

<b>Demos Global Group, Inc.</b> <b>Quality Procedure</b>	No.	QP07
	Revision No.	1
	Last version date:	05/30/2018
	Date:	07/20/2019
<b>Procedure for Complaint and appeal</b>		

**1.0 Purpose**

The purpose of this procedure is to describe the handling of an incident, complaint and appeals received from the client and from other interested parties.

**2.0 Scope**

This procedure covers all complaint and appeal received by any means, like written, verbal, e-mail etc. It also includes adverse findings during evaluation.

**3.0 Responsibility**

**Demos Global has a person in charge to manage complainants either from the staff or from the clients. The complainant officer** is responsible for receiving the complaint and appeal from the clients. The Complainant officer in consultation with the auditors are responsible for handling, validating and analyse the complaint and appeal.

The overall responsibility to execute this procedure is given below.

Activity	Responsibility
Completion and submittal of incident report records for entry into the Corrective Action System	All <b>Demos Global Group, Inc.</b> staff members
Incident investigation and analysis	Complainant Officer
Handling of complaint and appeal	Complainant Officer
Review, analysis and decision for closing	Complainant Officer

**4.0 Description of activity**

**4.1 Evaluation Incidents**

For the purposes of this document “Evaluation incidents” are defined as complaints, suggestions, observations and opportunities for improvement. Evaluation incidents information is reviewed for proper treatment. This procedure describes the methodology by which **Demos Global Group, Inc.** collects and processes incident reports; and communicates the impact to staff members.

**Demos Global Group, Inc.** recognizes that incidents occur in daily operation that collectively have an impact on the auditing process. In order to properly analyze and review the issues, a consistent and thorough process for collection of information is vital.

**4.1 Complaints**

Complaints are incidents of grievance or dissatisfaction with **Demos Global Group, Inc.** Complaints may be:

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- internal in nature – raised by a **Demos Global Group, Inc.** staff member with regard to internal service, operations or employee performance
- external in nature—raised by **Demos Global Group, Inc.** clients, suppliers or other affiliated organizations
- written
- verbal
- complaints raised by client’s or shareholders

**4.2. Terminology used in this procedure for incidents**

The incidents and complaints are considered as any of the below 4 things and procedure describes the system for handling the same.

**4.3. Suggestions**

**Demos Global Group, Inc.** recognizes that positive feedback is as important as negative. Suggestions are vital in identifying preventive action and system improvement. As with complaints, suggestions may be internal or external in nature, written or verbal.

**4.4. Appeals**

**Demos Global Group, Inc.** recognizes that the client may have some reservations or may not agree with the conduct of auditors. Auditing findings, certification decision and / or overall interaction with **Demos Global Group, Inc.** staff. Client is free to communicate the same to **Demos Global Group, Inc.**

**4.5. Observations**

Observations are witnessed incidents of operational deficiency, malfunction and or failure. Observations are often made by individuals independent of the activity witnessed and therefore objective in nature. Observations also play important role in identification of preventive action and system improvement.

**4.6. Opportunities for Improvement**

Opportunities for Improvement are incidents where the system has not failed, yet greater operational efficiency may be obtained in analyzing current practice. Opportunities for Improvement are often collected internally, but input from external sources is also beneficial.

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**4.7. Receipt of Incidents**

The incident may be reported by any means – verbal or written. In case of an external source, the incident report may be received by any staff member. The staff member shall fill the Incident report recording all the information and details of the complaint. The filled report shall be submitted to the Complainant officer for further action. In case of internal source, the incident report shall be filled by the staff member and submit to the Complainant Officer.

Demos Global acknowledges the reception of the complaint and the appeals send a confirmation by email to the complainant.

The Complainant Officer shall contact (telephone, email, letter) the external source to acknowledge the receipt of information within 5 working days of receipt. She shall understand the issue in detail from the source (to avoid any error in writing the report). She may decide to personally meet the complainant, depending on the gravity and seriousness of the issue.

In case of Complaints and Observations, it may be against **Demos Global Group, Inc.** (a system / procedure or a person) or a **Demos Global Group, Inc.** certified companies (client). In case of suggestion / opportunity for improvement, it is for **Demos Global Group, Inc.** to study the suggestion and decide.

All such incidents received by any means or by any one is first recorded in the electronic file in the Incident report with the details of;

- Complaint and appeal form
- Mode of receipt,
- Received by,
- Name of client
- Description of complaint and appeal,
- Reference of services against, which complaint and appeal is raised along with the reference, date and other details,

Client' complaint and appeal incident report are sent to the Vice President for analysing the root cause.

The Complainant Officer validates the complaint after checking necessary back–up records or personal interview of auditors / staff members (who were involved in the job).

**4.8. Handling of Complaint and Observations**

In case of a complaint / observation against **Demos Global Group, Inc.**, the Complainant Officer analyses the issue to determine if there is system error or person error. She shall

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determine the root cause and determine correction, corrective and preventive action. The possible complaints are –

- Administration – problems with appointments, certification files, certificates issued or issued late,
- Auditors / subcontractors problems with incomplete auditing/ or surveillance documentation
- Agents – problems with general compliance with **Demos Global Group, Inc.** administration or auditing procedures

The correction is affected immediately to satisfy the complainant. This may include training / counseling the person involved. The CAPA is discussed with management during next Management Review. Appropriate action is taken based on discussions (change in procedure / formats, training to all personnel etc.). An email is sent out to all staff detailing the issue and remedial action (for information). A copy of the complaint and investigation details is maintained in the respective individual's personnel file for reference at the performance appraisals.

