



## **Cema International Compliance Services S.A. de C.V.**

Florencia 3127, Lomas de Providencia, Guadalajara, Jalisco, México, C.P. 44647

### **PROCEDURE FOR COMPLAINTS AND APPEALS**

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## 1. PURPOSE

The purpose of this procedure is to describe the management and handling of incidents, complaints, and appeals received from clients, the company itself, and other interested parties.

## 2. SCOPE

This procedure applies to all types of complaints and appeals received by Cema International Compliance Services S.A. de C.V..

## 3. TERMS AND DEFINITIONS

### INCIDENT

Refers to Complaints, Suggestions, Appeals, Observations, and Opportunities for Improvement.

### COMPLAINTS

omplaints are incidents of dissatisfaction with Cema International Compliance Services S.A. de C.V. They may be internal or external in nature, raised by clients, suppliers, or other affiliated organizations, as well as by clients' own customers or interested parties. Complaints may be submitted in writing or verbally.

### SUGGESTIONS

Cema International Compliance Services S.A. de C.V. recognizes that positive feedback is as important as negative feedback. Suggestions are vital for identifying risks and improving the system. Like complaints, they may be internal or external, written or verbal.

### APPEALS

Cema International Compliance Services S.A. de C.V. recognizes that a client may have reservations or disagree with the evaluator's conduct, evaluation results, the decision of the certification committee, or their general interaction with the company. The client is free to communicate this to the Appeals Committee of Cema International Compliance Services S.A. de C.V., and such cases will be treated as client appeals.

### OBSERVATIONS

Observations are incidents witnessed regarding deficiencies and/or service/operational failures. They are usually made by individuals independent of the observed activity and are therefore objective in nature. Observations play an important role in identifying risks and improving the system.

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## OPPORTUNITIES FOR IMPROVEMENT

These are incidents where the system has not failed but greater operational effectiveness could be achieved by analyzing current practices. They are usually collected internally, though external input is also beneficial.

All applicable terms defined in Clause 3 of the Integrated Management System Manual also apply here.

## 4. PROCEDURE

### 4.1 MANAGEMENT SYSTEM INCIDENTS

For the purpose of this document, Management System Incidents refer to complaints, suggestions, observations, and opportunities for improvement. The data from these incidents are entered into the Corrective Action Report for appropriate handling.

Cema International Compliance Services S.A. de C.V. recognizes that incidents naturally occur in daily operations and collectively impact the Management System. To properly analyze and address system-related issues, it is essential to maintain a consistent and comprehensive process for information gathering.

### 4.2 RECEIPT OF INCIDENTS

The incident may be reported by any means: verbally or in writing. In the case of external sources, the client may submit a complaint or appeal through the official channels established by Cema International Compliance Services S.A. de C.V., including the company website <https://www.cemacertificacion.com/contactanos>, the email address [training@cemacertificacion.com](mailto:training@cemacertificacion.com), and/or by phone at **+52 1 33 2106 5769**. The incident report may be received by any staff member. The staff member will complete the incident report by recording all the information and details of the complaint. The completed report will be forwarded to the Quality Manager to take appropriate action. In the case of an internal source, the incident report will be completed by the staff member and submitted to the Quality Manager.

The Quality Manager will contact (by phone or email) the external source to acknowledge receipt of the information within 5 business days of receiving it. They will understand the problem in detail from the source (to avoid errors in drafting the report). They may decide to meet personally with the initiator, depending on the severity and seriousness of the problem.

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All incidents of this type received by any means or from any person are first recorded in the incident report with the following details:

- Complaint or Appeal ID Number
- Method of Receipt
- Received By
- Name of Client / Other Party
- Description of the Complaint or Appeal
- Reference to the service(s) the complaint or appeal concerns (including reference, date, and other relevant details).

Reports of complaints and incidents involving appeals from customers or other parties are forwarded to the quality manager for root cause analysis.

The quality manager validates the complaint after reviewing the necessary supporting records or personally interviewing the evaluators or staff members (who were involved in the service).

### 4.3 HANDLING CUSTOMER COMPLAINTS AND OBSERVATIONS

In the case of a complaint or observation against Cema International Compliance Services S.A. de C.V., the Quality Manager analyzes the problem to determine whether it is a system error or a human error, identifies the root cause, and defines corrective or preventive actions.

Possible complaints include:

- Administrative issues (appointments, certification files, certificates issued late or incorrectly)
- Evaluator/subcontractor issues (incomplete audit documentation)
- Agent issues (non-compliance with administrative or audit procedures).

Immediate corrective actions are taken to satisfy the complainant, which may include training or counseling of the involved person. Corrective and preventive actions are discussed during the Management Review meeting. Appropriate measures are then implemented (procedure or format changes, staff training, etc.). An email summarizing the issue and corrective measures is sent to all staff for informational purposes. A copy of the complaint and investigation details is stored in the personal file of the involved individual for reference in future performance evaluations.

If the complaint or observation is against a certified client, the Quality Manager reviews it with the evaluator. If valid, the complaint is forwarded to the client for a response. No confidential reports or

information are sent to complainants without written permission from the client. Depending on the client's response, the Quality Manager may;

- Inform the complainant of the response and request feedback.
- Request further clarification from the client.
- Assign an evaluator to personally visit the client and investigate (treated as a special visit billed to the client).
- Arrange a joint meeting with the client, complainant, and Cema International Compliance Services S.A. de C.V.

