



HANDLING OF APPEALS AND COMPLAINTS

Should a person have a complaint against VantaSec Kft., the complaint shall be submitted in writing without delay to the Executive Director. If the complaint is against the Managing Director, the complaint shall be addressed to the Certification Director of VantaSec Kft.

The receipt of the complaint shall be acknowledged in writing. Subsequently, the complaint shall be investigated by VantaSec Kft. without any partiality and, if the outcome is satisfactory, the investigation shall be closed. After the investigation is closed, the person submitting the complaint will be informed that the investigation has been successfully concluded.

All written or verbal complaints received by VantaSec Kft. shall be investigated within 60 days of receipt. Following the submission of the complaint, the person lodging the complaint shall be informed in writing as soon as possible that the investigation has been initiated and shall be informed in writing about the outcome and closure of the investigation as soon as possible.

The investigation process shall take place in the management systems operated by VantaSec Kft., where all information and documents are subject to confidentiality.

Each time a complaint concerns a certified organisation, the results of all previous audits shall be reviewed to determine the outcome of each review.

The investigation, decision and communication of the outcome of a substantiated complaint shall in all cases be carried out by the designated person(s) of VantaSec Kft., who were not – and have never been – involved in the subject matter of the complaint.

Following the conclusion of the investigation of the complaint, the person lodging the complaint shall be informed in writing of the outcome and, after the information is provided, a written agreement shall be made as to whether the subject matter and resolution of the complaint will be disclosed to the parties concerned, and if so, in what form and to what extent. The case shall be made public within 30 days of its closure.

Related documents:

- Product Certification Procedure Instruction (EU 03) – Handling of Appeals and Complaints
- Management System Certification Procedure Instruction (EU 03) – Handling of Appeals and Complaints
- Verification Body Procedure Instruction (EU 03) – Handling of Appeals and Complaints



PRODUCT CERTIFICATION PROCEDURE INSTRUCTION



3 Handling of appeals and complaints

3.1 Purpose of the procedure

The purpose of this procedure is to ensure that VantaSec Kft. handles and/or investigates incoming appeals and complaints in a controlled manner and in accordance with the applicable requirements.

3.2 Area of validity

This procedure applies to the whole of VantaSec Kft.

3.3 References

- MSZ EN ISO/IEC 17065:2013 Conformity assessment. Requirements for bodies certifying products, processes and services

Definitions

Appeals	A written document challenging a certification decision made by VantaSec Kft.
Appeals procedure	A procedure initiated where a certification decision of VantaSec Kft. is not accepted, which is started by convening of the Impartiality Committee and concluded with an objective decision, which may be challenged again by the Appellant.
Appeals Committee	An ad hoc committee consisting of 3 impartial and independent auditors and/or experts who work together at the request of the Impartiality Committee in connection with the investigation of a specific appeal. It has the power to make recommendations and has one vote in the decision.
Complaints	An observation concerning the activities of VantaSec Kft. and the work of its personnel, which may be submitted either in writing or verbally. Furthermore, any report concerning partners certified by VantaSec Kft., their activities or their certified products shall be treated as a complaint.
<u>Impartiality Committee</u>	The committee supervising the professional activities of VantaSec Kft.

3.4 Responsibilities and authorities

The **Director of Certification** is responsible for handling all appeals and complaints in accordance with this procedure. The **Head of Quality Management** is responsible for ensuring that documentation and any corrective and preventive action to be implemented are documented and traceable for each process.

The **Impartiality Committee** is responsible for adequately supervising the professional activities of VantaSec Kft. and, where necessary, adopting resolutions to develop and improve those activities.

All employees of VantaSec Kft. are responsible for forwarding any complaints they receive to the **Director of Certification**. No person who is involved in the submitted complaint or appeal, or who provides consultancy to a client, shall participate in the investigation.

3.5 Process control

3.5.1 Handling of appeals

An appeal against a decision of VantaSec Kft. may be submitted in writing to the **Director of Certification** of the company within 15 days of receipt of the contested decision. The appeal shall contain the following:

- details of the person submitting the appeal,
- the subject and grounds of the appeal,
- date and authorised signature.

