Green Key's Policy on complaints and appeals

1. INTRODUCTION

This Green Key Policy on handling of complaints and appeals takes effect on 1 October 2026 and replaces all former policies in Green Key regarding the handling of complaints and appeals. This policy applies to the handling of certification related complaints and appeals as well as governance and impartiality related complaints and appeals.

2. GENERAL PRINCIPLES

All complaints/appeals shall:

- be submitted using the standard formula for complaints/appeals on the Green Key website
- be acknowledged in writing within ten (10) working days
- be handled objectively and without discrimination
- be investigated by persons not involved in the subject of the complaint/appeal
- be documented and recorded
- be treated confidentially (the complainant/appellant can choose to be anonymous, if it relates to a complaint/appeal towards a specific person)
- not result in retaliatory or discriminatory actions.

The final outcome of all complaints and appeals shall:

- be documented
- state the rationale for the decision
- be communicated in writing
- identify any corrective or preventive actions taken.

Green Key International (and, when relevant, the Green Key National Operator) will act as the communication channel for receiving the complaint/appeal and for providing information about the outcome, but the Certification Body or Impartiality Committee, depending on the type of complaint/appeal, retains full responsibility for the evaluation and decision. Green Key International or the Green Key National Operator will not modify, summarise, reinterpret or supplement the decision.

The written decision shall clearly identify the issuing body (Certification Body or Impartiality Committee). All communications, including the original complaint/appeal, the decision issued (by the Certification Body or Impartiality Committee), and the transmitted communication to the complainant/appellant, shall be documented and retained in accordance with the applicable record retention procedures.

3. HANDLING OF CERTIFICATION-RELATED COMPLAINTS AND APPEALS

3.1 Responsibility

Complaints and appeals related to certification activities shall be processed by designated staff of the Certification Body who:

- are not involved in the original audit, evaluation or certification decision
- have no conflict of interest
- are competent in the relevant certification scope

3.2 Escalation of applicable cases

Applicable cases of complaints/appeals related to the certification process are:

a. Complaints related to alleged non-conformity with Green Key requirements at a certified establishment

This type of complaint is a formal enquiry submitted to highlight non-conformity with one or more requirements at a Green Key certified establishment.

A complaint shall be submitted using the standard formula for complaints/appeals on the Green Key website. A complaint submitted through other channels will be directed to re-submit through the standard formula. Any documentation showing proof of non-conformity with requirements (e.g., photographs) should be enclosed.

Green Key International collects the submitted complaint and shares it with the Certification Body within ten (10) working days. Where relevant, the Green Key National Operator will receive a copy of the complaint. The Certification Body assigns designated staff according to the criteria reported under paragraph 3.1 of this policy.

The appointed Certification Body contact person must within ten (10) working days after receiving the complaint start the investigation of the complaint. After ensuring the complaint relates to an establishment that currently holds Green Key certification and that concerns requirements that fall under the scope of the Green Key certified establishment, the Certification Body will ensure that the Green Key National Operator (or Green Key International in countries without a National Operator) contacts the Green Key certified

establishment requesting appropriate documentation confirming conformity with the requirements under complaint within twenty (20) working days.

If the feedback from the certified establishment reveals conformity with Green Key requirements, the Certification Body shall request the Green Key National Operator (or Green Key International in countries without a National Operator) to inform the complainant and the certified establishment about the outcome of the investigation. The certification of the establishment will not be suspended.

If the feedback from the certified establishment reveals non-conformity with Green Key requirements, the Certification Body shall determine appropriate action in accordance with the Policy on Suspension and Withdrawal. The Certification Body shall request the Green Key National Operator (or Green Key International in countries without a National Operator) to inform the complainant and the certified establishment about the outcome of the investigation.

b. Appeals related to the outcome of audits and/or certification decisions

This type of appeal is a formal enquiry sent to Green Key International by an applicant establishment to indicate dissatisfaction with the outcome of an on-site certification audit and/or the outcome of a decision by the Certification Body in relation to the certification.

An appeal shall be submitted using the standard format for complaints/appeals on the Green Key website. An appeal submitted through other channels will be directed to re-submit through the standard formula. Any documentation supporting the appeal should be enclosed.

Green Key International collects the submitted appeal and shares it with the Certification Body within ten (10) working days. The Certification Body assigns designated staff according to the criteria reported under paragraph 3.1 of this policy.

The appointed Certification Body contact person must investigate the appeal and its documentation, take a decision within twenty (20) working days after receiving the appeal and inform the Green Key National Operator (or Green Key International in countries without a National Operator) about the decision.

