

Complaint and Appeal Procedure

Effective: 19th September, 2017

ETP-OP-06 V04(E)

1 Purpose

This procedure is for ICTI Ethical Toy Program applicants (factories) to raise complaints and appeals in regard to audit firms' conduct and ICTI Ethical Toy Program's decision.

2 Scope

- 2.1 Any complaint or appeal should be initiated by an ICTI Ethical Toy Program applicant (factory) or the authorized party of the applicant in written. ICTI Ethical Toy Program will not accept any complaint or appeal from unauthorized party.
- 2.2 The applicant can raise the complaint or appeal with regards to:
 - The inappropriate attitude/action of the ICTI Ethical Toy Program accredited auditors or their unprofessional technical skills;
 - Audit firm's audit report/finding and/or process procedure;
 - ICTI Ethical Toy Program's disposition and/or process procedure;
 - Technical Advisory Council (hereafter 'TAC')'s disposition.

Remark: For any complaint regarding integrity (e.g. bribery) issues occurred during the audit process, please report to the designated team via integrity@ethicaltoyprogram.org.

3 Procedure

3.1 Complaint and Appeal Channel

- 3.1.1 The complainant is required to submit its complaint or appeal in written by using the Factory Complaint and Appeal Form that could be obtained at the end of this document or from ICTI Ethical Toy Program website: www.ethicaltoyprogram.org
- 3.1.2 The complaint or appeal is required to be specific and truthful. Reference to relevant ICTI Ethical Toy Program requirements is mandatory. The complaint or appeal shall not be processed if the complaint or appeal is absent of reference to ICTI Ethical Toy Program requirements, written response will be provided.
- 3.1.3 Completed Factory Complaint and Appeal Form should be sent to the below address via mail or email:

ICTI Ethical Toy Program
5/F Unit 518, Star House

3 Salisbury Road
Tsim Sha Tsui
Hong Kong
Email: tac-appeal@ethicaltoyprogram.org

3.2 Complaint and Appeal Against ICTI Ethical Toy Program Accredited Auditors or Audit Firm

- a) ICTI Ethical Toy Program accredited auditors and/or ;
- b) ICTI Ethical Toy Program accredited audit firm and/or;
- c) ICTI Ethical Toy Program's disposition and/or;
- d) ICTI Ethical Toy Program's Process Procedure and/or;
- e) TAC's disposition.

If the complainant disagrees to circumstances a) to d), an appeal could be made to TAC. (TAC is an independent committee represented by major manufacturers, toy brands, retailers and licensors.)

TAC shall receive the appeal directly while ICTI Ethical Toy Program would be automatically copied at the same time. ICTI Ethical Toy Program should acknowledge the appeal within 5 working days. TAC shall take lead for the direction of investigation and ICTI Ethical Toy Program shall follow the instruction of TAC to prepare relevant information and original appeal package for TAC to review. TAC shall make a disposition based on the available supporting evidence.

- 3.2.1 If the complainant disagrees to circumstance (e), further appeal could be made to Oversight & Appeals Committee of Governing Board. The appeal form shall be sent via mail or email to the address mentioned above AND attention to the CEO of ICTI Ethical Toy Program. ICTI Ethical Toy Program will acknowledge the appeal within 5 working days on behalf of Oversight & Appeals Committee of Governance Board. ICTI Ethical Toy Program shall prepare relevant information, original appeal package and the investigation report under TAC's instruction within 10 working days.
- 3.2.2 The Oversight & Appeals Committee of Governance Board shall review the claim made by the complainant in respect to the disposition. A decision shall be made based on the documents presented in regard to the issue involved. The complainant will be notified of the decision accordingly.
- 3.2.3 The Oversight & Appeals Committee of Governance Board reserves the right to refuse any complaint and/or appeal it considers invalid without any factual evidence support.
- 3.2.4 The decision and/or judgment of the Oversight & Appeals Committee of Governance