In case of a complaint / observation against a client, the Complainant Officer studies the complaint and discusses with the auditors (last auditing). If the complaint is found genuine and valid i.e. indicates a system failure, the complaint is sent to the client for a response. No confidential reports or information is sent to complainants without written permission from the client. Adequate time is given to the client for response. If required, the Complainant officer follows-up with the client for the response. Depending on the response, the Complainant officer may decide to –

- Write to the complainant about the response and asks for his response.
- Ask further clarification from the client
- Depute auditors to personally visit the client and investigate for system failure. Such visit shall be considered as special visit and charged to the client.
- Request a joint meeting with client, complainant and **Demos Global Group, Inc.**

The Complainant Officer shall communicate with the complainant at the end of the process detailing the findings and to formally close the complaint. A copy of the correspondence is kept in the client file for records and the same is passed to the auditors during next evaluation. The details of all complaints and action taken (Correction, CAPA) are discussed in Management Review and IC meeting.

#### 4.9. Handling of Appeals

Any client, who fails to satisfy an auditing or surveillance, may appeal against the decision. Where an appeal is received the following procedure is followed.

- The Complainant Officer hears the appeal and determine the outcome.

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All appeals shall be received by the Certification Manager and details of the appeals shall be recorded and maintained by the Certification Manager.

- Certification Manager sends the complaint to the Complainant Officer, who shall investigate the appeal made and inform the client about its plan of action for investigation and action there upon.
- An investigation report (Incident Report) for each individual appeal shall be maintained by the Certification Manager and the Complainant officer. In case, any further corrective action is required post actions identified and taken based on Incident report – Corrective action procedure QP04 is implemented.
- A copy of the investigation report shall be sent to the client.
- In case of any further ambiguity, the same shall be reviewed by the Complainant Officer and appropriate decision arrived at.
- All appeals made are collated and analyzed on a yearly basis.
- Necessary corrective and preventive actions shall be taken based on the appeal trend.
- Appeal trends and corrective and preventive action taken shall also be reviewed as part of the Management committee meeting and Impartiality committee meeting.
- Certification Manager shall ensure that details with respect to the appellant and actions there upon is not shared with the auditors.
- Complainant officer shall ensure that no discriminatory action is taken against the appellant.
- The client is made aware of the appeals process and is available to him on request.

In case of an appeal made by a client against a decision made by the auditors, or the certification decision, the appeal shall be recorded by the Vice President and forwarded to the Complainant Officer. The Complainant officer reviews the appeal, investigate (which may include discussion with concerned client, respective auditors and review of Auditing report). The Complainant officer in conjunction with the Board of Directors may also direct any other auditors to visit the site and determine the validity of the appeal. The decision taken by the Complainant officer shall be communicated in writing, to the client and to the Board of Directors for necessary action. The case is also discussed during the next MRM and Impartiality Committee meeting. In exceptional cases, the case may be discussed with Impartiality Committee members on one-to-one basis.

#### **4.10. Handling of Suggestions / Opportunity for improvement**

- In case of suggestion / opportunity for improvement, the source is predominantly internal, and the concerned staff member fills the incident report and submits to the Board of Directors.
- The Vice President studies the suggestion to determine any conflict with ISO/IEC 17065, **Demos Global Group, Inc.** Policy.

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- The suggestion is accepted if found beneficial and does not adversely impact any other process. The Vice President determines the changes in existing documentation and implements appropriately.

If any client asks for the appeal / complaint handling process, then it is forwarded to the Vice President and the Complainant Officer. She informs a client the appeals and complaint handling process of **Demos Global Group, Inc.** if any complaints / appeals are received by clients.

#### 4.11. Closing of complaint and appeal

Depending on the nature of the non-conformity, the Vice President / Certification Manager in conjunction with the Complainant Officer may follow up with requests for corrective and preventive actions. When the investigation of client complaint and appeal determines that remote operation or other external organizations contributed to the complaint and appeal, the Certification Manager and the Complainant officer or his delegate contacts these organizations and provides them with all relevant information.

Every client complaint and appeal are recorded. The records are maintained by the Vice President / Certification Manager. When there are copies of written communication, reports and other documents related to a complaint and appeal, these records are organized into a file and are identified with the complaint and appeal number and having records of the corresponding corrective or preventive actions. The Vice President after reviewing the entire process and the suggestions, and decisions of the Complainant officer identifies need for taking corrective and preventive action to prevent such complaint and appeal in future and accordingly concerned person is informed.

All the complaint and appeal received by **Demos Global Group, Inc** is closed within 15 working days after receipt of the complaint and appeal. Complainant Officer is authorized for closing of complaint and appeal. Every effort is made to close the complaint or appeal within 15 days. If there is a delay it is recorded with the information and proper notification will be sent to the client.

#### 5.0 References

QP01 Procedure for document maintenance  
 QP04 Procedure for corrective and Preventive action

#### 6.0 Formats / Exhibits

F15 Incident Report  
 F30 Incident Log