The **Project Coordinator** receives and registers the appeal and then forwards it to the **Head of Quality Management**, who ensures the traceability of the appeal by opening a uniquely numbered non-conformity sheet and, following closure, initiates corrective and preventive actions. When the non-conformity sheet is opened, the **Head of Quality Management** confirms to the appellant in writing that the investigation has commenced.

PRODUCT CERTIFICATION PROCEDURE INSTRUCTION



The unique number of the non-conformity sheet shall appear on all documents, records and related correspondence, including emails, generated during the investigation.

The **Director of Certification** reviews the subject of the appeal and then collects and examines previous appeals concerning similar matters. Following the review of previous appeals, he/she commences the investigation of the case and communicates the findings to the **Appellant** in writing.

If the **Appellant** is dissatisfied with the findings of the **Director of Certification** and notifies VantaSec Kft. thereof in writing, the **Director of Certification** shall convene the Impartiality Committee and refer the investigation of the case to it.

The **Chair of the Impartiality Committee** shall decide on the appeal within 60 days of receipt of the appeal. In such cases, an **Appeals Committee** shall be set up, consisting of 3 impartial and independent auditors and/or experts who agree to participate in the appeals procedure.

The **Director of Certification** shall inform the **Appellant** in writing of the composition of the **Appeals Committee**. Within 8 days of receiving such information, the Appellant may raise a written objection, stating the reasons, against any member of the **Appeals Committee**.

On the basis of the reasons submitted, the **Impartiality Committee** shall decide whether to accept or reject them. If the reasons are accepted, the **Chair of the Impartiality Committee** shall change the composition of the **Appeals Committee**. If no written comments or objections are received from the **Appellant** within the time limit, the composition of the **Appeals Committee** shall be deemed accepted.

The three-member ad hoc **Appeals Committee** shall examine all documents relating to audits conducted at the organisation, certification decisions, related resolutions and correspondence in order to make a well-founded decision.

Where the **Appeals Committee** considers it necessary, it may conduct an on-site inspection in order to make an objective decision. On the basis of the facts examined, the **Committee** shall prepare a report and make a recommendation to the **Impartiality Committee** regarding the decision on the appeal.

The decision shall be taken at an extraordinary meeting of the **Impartiality Committee**, at which the representative of the **Appeals Committee** shall have one vote. The **Impartiality Committee** shall take its decision by simple majority; in the event of a tie vote, the **Chair of the Committee** shall have the casting vote.

The **Director of Certification** shall inform the **Appellant** in writing of the outcome of the **Impartiality Committee's resolution**, which may be a decision:

- upholding the appeal,
- rejecting the appeal (the Appellant may exercise the right to seek legal remedy).

Following the closure of a complaint or appeal, VantaSec Kft. shall take all measures necessary to resolve the complaint or appeal.

3.5.2 Handling of complaints

All written complaints received by VantaSec Kft. shall be investigated within 60 days of receipt. Following receipt of a complaint, the **Director of Certification** of VantaSec Kft. shall examine the complaint to determine whether it relates to certification activities for which VantaSec Kft. is responsible.

- If it does, the **Director of Certification** shall notify the complainant in writing as soon as possible that the investigation has commenced and shall likewise notify the complainant in writing of the outcome and closure as soon as possible.
- If the complaint does not relate to certification activities, the **Director of Certification** shall inform the complainant in writing of the findings as soon as possible.

The investigation shall be conducted within the quality management system operated by VantaSec Kft., in which all information and documents are subject to confidentiality. VantaSec Kft. shall not disclose information concerning the investigation to anyone other than the parties concerned. Exceptions are:

- Official proceedings, contentious and non-contentious proceedings; or
- The provision of information at the request of the National Accreditation Authority.

Whenever a complaint concerns a certified organisation, the **Director of Certification** shall review the outcome of all previous audits to determine the outcome of the individual reviews.

