

PROCESS PROCEDURE 13, VERSION 02

Procedure for dealing with complaints

Purpose	Describe the procedure to be followed for dealing with complaints or grievances addressed to Donau Soja Organisation.
Definition	Complaints or grievances: These include, but are not limited to, complaints against Donau Soja Association or any of its affiliated subsidiaries, a Donau Soja member, or a Donau Soja-/Europe Soya-certified company.
Outline	1 General provisions
Status	Version 02: written by J. Weihs on 2 January 2024; reviewed and approved by D. Gollan on 10 January 2024.

1 General provisions

- 1.1 This procedure may be used by any individual or organisation, including Donau Soja members, non- members and other stakeholders.
- 1.2 Complaints and grievances may be filed regarding any non-conformity, breaches or misuse of any element of the Donau Soja System, including but not limited to:
 - Donau Soja Membership, statutes and governance rules;
 - Donau Soja Standards, including the process for developing/revising Donau Soja standards and related documents;
 - Donau Soja Certification, including audit processes, the issuance/suspension/withdrawal of certificates, Donau Soja certification bodies and auditors, as well as Donau Soja accreditation mechanism;
 - Donau Soja / Europe Soya trademark, use of compliance claims;
 - Report any misrepresentation or corruption under Donau Soja scope.
- 1.3 As a rule, complaints or grievances shall be resolved at an operational level. If no acceptable solution can be found at an operational level, the complaint or grievance shall be escalated to Donau Soja Management and/or the Donau Soja Board and Steering Committee (Presidium).

2 Submitting the complaint

- 2.1 A complaint or grievance shall be submitted no later than six (6) months after the action subject to complaint occurred. Only in exceptional cases will Donau Soja consider complaints submitted at a later stage.
- 2.2 Complaints or grievances shall be submitted in writing and shall contain the following information:



- name, organisation and address of the applicant (complainant),
- organisation targeted by the complaint (e.g. Donau Soja Organisation, Donau Soja member, Donau Soja-/Europe Soya-certified partner),
- reason for the complaint,
- description of the misconduct, and
- signature of the applicant (complainant).
- 2.3 Complaints or grievances shall be submitted to standards@donausoja.org
 together with all additional evidence/documents. If possible, both the complaint and additional documentation shall be submitted in English.

3 Processing the complaint

- 3.1 Donau Soja shall verify that the complaint is complete, document the complaint and initiate the resolution process.
- 3.2 Donau Soja shall inform the applicant (complainant) within ten (10) working days as to whether the complaint has been accepted or rejected. In case of acceptance, the next steps and the timeline shall be outlined.
- 3.3 Donau Soja shall handle the complaint on the appropriate level and suggest possible ways of settling the complaint. The following Complaint Levels are identified:
 - Level 1: complaints to be handled at an operational level,
 - Level 2: complaints to be handled at a strategic level and involving Donau Soja Executive Management, and
 - Level 3: complaints to be handled at the organisational level and involving the Donau Soja Board and Steering Committee (Presidium).
- 3.4 In case of complaints relating to the inspection and certification process, Donau Soja shall refer the applicant (complainant) to the responsible certification body.

4 Settling the complaint

- 4.1 The process of settling the complaint and any complaint resolution shall be in accordance with the Donau Soja Statutes and other relevant Donau Soja rules and procedures including the Donau Soja Conflict of Interest Policy.
- 4.2 Decisions shall be approved by a representative of Donau Soja Organisation corresponding to the relevant Complaint Level.

<u>Complaint Level 1</u>: Donau Soja shall notify the applicant (complainant) of the decision within two (2) months of the complaint being submitted and shall give reasons for its decision. The applicant (complainant) may file an appeal within ten days following the communication of the decision. Whenever no settlement could be found at the operational level the complaint/grievance shall be escalated further to the Executive Management.

<u>Complaint Level 2</u>: Donau Soja shall notify the applicant (complainant) of the decision within two (2) months of the complaint being submitted and shall give reasons for its decision. The applicant (complainant) may file an appeal within ten days following the communication of the decision. Whenever no settlement could be found at the Executive Management level the complaint/grievance shall



- be escalated further to the Donau Soja Board and Steering Committee (Presidium).
- 4.3 <u>Complaint Level 3</u>: Donau Soja shall notify the applicant (complainant) of the decision within six (6) months of the complaint being submitted and shall give reasons for its decision. The applicant (complainant) cannot file an appeal.

5 Documenting the complaint

- 5.1 Donau Soja shall keep a register of all complaints, including at least the following information: type of complaint, date of reception, party in charge of its resolution, parties involved and resolution.
- 5.2 An annual summary of all complaints shall be available upon request and within confidentiality rules.