

## Verification Complaints Policies and Procedures

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### Introduction:

This policy deals with the procedures to be followed by MOORE staff on receipt of or issuing a complaint to or from any source against the Measured Entity or MOORE itself. This policy further details the conditions under which Complaints are validated and procedures to be followed when approving and conducting special evaluations.

The purpose for this policy is to:

- a) Establish conditions for validating all types of complaints;
- b) To identify the applicable forms to be used when handling complaints: and
- c) To detail effective guidance for MOORE staff, on what procedures to be followed when handling complaints by measured enterprises, MOORE Staff, other enterprises than the measured enterprise, stakeholders or MOORE Customers or suppliers.

### Policy Statement:

It is the policy of MOORE to review all complaints received from any source, against either a Measured Enterprise or MOORE itself that are related to compliance with MOORE's standards, criteria, or procedures and to resolve any such complaints in a timely, fair, and equitable manner. MOORE are committed to appropriately addressing all complaints to inspire confidence in our verification process. Furthermore, it is the policy of MOORE to retain all documentation associated with any such complaint received for a period of not less than four (4) years. MOORE will not pursue complaints that are not in writing or that are anonymous. Receipts of all complaints will be acknowledged within fourteen (14) days. Complaints against MOORE employees will be handled in accordance with the MOORE HR Manual and may result in actions up to and including termination of employment. Complaints against a Measured Enterprise due to the Measured Enterprise providing incorrect or misleading information regarding the B-BBEE status, the contents of verification reports and final certificate, or the verification action taken by Moore Stephens PR, the Measured Enterprise will be required to make a public correction.

### Procedures:

A description of the complaint's procedure and CAD form is publicly available in the Verification Agreement and on our website; [www.mooreinfinitybee.co.za](http://www.mooreinfinitybee.co.za)

#### 1) Receipt of Complaints

When MOORE receives a complaint via email, fax, telephone, the complainant is emailed or faxed the Complaints Form MS122, they can additionally be referred to the website for an overview of the policy. All complaints must be completed on the CAD MS 122 form and must be sent to the Managing Director for Moore BEE, Neil Van Rooyen (NvR). He will acknowledge receipt of the complaint within 2 days by email.

## **2) Verification of Validity and Investigating of Complaints**

On receipt of a complaint a copy of the complaint is recorded in the Measured Enterprise's folder on the network. The complaint will also be logged in the Complaints and Appeals Log by NvR. A copy of the complaint is forwarded by NvR to the Managing Director for Moore Group and Independent Chairman, Leonard Roberts (LR), informing them of the complaint.

The complaint will be reviewed by the MD whereby he will:

- Establish the validity of complaint by checking the name of the ME against the client information, checking the certificate number if applicable, reviewing the nature of complaint provided against policies, procedures and codes of conducts to assess whether or not there has been a breach in principle;
- Review of the severity of the reported complaint by understanding and measuring the consequences of the potential breach; and

## **3) Decision of what actions to take**

- Decide on follow up action to be taken: The MD will convene the Complaints & Appeals Committee in accordance with the Committees Procedure (MSPol06) within 1 week of the receipt of the complaint. The decision for what action to take will be based on nature and severity of the complaint.

## **4) Tracking and Recording of Complaints**

As noted above, complaints will be captured on the MS122 document and recorded on the Complaints Log. The complaint will be captured at point of receipt, point of acknowledgement to client, verification of validity of the complaint, communication of feedback to the complainant and acceptance of the feedback. Once signed acceptance has been received from the complainant on the MS122, this will be the final update and sign off of the register.

## **5) Decisions Communicated to the Complainant**

Once a decision has been reached, this must be communicated in writing to the complainant within the prescribed timeframes below.

The Complaints & Appeals Committee Terms of reference is as follows:

### Committee Members

- The MD will base the selection of committee members on independence (i.e. not involved in the original verification), competence – this will be done by reviewing the MOORE Skills & Competence Matrix to select individuals with an average level 3 skill. The committee members will be formally notified of their appointment by the MD.

### Objectives

- To investigate the breach and root cause thereof outlined in the complaints form completed by the MD
- To gather evidence to support the complaint
- To ensure that the complaint is investigated impartially and confidentiality
- To advise the MD on the decision on appropriate corrective action to be taken
- The decision must be made within 14 days of the convening of the committee

### Procedure

The MD will provide the complainant with progress reports by email within the 30-day period.

The chairperson will distribute the information at the committee meeting and will be responsible for minuting the meeting

Agenda:

- Terms of reference/ objectives review
- Review of complaint
- Review of information and evidence
- Root Cause Analysis
- Outcome of Analysis
- Decision
- Corrective Action Proposal

The decision will be communicated in writing to the MD within 2 days by the chairperson.

If it appears that a MOORE representative or an individual working on behalf of MOORE may have violated MOORE's criteria, policies, or procedures, that individual will be asked to respond to the issues raised in the complaint within 1 week. If MOORE determines that a violation has occurred, MOORE will counsel the responsible party and may take further action as circumstances warrant, up to and including termination as a MOORE representative.