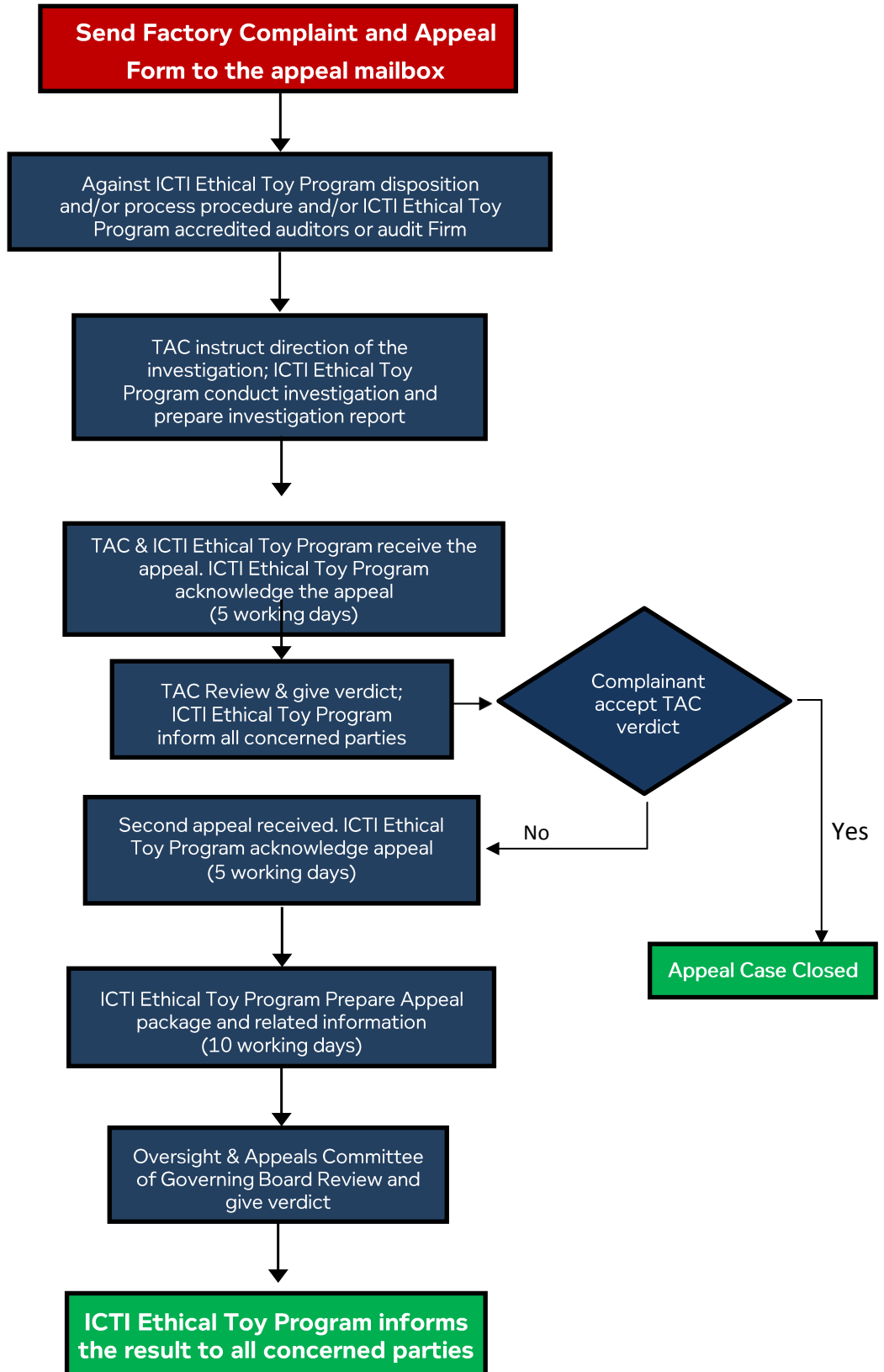


Board shall be final.

- 3.3 ICTI Ethical Toy Program Operations shall inform all parties concerned of the disposition made by TAC or the Oversight & Appeals Committee of Governance.**

4. Appendix

4.1 Flow-Chart of Complaint and Appeal Procedure



4.2 Factory Complaint and Appeal Form

Factory Complaint and Appeal Form

Effective: 1st October, 2013

ETP-F-11 V03 (E)

FACTORY INFORMATION	
Factory Name:	ETP Registration/Seal Number:
Factory Address:	
Factory Representative / Manager (Name & Title)	
Contact Number:	Email Address:
Other Contacts Information (if any):	
COMPLAINT AND APPEAL INFORMATION	
Complaint and Appeal Subject	<input type="checkbox"/> Auditors' Integrity or Other Inappropriate Conduct for an ETP Audit <input type="checkbox"/> Audit Firm's Audit Report/Finding and/or Process Procedure <input type="checkbox"/> ETP's Disposition and/or Process Procedure
Complaint and Appeal Date:	Incident Date & Audit Type:
Complaint and Appeal Details (please describe):	
Related Evidence/Photos/Documents List:	

Signature of Factory Legal Representative & Chop of Factory

INTERNAL USE ONLY	
ICTI Ethical Toy Program Review	
ICTI Ethical Toy Program Review Date:	ICTI Ethical Toy Program Review By:
Initial Review Result:	
Related Evidence/Photos/Documents List and Additional Comment:	
TAC Review (If applicable)	
TAC Review Date:	TAC Review By:
TAC Review Result:	
Related Evidence/Photos/Documents List and Additional Comment:	
Oversight & Appeals Committee of Governing Board Final Review	
Final Review Date:	Final Review By:
Final Review Result:	