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TEXTILE EXCHANGE STANDARDS



# **COMPLAINTS POLICY**

## Document Information

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February 19, 2025	V3.0	ASR-110 was revised and re TE-TXL-POL-206	e-released under its new code:
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#### Document Revision and Interpretation

The Complaints Policy will undergo a review process at least every five years. Points of clarification may be incorporated into supplementary and guidance documents prior to the next review. More substantive feedback or suggested changes will be collected and assessed as part of the next review of the document.

Any uncertainty regarding the correct interpretation of a criterion should be resolved by the "Notes and Examples" section, where possible. You may submit feedback to Textile Exchange's standards system at any time via <u>this form</u> or by sending an email to <u>standards@textileexchange.org</u>.

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## A. About the Document

The Textile Exchange Complaints Policy explains how Textile Exchange receives, manages, and addresses complaints and appeals relating to Textile Exchange standards, assurance, standards claims, and scheme participants including certification bodies and accreditation bodies.

#### A1. Implementation

The following implementation timelines apply:

A1.1.1	TE-TXL-POL-206-V3.0 replaces ASR-110-V2.0, is effective February 19, 2025 and may be used immediately.
A1.1.2	The mandatory implementation date for TE-TXL-POL-206-V3.0 is June 3, 2025. All complaints submitted and/or reviewed on or after <b>June 3, 2025</b> shall follow the criteria of TE-TXL-POL-206-V3.0.

#### A2. Document References

Scheme participants are subject to the criteria of the following documents, and it is essential that they are used alongside this document. All can be found at <u>TextileExchange.org/knowledge-center</u>. Where a specific version of a document is referenced, this is to ensure clarity in referencing specific criteria and does not supersede mandatory implementation dates for future versions of the document. The latest version of referenced documents, including any amendments (e.g. calibrations), applies for those without a version number.

A2.1.1	<u>Textile Exchange Complaint Form</u>
A2.1.2	<u>TE-301 Standards Claims Policy</u> (TE-301)
A2.1.3	<u>TE-302 Standards Logo Use Specifications</u> (TE-302)
A2.1.4	ISO/IEC 17065:2012 Conformity Assessment – Requirements for bodies certifying products, processes, and services
	1) References to ISO17065 refer to ISO/IEC 17065:2012.

NOTE: *TE-301 Standards Claims Policy* and *TE-302 Standards Logo Use Specifications* describe the requirements for use of claims about Textile Exchange standards and their applicable logos, including details on claims and logo use which may be made by non-certified organizations.

#### A3. Document Definitions

Refer to <u>Textile Exchange glossary</u> for definitions of terms used in this document. Defined terms are shown in *italics* in the first usage in this document, and in some other uses for clarity.

NOTE: Please note that <u>TE-101 Terms and Definitions for Textile Exchange Standards and Related</u>

<u>Documents</u> will not be updated going forward and will become obsolete (i.e. retired) alongside the mandatory implementation date of the *Materials Matter Standard* (TE-MM-STN-101). Therefore, TE-101 may still be referenced until the *Materials Matter Standard* becomes mandatory, but the Textile Exchange glossary (<u>https://textileexchange.org/glossary/</u>) takes precedence in case of any contradiction or omission.

# B. Document Scope

### Bl. Scope of the Document

B	1.1.1	<ul> <li>This policy applies to complaints regarding Textile Exchange as a standard owner or the conformity of any scheme participant with Textile Exchange requirements or objectives, such as complaints related to: <ul> <li>a. The conformity of certified organizations;</li> <li>b. Certification bodies;</li> <li>c. Accreditation bodies; or</li> <li>d. The unauthorized, false, or misleading use of a Textile Exchange standard logo or other claims related to certification.</li> </ul> </li> </ul>
B1	1.1.2	The scope of this policy includes appeals of decisions related to complaints.
B1	1.1.3	Complaints or feedback about Textile Exchange's activities or a scheme participant outside of the standards system are not included within the scope of this policy. This type of feedback may be submitted to Textile Exchange using the contact form available at <a href="https://textileexchange.org/contact">https://textileexchange.org/contact</a> .
B1	1.1.4	The scope of this policy does not include inquiries or feedback related to Textile Exchange standards, policies, procedures, and systems. Comments and feedback on standards and related normative documents may be submitted using the Textile Exchange Standards Feedback Form available at <a href="https://www.tfaforms.com/5063645/">https://www.tfaforms.com/5063645/</a> .

