



FAIR FOR LIFE & FOR LIFE

Allegation Policy

Version September 2018

INTRODUCTION

The FFL & FL Standards define strong criteria to be met by certified operations. The compliance with these criteria is verified during annual audits of all certified operations (see FFL & FL Certification Processes). While these regular verifications are the main pillar of the certification system, other stakeholders besides the company management and the control body (CB) also take a part in the monitoring system of compliance, strengthening the guarantee system. This includes workers, producers, companies, consumers, research institutions, NGOs, etc.

The FFL & FL allegation system gives the possibility to any stakeholder to make an allegation by contacting the Control Body. The resulting allegation investigation aims to ascertain whether or not the allegation is accurate, and if accurate, to elicit root cause analysis, corrective actions and actions to prevent recurrence.

This document lines out how allegations can be filed by any stakeholder and how they will be followed-up upon by the CB.

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1. WHAT IS AN ALLEGATION?

An allegation is a claim that FFL or FL Standard requirements are not or not fully being complied with by a certified operation. Any stakeholder can file an allegation with the CB.

2. HOW TO FILE AN ALLEGATION?

 info@fairforlife.org	 ECOCERT SA BP 47 Lieu dit Lamothe Ouest-Route de Clermont Savès 32600 L'Isle Jourdain FRANCE	 + 33 (0)5 62 07 34 24	 contact form on the FFL & FL Website
or your contact person at the control body			
Important: Please indicate whether you wish to remain anonymous towards the alleged party			

In order to be accepted, an allegation must comply with certain requirements:

- ✓ Complaints shall be made either **in writing** (via mail or email or using the contact form on the FFL&FL Website) or **verbal** (personal or via phone).
- ✓ The allegation shall be fully **detailed** and include all available **evidence** to support the allegation. No form or format for is required.
- ✓ The allegation shall address violation of requirements within the **scope** of the Fair for Life or For Life certification: it shall address the violation of applicable FFL or FL criteria by a certified operation, or a substantial ethical or environmental violation by one of its affiliates.
- ✓ If the allegation is filed by a worker of the accused company: an allegation shall be filed only once the respective company's **internal grievance procedure** has proved unsuccessful in addressing the issue.

Reminder: According to FFL & FL Standards, every operator should have in place an internal grievance procedure which ensures that workers have the right to be heard and the right to appeal (SOC-12). Moreover, management must not discipline, dismiss or discriminate against workers for following the grievance procedure (SOC-13).

3. HOW IS THE ALLEGATION INVESTIGATED?

a) Principles of the Allegation Process

The Fair for Life and For Life allegation procedures are based on Section 7.13 *Complaints and Appeals* of the ISO 17065:2012 and the best practices as implemented by other social standard certification schemes.

Allegations received by the CB will be handled in different stages, following an escalation process methodology. The escalation approach implicates that the CB will handle the received objections in gradual steps, case by case, designating the responsible persons and resources according to the severity of each case.

The CB will ensure that the allegation investigation process is credible, transparent, impartial and documented and respects confidentiality:

- ✓ Allegations are be treated according to a defined internal procedure.
- ✓ All steps of the allegation investigation, from receipt to final conclusions, are documented.
- ✓ Allegations will be reviewed and managed by a person that is not involved in the regular certification process of the alleged operation or has provided consultancy to the same within the past 2 years.
- ✓ The results of the investigation will not be made public but communicated directly to both the complainant and the alleged party. If the decision involves suspending or revoking certification or registration of a party, this status change will be communicated, but not the reason for the status change.

If the complainant wishes to remain anonymous towards the alleged party, confidentiality is likewise guaranteed.

b) Steps of the Allegation Process



When an allegation is received, the complainant will be notified of the **process and timeline**.



The severity of the allegation is pre-assessed in order to decide if it should be handled as a minor or a major allegation:

- **Minor allegations** (raised only singularly, submitted verbally only, without substantial evidence provided and/or directly contradicted by audit findings), will be investigated in detail within the usual audit plan. During the annual audit they will be followed up and cross-verified by means of workers'/producers' interviews, site inspections and document reviews as applicable.
- **Major allegations** (raised by several stakeholders or workers OR not substantially contradicted by audit findings and concerning minimum certification requirements, objective evidence of violation of the standards) will be investigated in detail immediately through, if necessary, complementary evaluation (documentary or on-site).



The Certification Manager is in charge of managing the allegation process and will designate the responsible person for dealing with each allegation according to its nature and severity (and according to the CB's internal procedures). If required, external experts may be invited to support in resolution of the allegation or further investigation of the allegation.

1. The management of the **operation is informed** of any allegations (in general terms that do not give information on identity of informant) and is given the chance to respond.

2. The received information is reviewed by the designated person.
 - a) In case of minor allegations, the necessary information is forwarded to the Evaluation Officer in charge of the audit planning of the alleged operation in order to organize the follow-up during the next annual audit.
 - b) In case of major allegations, additional information and/or documents are requested to the alleged company, if deemed necessary.
If the allegations cannot be verified remotely, a scheduled or unannounced audit of the certified operation is performed, at the cost of the certified operation.
3. The management of the **operation is informed** of any findings and is given the chance to respond.
4. Based on the findings of the investigation, a new non-conformity can be identified and lead to a new certification decision (including, if necessary, suspension or withdrawal of the certificate) as per procedures defined in the FFL&FL Certification Processes.



At the end of the investigation, a report on the conclusions is sent to the complainant.

The CB reserves the right to close the investigation of particular cases if:

- a) the underlying incident date back more than 12 months, except if the allegation is related to the criteria ELIG-2 or ELIG-3 (substantial ethical or environmental violations on company or corporate group level), for which incidents may date back up to 10 years;
- b) no sufficient evidence could be presented by the complainant;
- c) the allegation concerns the private contractual relationship between two operators, without any link to Fair for Life or For Life Standards;
- d) the allegation was not linked to a potential violation of the Fair for Life or For Life Standards or policies; and/or
- e) the incident can be resolved with dialogue and training, or is already being addressed through an internal grievance channel or other external allegations process.

4. APPEAL OF DECISION

Both the complainant and the accused operation have the right to appeal the certification decision following the allegation investigation following the steps described in the FFL & FL Certification Processes, Section 4.2 Appeals.