

Complaints & appeals management

Group QHSE PO-004

Version 12
February 2025
Internal



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1 – Purpose & definition

At Bureau Veritas, we are committed in providing exceptional service and addressing any concerns or issues our customers, clients or stakeholders may have.

To ensure a fair, transparent, standard and efficient process, we have established this policy that outlines the group requirements for receiving, investigating, and resolving complaints and appeals, as well as the principles and responsibilities that guide our approach.

By adhering to this policy, we aim to foster a culture of accountability, continuous improvement, responsive customer service and customers' satisfaction.

The present policy recalls the definitions and set the key principles, obligations associated to the end-to-end management process of complaints or appeals.

Note: Claim and complaint may refer to a similar issue however within Bureau Veritas, it is managed by different groups (refer to table below).

*Complaint	<p>A formal expression of dissatisfaction (other than appeal) sent to a BV entity by an interested party relating to a contract, a service or activity with / by BV to which a response is expected.</p> <p>Example of interested parties: Client (including customer of BV client), accreditation body, scheme owner, legal authority</p> <p>If a complaint is received from a client, it is indicated as "client complaint".</p>
Major complaint	<p>Is a complaint that</p> <ul style="list-style-type: none"> - has a significant impact on the customer, client, or stakeholder, such as financial losses, serious service disruptions, or significant reputational damage, or - requires extensive investigation, coordination across multiple departments, or the involvement of senior management to resolve, or - has a higher likelihood of escalation internally or through external channels, such as regulatory bodies or media attention, or - indicates broader, systemic issues within the organization that need to be addressed <p><i>The categorization as major complaint is defined by each Operating Group</i></p>
*Appeal	<p>An Appeal is a formal request by a BV client to reconsider a decision or statement (it can be on attestation or certificate or findings on reports) taken by BV at the end of an assessment process</p>

	<i>Within Bureau Veritas an appeal is always associated to a LTO and is managed by the LTO owner</i>
Claim	<p>Any dispute: § initiated by or against a BV entity, § whether from or against any third party (e.g. clients, customers, suppliers, subcontractors, joint-venture partners, intermediaries, third parties, etc.), § whether at a pre-litigation (no court/arbitration proceedings) or litigation stage (court/arbitration proceedings pending), subject to threshold, § whether the claimant asks for refunds of fees, payment of price, damages or other kind of remedies.</p> <p><i>The claims are managed by the legal department</i></p>

* If a complaint is verbal, the person receiving the call should strive to have formal written statement from the complainer to formalize the complaint. Alternatively, and eventually, any employee can raise it on behalf of the Complainant using an appropriate form.

An appeal can only be submitted formally (any verbal appeal must be formalized by the appellant).

Complaints and appeals may be submitted through an online form (if available) to enable the event to be raised and administered efficiently.

2 – Scope of application

The boundaries of this policy are:

- Scope in:
 - complaints/appeals
- Scope out:
 - Preventive and corrective action (PO-006)
 - Handling of non-conformity (PO-002)
 - Control of operational records (PO-003)
 - Claims management (with legal and compliance department)
 - Ethical compliance / whistleblowing

This Policy applies to Bureau Veritas Group, worldwide, including all its Operating Groups and support functions. Compliance is mandatory for all.

Note: within this document, Operating Group may entail the Operating Region(s) or district(s) of the OG itself.

3 – Key principles

- Fairness and objectivity
 - Unless otherwise specified by the complainant, complaints must be treated in accordance with the principle of confidentiality and anonymity (as applicable)
 - No employee, regardless of his/her position or responsibilities, can manage the complaint nor conclude the process for the work that he/she will have performed (however he/she can be part of the process itself)
 - To ensure impartiality during the complaint investigation process, the names and identities of the personnel handling investigations should not be disclosed to the complainant/appealer.
- Confidentiality and data protection:
 - Complaints and appeals are priority matters and must be handled as quickly as possible while limiting the diffusion and communication of related information and documentation to the person in charge of addressing the case.
 - Unless otherwise authorized by Legal & Compliance team, complaints cannot be disclosed outside of Bureau Veritas.

