

# Complaints and Feedback Policy

The Textile Exchange Complaints and Feedback Policy explains how Textile Exchange receives, manages, and addresses both complaints and general feedback relating to Textile Exchange standards, standards logos, and scheme participants.

## Section A - Scope

### A1. Policy Scope

A1.1 This policy covers the following types of complaints and feedback:

1. General feedback relating to Textile Exchange standards, policies, procedures, and systems;
2. General feedback regarding the performance of certified organizations, certification bodies, and accreditation bodies relating to Textile Exchange standards;
3. Complaints regarding the conformity of any scheme participant with Textile Exchange requirements or objectives;
4. Unauthorized, false, or misleading use of a Textile Exchange standard's logo or other claims related to certification; and
5. Textile Exchange as a standards owner and secretariat.

A1.2 Complaints or feedback about Textile Exchange's activities outside of the standards are not included within the scope of this procedure. This type of feedback may be submitted to Textile Exchange using the contact form available at <https://textileexchange.org/contact-us/>.

A1.3 Complaints about a scheme participant which do not relate to Textile Exchange requirements or objectives (e.g. customer service issues) will be passed along to the scheme participant and considered to be closed.

### A2. Principles

A2.1 Textile Exchange aims to investigate complaints in a fair, balanced, and objective manner and to resolve the issues efficiently and effectively.

A2.2 Textile Exchange seeks to resolve complaints at the least formal levels.

A2.3 Complaints are accepted from any company, organization, or individual.

A2.4 All parties involved in the process are requested to refrain from commenting publicly on a complaint until a decision is made.

A2.5 Records are kept for all complaints, resolutions, and related documentation for five years. General information is available upon request to interested parties.

### A3. Definitions

The following definitions are used in this policy. Additional definitions may be found in *TE-101 Terms and Definitions for Textile Exchange Standards and Related Documents*.

**Complaint:** A formal expression of dissatisfaction by a third party.

**Feedback:** Comments, suggestions, or requests for clarification relating to a particular document, policy, or practice.

**Scheme Participant:** Legal entity which is involved with Textile Exchange and its Standards, including certified organizations, certification bodies, accreditation bodies, and Textile Exchange.

References to *ISO17065* refer to ISO/IEC 17065:2012.

## Section B - Submission Process

### B1. Feedback Submission Process

B1.1 Textile Exchange accepts feedback on standards and related normative documents, as well as feedback relating to certified organizations, certification bodies, and accreditation bodies at any time. Feedback may be incorporated into existing guidance documents (e.g. User Manuals, calibration), communicated to an applicable certification body or accreditation body, or may be saved as input to the next applicable revision process.

B1.2 Feedback should be submitted as follows:

1. In response to a request for feedback, in the format specified in the request; this typically occurs in relation to a revision process;
2. For general issues, or for the Content Claim Standard, Organic Content Standard, Recycled Claim Standard, or Global Recycled Standard to [Standards@TextileExchange.org](mailto:Standards@TextileExchange.org);
3. For the Responsible Down Standard to [ResponsibleDown@TextileExchange.org](mailto:ResponsibleDown@TextileExchange.org);
4. For the Responsible Wool Standard, Responsible Mohair Standard, and Responsible Alpaca Standard to [ResponsibleWool@TextileExchange.org](mailto:ResponsibleWool@TextileExchange.org);
5. For assurance related documents and issues (including requirements for certification bodies), or specific feedback about a certified organization, certification body, or accreditation body to [Assurance@TextileExchange.org](mailto:Assurance@TextileExchange.org); or
6. Using the Textile Exchange Contact Form at <https://textileexchange.org/contact-us> (less preferred option).

## B2. Complaints Submission Process

- B2.1** Textile Exchange encourages complaints against certified organizations to first be submitted to the organization's certification body, and complaints against certification bodies to first be submitted to the certification body or to the certification body's accreditation body. If the complainant is not comfortable addressing the scheme participant directly or is not satisfied with the response from the scheme participant, they may submit a complaint to Textile Exchange.
- B2.2** Complaints should be submitted using the Textile Exchange Complaints Form at <https://www.tfaforms.com/forms/view/4798177>. Complaints may also be submitted by email to [Assurance@TextileExchange.org](mailto:Assurance@TextileExchange.org) or by mail to Textile Exchange, 511 South 1<sup>st</sup> Street, Lamesa TX 79331 United States.
- B2.3** All complaints shall be submitted in writing, in English, explaining the contact details of the complainant, the nature of the complaint, who or what the complaint is against, what has been done so far, what the complainant's expected outcome is, and including all documented evidence to support the claim. Failure to include any of the above information may limit Textile Exchange's ability to investigate the complaint.
- B2.4** In the case of complaints which are submitted by means other than the complaints form, Textile Exchange shall request that the complainant fill out the complaint form. If the complainant does not fill out the form and does not request otherwise, Textile Exchange shall assume consent to disclose the identity of the complainant to the applicable parties.