If the Certification Body decides that the establishment has conformity with Green Key requirements, the Green Key National Operator (or Green Key International in countries without a National Operator) will share the feedback from the Certification Body with the appellant, and the Certification Body will issue the certification.

If the Certification Body decides that the establishment has one or more non-conformities

with Green Key requirements, the Green Key National Operator (or Green Key International in countries without a National Operator) will share the feedback with the appellant, and the Certification Body will only issue the certification once non-conformities have been rectified (following the standard procedure as described in the Certification Process Manual).

c. Complaints related to the general performance of the Auditor, Certification Body staff, and/or Green Key management staff

This type of complaint is a formal enquiry sent to Green Key to indicate dissatisfaction on issues related to the performance of the auditor, the Certification Body and/or Green Key management staff (Green Key National Operator staff or Green Key International staff). This type of complaint deals with competences, conduct, performance, or lack of professional behaviour, but do not deal with impartiality issues (for complaints related to impartiality issues, see Chapter 4 below).

A complaint shall be submitted using the standard format for complaints/appeals on the Green Key website. A complaint submitted through other channels will be directed to re-submit through the standard formula.

Green Key International collects the submitted complaint and shares it with the Certification Body who assigns designated staff according to the criteria reported under paragraph 3.1 of this policy.

The appointed Certification Body staff must investigate the complaint within twenty (20) working days and contact the relevant auditor, Certification Body staff or Green Key management staff (Green Key National Operator staff or Green Key International staff) to request relevant feedback or documentation.

If the investigation leads to the justification of the complaint, the person under complaint will be informed to ensure that the person rectifies the performance. The Certification Body will ensure that Green Key International shares the final feedback with the complainant.

If the Certification Body finds that the complaint is not justified, the Certification Body will ensure that Green Key International shares the final feedback with the complainant. If the complainant feels that the decision is not impartial, the decision can be double-checked by the Impartiality Committee (see Chapter 4 below).

4. HANDLING OF COMPLAINTS/APPEALS RELATED TO IMPARTIALITY RISKS

4.1 Responsibility

The complaint/appeal can relate to:

- issues related to impartiality, objectivity, confidentiality, non-discrimination, anti-bribery and anti-corruption by one or more persons in charge of the Green Key management (Green Key National Operator staff or Green Key International staff), the auditor/auditing company and/or the Certification Body staff
- overall structural concerns of the set-up of the Green Key certification system
- appeal of the decision in relation to general performance (see Chapter 3.2 c)

The Certification Body will ensure that any such complaint/appeal is referred to and processed by the Impartiality Committee that shall:

- review the complaint/appeal independently
- assess the risks in relation to impartiality, objectivity, confidentiality, non-discrimination, anti-bribery and/or anti-corruption
- assess the risks in relation to structural concerns
- assess the risks in relation to the general performance
- provide a documented decision

Members of the Impartiality Committee involved in handling such complaints shall:

- Have no conflict of interest
- Not have been involved in the matter under review
- Act independently of the Certification Body management, the Auditor/Auditing Company and the Scheme Owner

4.2 Escalation of applicable cases

Complaints/appeals related to issues related to impartiality, objectivity, confidentiality, non-discrimination, anti-bribery and/or anti-corruption or overall structural concerns shall be submitted using the standard format for complaints on the Green Key website. A complaint/appeal submitted through other channels will be directed to re-submit through the standard formula. Any documentation supporting the complaint/appeal should be enclosed.

When receiving this type of complaint/appeal, Green Key International will forward it to the Certification Body to forward to the Impartiality Committee, who must investigate the complaint/appeal and its documentation within twenty (20) working days after receiving it.

The Impartiality Committee will contact the relevant person under complaint/appeal whether it is a person in charge of the Green Key management (Green Key National Operator staff or Green Key International staff), the auditor/auditing company and/or the Certification Body staff to have a clarification of the issue related to impartiality, objectivity, confidentiality, non-discrimination, anti-bribery and/or anti-corruption. If the

complaint/appeal relate to an overall structural concern, the Impartiality Committee will contact the Certification Body and/or FEE as Scheme Owner for clarification. If the complaint/appeal relates to an appeal of a decision in relation to general performance, the Impartiality Committee will contact the Certification Body for clarification.

If the Impartiality Committee decides that complaint/appeal is justified, the relevant entity (FEE/Green Key national or international management staff, the auditor/auditing company or the Certification Body) will be informed to ensure that they take appropriate action regarding the issue concerned. The complainant will be informed about the decision of the Impartiality Committee by Green Key International.

If the Impartiality Committee decides that complaint is not justified, the complainant will be informed about its decision by Green Key International.