■ Acknowledgment and external communication.

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- No express acknowledgment of faults or errors should ever be made, even when proposing a solution to a client, as this could invalidate any available Bureau Veritas insurance or further action.
- Formal responses to complaints and appeals shall be made in writing
- The complainant/appealer must receive within the timeframe mentioned in chapter 4 below,
 - Either a final response, or
 - A formal acknowledgment if a final response is not yet possible.
- If the complainant and the topic of the complaint are not related to a contract with Bureau Veritas, careful consideration must be given to whether the complaint should be addressed, taking potential liability into account. For such complaints, the Business Unit Manager shall consult with its management (including legal and finance as relevant) before responding the complainant.
- It is highly recommended to use standardized text when responding to complaints or appeals (you may liaise with your legal and compliance department).

4 – Governance rules

- The registration of any complaint or appeal is mandatory **within *not more than 5 working days** from first contact to Bureau Veritas. Unless otherwise agreed or **required, the registration shall be on Group authorized solutions (such as iEvaluate, Salesforce)
- To the best possible efforts, the final response (or interim response in the case of complex case) to complainant or appealer shall not exceed 30 days and 90 days respectively.
- Each Operating Group (or operating region) shall set in place a process to manage major ***complaint from identification, monitoring, controlling its resolution and tracking the amount of work (cost, time and resources) required to address it.
- Each Operating Group (or operating region) shall set performance and reporting criteria associated to the *complaint(s) and appeal(s) received (refer to typical process section hereafter). This shall include the establishment of a unified system for tracking, analyzing, and reporting on the volume, nature, and resolution (including Root Cause Analysis as relevant) of complaints and appeals.

* Some LTO's may require shorter deadlines for the acknowledgement.

**only when complaints and appeals are related to an LTO and that the LTO obligations impose specific registration requirements.

***: particular care and attention should be given to a complaint raised by Key account

5 – Responsibilities

- Any person receiving a complaint is responsible to inform, **in writing** his/her higher management level for further treatment
- The person logging the complaint is responsible for ensuring that the complaint is eventually addressed to the right person within Bureau Veritas.
- For appeal, the technical manager of the LTO is responsible for ensuring that the appeal is recorded, processed and reported in due time.
- The Business Unit, Operations or Technical **manager** to which the complaint is addressed/related, is responsible for ensuring that the complaint is handled and responded after acknowledgement as quickly as possible (refer to typical process steps given section 6 as guidance)

6 – Typical End-to-End Process Steps applicable to complaint or appeal management

Complaint Management Process

For each complaint, a structured process shall be followed, addressing the following points:

1. **Recording the Complaint**
 - Document the complaint and describe the problem, including its business impacts.
2. **Investigations, Root Cause Analysis and Correction actions**
 - Perform the needed investigations including RCA then decide on corrective actions (with timeline) as well as the formal response to send to the complainer/appealer.
 - Ensure to update the status/stage of any complaint or appeal in internal complaints/appeals management group authorised solutions.
2. **Communication**
 - Share the details of the complaint and findings with the relevant internal parties.
3. **Escalation for Specific Cases**
 - If the complaint involves litigation, insurance declaration, court summons, or risks to the organization's image or accreditation, escalate the complaint to the regional or head office (HO) divisional legal contact.
4. **Complaint Resolution**
 - For other complaints, follow these steps:
 - **Quick Resolution:**
 - If the complaint can be resolved immediately or very quickly, implement the solution, respond to the customer asap without exceeding 30 days from the receipt day of the complaint, and record the “answering date” KPI.
 - Continue processing the standard procedure outlined below to prevent recurrence.
 - **Additional Investigation Required:**
 - If further investigation is needed, send a written acknowledgment letter to the customer within five days of receiving the complaint. The letter should include the name and contact details of the Bureau Veritas manager responsible for the analysis and customer relationship.
 - The appointed manager is responsible for the following:
 - Identify the root causes of the problem, following Group QHSSE 107-PR Root Cause Analysis guidelines.
 - Propose a corrective action plan and begin its implementation.
 - Monitor the corrective action's implementation, assess its effectiveness, and keep the customer and internal stakeholders (e.g., in case of key accounts) informed.
 - Maintain documentation and ensure traceability.
 - Verify the sustainability of the results and close the issue once resolved.
 - Keep the customer updated as necessary.

