be recorded;
- ④ If verification cannot be carried out immediately, it shall be included in the next audit plan as an audit focus.

5.2.2.6 如投诉的理由成立, 申投诉调查小组应依据总经理审批意见启动调查程序。客服部在收到投诉后的 2 周内, 向投诉方提供初步反馈, 包括针对投诉提出的后续行动方案。调查过程中随时与投诉方保持沟通, 确保其了解处理进程。

Where the grounds for the complaint are substantiated, the Complaint Investigation Team shall initiate the investigation procedure in accordance with the approval opinion of the General Manager. The Customer Service Department shall provide preliminary feedback to the complainant within two weeks upon receipt of the complaint, including a follow-up action plan addressing the complaint. Maintain ongoing communication with the complainant throughout the investigation to keep the complainant informed of the progress.

5.2.2.7 申投诉调查小组根据调查需要, 参与投诉处理过程的人员应保证没有实施投诉涉及的审核, 也没有做出投诉涉及的认证决定, 参与人员应与投诉事项无关。

5.2.2.8 调查方式可包括召集听证会议、听取双方提供陈述、现场调查、调取书面文件等。认证机构应尽可能收集所有必要信息，以作为处理证据支撑。

If the reason for the complaint is established, the Customer Service Department shall according to the approval opinions, draft and complete the notification of feedback information of certification activities within the next day, upload it to the institutional information management system for publicity, and start the investigation procedure at the same time. A description of the complaints handling process should be made available to any interested party. A preliminary feedback including the follow-up action plan for the complaint shall be provided to the complainant within two weeks upon receipt of the complaint. Communicate with the complainant at any time during the investigation to ensure that it understands the process.

5.2.2.9 申投诉调查小组应在收到投诉事件之日起 60 日内对投诉事件进行调查、取证及核实，并形成投诉调查报告。投诉调查报告默认以中文书写，如投诉方有要求，协商一致后可采用其他商定语言。

The Complaint and Appeal Investigation Team shall conduct investigation, evidence collection and verification of the complaint within 60 calendar days from the date of receiving the complaint, and prepare a complaint investigation report. The complaint investigation report shall be written in Chinese by default. If requested by the complainant, other agreed languages may be adopted upon mutual consultation.

5.2.2.10 客服部在 60 天内将最终处理意见以书面形式通知投诉方和公司责任部门，并将最终处理意见记录在《客户申诉和投诉处理登记表》，所有申诉均需登记，无论是有效或无效。

The Customer Service Department shall conduct investigation, evidence collection and verification of the complaint within 60 calendar days upon receipt of the complaint, and prepare a complaint investigation report. The complaint investigation report shall be written in Chinese by default. If the complainant so requests, other agreed languages may be used after reaching mutual agreement.

5.2.2.11 如被投诉的问题是属于公司的问题，申投诉调查小组应向责任部门负责人开具《纠正/预防措施报告》，并要求在规定的时间内进行原因分析，采取纠正纠正措施。

If the complaint is a company issue, the Customer Service Department requires the

responsible person to submit the corrective/preventive action report within the specified time after the announcement.

5.2.2.12 如被投诉的是经公司认证的组织，客服部向该组织以书面形式通知，要求该组织对投诉的问题做出书面说明，并提交相关证据。必要时，公司将进行现场调查。调查时还应考虑认证组织管理体系的有效性，如要求认证组织采取适当的纠正和纠正措施，如证实该组织的管理体系的有效性存在问题时，将涉及缩小、暂停或撤消该组织的管理体系认证。

If the complaint is made by an organization certified by the company, the Customer Service Department shall notify the organization in writing, requiring the organization to make a written explanation of the complaint and submit relevant evidence. If necessary, the company will conduct on-site investigation. The effectiveness of the certification organization's management system should also be considered in the investigation. If the certification organization is required to take appropriate corrective and corrective actions, such as proving that the effectiveness of the organization's management system is in question, it will lead to reduce, suspend or withdraw the organization's management system certification.