## Section C - Management of Complaints

### C1. Initial Investigation of Complaints

- C1.1** Each complaint received is entered into Textile Exchange's complaints management system and is assigned to a case manager based on the nature of the complaint.
- C1.2** The case manager shall undertake an initial review to determine if the complaint has merit. Even if a complaint is immediately determined to not have merit, it shall be passed along to any applicable certification body or accreditation body, as described below.
- C1.3** Textile Exchange shall provide the complainant with an initial response to the complaint within ten business days of receipt, including requests for any additional information or clarification as needed.
- C1.4** Textile Exchange shall ensure that there is no conflict of interest between the case manager and the parties involved in the complaint. In the case of complaints against Textile Exchange, Textile Exchange shall ensure that this is considered at an individual level.

## C2. Complaints Against Certified Organizations

- C2.1 Textile Exchange shall share complaints against certified organizations with the organization's certification body, with a request for follow-up.
- C2.2 The certification body shall conduct its own review/investigation and provide a complaint response to Textile Exchange within ten business days of receiving the complaint. Textile Exchange may ask for additional follow-up from the certification body and will make a determination.
- C2.3 If corrective action is needed, the certification body shall confirm the steps which will be or have been taken to address the corrective action (e.g. issuing a non-conformity to the organization, withdrawing a scope certificate).
- C2.4 In the event that a complaint against a certified organization shows that a certification body has not met applicable requirements, the complaint shall also be treated as a complaint against the certification body.
- C2.5 Textile Exchange may manage a complaint against a certified organization directly or request that the certification body take specific actions (e.g. withdrawing a specific scope certificate) where Textile Exchange believes that this is justified.

## C3. Complaints Against Non-Certified Organizations

- C3.1 Complaints may be submitted against organizations that are not certified to Textile Exchange standards, including non-certified brands or retailers, when they are making claims about Textile Exchange standards (including the use of logos) which are not permitted by Textile Exchange.

NOTE: See the applicable Textile Exchange Logo Use & Claims Guide for details on claims about Textile Exchange standards which may be made by non-certified organizations.

- C3.2 Textile Exchange may share details of a complaint with a certification body if there is an indication that the certification body has a current or past relationship with the organization the complaint is against, including a past certification or a current initial audit process.
- C3.3 Textile Exchange will reach out to the applicable non-certified organization upon receipt of a complaint and request that corrective action be made. If the applicable correction is not made, Textile Exchange may pursue other actions, including banning an organization from certification and/or taking legal action.

## C4. Complaints Against Certification Bodies

- C4.1 Textile Exchange shall share complaints against a certification body with the certification body and may also share with the applicable accreditation body, with a request for follow-up.

1. Textile Exchange may communicate separately with the accreditation body where relevant, or where the complainant has requested that some information only be shared with the accreditation body.
2. Textile Exchange shall share the complaint with the accreditation body unless the complaint is for an issue which has been determined by Textile Exchange to be too minor to justify this and which does not relate to an ISO17065 requirement.

NOTE: If a complaint is received against a certification body which does not relate to a normative Textile Exchange requirement (e.g. customer service), the complaint will be forwarded to the certification body and considered to be resolved. The accreditation body will not be notified.

**C4.2** The accreditation body shall take responsibility for managing the complaint if it relates to a requirement from ISO17065, or if agreed between the accreditation body and Textile Exchange. In this case, the accreditation body shall notify Textile Exchange of the resolution of the complaint.

**C4.3** The certification body shall conduct its own review/investigation and provide a complaint response to Textile Exchange and the accreditation body within ten business days of receiving the complaint. Textile Exchange or the accreditation body may ask for additional follow-up from the certification body.

**C4.4** If corrective action is needed, the certification body shall confirm the steps which will be or have been taken to address the corrective action.

