



GLOBAL ORGANIC TEXTILE STANDARD  
ECOLOGY & SOCIAL RESPONSIBILITY

# GOTS COMPLAINTS PROCEDURE

ON COMPLAINTS HANDLING, INVESTIGATIONS AND  
DOCUMENTATION

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Global Standard gemeinnützige GmbH  
Rotebühlstr. 102 · 70178 Stuttgart · Germany  
[www.global-standard.org](http://www.global-standard.org)

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# COMPLAINTS PROCEDURE

## 1 INTRODUCTION; DEFINITION

- 1.1 Global Standard gGmbH (“Global Standard”) operates the Global Organic Textile Standard (“GOTS”).
- 1.2 GOTS has a robust complaint system where any individual or organisation is able to register a complaint about perceived violations of GOTS requirements. This system shall be used for any specific grievance that GOTS users may have within the system.
- 1.3 Complaints shall be treated as an essential and integral component of the GOTS system and as a direct measure of its popularity, importance and consumer engagement.
- 1.4 “Complaint” for the purpose of this document is any formal allegation of violations of GOTS rules, procedures and rights.
- 1.5 “Supply Chain Operator” for the purpose of this document would be a GOTS-certified entity or GOTS Approved Certification Body.
- 1.6 This procedure is based on the core criteria of legitimacy, accessibility, predictability, equitability, and transparency and is dialogue-based.

## 2 SCOPE

- 2.1 This document serves to describe the various steps to be taken towards the protection and integrity of the GOTS system, GOTS certification, GOTS-certified products and GOTS labelling dependent on the individual case and to ensure a formalised, timely and effective handling and resolving complaints raised, in particular, with regard to:
  - 2.1.1 Relevant Violations (for example of the Standard Setting Procedure), unauthorized, false or misleading use of the GOTS Signs or other related claims.
  - 2.1.2 Failures or omissions in the course of the GOTS certification procedure by GOTS-approved Certification Bodies
  - 2.1.3 Abuses of the GOTS certification system, including forgery of documents, falsely applying for and receiving Transaction (TCs) or Scope certificates (SCs), fraudulently allowing material that is not organic in nature, wilfully misrepresenting facts related to organisation, operations, certified material etc.
  - 2.1.4 Violations against the ownership and other rights of/in the Global Organic Textile Standard.
  - 2.1.5 Violations of the GOTS Chemical Input Criteria, Environmental Criteria, Human Rights and Social Criteria and Governance Criteria.

## 3 OVERALL RESPONSIBILITY

- 3.1 Complaints shall ultimately be the responsibility of the Director in charge of Quality Assurance of Global Standard.
- 3.2 Global Standard Protection Officers, Global Standard staff in the Quality Assurance unit with the assistance of other Global Standard staff who may be appointed for the specific purpose of complaint investigation, shall operate under the said Director.

## 4 RECEIPT OF COMPLAINTS

- 4.1 Complaints shall be received via the GOTS Complaint Form available on the GOTS website.
- 4.2 Complaints received over email shall be returned to the complainant with a request to use the GOTS Complaint Form. This must be documented in the Complaint Register (see below).
- 4.3 Should, in the absence of the Complaint Form the complaint be considered of particular importance, Global Standard staff are to fill in Complaint Forms on their own behalf or on behalf of complainant.
- 4.4 Complaints shall be accompanied by evidence of the alleged violation. This may be relevant screenshots, webpages, photographs, emails or other correspondence.

## 5 COMPLAINT HANDLING

- 5.1 Depending on the nature of the complaint, an investigation shall be undertaken by the Protection Officers or Responsible, QA unit respectively (“Processor”), which shall include the internet, contacting the parties concerned, the relevant GOTS Approved Certification Bodies (CBs) etc., reviewing the relevant documents (e.g. Transaction Certificates and other related documents) to determine if the complaint is legitimate and if there is a violation of GOTS requirements.
- 5.2 Should the determination be that the complaint is dubious or unfounded, the complainant shall be informed accordingly by the respective Processor.
- 5.3 The complainant shall have the right to appeal against such a determination and place such an appeal within 7 calendar days to the Director in charge of Quality Assurance. The Director shall review the determination made by the Processor. The complainant shall be informed of the results of such a review within 15 days of receipt of the appeal. Decisions taken by the Director shall be deemed to be final.
- 5.4 The Processor may call upon GOTS Regional or Special Representatives to assist in investigation-related activities within their respective regions.
- 5.5 The Processor shall consult the Global Standard management when necessary.
- 5.6 In order to maintain its neutrality, Global Standard shall not consider actionable complaints that are determined to be basically of a competitive nature unless they directly contravene GOTS requirements, policies, procedures and ethos. Complainants shall be informed accordingly.