The investigation method may include calling a hearing meeting, hearing the statement provided by both parties, on-site investigation, obtaining written documents, etc. The certification body shall

5.2.2.13 投诉方对最终处理意见表示满意时，客服部负责监督对最终处理意见的落实。

When the complainant is satisfied with the final opinion, the Customer Service Department shall be responsible for supervising the implementation of the final opinion. If the organization being complained about is certified by the company, the company shall require the organization to take corrective and preventive measures to report to the Customer Service Department. The Customer Service Department (together with the technical commission if necessary) shall confirm the feasibility of the corrective and preventive measures submitted by the certification organization. When necessary, the company shall conduct on-site verification of the effectiveness of the corrective and preventive measures taken by the certification organization.

5.2.2.14 投诉方如对最终处理意见不满意时，可以向公司提出复审，公司将该投诉提交

至公正性委员会进一步调查、复审，如认为认证机构未遵守认证相关法律法规并导致自身合法权益受到严重侵害，可直接向相关认可机构、所在地认证监管部门或国家认证认可监督管理委员会进行投诉。投诉方有权对认证机构的措施/决定向相应认证项目的认可机构进行投诉。

对于 FSC COC 认证项目，若问题未能通过全面实施本公司自身的投诉处理程序得到解决，或投诉人不同意本公司得出的结论和 / 或对本公司处理投诉的方式不满意，投诉人有权将其投诉提交至 ASI（Assurance Services International，FSC 指定的认可机构）。ASI 的投诉程序及联系方式可在 ASI 官方网站（www.asi-assurance.org）查询。

If the complainant is dissatisfied with the final resolution, the complainant may submit a request for review to the company. The company shall refer the complaint to the Impartiality Committee for further investigation and review. Where the complainant believes that the certification body has failed to comply with certification laws and regulations, resulting in serious infringement of its legitimate rights and interests, the complainant may file a complaint directly with the relevant accreditation body, local certification regulatory authority or the Certification and Accreditation Administration of the People's Republic of China. The complainant has the right to lodge a complaint against any measures or decisions issued by the certification body with the accreditation body of the corresponding certification programme.

For the FSC CoC certification programme, if the matter cannot be resolved through full implementation of the company's internal complaint handling procedure, or if the complainant disagrees with the company's conclusions and/or is dissatisfied with the manner in which the company handles the complaint, the complainant has the right to submit the complaint to ASI (Assurance Services International, the FSC-designated accreditation body). ASI's complaint procedure and contact information are available on the official ASI website (www.asi-assurance.org).

5.2.2.15 在投诉的提出、调查和决定等处理的全过程中，机构涉及人员（例如客户服务部、合规技术部及其他任何可能接触投诉处理的人员）必须公平公正，不得对投诉人进行任何区别对待，如有任何有可能造成针对投诉人的歧视行为，机构将由最高管理层指派调查小组处理此类事件。

Throughout the entire process of complaint submission, investigation, and decision-making,

the personnel involved in the institution (such as the customer service department, compliance technology department, and any other personnel who may come into contact with complaint handling) must be fair and impartial and must not discriminate against the complainant in any way. If there is any behavior that may cause discrimination against the complainant, the institution will appoint an investigation team from the highest management level to handle such incidents.

5.2.2.16 本公司应将匿名投诉以及无法证实、不足以构成正式投诉的不满意意见视为利益相关方意见，认证机构应在可能的情况下进行调查；无法立即调查的，纳入下次审核计划核实。

The certification body shall treat anonymous complaints, as well as grievances that cannot be verified or are insufficient to constitute formal complaints, as stakeholder feedback. The certification body shall conduct investigations where possible; where immediate investigation is not feasible, such matters shall be included in the next audit plan for verification.

5.5 记录与保密 Records and confidentiality

5.5.1 客户服务部应保存所有申投诉以及与认证有关的补救措施的记录。

Customer Service Department shall keep records of all complaints, disputes and remedies related to certification.

5.5.2 处理申投诉的工作人员应对相关未公开的信息负有保密的责任。

Staff handling complaints shall be responsible for the confidentiality of the relevant unpublished information.