During the investigation of each complaint, the **Head of Quality Management** of VantaSec Kft. shall ensure traceability by opening a non-conformity sheet. The complainant shall then be informed that the investigation has commenced. The unique number of the non-conformity sheet shall appear on documents, records and correspondence, including emails, generated during the investigation.

If VantaSec Kft. is required to take corrective or preventive action during the investigation, the **Head of Quality Management** shall ensure that it is documented and effective.

PRODUCT CERTIFICATION PROCEDURE INSTRUCTION



The **Director of Certification** is responsible for collecting sufficient information and documentation as soon as possible following receipt of the complaint to ensure an adequate degree of objectivity and to determine whether the complaint is well founded.

The investigation and decision concerning a well-founded complaint, and the subsequent communication of the decision, shall in all cases be carried out by the person(s) appointed by the **Director of Certification** of VantaSec Kft., who have not been involved in the subject matter of the complaint at any level or at any time.

Following completion of the investigation of the complaint, the **Director of Certification** shall inform the complainant of the outcome in writing. Following such notification, the **Director of Certification** shall initiate a written agreement on whether the parties concerned will make the subject matter and resolution of the complaint public and, if they do, in what form and to what extent. The case shall be made public within 30 days of its closure.

PROCEDURE INSTRUCTION



3 Handling of appeals and complaints

3.1 Purpose of the procedure

The purpose of this procedure is to ensure that VantaSec Kft. handles and/or investigates incoming appeals and complaints in a controlled manner and in accordance with the applicable requirements.

3.2 Area of validity

This procedure applies to the whole of VantaSec Kft.

3.3 References

- MSZ EN ISO/IEC 17021-1:2016 Conformity assessment. Requirements for organisations auditing and certifying management systems

3.4 Definitions

Appeals	A written document challenging a certification decision made by VantaSec Kft.
Appeals procedure	A procedure initiated where a certification decision of VantaSec Kft. is not accepted, which is started by convening of the Impartiality Committee and concluded with an objective decision, which may be challenged again by the Appellant.
Appeals Committee	An ad hoc committee consisting of 3 impartial and independent auditors and/or experts who work together at the request of the Impartiality Committee in connection with the investigation of a specific appeal. It has the power to make recommendations and has one vote in the decision.
Complaints	An observation concerning the activities of VantaSec Kft. and the work of its personnel, which may be submitted either in writing or verbally. Furthermore, any report concerning partners certified by VantaSec Kft., their activities or their certified products shall be treated as a complaint.
Impartiality Committee	The body supervising the professional activities of VantaSec Kft.

3.5 Responsibilities and authorities

The **Director of Certification** is responsible for handling all appeals and complaints in accordance with this procedure. The **Head of Quality Management** is responsible for ensuring that documentation and any corrective and preventive action to be implemented are documented and traceable for each process.

The **Impartiality Committee** is responsible for adequately supervising the professional activities of VantaSec Kft. and, where necessary, adopting resolutions to develop and improve those activities.

All employees of VantaSec Kft. are responsible for forwarding any complaints they receive to the **Director of Certification**.

3.6 Process control

3.6.1 Handling of appeals

An appeal against a decision of VantaSec Kft. may be submitted in writing to the **Director of Certification** of the organisation within 15 days of receipt of the contested decision. The appeal shall contain the following:

- details of the person submitting the appeal,
- the subject and grounds of the appeal,
- date and authorised signature.

The **Project Coordinator** receives and registers the appeal and then forwards it to the **Head of Quality Management**, who ensures the traceability of the appeal by opening a uniquely numbered non-conformity sheet and, following closure, initiates corrective and preventive actions. When the non-conformity sheet is opened, the **Head of Quality Management** confirms to the appellant in writing that the investigation has commenced.

PROCEDURE INSTRUCTION



The unique number of the non-conformity sheet shall appear on all documents, records and related correspondence, including emails, generated during the investigation.

