1. **SCOPE**

   This procedure covers the receiving, investigation and resolution of complaints of whatsoever nature received from any third party.

2. **PURPOSE**

   The purpose of this procedure is to ensure that all complaints are handled quickly and effectively; to avoid its recurrence and to learn from our mistakes to continuously improve our management system, client services, verification activities and processes in order to excel as a Verification Agency.

3. **RESPONSIBILITY AND AUTHORITY**

   3.1 The Administration Manager is responsible for the recording, investigation and resolution of all complaints within a period of no longer than 3 days after the complainant lodged the complaint.

   3.2 Upon receipt of a complaint, the Administration Manager shall confirm whether or not the complaint relates to our BEE verification activities for which we are responsible, and if so, shall deal with it in accordance with the procedure set out herein. The person investigating a complaint shall be completely independent from the complaint and the activities involving the complaint.

   3.3 The Administration Manager shall refer any complainant about a Measured Entity to the verified enterprise in question. The Administration Manager shall ensure that the subject of the complaint, as well as the identity of the complainant remains confidential.
3.4 The Administration Manager shall ensure that a copy of BEE/MP/9/01, which third parties, who want to lodge a complaint against us, may follow, is available on our website.

3.5 The Administration Manager shall acknowledge receipt of the complaint and shall provide the complainant with progress reports and the outcome.

3.6 The Administration Manager shall give the complainant formal notice of the end of the complaints-handling process.

3.7 Should the complaint relate to our Administration Manager, the Managing Member shall be responsible for the recording, investigation and resolution of the complaint.

4. REFERENCES

SANAS R47-02 clause 20

5. PROCEDURE

5.1 Upon receipt of a complaint, the Administration Manager shall record the complaint in the Complaint Register (BEE/MP/9/A1) and shall confirm whether or not the complaint relates to our BEE verification activities for which we are responsible, and if so, shall deal with it in accordance with the procedure set out herein.

5.2 After having recorded the complaint, the Administration Manager shall follow the following steps in resolving the complaint:
5.2.1 Diagnose the problem.

5.2.2 Analyse the environment and other relevant factors.

5.2.3 Identify the actual problem.

5.2.4 Develop several alternative solutions.

5.2.5 Evaluate the alternative solutions.

5.2.6 Choose the best alternative.

5.2.7 Implement the chosen alternative.

5.2.8 Evaluate and Modify.

The aforementioned steps are described in more detail hereunder:

5.2.1 **Diagnose the problem:**

The Administration Manager shall investigate the complaint thoroughly to determine the cause and symptoms of the problem that lead to the complaint. Problem definition and diagnosis involves three skills: noticing, interpreting and incorporating. Noticing involves identifying and monitoring numerous external and internal environmental forces and deciding which ones are contributing to the problem. Interpreting involves assessing the forces noticed and determining which are causes, not symptoms. Incorporating involves relating those interpretations to the
current objective of the department. If done haphazardly or incorrectly, the decision-maker is likely to choose a poor solution.

5.2.2 Analyse the environment and other relevant factors:

It is important that the Administration Manager collects as much information as is practically possible. The Administration Manager shall therefore gather the following information:

► Find out where the problem occurred and why it occurred there;
► Determine when it began and why it did so at that particular stage;
► Determine why it started and why;
► Identify who should accept responsibility for the solution.

5.2.3 Identify the actual problem:

Once the Administration Manager collects all the information, he or she should find it easier to identify the actual problem. If the Administration Manager is of the opinion that the problem the problem cannot be resolved, he or she should identify which other employee(s) in our company should be able to assist with the complaint. The Administration Manager should listen to what the other employee(s) have to say about the problem. Perhaps they have an explanation already. The Administration Manager must also determine the severity of the problem. If there is a danger of large losses, or a safety risk for staff, the problem must be attended to immediately.

A technique, which the Administration Manager can use here to determine all the possible fundamental causes of the problem, is a cause-and-effect analysis. This is how it works:

► Describe the effect of the problem as carefully as possible;
Draw a cause-and-effect diagram on a board and write down the problem;

Hold a brainstorming session on the possible causes and write them down;

Obtain consensus about the most likely causes;

If necessary, repeat the process using a likely cause of the problem to determine the fundamental cause. Once all the necessary information is obtained, continue with the process. To ensure that you are focusing on the actual problem, make use of this simple question: Why?

5.2.4 Develop several alternative solutions

Once the Administration Manager identifies the possible causes of the problem, they should look for feasible solutions to the problem. Sometimes a solution is apparent after the previous step and the Administration Manager can proceed directly to the implementation. If not, alternative solutions shall have to be developed.