**C4.5** The accreditation body may treat the complaint as a complaint against the certification body in its own systems and should consider the information relating to the complaint in the next assessment of the certification body. If the accreditation body notifies Textile Exchange that they will address the complaint, Textile Exchange may close the complaint on the basis of the accreditation body's evaluations.

## **C5. Complaints Against Accreditation Bodies**

**C5.1** Textile Exchange shall share complaints against an accreditation body with the accreditation body, with a request for follow-up.

NOTE: If a complaint is received against an accreditation body which does not relate to a normative Textile Exchange requirement (e.g. customer service), the complaint will be forwarded to the accreditation body and considered to be resolved.

**C5.2** The accreditation body shall conduct its own review/investigation and provide a complaint response to Textile Exchange within ten business days of receiving the complaint. Textile Exchange may ask for additional follow-up from the accreditation body.

**C5.3** If corrective action is needed, the accreditation body shall confirm the steps which will be or have been taken to address the corrective action.

## C6. Complaints Against Textile Exchange

- C6.1 Complaints received against Textile Exchange for matters unrelated to Textile Exchange standards and assurance will be forwarded to the applicable responsible person and managed outside of the scope of this policy.
- C6.2 Textile Exchange shall undertake an investigation into the complaint and shall involve all applicable staff members as needed to determine a resolution.

## Section D - Complaint Escalation and Resolution

### D1. Complaint Resolution

- D1.1 When a complaint is resolved, the case manager shall inform the complainant of the resolution of the complaint. Details of the resolution may be provided to the complainant as is deemed appropriate.
- D1.2 If the complainant is not satisfied with the resolution of a complaint, they may appeal to Textile Exchange within 15 business days of receiving notice of the resolution. In this case, the complaint shall be escalated.
- D1.3 Where necessary, the complaint may be escalated and a new case manager assigned, as described below.
- D1.4 Textile Exchange shall maintain documentation related to each complaint, including a final statement regarding the resolution of the complaint in the complaints management system.
- D1.5 Where a corrective action plan is required, the case manager shall monitor that the plan is completed according to the agreed timelines, and shall not consider the complaint to be closed until this is completed, unless the monitoring of the corrective action plan can be delegated to a certification body or accreditation body and Textile Exchange determines this to be sufficient.

### D2. Complaint Escalation

- D2.1 The case manager may involve other Textile Exchange personnel in the resolution of a complaint, as appropriate. In particular, details of a complaint may be discussed with the Assurance Team, Director of Assurance & Operations, or Director of Standards even if they are not formally escalated.
- D2.2 Where a case manager is unable to resolve a complaint, or where the nature of the complaint indicates the need for higher-level involvement, the complaint may be escalated to the following people or teams in order, who shall become the new case manager:
  1. Assurance Manager,

2. Director of Assurance and Operations,
3. Standards Management Team (SMT),
4. Managing Director, who may involve the Senior Advisory Team (SAT), and
5. Board of Directors.

**D2.3** Escalations to the Managing Director or to the Board of Directors should be limited to serious complaints against Textile Exchange or to complaints which represent a reputational risk to Textile Exchange, and which cannot be managed by the Standards Management Team.

**D2.4** If a complaint is escalated to the Managing Director or to the Board of Directors, the case manager or the Standards Management Team shall prepare a briefing document outlining the details of the complaint and identifying any Textile Exchange personnel and/or board members who may have a conflict of interest with the complaint.

**D2.5** As part of complaints resolution, the Managing Director or the Board of Directors may refer a complaint to mediation or to binding arbitration. It will be the right of Textile Exchange to determine the place and method of arbitration system resolution.

**D2.6** Decisions by the Board of Directors or by the Managing Director when so delegated by the Board of Directors shall be considered final except where doing so violates legal or contractual requirements.

### **D3. Sanctions and Bans**

**D3.1** Textile Exchange may take one or more of the following actions as part of the resolution of a complaint. Such actions shall be used judiciously and when Textile Exchange believes that they are truly warranted:

1. Public notice or notice to all certification bodies regarding any false or disallowed claims made by an organization or other scheme participant;
2. Banning of an organization from certification to any Textile Exchange standard for a minimum period of two years;
3. Actions to rescind the licensing contract for a certification body or the authorization contract for an accreditation body, based on the terms of the applicable contract;
4. Banning a certification body, certification body subcontractor, or individual from involvement with Textile Exchange standards; or
5. Legal action intended to safeguard Textile Exchange's reputation or the credibility of Textile Exchange standards, trademarks, and logos.