## 6 CONFIDENTIALITY OF COMPLAINANTS

- 6.1 Every complainant has the right to remain anonymous, and this may be informed as part of the complaint.
- 6.2 Global Standard shall ensure that the identity of such a complainant is not revealed to a Supply Chain Operator.
- 6.3 Global Standard shall ensure that no complainant is identified in external communication or on the GOTS website whether or not confidentiality has been requested.
- 6.4 Notwithstanding the complainant’s right to remain anonymous, Global Standard shall not accept complaints from persons or organisations who do not identify themselves to Global Standard.

## 7 CLASSIFICATION AND CATEGORISATION OF COMPLAINTS, IDENTIFICATION OF THE PROCESSOR

- 7.1 Violations and Complaints are categorised under the following broad heads (the list is not exhaustive):
- 7.1.1 **Violations of GOTS Signs** (Processor: responsible Protection Officer)
    - 7.1.1.1 GOTS signs are used on a non-certified product.
    - 7.1.1.2 GOTS Signs are used off-product when the products in question are not GOTS certified.
    - 7.1.1.3 GOTS Signs used incorrectly on online marketplaces or websites.
    - 7.1.1.4 Incorrect on-product use: colour, grade, references, licence number, size etc.
    - 7.1.1.5 Incorrect off-product use (such as catalogues, websites): confusion between certified and non-certified products.
    - 7.1.1.6 No label release from Approved Certifier
    - 7.1.1.7 Any other misrepresentations jeopardizing GOTS' credibility and reputation.
  - 7.1.2 **Violation of GOTS Requirements** (Processor: Quality Assurance Unit)
    - 7.1.2.1 Violation of GOTS policies or procedures (such as Transaction / Scope Certificates).
    - 7.1.2.2 Complaints against Certification Bodies (CBs).
    - 7.1.2.3 CBs not following GOTS Requirements or policies.
    - 7.1.2.4 CBs indulging in unethical business practices.
    - 7.1.2.5 Others.
  - 7.1.3 **Violations of GOTS Standard Setting procedures** (Processor: Monitoring & Evaluation Specialist)

## 8 REMEDIAL ACTIONS TO BE TAKEN

- 8.1 The Processor shall, on consultation and direction from the Global Standard management, take steps against proven violations. The Processor shall aim to settle the complaint amicably to the extent possible.
- 8.2 Actions shall generally follow the procedures detailed in the following sections which lists the most common violations.
- 8.3 Complaints may be redirected to relevant CBs directly for investigation and/or action at their end, should it be found necessary. The Processor may, in some relevant cases, request and allow CBs to correspond directly with the complainant.
- 8.4 Complaints may be redirected to relevant Accreditation Bodies (ABs) for investigation and/or action at their end, should it be found necessary by the Processor.
- 8.5 The Global Standard management shall take any reasonable and efficient actions as considered necessary upon a complaint or irrespective thereof to protect the integrity and spirit of GOTS including those listed below.

## 9 COMMUNICATION

- 9.1 Communications should typically be done electronically with concerned parties. Where necessary, a formal letter is used.

- 9.2 Telephone calls should be avoided except for an initial stage of complaint redressal and should almost always be followed up with a written (electronic) communication.
- 9.3 After a complaint procedure is closed, the Processor informs the complainant.

## 10 CONSULTATION WITH LAW FIRMS

- 10.1 The Protection Officers may commence and maintain consultations with Law Firms that Global Standard appoints for the purpose should there be a need to do so.
- 10.2 Consultations with Law Firms may typically be required upon doubts or trademark violations or upon direction by the Director.
- 10.3 Regional Representatives may be requested to liaise with local firms, should this be deemed necessary by the Global Standard management or Protection Officers.