This process should not be done out of proportion, meaning that they should not consider too many possibilities. The Administration Manager should identify enough possibilities to make a good decision. The amount of solutions the Administration Manager considers will also depend on the amount of time they have available and the importance of the decision.

The Administration Manager will have to start gathering information about all facets of the situation. There are many sources from which information can be gathered from such as interviews, discussions, published material and their own impressions.
The Administration Manager should apply a process in which obvious and creative solutions are
generated. Techniques to help develop various alternatives are the following:

► **Elimination**: Which forms, reports and tasks can be eliminated?

► **Rearrangement**: Can the work procedures be modified? For example, can more work
be given to certain employees and less to others? Can more or less work be included in
the procedure?

► **Substitution**: Can employees be substituted for other employees?

► **Combination**: Can certain procedures and the responsibilities of certain employees be
combined?

► **Enlargement**: Which work or employees can be added? Should you allocate more
time for certain tasks?

► **Reduction**: Which work or employees can be reduced or eliminated? Should you
allocate less time for certain tasks? Can we use fewer files and still function effectively?

The aim is not to find the best idea, but to find the best possible solution for the problem. The
following criteria can be used to evaluate ideas:

► Will it solve the problem and does it improve the current situation?

► Is the solution acceptable to those who are affected by it and those implementing it?
► Is it suitable to implement the proposal now?

► Is the idea a permanent or a temporary solution?

► Are the necessary resources available?

► Are we going overboard with the idea?

► What consequences will it have on our company in terms of cost and other scarce resources?

► What is the risk associated with each alternative?

► Is the solution within the internal and external limitations of our company regarding policies, procedures, rules and regulations?

5.2.5 Choose the best alternative

The Administration Manager must choose the best alternative in the given circumstances, i.e. the alternative that offers the most benefits and the fewest negative consequences. Choose the alternative that is best for our company.

There are some of the reasons for choosing one alternative over another:

► It takes less time;

► It is more effective;
The employees or management prefer it;

- It will improve productivity;

- It will reduce operating costs.

5.2.6 Implement the chosen alternative

The Administration Manager shall be responsible for the implementation of the chosen alternative. All those involved must be advised of the final choice. If the decision involves other departments, they must also be involved in the process. A plan of action must be drawn up, i.e. the Administration Manager must decide who will do what and when, so that the alternative can be implemented properly. This plan must be drawn up and accepted by all those concerned.

5.2.7 Evaluate and Modify

Once the solution has been implemented, the Administration Manager must introduce control measures to establish whether or not the problem has in fact been resolved. It must determined whether the choice was the correct one and whether it had the desired effect on the solution.

5.3 The Administration Manager furnishes the compliant with at least one (1) progress report during the above procedure. Once the complaint has been dealt with in accordance with the above procedure, the Administration Manager gives the complainant formal notice of the end of the complaints-handling process by sending a formal notice, i.e. a Complaints Resolution Notice (BEE/MP/9/02) to the complainant, and if the complainant was not the Measured Entity, to the complainant and to the Measured Entity in respect of whom a complaint was lodged. If a special
evaluation is identified as part of the corrective actions to be implemented in terms of our Corrective Actions Procedure (BEE/MP/11), the Administration Manager will follow our Special Evaluation Procedure (BEE/SP/25).

6. **DEFINITIONS**

6.1 “The Administration Manager” means the Administration Manager, alternatively, the person(s) appointed by Top Management to carry out the duties of the Administration Manager.

6.2 “Top Management” means the Managing Member.

7. **RECORDS**

<table>
<thead>
<tr>
<th>Record Reference Number</th>
<th>Records (Including Computer records where applicable)</th>
<th>Responsibility</th>
<th>Minimum Retention Period</th>
<th>Disposal</th>
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<td>BEE/MP/9/A1</td>
<td>Complaints Register</td>
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FORMAL COMPLAINT PROCEDURE

1. GENERAL PRINCIPLES

1.1 Any Measured Enterprise that has a complaint against BEE Empowered or any of its internal or external verification personnel, is entitled to make use of the Formal Complaint Procedure as set out below.

1.2 A complaint is any feeling of dissatisfaction, injustice or unfair treatment a Measured Entity may experience in relation to their verification by BEE Empowered, which has not been resolved informally.

1.3 The purpose of the Formal Complaint Procedure is to enable Measured Entity to have their complaints resolved fairly, quickly and as close to the point of origin as possible.