Appeal Management Process

For each appeal, a similar structured process as outlined for complaint management shall be followed unless specific requirements exist to comply with LTO (Legal, Technical, and Operational) obligations. In such cases, the Bureau Veritas legal entity holding the LTO will define and manage the appeal process.

Contingency

If there is no response from the Complainant within 10 working days following the initial issuance of BV formal response (e.g. the final response - refer to 2nd bullet on chapter 4 - or subsequent ones), the event may be considered as closed in BV System.

If the response is not accepted by the complainant, this will be forwarded to the complaint responsible person within Bureau Veritas for a decision on whether a second response letter is to be issued or whether direct communication with the Complainant will be sufficient. In this case, the person responsible must notify the Customer Relations mailbox of the outcome and whether the Complainant was happy with the discussion to close the complaint.

7 – Review and Control Process

The Group QHSSE Statements, Policies and Procedures are maintained accurate and up-to-date. They will be updated as necessary. This document is uncontrolled once printed. Validation and communication are ensured according to the Group documents management process. QHSSE Managers remain responsible for integration of this policy into their management system.

Compliance with this policy is ensured through:

- Group, Divisional, Operating Group, Regional, Country internal reviews
- External audits

Group audits will be based on the following checklist:

No.	Elements to be examined
1	Customer complaints are received, documented and answered within an appropriate delay.
2	Complaints are analyzed for trends. Actions are implemented in the processes
3	Complaints are documented in iEvaluate Tool, or an equivalent defined at country/ entity or OG level.
4	Major complaints undergo an RCA process as per Group QHSSE 107 PR.
5	Customer complaints are visible in the CRM tool.

8 – Associated Process Descriptions & Reference to Standards

Supporting and associated documents:

Title	Type	Location
Group QHSSE Manual	Manual	Internal Website
Group QHSSE 006-PO Preventive & Corrective actions	Policy	Internal Website
Group QHSSE 002-PO Handling of non-conformity	Policy	Internal Website
Group Corporate Governance and Risk Management Policy	Policy	Internal Website
iEvaluate – Basic functionalities – Manual for I&F users	User guide	Internal Website

Compliance to standards:

- ISO 9001:2015
- 7.4 Communication
 - 8.2.1 Customer communication
 - 8.6 Release of products and services
 - 9.1.3 Analysis and evaluation
 - 10.2 Nonconformity and corrective action

- 7.6 Complaints and appeals process
- ISO 17021: 2015 9.8 Complaints
- ISO 17024: 2015 9.8 Appeals against decisions on certification
- 9.9 Complaints
- ISO 17025: 2017 7.9 Complaints
- ISO 17065: 2012 7.13 Complaints and appeals

9 – Document Validation and History

Validation:

	Proposal	Verification	Approval
Name	Taskgroup	Servane Collier	Nicolas Mey
Function	TIQ network	Group QHSE Director	VP TIQ
Date	30/01/2025	13/02/2025	18/02/2025

Revision History:

Version	Date	Comments
1	2005	Group reference document
2	June 2008	Alignment of policy with the Quality manual (Revision 1.1 of the 01/11/2007)
3	May 2009	Review by the TQR policy making group
4	July 2009	Update reference to ISO 9001:2000 to ISO 9001:2008
5	July 2011	Feedback from Network taken into account
6	July 2014	KPIs changed – Answering date & hit rate introduced.
7	December 2015	Combination of Q & HSSE
8	December 2016	Alignment on ISO 9001:2015 and ISO 14001:2015
9	April 2018	Alignment with the new tool QESIS
10	November 2018	Correcting versions of technical standards
11	October 2023	Replacement of QESIS tool by iEvaluate or equivalent tool – Adjustment of the rule for documents review
12	February 2025	New chapters 1 to 6 Additional references to ISO standards