# SANCTIONS

## 11 CERTIFICATION BAN (OR RESTRICTIONS) ON CERTIFIED ENTITIES

- 11.1 In cases where gross violations of the GOTS rules or procedures or the use of GOTS Signs are found, or where there is a serious breach of Global Standard principles, the Global Standard management shall decide, on its own volition or based on a recommendation by a CB, to impose a ban on certification/approval or a restriction on existing certification/approval Certification Ban (or Restriction) on Certified Entities or holders of Letters of Approval or companies seeking to be certified or companies who offer chemical inputs/accessories for approval.
- 11.2 A Certification Ban shall be expressly discussed by the Global Standard management. The evidence available shall be studied to determine if a Certification Ban / Restriction is appropriate.
- 11.3 A Certification Ban may be instituted for a period of 24 months (or less, if decided by the Global Standard management) at one time.
- 11.4 Decisions of the Certification Ban shall be communicated to the Certified Entity concerned only through the respective CBs in a normal course. The Processor may directly communicate such decisions to the Certified Entity in exceptional cases where the CB is unable or unwilling to do so.
- 11.5 Certification Bans shall be published on the GOTS website, and all GOTS-approved CBs informed of the ban within 7 working days following the announcement.
- 11.6 A Certification Ban, once instituted, shall lapse at the end of the stated period in the official communication unless extended by the Global Standard management.
- 11.7 The Global Standard management shall have the right to extend a Certification Ban in cases where the concerned Certified Entity does not show a willingness to respect the rights of Global Standard or its Standard in spirit or action.
- 11.8 For persistent and continued violations by specific persons, the Global Standard management may implement a ban on all organisations operated, headed or owned or have a decisive majority in ownership by such persons. The duration of such a ban shall be consistent with the ban on the operation itself.

- 11.9 Under extraordinary circumstances, Global Standard may implement a permanent ban, in particular, because of persistent or gross violations or criminal acts This decision shall be approved by the Advisory Council of Global Standard.
- 11.10 On the recommendation of the respective CB, the Global Standard management may reduce or rescind or withdraw a ban on a Certified Entity.

## 12 SANCTIONS OR PENALTIES – CERTIFICATION BODIES

- 12.1 In case of substantial culpable breach of contractual obligations of CBs, including repeated disregard or failure to implement Global Standard requirements and policies, including (but not limited to) those of GOTS labelling; material, product and process classifications; required use and update of GOTS databases, Global Standard may, at its discretion, impose reasonable sanctions or financial penalty on GOTS Approved CBs.
- 12.2 Due process shall be followed for such action against CBs. Global Standard shall inform the CB of the identified breach in writing or by email and request a clarification from the CB within 10 working days.
- 12.3 Should an unsatisfactory or no response be received, the Global Standard management shall decide based on available information.
- 12.4 Sanctions for example, could include restrictions on certifications (either new or recertification), issuance of transaction certificates, issuance of Letters of Approval or geographic operations.
- 12.5 Financial Penalties shall be reasonable. Should the CB dispute the amount of penalty imposed by Global Standard, such a penalty shall be arbitrated vide an Arbitrator as per clause 9.11 of the Global Standard CB Contract.
- 12.6 The CB shall be given the opportunity to a remediation period of at least 30 working days and not exceeding 60 working days to satisfactorily resolve the breach, following which Global Standard shall consider further sanction, penalty or termination of the CB Contract.
- 12.7 Certification Bodies shall be permitted to appeal against imposed sanctions and or penalties within 15 working days of having received intimation about such penalty. Appeals shall be considered only if new information or details are available, and the decision of the Global Standard management shall be considered final. Global Standard shall inform the CB of the final decision with reasoning by email/writing.
- 12.8 Sanctions and/or Penalties shall not infringe upon the rights of Global Standard to terminate a CB contract as per Contract conditions or to take any further legal action if necessary.

## 13 GOTS DOCUMENTS FOR REFERENCE<sup>1</sup>

- 13.1 GOTS (Global Organic Textile Standard)
- 13.2 Manual for the Implementation of GOTS
- 13.3 Conditions for the Use of GOTS Signs
- 13.4 Retailer's Declaration for the Use of GOTS Signs
- 13.5 Policy for the Issuance of Scope Certificates
- 13.6 Scope Certificate Template
- 13.7 Policy for the Issuance of Transaction Certificates

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<sup>1</sup> In all cases, the latest versions of these documents shall be applicable.

- 13.8 Transaction Certificate Template
- 13.9 Policy for Issuing Letters of Approval for GOTS Additives
- 13.10 Template for Issuing Letters of Approval for Colourants/Textile Auxiliaries
- 13.11 Template for Issuing Letters of Approval for Accessories
- 13.12 Global Standard / GOTS Contracts with Approved Certification Bodies

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### Version History

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