1.4 Measured Entity may lodge their complaints without fear of victimization. BEE Empowered assures Measured Entities that they will not be prejudiced in any way as a result of using the Formal Complaint Procedure.

1.5 Any Measured Entity lodging a complaint in terms of this procedure is entitled to representation.

1.6 Each step in the procedure shall be subject to stipulated time limits. It is, however, accepted that these limits may be varied by mutual agreement or in relation to the availability of the person(s) involved in the process.
2. STAGES OF PROCEDURE

2.1 Stage 1: Verification Manager

2.1.1 A Measured Entity who has a complaint, should report the complaint by completing the attached form BEE/MP/9/A3, and by faxing a copy of the duly completed form BEE/MP/9/A3 to the Verification Manager whose name appears in the Measured Entity’s Verification Plan. Form BEE/MP/9/A3 must be completed and signed by the duly authorised representative of the Measured Entity. The Verification Manager must endeavour to resolve the complaint and communicate the outcome to the Measured Entity within three (3) working days after having received the complaint.

2.1.2 In the event of the complaint not being resolved to the satisfaction of the Measured Entity within three (3) working days, or in the event of the complaint relating directly to the Verification Manager, the Measured Entity may refer the complaint to the Administration Manager of BEE Empowered. The purpose of such a referral is to seek their advice.

2.1.3 The Measured Entity may, accompanied by its representative, approach the Verification Manager again, who will make a further attempt to resolve the complaint. It must be understood that this process is designed to give the Verification Manager every opportunity to resolve the complaint. The Verification Manager must record his or her response on form BEE/MP/9/A4 and furnish the representative of the Measured Entity with a copy of same within three (3) days after having received the complaint from the Measured Entity, or within three (3) days after the Measured Entity has referred the complaint to him or her for reconsideration.
2.1.4 The Measured Entity is, however, entitled to proceed to Stage 2 if it is felt that no purpose would be served by discussing the matter with the Verification Manager again.

2.2 Stage 2: Administration Manager

2.2.1 The Measured Entity must invoke Stage 2 timeously and preferably within two (2) days of having received a response from the Verification Manager in respect of Stage 1. The duly authorised representative shall complete and sign form BEE/MP/9/A4 and fax a copy thereof to the Administration Manager concerned.

2.2.2 The Administration Manager shall be required to provide a written response on form BEE/MP/9/A5 within three (3) days after having received a copy of form BEE/MP/9/A4. If the complaint is not resolved to the satisfaction of the Measured Entity within three (3) working days, Stage 3 shall be invoked.

2.3 Stage 3: Managing Member or the Designated Manager

2.3.1 The duly authorised representative of the Measured Entity shall hand copies of forms BEE/MP/9/A3, BEE/MP/9/A4 and BEE/MP/9/A5 completed at Stages 1 and 2, to the Managing Member or the Designated Manager within two (2) days after having received Form BEE/MP/9/A5 from the Administration Manager.

2.3.2 The Managing Member or the Designated Manager shall within three (3) working days of the receipt of the forms listed in clause 2.3.1 hold a meeting in an attempt to resolve the matter.
2.3.3 The representative of the Measured Entity, the Verification Manager and the Administration Manager may attend this meeting. The Managing Member or the Designated Manager will determine the parties that will contribute to the constructive resolution of the complaint and require their attendance. The Managing Member or the Designated Manager will chair the meeting.

2.3.4 The Managing Member or the Designated Manager will record his/her response in writing using form BEE/MP/9/A6 and provide his/her response to the Measured Entity within two (2) days of the meeting.

2.3.5 The meeting procedure may include any of the following steps:

2.3.5.1 An investigation carried out by the Managing Member or the Designated Manager into the facts of the case in preparation of the meeting;

2.3.5.2 The parties shall agree the time, date and venue for the meetings. Every endeavour shall be made to ensure that this time period meets the relevant time periods, but reasonable extensions must be fairly considered if necessary.

2.3.5.3 The chairperson of the meeting will be responsible for the process followed in the meeting. In this regard he or she should consider the following processes:

2.3.5.3.1 All relevant information is made available to the parties prior to or at the meeting for consideration;

2.3.5.3.2 All relevant witnesses (if applicable) which the parties may wish to call are notified in advance to be available at the time of the meeting;
2.3.5.3.3 The Measured Entity and BEE Empowered or their representatives will have an opportunity to present their cases fully and to ask questions of each other’s witnesses;

2.3.5.3.4 Minutes of the meeting are taken in summary form.

2.3.5.4 The chairman shall submit the written solution to the appropriate person in terms of the requirements of the relevant stages of the procedure.

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