# Section 1 - Confidentiality of Complaints

NOTE: General information about the Textile Exchange standards system which is not confidential is available upon request to interested parties.

### 1.1. Principles and Confidentiality

1.1.1	Textile Exchange shall resolve complaints efficiently and effectively in a fair, balanced, and impartial manner.
1.1.2	Textile Exchange shall accept complaints from all stakeholders.
1.1.3	Textile Exchange shall use, disclose, and protect information in accordance with the Privacy Policy available here: <u>https://textileexchange.org/privacy-policy/</u> .
1.1.4	All parties involved shall take necessary measures to preserve the confidentiality of information obtained during and after the review of the complaint when requested by the complainant or when it is otherwise prudent and shall refrain from commenting publicly on a complaint until a decision is made.
1.1.5	When complaints relate to a certified organization or a certification body, Textile Exchange may disclose information about the complaint to the related certification body and accreditation body.
1.1.6	Textile Exchange shall not disclose the identity of the complainant to the parties involved where the complainant has requested to remain anonymous.
	NOTE: 1) Anonymous complaints may limit the ability of Textile Exchange to fully evaluate the merits of the complaint.
1.1.7	The details of a complaint review may not be disclosed to the complainant when it is still ongoing as most investigations are confidential. Textile Exchange may contact the complainant should further information be required to support the review of the complaint.

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## Section 2 – Submission Process

### 2.1. Complaints Submissions Process

2.1.1	Complaints against certified organizations shall first be submitted to the organization's certification body, and complaints against certification bodies should first be submitted to the certification body or to the certification body.
2.1.2	If the complainant is not satisfied with the response from the scheme participant or the complaint cannot be resolved, they may submit a complaint to Textile Exchange.
2.1.3	Complaints should be submitted using the Textile Exchange Complaints Form at <u>https://textileexchange.org/complaint-form/</u> .
2.1.4	<ul> <li>All complaints shall be submitted in writing, in English, including:</li> <li>a. The contact details of the complainant;</li> <li>b. The nature of the complaint;</li> <li>c. Who or what the complaint is against;</li> <li>d. What actions have been taken so far;</li> <li>e. What the complainant's expected outcome is; and</li> <li>f. All documented evidence to support the alleged claim.</li> </ul>
2.1.5	Failure to include any of the information outlined in 2.1.4 may limit Textile Exchange's ability to fully evaluate the complaint.
2.1.6	In the case of complaints which are submitted by means other than the Complaint Form, such as by email to <u>assurance@textileexchange.org</u> , Textile Exchange shall request that the complainant fill out the Complaint Form. If the complainant does not fill out the form, then it shall remain at the discretion of Textile Exchange to determine whether any further response or review is warranted.

# Section 3 – Management of Complaints

### 3.1. Initial Review of Complaints

3.1.1	Textile Exchange shall enter each complaint received into their complaints management system and assign a case manager based on the nature of the complaint.
3.1.2	Upon receipt of a complaint, Textile Exchange shall undertake an initial review to determine if the complaint has merit and meets the scope of this policy, and if applicable, share accordingly with the applicable certification body or accreditation body, as described in this policy.
3.1.3	Textile Exchange shall provide the complainant with an initial response to the complaint within 14 calendar days of receipt, including requests for any additional information or clarification needed, or the rejection of the complaint (with written explanation) to the complainant as applicable.
3.1.4	Textile Exchange shall ensure that there is no conflict of interest between the case manager and the interested parties involved in the complaint.

