

## **1 PURPOSE**

This document describes requirements and procedures to ensure that CQC, as a verification body, provides service of verification for CBAM in an impartial and accurate manner, and safeguards the benefits of the verification clients. Meanwhile, ensure that CQC can function legally, and make decisions independently.

Regulation (EU) 2023/956, Commission Delegated Regulation (EU) 2025/2551, ISO 17029:2019/14065:2022 and other guidance issued by the accreditation body shall be followed.

## **2 SCOPE**

**2.1** This procedure applies to the appeals, complaints and disputes arising from contracted verification clients or any other relevant parties and handling of judicial processes.

**2.2** The criteria of valid appeals, complaints and disputes which are included the followings:

- a) which have not been in judicial procedure;
- b) which do not exceed CQC's business scope;
- c) those that have not been resolved through an interceded agreement, or those that have been resolved through an interceded agreement and implementation but have raised new issues;
- d) which comply with the Laws and Regulations of EU;
- e) the evidences of which are complete;
- f) which have not been handled by relevant administrative department;
- g) applicant's information is complete and authentic.

## **3 RESPONSIBILITIES**

**3.1** The General Manager of CQC is responsible for the approval of decisions regarding major appeals, complaints and disputes & Judicial processes.

**3.2** Department of Auditing and Legal Compliance (A&L Dept.) of CQC is in charge of accepting and handling appeals, complaints and disputes, handling of judicial processes, performing investigation, drafting decision and submitting it to the General Manager of CQC for approval.

**3.3** The relevant departments of CQC are responsible for participation during investigation.

**3.4** The impartiality committee is responsible for the appeals, complaints and disputes which are submitted to it, the related departments of CQC are responsible for participating in the investigation.

## **4 DEFINITIONS**

### **4.1 Appeal**

Appeal is a request to CQC for reconsideration of a decision it has made with respect to the issuance of a verification opinion.

### **4.2 Complaint**

Complaint is an expression of dissatisfaction, other than appeal, by any person or organization to CQC, relating to CQC's activities, where a response is expected.

### **4.3 Dispute**

Dispute is the oral or written statement from verification client and the stakeholders on the disagreement about CQC's verification service and technique aspects.

### **4.4 Judicial process**

Judicial process means any type of legal proceeding of any nature, including but not limited to administrative, civil or criminal proceedings, before a national or international court or tribunal, or administrative body, whether such proceeding is related to CQC or otherwise.

## **5 PROCEDURE**

### **5.1 Appeal**

5.1.1 The verification client may submit the written appeals to A&L Dept. within 30 working days when received CQC's notice of unaccepted application or final verification reports.

5.1.2 A&L Dept. , upon receiving the appeals, shall make analysis and decide whether to accept the appeals, and inform the submitter. If it is not acceptable, the reason should be explained. A&L Dept. shall report to the General Manager of CQC upon receiving the appeals. The General Manager shall authorize the formation of an appeal handling team, which shall take actions and make decisions based on the facts, and then initiate the following steps:

(a)Investigation:The appeal handling team shall gather and verify all relevant information related to the appeal, ensuring thorough documentation of the evidence, contracts, and correspondence involved.

(b)Substantiation:The appeal handling team shall substantiate the appeal based on all necessary information collected.

(c)Action-taking: The appeal handling Team, under the General Manager's guidance, will develop a response strategy, outlining potential actions based on gathered evidence and applicable regulations. Based on investigation and substantiation, the appeal handling team shall submit draft decision and relevant measurements to the General Manager for approval and making decision. The appeal handling team shall ensure that decision take into account all the relevant information available and gathered as part of investigation. Following approval from the General Manager, the appeal handling team will take the agreed-upon actions. The appeal handling team shall provide progress reports on the appeal investigation and handling to the appellant and provide an information notice on the final decision. The decision should be notified to the appellant in written form within 6 months after receiving the appeal.

5.1.3 A&L Dept. shall ensure that the submission, investigation, and decision on appeals do not result in any discriminatory actions against the appellant.

5.1.4 A&L Dept. shall keep the relevant data and documents in time after the resolution of the appeal.

## **5.2 Complaint**

5.2.1 The written complaint shall be submitted to A&L Dept. with detailed event, necessary evidence, and complainant's signature or stamp. Any anonymous complaints are unacceptable in general, while it will be recorded and investigated, and CQC will take corrective or preventive actions when appropriate for service improvement.

5.2.2 A&L Dept. , upon receiving the complaints, shall make analysis and decide whether to accept the complaints, and inform the submitter. If it is not acceptable, the reason should be explained. Upon receiving a signed complaint on CQC's verification activities, A&L Dept. shall confirm its receipt and validity, then initiate the following steps:

(a)Substantiation: A&L Dept. shall find out the information involved, and substantiate the complaint based on all necessary information collected.

(b)Investigation: A&L Dept. shall, within two months after receiving the complaints, finish the investigation and submit suggestion to the General

Manager for approval. If confirmed to relate to CQC's verification activities, the complaint shall be resolved. Investigation and resolution of complaints shall not result in any discriminatory actions.