The **Director of Certification** reviews the subject of the appeal and then collects and examines previous appeals concerning similar matters. Following the review of previous appeals, he/she commences the investigation of the case and communicates the findings to the **Appellant** in writing.

If the **Appellant** is dissatisfied with the findings of the **Director of Certification** and notifies VantaSec Kft. thereof in writing, the **Director of Certification** shall convene the **Impartiality Committee** and refer the investigation of the case to it.

The **Chair of the Impartiality Committee** shall decide on the appeal within 60 days of receipt of the appeal. In such cases, an **Appeals Committee** shall be set up, consisting of 3 impartial and independent auditors and/or experts who agree to participate in the appeals procedure.

The **Director of Certification** shall inform the **Appellant** in writing of the composition of the **Appeals Committee**. Within 8 days of receiving such information, the Appellant may raise a written objection, stating the reasons, against any member of the **Appeals Committee**.

On the basis of the reasons submitted, the **Impartiality Committee** shall decide whether to accept or reject them. If the reasons are accepted, the **Chair of the Impartiality Committee** shall change the composition of the **Appeals Committee**. If no written comments or objections are received from the **Appellant** within the time limit, the composition of the **Appeals Committee** shall be deemed accepted.

The three-member ad hoc **Appeals Committee** shall examine all documents relating to audits conducted at the organisation, certification decisions, related resolutions and correspondence in order to make a well-founded decision.

Where the **Appeals Committee** considers it necessary, it may conduct an on-site inspection in order to make an objective decision. On the basis of the facts examined, the **Committee** shall prepare a report and make a recommendation to the **Impartiality Committee** regarding the decision on the appeal.

The decision shall be taken at an extraordinary meeting of the **Impartiality Committee**, at which the representative of the **Appeals Committee** shall have one vote. The **Impartiality Committee** shall take its decision by simple majority; in the event of a tie vote, the **Chair of the Committee** shall have the casting vote.

The **Director of Certification** shall inform the **Appellant** in writing of the outcome of the **Impartiality Committee's resolution**, which may be a decision:

- upholding the appeal,
- rejecting the appeal (the Appellant may exercise the right to seek legal remedy).

3.6.2 Handling of complaints

All written complaints received by VantaSec Kft. shall be investigated within 60 days of receipt. Following receipt of a complaint, the **Director of Certification** of VantaSec Kft. shall examine the complaint to determine whether it relates to certification activities for which VantaSec Kft. is responsible.

- If it does, the **Director of Certification** shall notify the complainant in writing as soon as possible that the investigation has commenced and shall likewise notify the complainant in writing of the outcome and closure as soon as possible.
- If the complaint does not relate to certification activities, the **Director of Certification** shall inform the complainant in writing of the findings as soon as possible.

The investigation shall be conducted within the quality management system operated by VantaSec Kft., in which all information and documents are subject to confidentiality. VantaSec Kft. shall not disclose information concerning the investigation to anyone other than the parties concerned. Exceptions are:

- Official proceedings, contentious and non-contentious proceedings; or
- The provision of information at the request of the National Accreditation Authority.

Whenever a complaint concerns a certified organisation, the **Director of Certification** shall review the outcome of all previous audits to determine the outcome of the individual reviews.

During the investigation of each complaint, the **Head of Quality Management** of VantaSec Kft. shall ensure traceability by opening a non-conformity sheet, following receipt and registration by the **assistant**. The complainant shall then be informed that the investigation has commenced. The unique number of the non-conformity sheet shall appear on documents, records and correspondence, including emails, generated during the investigation.

If VantaSec Kft. is required to take corrective or preventive action during the investigation, the **Head of Quality Management** shall ensure that it is documented and effective.

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The **Director of Certification** is responsible for collecting sufficient information and documentation as soon as possible following receipt of the complaint to ensure an adequate degree of objectivity and to determine whether the complaint is well founded.

The investigation and decision concerning a well-founded complaint, and the subsequent communication of the decision, shall in all cases be carried out by the person(s) appointed by the **Director of Certification** of VantaSec Kft., who have not been involved in the subject matter of the complaint at any level or at any time.