### 3.2. Complaints Against Certified Organizations

3.2.1	Textile Exchange shall share complaints against certified organizations with the organization's certification body, with a request for follow-up.
3.2.2	The certification body shall acknowledge receipt of complaint and provide an initial response to Textile Exchange within 14 calendar days. The certification body shall conduct their own review/investigation and the resolution shall be provided to Textile Exchange within 30 calendar days. Textile Exchange may ask for additional information (e.g. audit reports, supporting documents for an issued transaction certificate) or follow-up from the certification body.
3.2.3	If action is needed to resolve the complaint, the certification body shall confirm the steps which will be or have been taken to complete the necessary action (e.g. issuing a non-conformity to the organization, withdrawing a scope certificate) and any associated timelines.
3.2.4	If 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.
3.2.5	Textile Exchange reserves the right to review 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.

### 3.3. Complaints Against Non-Certified Organizations

3.3.1	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. 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 audit process.
3.3.2	Textile Exchange shall reach out to the applicable non-certified organization upon receipt of a complaint and request necessary corrective actions. If the applicable corrections are not completed, Textile Exchange may pursue other actions, including banning an organization from certification and/or taking legal action.

### 3.4. Complaints Against Certification Bodies

3.4.1	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.
3.4.2	Textile Exchange may communicate separately with the accreditation body where relevant.
3.4.3	Textile Exchange shall share the complaint with the accreditation body unless they determine that the complaint is for an issue which is not relevant to be shared (e.g. if it is deemed by Textile Exchange to be minor in nature and therefore such sharing cannot be justified).
3.4.4	If a complaint is received against a certification body which does not relate to a normative Textile Exchange requirement (e.g. related customer service), the complaint may be forwarded to the certification body and considered to be resolved. The accreditation body may be notified.
3.4.5	The accreditation body shall take responsibility for managing the complaint if it relates to a requirement from ISO17065, any normative Textile Exchange requirement which is within the scope of the accreditation body's assessment, 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.
3.4.6	The certification body shall acknowledge receipt of the complaint and provide an initial response to Textile Exchange within 14 calendar days of receiving the complaint. The certification body shall conduct its own review/investigation and the resolution shall be provided to Textile Exchange and the accreditation body within 30 calendar days. Textile Exchange or the accreditation body, as applicable, may ask for additional follow-up or corrective actions from the certification body.
3.4.7	If action is needed to resolve the complaint, the certification body shall confirm the steps which will be or have been completed and any associated timelines for pending actions.
3.4.8	Textile Exchange reserves the right to review a complaint against a certification body directly or request that the accreditation body take specific actions (e.g. withdrawing an accreditation) where Textile Exchange believes that this is justified, or take other actions directly (e.g. sanction or withdrawal of licensing).

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### 3.5. Complaints Against Accreditation Bodies

3.5.1	Textile Exchange shall share complaints against an accreditation body with the accreditation body, with a request for follow-up.
3.5.2	If a complaint is received against an accreditation body which does not relate to a normative Textile Exchange requirement (e.g. related to customer service), the complaint may be forwarded to the accreditation body and considered to be resolved.
3.5.3	The accreditation body shall acknowledge receipt of the complaint and provide an initial response to Textile Exchange within 14 calendar days of receiving the complaint. The accreditation body shall conduct its own review/investigation and the resolution shall be provided to Textile Exchange within 30 calendar days. Textile Exchange may ask for additional follow-up or corrective actions from the accreditation body.
3.5.4	If action is needed to resolve the complaint, the accreditation body shall confirm the steps which will be or have been completed and any associated timelines for pending actions.

