

1.0 Purpose

This Quality System Level Procedure (QSLP) provides direction for the handling and processing of complaints, and appeals related to the operations and decisions of UL Supplier Quality Audits & Certifications (here in referred to as UL).

2.0 Scope

This procedure applies to the activities of the management, staff, auditors, and the Appeals Committee of UL and intended to define the process for resolving complaints and appeals between parties with an interest in the UL audit, certification, and/or decision-making process.

CAPA disputes (e.g., requests to refute, reverse, change or reclassify a nonconformance) are *not included in the scope* of this QSLP and thus won't be considered via this process. Procedures for Certification define the process for CAPA disputes.

3.0 Responsibility

The UL Business Manager ensures this procedure is effectively implemented and that a submission, investigation and decision on complaints or appeals do not result in any discriminatory actions against the complainant / appellant. The Business Manager is also responsible to ensure the Appeals Committee is established and operational, and that resources and information necessary to carry out the various committee duties / functions are available.

UL Quality Assurance (QA) ensures that records of complaints and appeals and their outcomes are maintained; those complaints and appeals that required internal corrective action are addressed (see COP 8.5 Corrective and Preventive Action); and that all complaints and appeals and their outcomes are analyzed and reported through annual Management Review. Additionally, QA ensures that personnel assigned to investigations are free from any commercial, financial, and other pressures that may influence the results of their decisions.

The Appeals Committee is responsible to investigate and formulate independent, impartial rulings on appeals. (See QSLP 5.2 Terms of Reference).

UL Client Services are responsible for confirming receipt of complaints and appeals, providing access to this procedure when requested and required, initiating Complaints and Appeals in the system and for communicating outcomes of investigations that result from Complaints or Appeals.

The Organization (complainant or appellant) is responsible to request resolution under the complaints and appeals process. The Organization is also responsible to complete formal documentation as requested by UL when submitting a complaint or appeal as specified in this procedure, and for providing objective evidence to support their complaint or appeal.

4.0 Definitions

Complaint: An informal or formal communication of dissatisfaction levied against a member of the UL staff, subcontracted personnel working on behalf of UL, or a UL client or any other stakeholder interested in the certification and/or audit process.

Appeal: An appeal is a request by an applicant or certified organization for reconsideration of any adverse certification decision related to its desired certification status. These decisions include granting, maintaining, extending, reducing, suspending, and withdrawing certification. Appeals must be received within 30 calendar days of notification of certification decision.

5.0 Requirements

This procedure establishes a formal method for receiving, documenting, evaluating, analyzing, and making decisions on complaints or appeals. A complaint against a UL customer or any other interested stakeholder who may feel harmed by any decisions or actions rendered by UL will also be allowed to enter the complaints process as described herein.

When a client wishes to submit a formal complaint or appeal, Client Services provides access to this procedure to the dissatisfied party / appellant, and request completion of [QF 7.7-2](#) Concern Intake Form and submission of supporting objective evidence. When all required documentation has been submitted, Client Services acknowledges receipt and initiates the Complaints and Appeals Workflow for processing.

UL Quality Assurance (QA) performs a review which includes:

- Determining if the concern meets the definition of complaint or appeal (section 4.0 above),
- Ensuring that the workflow includes the necessary information to proceed with an investigation, and
- Assigning independent investigator(s) to the case who have not been involved in the audit and certification activities related to the complaint.

Once a concern is accepted and routed for complaint or appeal investigation, it is considered validated.

5.1. Inquiry

There may be cases where a concern is submitted into the complaints or appeals process but does not meet the definition of complaint or appeal as defined in section 4.0 above. Where such cases exist, the concern will be treated as an inquiry and will not result in a full investigation. The assigned personnel will respond to the inquiring party via email within five (5) business days of assignment regarding the outcome.

5.2. Complaint

An investigation is conducted by gathering facts and information. Upon completion of the investigation, the UL Investigation & Outcome portion of [QF 7.7-2](#) Concern Intake Form is completed by the Lead Investigator. Where it is determined that actions are required to be taken by UL, they shall be recorded in the workflow. The form is uploaded into the Complaints and Appeals Workflow and then progressed to the Communication phase of the process. Client Services will issue the outcome of the investigation to the client and archive the workflow.

5.3. Appeal

Appeals must be documented on the [QF 7.7-2](#) Concern Intake Form and must be received within 30 days of notification of certification decision in order to be considered. Three (3) Appeals Committee members shall be assigned to participate in the investigation. The appealed certification decision shall remain effective pending the conclusion of the appeal process.

All appeal investigations will include interview with the Appellant and the UL personnel involved in certification decision. These interviews are held remotely / virtually and are conducted in English. The appellant is responsible for supplying at its cost any translation services required to address the appeal. The Appeals Committee will communicate to UL and the appellant interview dates in advance of each meeting.

The Appeals Committee may request additional documentation or statements from the appellant, expert witnesses, staff of UL, or others who may be needed to render a fair and objective ruling on the matter.

The appellant shall notify UL in writing at least 15 calendar days in advance if the appellant intends to have legal counsel present at the interview. This is to ensure UL has sufficient advance notice so that UL can also

have legal counsel present. If UL is not notified in writing 15 calendar days in advance that the appellants' counsel will be present, but counsel shows at the interview, the appellant's legal counsel will not be allowed to be present and will be asked to exit the virtual interview.

Following the investigation, the Appeals Committee deliberates privately to reach a majority decision. Where it is determined that actions are required to be taken by UL, they shall be recorded in the workflow. If the panel upholds the appeal, the certification decision will be remanded to the certification decision-maker for further consideration. If the panel does not uphold the appeal, finding the appeal without merit, the certification decision stands. Upon completion of the investigation, the UL Investigation & Outcome portion of [QF 7.7-2](#) Concern Intake Form is completed by the Appeals Committee.

An appeal can be withdrawn at any time until an appeal decision is issued. When an appeal is not upheld or is withdrawn, UL will not accept a future appeal on the same certification decision.

When a final decision has been rendered, UL Client Services communicates in writing the decision on the appeal.

5.4. Tracking Actions Resulting from Investigations

Actions resulting from Investigations are tracked in Complaint and Appeal workflows. When it was determined that long term actions are required, the workflow is transitioned to the Track Actions step after the outcome is communicated to the complainant or appeal. Quality Assurance will oversee the closure of all required actions related to the complaint or appeal and will close out the record once actions are validated as being taken. Where no long-term actions are required, the workflow moves to the completed step.

5.5. Independence and Impartiality

The complaints and appeal process is subject to UL's Impartiality Policy (COP 4.1). UL ensures that complaint and appeal investigations and decisions do not result in any discriminatory action. QA ensures that personnel assigned to investigations are free from any commercial, financial, and other pressures that may influence the results of their decisions. Decisions resolving the complaint or appeal shall be made by, or reviewed and approved by, person(s) not involved in the certification activities related to the complaint or appeal.

To ensure there is no conflict of interest, personnel who have provided consultancy for a client, or been employed by a client, will not be used to review, or approve the resolution of a complaint or appeal for that client for at least two years following the end of the consultancy / employment.

6.0 Associated Documents

The current versions of the following documents were referenced in the development of this procedure:

- ISO/IEC 17065
- ISO/IEC 17021-1
- ISO/IEC 17020
- QSLP 5.2 Committee Terms of Reference
- COP 4.1 A&I Independence & Impartiality
- COP 7.5 A&I Complaints & Appeals
- COP 8.5 Corrective and Preventive Action
- [QF 7.7-2](#) Concern Intake Form