Following completion of the investigation of the complaint, the **Director of Certification** shall inform the complainant of the outcome in writing. Following such notification, the **Director of Certification** shall initiate a written agreement on whether the parties concerned will make the subject matter and resolution of the complaint public and, if they do, in what form and to what extent. The case shall be made public within 30 days of its closure.

PROCEDURE INSTRUCTION



3 Handling of appeals and complaints

3.1 Purpose of the procedure

The purpose of this procedure is to ensure that VantaSec Kft. handles and/or investigates incoming appeals and complaints in a controlled manner and in accordance with the applicable requirements.

3.2 Area of validity

This procedure applies to the whole of VantaSec Kft.

3.3 References

MSZ EN ISO/IEC 17029:2020 Conformity assessment. General principles and requirements for validation and verification bodies

MSZ EN ISO 14065:2022 General principles and requirements for bodies validating and verifying environmental information

ISO 14066:2023 Environmental information — Competence requirements for teams validating and verifying environmental information

Government Decree 424/2025 (XII. 23.) on the requirements applicable to ESG certification and the activities of ESG certifiers

MSZ EN ISO 9000:2015 Quality management systems Fundamentals and vocabulary (ISO 9000:2015)

MSZ EN ISO/IEC 17000:2020 Conformity assessment. Vocabulary and general principles (ISO/IEC 17000:2020)

3.4 Definitions

Appeals	A written document challenging a verification decision made by VantaSec Kft.
Appeals procedure	A procedure initiated where a verification decision of VantaSec Kft. is not accepted, which is started by convening of the Governing Board and concluded with an objective decision, which may be challenged again by the Appellant.
Appeals Committee	An ad hoc committee consisting of 3 impartial and independent verifiers and/or experts who work together at the request of the Governing Board in connection with the investigation of a specific appeal. It has the power to make recommendations and has one vote in the decision.
Complaints	An observation concerning the activities of VantaSec Kft. and the work of its personnel, which may be submitted either in writing or verbally. Furthermore, any report concerning a verification performed by VantaSec Kft. shall be treated as a complaint.
Impartiality Committee	The body supervising the professional activities of VantaSec Kft.

3.5 Responsibilities and authorities

The **Head of Certification** is responsible for handling all appeals and complaints in accordance with this procedure. The **Head of Quality Management** is responsible for ensuring that documentation and any corrective and preventive action to be implemented are documented and traceable for each process.

The **Impartiality Committee** is responsible for adequately supervising the professional activities of VantaSec Kft. and, where necessary, adopting resolutions to develop and improve those activities.

All employees of VantaSec Kft. are responsible for forwarding any complaints they receive to the **Head of Certification**.

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3.6 Process control

3.6.1 Handling of appeals

An appeal against a decision of VantaSec Kft. may be submitted in writing to the **Head of Certification** of the organisation within 15 days of receipt of the contested decision. The appeal shall contain the following:

- details of the person submitting the appeal,
- the subject and grounds of the appeal,
- date and authorised signature.

The **Project Coordinator** receives and registers the appeal and then forwards it to the **Head of Quality Management**, who ensures the traceability of the appeal by opening a uniquely numbered non-conformity sheet and, following closure, initiates corrective and preventive actions. When the non-conformity sheet is opened, the **Head of Quality Management** confirms to the appellant in writing that the investigation has commenced.

The unique number of the non-conformity sheet shall appear on all documents, records and related correspondence, including emails, generated during the investigation.

The **Head of Certification** reviews the subject of the appeal and then collects and examines previous appeals concerning similar matters. Following the review of previous appeals, he/she commences the investigation of the case and communicates the findings to the **Appellant** in writing.

If the **Appellant** is dissatisfied with the findings of the **Head of Certification** and notifies VantaSec Kft. thereof in writing, the **Head of Certification** shall convene the Impartiality Committee and refer the investigation of the case to it.