### 3.6. Complaints Against Textile Exchange

3.6.1	Complaints received against Textile Exchange for matters unrelated to the Textile Exchange standards system shall be forwarded to the applicable responsible person and managed outside of the scope of this policy.
3.6.2	Textile Exchange shall undertake an investigation into the complaint and shall involve all applicable staff members as needed to determine a resolution. Textile Exchange shall provide a response to complainant within 30 calendar days with a plan for resolution.

# Section 4 – Complaint Resolution, Appeals, and Sanctions

### 4.1. Complaints Resolution

4.1.1	Textile Exchange personnel shall be involved in the resolution of a complaint as appropriate depending upon the nature of the complaint.
4.1.2	When a complaint resolution is decided, the case manager shall inform the involved parties of the resolution of the complaint as applicable and appropriate to the nature of the complaint, and any required actions. At minimum, the case manager shall inform the complainants or aggrieved parties of the decision.
4.1.3	If the certification body or accreditation body is responsible for managing the complaint as described in Section C and determines that corrective actions are required, then that party shall also be responsible for ensuring the necessary corrective action plan is completed according to the designated timelines.
4.1.4	Where a corrective action plan is required, which is not managed by the relevant certification body or accreditation body, 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.
4.1.5	Textile Exchange shall maintain documentation related to each complaint in the complaints management system, including details regarding the resolution of the complaint. Records are kept for all complaints, resolutions, and related documentation for a minimum of five years.
4.1.6	Textile Exchange, on a regular basis, shall publicly report a summary of all concluded complaints, and resulting actions, ensuring confidentiality of complainants or aggrieved parties, where requested or prudent.

#### 4.2. Appeals Process

NOTE: All parties involved in a complaint have the right to appeal a decision for reconsideration.

4.2.1	All parties involved in a complaint have the right to appeal a decision for reconsideration. If the complainant or the subject of the complaint is not satisfied with the resolution of a complaint, they may appeal to Textile Exchange within 14 calendar days of receiving notice of the resolution. Appeals should be submitted to <u>assurance@textileexchange.org</u> .
4.2.2	A letter of appeal shall be accompanied by an explanation and supporting documentation that the complainant believes was not considered during the investigation.
4.2.3	Textile Exchange shall acknowledge receipt of an appeal within 14 calendar days. A new case manager shall be assigned (i.e. a different case manager than who managed the original complaint). The case manager shall review the appeal and prepare a summary report for an internal appeals reviewer, additionally identifying any Textile Exchange personnel and/or board members who may have a conflict of interest with the appeal.
4.2.4	The appeal shall be reviewed by the appeals reviewer. A decision to uphold or overturn the original decision shall be made within a maximum timeframe of 90 calendar days of receipt of the appeal and

this decision shall be communicated with the complainant or aggrieved parties. This communication shall explain the decision, any steps which will be or have been completed to resolve the complaint, any associated timelines for pending actions, and the reason the appeal decision was made.
 4.2.5 Should a complaint be referred to mediation or to binding arbitration for resolution, it shall be the right of Textile Exchange to determine the place and method of mediation or arbitration system resolution.
 4.2.6 Appeal decisions shall be considered final.

#### 4.3. Sanctions and Bans

4.3.1	Textile Exchange may decide to issue a sanction or ban as part of the resolution of a complaint. Such actions shall be used judiciously and when Textile Exchange believes they are truly warranted, which may include one or more of the following actions:
	a. Public notice or notice to all certification bodies regarding any false or disallowed claims made by an organization or other scheme participant;
	b. Banning an organization from certification to any Textile Exchange standard for a minimum period of time;
	c. Actions to restrict or rescind the licensing contract for a certification body or the authorization contract for an accreditation body, based on the terms of the applicable contract:

- d. Banning a certification body, certification body subcontractor, accreditation body, individual, or other entity from involvement with Textile Exchange standards; and/or
- e. Legal action intended to safeguard Textile Exchange's reputation or the credibility of Textile Exchange standards, trademarks, and logos.