(c)Action-taking:Following approval from the General Manager, A&L Dept. will take the agreed-upon actions, and send back the confirmation of receipt, handling progress and the final decision to the complainant and the relevant parties. If applicable, provide progress reports to the complainant.

5.2.3 A&L Dept. keeps the relevant data and documents in time after the resolution of the complaint.

### **5.3 Dispute**

5.3.1 The disputes raised during the verification process shall be handled through negotiation between verification team leader and verification client. If the agreement couldn't be reached through negotiation, the verification team leader may draw a conclusion and submit to A&L Dept. of CQC with dispute description and the verification materials. The verification client may also put forward the dispute in written to A&L Dept. within 10 working days when the dispute happens. Disputes about other issues than verification shall be submitted to A&L Dept. within 10 working days after the occurrence.

5.3.2 A&L Dept. , upon receiving the disputes, shall make analysis and decide whether to accept them, and inform the submitter. If it is not acceptable, the reason should be explained. A&L Dept. shall take investigation in time after receiving the disputes, and inform the disputer about the confirmation of receipt, handling progress and final decision.

5.3.3 A&L Dept. shall keep the data and documents after the resolution of the dispute.

5.3.4 The disputer may submit the appeal or complaint directly to the relevant department, if unsatisfied with the handling decision of CQC.

### **5.4 Judicial process**

5.4.1 A&L Dept. shall be the primary department responsible for handling judicial processes.

5.4.2 A&L Dept. shall promptly report all judicial cases to the General Manager of CQC. The General Manager is authorized to appoint a Judicial Process Handling Team, composed of relevant personnel from the A&L Dept. and, if needed, external legal advisors.

5.4.3 Upon receiving a judicial case, A&L Dept. shall confirm its receipt and validity, then initiate the following steps:

(a) Investigation: Gather and verify all relevant information related to the case, ensuring thorough documentation of the evidence, contracts, and correspondence involved.

(b) Reporting: Prepare an initial report on the case status, detailing its circumstances and potential impacts. This report is to be submitted to the Judicial Process Handling Team and the General Manager for further review.

(c) Strategy-Making: The Judicial Process Handling Team, under the General Manager's guidance, will develop a response strategy, outlining potential actions and legal steps based on gathered evidence and applicable regulations.

(d) Implementation: Following approval from the General Manager, A&L Dept. will execute the agreed-upon actions, including court filings, responses, or settlement proposals, as required.

The Judicial Process Handling Team will ensure that all decisions made in response to the case consider the complete set of information collected during the investigation phase.

5.4.4 The Judicial Process Handling Team shall identify any systemic issues or procedural gaps that may have contributed to the judicial case and recommend corrective actions to prevent recurrence.

5.4.5 Following the closure of each case, A&L Dept. shall complete a judicial case summary. This summary will be reviewed by the General Manager and relevant departments.

5.4.6 A&L Dept. shall keep records of all judicial processes, including case files, investigation documents, decision records, and any related correspondence. All documentation shall be stored securely and treated as confidential, with access restricted to authorized personnel only.

5.4.7 If a judicial process is pending or has been instituted against CQC as a verification body, and the matter is found incompatible with CQC's function as a verification body, CQC shall promptly report the relevant subject matter to accreditation body.

## **5.5 Others**

5.5.1 The handling policy and procedure of appeals, complaints and disputes & Judicial processes are publicized through CQC website after being approved by the General Manager.

5.5.2 For the purpose of impartiality, the staff involved in the appeals, complaints, disputes, Judicial processes and previous verification activities shall not take part in the investigation, review or approval.

5.5.3 The staff to handle appeals, complaints and disputes & Judicial processes shall work in an objective and impartiality manner, and be responsible for the confidentiality of relevant non-public information.

5.5.4 CQC shall take appropriate corrective and preventive actions for all the appeals, complaints and disputes & Judicial processes, and make effectiveness evaluation of the taken actions. If the corrective action for complaints/disputes handling are required, A&L Dept. shall organize the relevant departments of CQC to make analysis, investigation and on-site investigation (when necessary), and ensure that appropriate corrective actions are taken. If the complaints/disputes are related to system operation and documentation, the corrective action shall be conducted according to the Procedure of Non-conformity, Corrective and Preventive Actions Control (CBAMP 03).

5.5.5 A&L Dept. shall annually summarize and analyze the appeals, disputes and complaints & Judicial processes disposed and submit them to management review for assessment.

5.5.6 Anyone can also submit appeals, complaints and disputes & Judicial processes against CQC to CQC Impartiality Committee. The contact information of Impartiality Committee is available on CQC website. A&L Dept. shall inform the appellant that in case the appellant is not satisfied with the decision of the appeal handling team, it has an option of complaining to the accreditation body.

5.5.7 The procedures for handling disputes, appeals, and complaints & Judicial processes shall be available on CQC's website.

5.5.8 Personnel responsible for investigating complaints, disputes, and appeals & Judicial processes shall be independent of those involved in CBAM verification activities to ensure objectivity.

5.5.9 A description of the process for handling appeals and complaints shall be available to any interested party.

## **6 Relevant Records**

Appeals, complaints and disputes records

CBAMF02-01