The **Chair of the Impartiality Committee** shall decide on the appeal within 60 days of receipt of the appeal. In such cases, an **Appeals Committee** shall be set up, consisting of 3 impartial and independent auditors and/or experts who agree to participate in the appeals procedure.

The **Head of Certification** shall inform the **Appellant** in writing of the composition of the **Appeals Committee**. Within 8 days of receiving such information, the Appellant may raise a written objection, stating the reasons, against any member of the **Appeals Committee**.

On the basis of the reasons submitted, the **Impartiality Committee** shall decide whether to accept or reject them. If the reasons are accepted, the **Chair of the Impartiality Committee** shall change the composition of the **Appeals Committee**. If no written comments or objections are received from the **Appellant** within the time limit, the composition of the **Appeals Committee** shall be deemed accepted.

The three-member ad hoc **Appeals Committee** shall examine all documents relating to audits conducted at the organisation, certification decisions, related resolutions and correspondence in order to make a well-founded decision.

Where the **Appeals Committee** considers it necessary, it may conduct an on-site inspection in order to make an objective decision. On the basis of the facts examined, the **Committee** shall prepare a report and make a recommendation to the **Impartiality Committee** regarding the decision on the appeal.

The decision shall be taken at an extraordinary meeting of the **Impartiality Committee**, at which the representative of the **Appeals Committee** shall have one vote. The **Impartiality Committee** shall take its decision by simple majority; in the event of a tie vote, the **Chair of the Committee** shall have the casting vote.

The **Head of Certification** shall inform the **Appellant** in writing of the outcome of the **Impartiality Committee's resolution**, which may be a decision:

- upholding the appeal,
- rejecting the appeal (the Appellant may exercise the right to seek legal remedy).

3.6.2 Handling of complaints

All written complaints received by VantaSec Kft. shall be investigated within 60 days of receipt. Following receipt of a complaint, the **Head of Certification** of VantaSec Kft. shall examine the complaint to determine whether it relates to certification activities for which VantaSec Kft. is responsible.

- If it does, the **Head of Certification** shall notify the complainant in writing as soon as possible that the investigation has commenced and shall likewise notify the complainant in writing of the outcome and closure as soon as possible.
- If the complaint does not relate to certification activities, the **Head of Certification** shall inform the complainant in writing of the findings as soon as possible.

PROCEDURE INSTRUCTION



The investigation shall be conducted within the quality management system operated by VantaSec Kft., in which all information and documents are subject to confidentiality. VantaSec Kft. shall not disclose information concerning the investigation to anyone other than the parties concerned. Exceptions are:

- Official proceedings, contentious and non-contentious proceedings; or
- The provision of information at the request of the National Accreditation Authority.

Whenever a complaint concerns a certified organisation, the **Head of Certification** shall review the findings of all previous audits to determine the outcome of the individual reviews.

During the investigation of each complaint, the **Head of Quality Management** of VantaSec Kft. shall ensure traceability by opening a non-conformity sheet, following receipt and registration by the **Project Coordinator**. The complainant shall then be informed that the investigation has commenced. The unique number of the non-conformity sheet shall appear on documents, records and correspondence, including emails, generated during the investigation.

If VantaSec Kft. is required to take corrective or preventive action during the investigation, the **Head of Quality Management** shall ensure that it is documented and effective.

The **Head of Certification** is responsible for collecting sufficient information and documentation as soon as possible following receipt of the complaint to ensure an adequate degree of objectivity and to determine whether the complaint is well founded.

The investigation and decision concerning a well-founded complaint, and the subsequent communication of the decision, shall in all cases be carried out by the person(s) appointed by the **Head of Certification** of VantaSec Kft., who have not been involved in the subject matter of the complaint at any level or at any time.

Following completion of the investigation of the complaint, the **Head of Certification** shall inform the complainant of the outcome in writing. Following such notification, the **Head of Certification** shall initiate a written agreement on whether the parties concerned will make the subject matter and resolution of the complaint public and, if they do, in what form and to what extent. The case shall be made public within 30 days of its closure.