VISTA INFOSEC®
TRUSTED ADVISORS, ASSURED COMPLIANCE™

CERTIFICATION BODY — SYSTEM PROCEDURE

Procedure for Handling of Complaints

and Disputes

DOCUMENT CONTROL

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Notes

1. The Management Representative is responsible for the issue and distribution of this document, including amendments.
2. The authorized user / holder of this copy is responsible for incorporating all amendments and maintaining the currency of the document.

1. PURPOSE AND SCOPE:

1.1 The purpose of this document is to establish procedures for the **receipt, handling, investigation and resolution of complaints and disputes** concerning VISTA InfoSec or its clients. The procedure is intended to ensure that complaints and disputes are addressed in an impartial, timely and systematic manner, and that appropriate opportunities for improvement are identified.

Where necessary, **corrective actions, preventive actions and quality improvement measures** shall be initiated based on the analysis and findings arising from complaints and disputes.

1.2 The scope of this document covers the handling of:

- Complaints and disputes concerning clients certified by VISTA InfoSec Certification Services; and
- Complaints and disputes raised against VISTA InfoSec Certification Services.

2. RESPONSIBILITY

Management Representative (MR) is responsible for:

- Registration and acknowledgement of complaints/disputes;
- Coordinating and managing all activities leading to their satisfactory resolution and closure; and
- Providing information to the CEO and Management Committee on the status, investigation, actions taken and outcome of complaints/disputes.

Management Committee / CEO holds overall responsibility for the final resolution of escalated complaints/disputes, ensuring that they are handled impartially and effectively.

3. ASSOCIATED DOCUMENTS

- AIMS/AAA-01 – VISTA APEX Manual
- AIMS/AA-02 – AIMS Manual (Scheme)
- AIMS/AA-03 – AIMS Procedure Manual

4. DEFINITIONS

For the purposes of this document, the definitions specified in ISO/IEC 17021-1, ISO/IEC 42006, ISO/IEC 27006-1:2024 and ISO 9000, together with the definitions provided in the VISTA APEX Manual, shall apply.

5. RESOURCES

For the purposes of the activities defined in this document, the personnel resources are as identified in the VISTA APEX Manual.

6. PROCEDURE FOR HANDLING COMPLAINTS AND DISPUTES

6.1 Registration and Acknowledgement

All complaints and disputes received by VISTA InfoSec shall be serially registered and acknowledged by the Management Representative (MR) within **two working days** of receipt. The MR shall review the complaint/dispute to determine whether it relates to the certification activities.

The following actions shall be taken:

a) For complaints/disputes concerning certified clients, the MR shall appoint a suitable nominee, independent of the subject of the complaint/dispute, and forward the complaint and relevant information to the nominee for necessary investigation by the fastest appropriate means. The complaint/dispute shall also be referred to the concerned client, where appropriate and at a suitable stage of the investigation.

b) For complaints/disputes concerning VISTA InfoSec Services itself, the MR shall appoint a suitably qualified and impartial nominee to conduct the necessary investigation. The nominee shall not have been involved in the subject matter of the complaint or in the related certification decision.

c) The Certification Body (CB) shall be responsible for gathering and verifying all information required to validate and evaluate the complaint/dispute.

6.2 Initial Actions

Following registration of a complaint/dispute, the designated nominee, who shall be independent of the persons involved in the subject matter of the complaint/dispute, shall initiate the necessary actions within **three working days**.

The initial actions shall include, as appropriate:

- Discussing the complaint/dispute with the complainant in a courteous and professional manner and obtaining any additional information required;
- Confirming whether the complainant wishes their identity to be kept confidential, subject to applicable legal, regulatory and certification requirements; and
- Informing the complainant of the next steps in the process and the anticipated time frame for completion.

6.3 Investigation and Additional Assessment

Following the initial actions, the designated nominee shall investigate the complaint/dispute and determine the appropriate course of action.
Where necessary, the investigation may include:

- Review of relevant records, reports, correspondence and other documented information;
- Obtaining additional information from the complainant and/or the certified client; and

- Determining whether an additional assessment or visit to the certified client is necessary.