After resolution, the Quality Manager informs the complainant of the findings and formally closes the case. A copy of all related correspondence is kept in the client's file and shared with the evaluator during the next audit. All complaints and actions (corrections, corrective and preventive actions) are reviewed in Management Reviews and Impartiality Committee meetings.

#### 4.4 HANDLING OF APPEALS

Any company or organization that is dissatisfied or disagrees with an evaluation or surveillance, whether regarding the process or the results, may appeal the decision through the appeals process. When an appeal is received, the following procedure shall be followed:

The members of the Appeals Committee shall be appointed under the direction of the Executive Director, who will review the appeal and determine the outcome. If the Executive Director is part of the certification team, they will decide who will act as the instructor for the appeals process. In such a case, the CEO shall refer the matter to the Impartiality Committee and/or Cema International Compliance Services S.A. de C.V. to make a decision regarding the appeal. The decision on the appeal shall be made based on the joint decision of Cema International Compliance Services S.A. de C.V. and the Impartiality Committee. The results of the appeal shall be communicated to the Impartiality Committee.

- All appeals shall be received by the Quality Manager, and their details shall be recorded in the Appeals Register maintained by the Quality Manager.
- The Quality Manager shall investigate the appeal and inform the client of the plan of action for the investigation and the corresponding measures to be taken.
- The Quality Manager shall maintain an Investigation Report (Incident Report) for each individual appeal. In the event that additional corrective or preventive actions are required, the necessary measures shall be identified and implemented based on the Incident Report and the Corrective and Preventive Action Procedure.
- A copy of the investigation report shall be sent to the client.

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- In the event of any other ambiguity, the Board of Directors shall review the matter and make the appropriate decision.
- If the issue remains unresolved, it shall be referred to the Certification Board for further consideration and feedback.
- All appeals submitted shall be compiled and analyzed annually.
- Corrective and preventive actions shall be implemented as necessary based on the trend of appeals.
- The trends of appeals and the corrective and preventive actions taken shall also be reviewed within the framework of the Certification Committee and the Impartiality Committee meetings.
- The Quality Manager shall ensure that details relating to the appellant and the measures taken are not shared with audit team members.
- The Quality Manager shall ensure that no discriminatory actions are taken against the appellant.
- The client shall be informed of the appeals procedure, which is available upon request.

#### 4.5 HANDLING OF OPPORTUNITIES FOR IMPROVEMENT

In the case of an opportunity for improvement, the source is predominantly internal, and the affected staff member fills out the Incident Report and submits it to the Quality Manager. The other source may be internal or external.

The Quality Manager reviews the suggestion to determine whether it conflicts with the ISO 17021-1 and ISO 17065 standards. If the suggestion conflicts with these standards, it is communicated to the initiator. However, the suggestion is also discussed during the Management Review. If the suggestion does not conflict, its benefits and impact on other processes are evaluated.

The suggestion is accepted if it is considered beneficial and does not negatively affect any other process. The Quality Manager determines the necessary changes in the existing documentation and applies them through the Document Control Procedure.

If any certified client or interested party inquires about the process for handling appeals/complaints, they are referred to the Quality Manager. The Quality Manager will inform the certified client or any other interested party about the procedure for handling appeals and complaints of Cema International Compliance Services S.A. de C.V., in case certified clients or interested parties receive any complaint or claim.

## 4.6 CLOSURE OF THE COMPLAINT OR APPEAL

Depending on the nature of the incident, the Quality Manager may follow up with requests for corrective and preventive actions. When the investigation of the client's complaint or appeal determines that remote operations or other external organizations contributed to the complaint or appeal, the Scheme Manager or their delegate shall contact these organizations and provide them with all relevant information.

All client complaints and appeals are recorded. The records are maintained by the Quality Manager. When there are copies of written communications, reports, and other documents related to a complaint or appeal, these records are organized in a file identified with the complaint or appeal number, and they also include records of the corresponding corrective action.

Records of investigations relating to the quality of service or other testing characteristics are maintained by the Scheme Manager. Based on the analysis of the client's complaint or appeal (or that of other parties), the necessary actions are taken, and a response is sent to the client to close the complaint or appeal.

The Quality Manager identifies the need to take corrective actions to prevent such complaints and appeals in the future, and the affected person is informed accordingly.

**ll complaints and appeals received from appellants shall be closed within seven (7) business days of receipt of the complaint or appeal.** The Quality Manager or the System Manager is authorized to close complaints and appeals.

## 5. REFERENCES

- PrimusGFS General Regulations V3.2
- ISO/IEC 17021-1:2015 - Conformity Assessment – Requirements for Bodies Providing Audit and Certification of Management Systems - Part 1: Requirements
- ISO/IEC 17021-3:2017 - Conformity Assessment – Requirements for Bodies Providing Audit and Certification of Management Systems - Part 3: Competence Requirements for Auditing and Certification of Quality Management Systems
- ISO/IEC TS 17023:2013 - Conformity Assessment – Guidelines for Determination of the Duration of Management System Certification Audits

- ISO/IEC 17065:2012 - Conformity Assessment – Requirements for Bodies Certifying Products, Processes and Services
- ISO 19011:2018 - Guidelines for Auditing Management Systems
- GLOBALG.A.P. General Regulations Part III - Rules for Accreditation and Certification Bodies
- BRC 004: Requirements for Certification Bodies Offering Certification Against BRCGS Criteria
- ISO 31000:2018 - Risk Management - Guidelines

## 6. RECORDS

### 6.1 FOR-SGI-13 Record of Complaints and Appeals.