If MOORE finds that a violation of its policies or procedures has occurred which may have had an effect on the verification action, MOORE may initiate further proceedings as circumstances warrant: If the effect is limited to that particular ME, MOORE may revisit to the Measured Enterprise at its own cost with an independent verification team from the original verification. If all verification activities are found by the committee to have been affected, MOORE will cease operations until such time as corrective action has been implemented. All ME's and the DTI will be advised by the MD.

Following the decision and recommendation for corrective action by the Complaints Committee, the MD will advise an independent verification manager to implement the corrective action and monitor the effectiveness. The VM will report back to the MD in writing within 3 months of the date of the committee meeting.

If it is decided that there is no breach according to the nature of the complaint, the complainant will be notified either by email by the MD that no further action will be taken within. A copy of this notification will be stored in the Measured Enterprise's folder as per the procedure in MSPol04.

#### 1.1 Complaints against a Measured Enterprise

On establishment of a breach of MOORE's standards, criteria, or procedures by the Measured Enterprise, a complaint is formulated by MOORE or by a 3<sup>rd</sup> party. The MD will validate the complaint by checking the name of the ME against the client information, checking the certificate number if applicable, reviewing the nature of complaint provided against policies, procedures and codes of conducts to assess whether or not there has been a breach in principle;

If the complaint appears to warrant further investigation, the MD will forward a copy of the complaint to the authorised official of the Verified Enterprise with a request for a response within 2 weeks. The enterprises response will be reviewed by the Complaints Committee of MOORE within 2 weeks days of receipt of the enterprise's response.

If MOORE determines that the enterprise's response satisfactorily addresses the issue or issues raised in the complaint, the matter will be considered closed and the 3<sup>rd</sup> party notified within fourteen (14) days. The Complaints and Appeals Log MS116 will be updated.

In the event that an entity response is not received by MOORE within thirty (30) days of the request for the response, or if the response is not deemed to have satisfactorily resolved the issue, MOORE may

initiate further proceedings as circumstances warrant, up to and including a Special Evaluation and/or revocation of verification status.

Complaints against a Measured Enterprise due to the Measured Enterprise providing incorrect or misleading information regarding the BEE status, the contents of verification reports and final certificate, or the verification action taken by MOORE, the Measured Enterprise will be required to make a public correction. A copy of the follow up action is clearly documented on the Measured Enterprise's file with the complaint clearly marked as being resolved (including date of resolution).

The MD will provide the authorised representative of the ME with formal written notification that the Complaints process has ended. If the ME expresses dissatisfaction with the conclusion the MD will advise the ME to contact the DTI.

## 2. Complaints against MOORE and / or its staff

On receipt of a complaint a copy of the complaint is recorded in Appeals and Complaints Log on the network. Meeting will then be called in order to inform the Managing Director of the complaint.

The complaint will be reviewed by the MD whereby he will:

- Establish the validity of complaint by reviewing the nature of complaint provided against policies, procedures and codes of conducts to assess whether or not there has been a breach in principle;
- Review of the severity of the reported complaint by understanding and measuring the consequences of the potential breach; and
- Decide on follow up action to be taken: The MD will convene the Complaints & Appeals Committee in accordance with the Committees Procedure (MSPol06) within 1 week of the receipt of the complaint.
- Ensure compliant has been communicated to the personnel/measured entity who laid the complaint and that it signed off that the personnel/measured entity is satisfied with the procedure followed by Moore and be allowed to comment if required.

The Complaints & Appeals Committee Terms of reference is as follows:

### Committee Members

- The MD will base the selection of committee members on independence, competence – this will be done by reviewing the MOORE Skills & Competence Matrix to select individuals with an average level 3 skill. The committee members will be formally notified of their appointment by the MD at the first meeting convened by the committee.

### Objectives

- To investigate the breach and root cause thereof outlined in the complaints form completed by the MD
- To gather evidence to support the complaint
- To ensure that the complaint is investigated impartially and confidentiality
- To advise the MD on the decision on corrective action to be taken
- The decision must be made within 14 days of the convening of the committee

The decision will be communicated in writing to the MD within 2 days by the chairperson.

If it appears that a MOORE representative or an individual working on behalf of MOORE may have violated MOORE's criteria, policies, or procedures, that individual will be asked to respond to the issues raised in the complaint within 1 week. If MOORE determines that a violation has occurred, MOORE will counsel the responsible party and may take further action as circumstances warrant, up to and including termination as a MOORE representative. If it is decided that there is no breach according to the nature of

the complaint, the complainant will be notified either by email by the MD that no further action will be taken within.

**Related Policies, Procedures and Forms:**

MSPol12 - HR Policies & Procedures

MSPol13 - Verification Engagement Policy & Procedure Manual

MSPol10 - Control of Record Policy & Procedures

MS116 - Complaints and Appeals Log