Where required, the CB may conduct an assessment of the certified client at short notice or, where justified and permitted by the applicable certification scheme and contractual arrangements, an unannounced assessment. Such an assessment may be undertaken to investigate a complaint, respond to significant changes, or follow up on a suspended certification.

Where a visit to the certified client is required, the CB shall normally arrange the visit within a target period of **two weeks**, on a mutually convenient date.

Due consideration shall be given to the selection and assignment of the assessment team, particularly where the client has limited or no opportunity to object to the team members. The CB shall ensure that the assigned personnel are competent, impartial and free from conflicts of interest.

6.4 Target Time Frames

The target time frames for completing the investigation and closing complaints/disputes shall be:

- **10 working days** from receipt of the complaint/dispute where no client visit is required; and
- **20 working days** from receipt of the complaint/dispute where a client visit is required.

Where these target time frames cannot be met, an interim communication shall be provided to the complainant indicating the revised anticipated date of completion.

6.5 Communication of Investigation Outcome

Upon completion of the investigation, the designated nominee shall, where appropriate, communicate with the complainant and inform them of the conclusion and outcome of the investigation.

6.6 Complaints/Disputes Concerning VISTA InfoSec Services

For complaints/disputes relating to Certification Services, the designated nominee shall prepare and issue a formal written response to the complainant.

Where the investigation identifies any nonconformity, deficiency or opportunity for improvement within Certification Services, appropriate **correction, corrective action, preventive action or quality improvement action** shall be initiated, as applicable, to prevent recurrence.
The effectiveness of such actions shall be reviewed and recorded.

6.7 Complaints/Disputes Concerning Certified Clients

For complaints/disputes concerning certified clients of Certification Services, the designated nominee shall issue an appropriate written response to the complainant, with a copy to the MR for information.

The nominee shall also ensure that:

- Relevant information arising from the complaint/dispute is considered during the next scheduled assessment of the certified client, as appropriate;
- Any identified concerns requiring follow-up are clearly communicated to the assessment team; and

- Where necessary, appropriate corrective or preventive action is initiated within Certification Services.

Due consideration shall be given to confidentiality. Information concerning the certified client shall not be disclosed to the complainant unless it is already publicly available, has been authorized for disclosure, or disclosure is required by applicable legal, regulatory or accreditation requirements.

The following wording may be used, as appropriate, when communicating the outcome:

a) Where the complaint is not substantiated:

> *"We are satisfied, based on the information and evidence reviewed, that the organization has followed its established processes for handling customer complaints and corrective actions in accordance with the applicable requirements."*

b) Where the complaint is substantiated and corrective action has been initiated:

> *"We are satisfied, based on the information and evidence reviewed, that the required corrective action has been taken or initiated by the organization. The implementation and effectiveness of the action will be considered during the normal certification surveillance/assessment activities, as appropriate."*

The above wording shall be suitably modified to reflect the actual findings and shall not disclose confidential information.

6.8 Closure and Reporting

A complaint/dispute shall be considered satisfactorily resolved and closed when all actions identified as necessary during the investigation have been completed and the outcome has been formally communicated to the complainant.

Records of all complaints/disputes, including their registration, investigation, evidence reviewed, decisions, actions taken, communications and closure, shall be maintained.

A summary of complaints/disputes and related actions shall be reported to the **Management Committee and Advisory Board**, as appropriate, for review and evaluation. The Management Committee shall have overall responsibility for ensuring the adequacy and appropriateness of actions taken and the satisfactory resolution of complaints/disputes.

Formal communication confirming the closure and outcome of the complaint/dispute shall be provided to the complainant.

6.9 non-discrimination

The submission, investigation, handling and decision on complaints/disputes shall not result in any **discriminatory, retaliatory or adverse action** against the complainant.

6.10 Public Information

Any information concerning the outcome of a complaint/dispute that is intended to be made public shall be determined by Certification Services in consultation with the concerned certified client, where applicable, while ensuring compliance with applicable **confidentiality, legal, regulatory and accreditation requirements**.