

Opal.	Title: Complaints and NCR System
System: CoC - All Document Type: Manual	Doc ID: 72; Version: 10; Status: Approved Approval By: Sustainability Coordinator

1. Introduction

The objective of this document is to detail the mechanism implemented by Opal Australian Paper to deal with complaints and non-conformances. Complaints and non-conformances might arise as a consequence of observations made by Opal Australian Paper of our suppliers or contractors, observations made of Opal Australian Paper by customers or other stakeholder or generated as a result of audit activities.

The process of investigation, response and corrective action is detailed, and is based on the requirements of:

1. *AS4707: 2021 - Australian Standard Chain of Custody for Forest and Tree-Based Products.*
2. *FSC-STD-40-004 V3-1 FSC Standard for Chain of Custody certification*
3. *FSC-STD-50-001 V2-1 Requirements for the use of the FSC trademarks by Certificate Holders*
4. *PEFC ST 2002:2020 – Chain of Custody of Forest and Tree Based Products – Requirements*
5. *FSC-STD-40-005 V3-1 Requirements for Sourcing FSC Controlled Wood*

2. Procedure – Chain of Custody

Opal Australian Paper will maintain a record of all observations made known to the organisation relating to its CoC systems. This will be achieved using the Central Office (CO) Chain of Custody Systems **Complaints & NCRs** register located in the Chain of Custody PowerApp. PowerApp is located in the [Opal Sustainability Sharepoint page](#).

Given that not all observations resulting in complaints or non-conformances will be immediately identified by the originator as being related to one specific chain of custody system, the handling of all observations will be done in a consistent manner. Observations shall be handled according to the specific requirements of the PEFC, Responsible Wood® and/or FSC® standards.

All Opal Australian Paper personnel have access to the **Complaints and NCRs register** for the lodgment of observations. The OAP CoC Management Representative is responsible for maintaining the register and ensuring any actions or tasks are completed by the relevant Opal Australian Paper personnel as shown in Table 1 – Subject Matter Experts.

Opal.	Title: Complaints and NCR System
System: CoC - All Document Type: Manual	Doc ID: 72; Version: 10; Status: Approved Approval By: Sustainability Coordinator

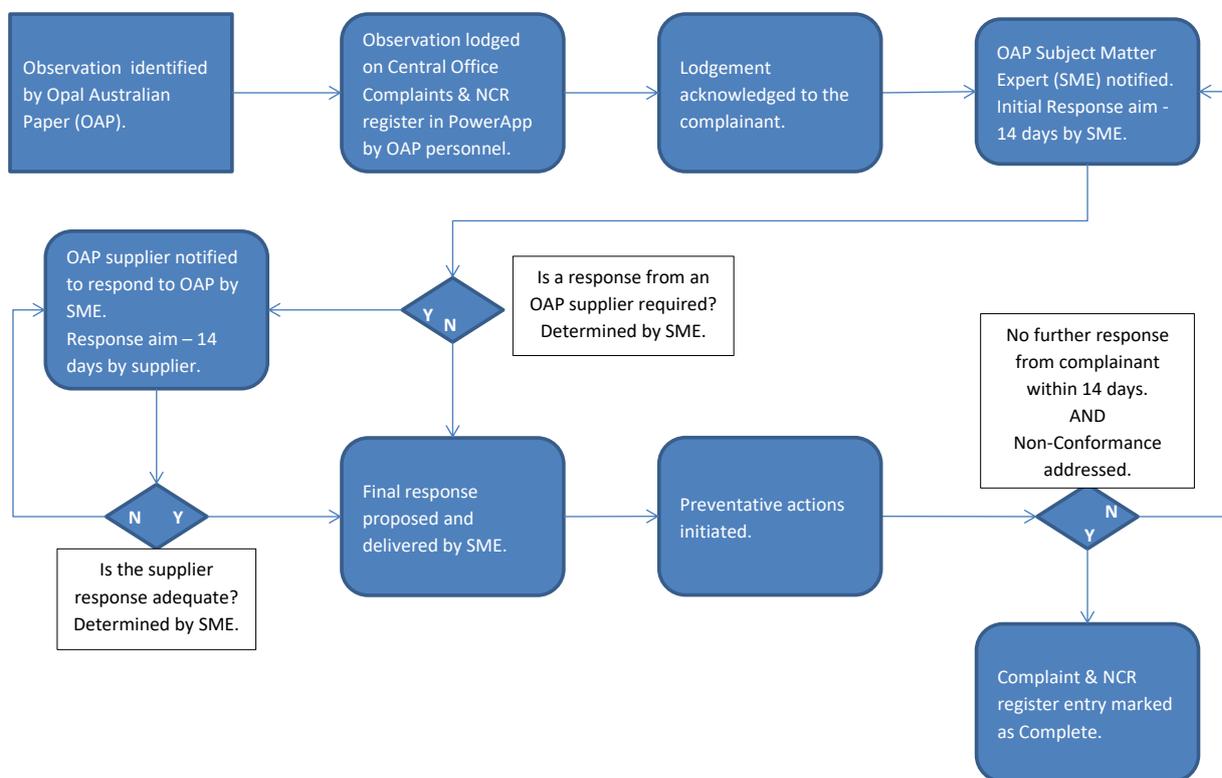


Figure 1 - Complaints and NCRs Process

2.1 Principles for Complaint Handling

The staff member initially assigned the item will select the relevant subject matter expert (SME) to follow the item to conclusion. The SME will contact the parties involved in the observation by e-mail, phone, or other means to see if the item can be resolved informally. The details including any communication will be documented (date, time and summary of issues discussed/corresponded to) and put in the Complaints & NCR Register. The period for an initial response will be 14 days. In the absence of material allowing a final response before this time, an initial response will be provided indicating an acceptance of the observation and the actions taken to date.

After our final response is made and in the case of complaints if we do not hear further from the complainant within a further 14 days of our contact then the complaint will be closed. If response is not accepted by the complainant, the Subject Matter Expert will recommend to the OAP CoC Management Representative one of the following:

- a) Our answer provided is considered conclusive and we should close the item, or,

Opal.	Title: Complaints and NCR System
System: CoC - All Document Type: Manual	Doc ID: 72; Version: 10; Status: Approved Approval By: Sustainability Coordinator

- b) The observer has raised new issues that allow the original item to be closed and a new one opened, or,
- c) The observation is of such a serious nature that it should be referred by OAP to the certification body or Standards Body.

The OAP CoC Management Representative will determine the pathway.

Where possible, the privacy and identity of the people involved in making complaints will be protected whilst recognizing that the identity of the complainant may be obvious depending on the circumstances.

OAP personnel will refrain from commenting publicly on observations until the investigations are completed and the item responses complete.

The originator can withdraw the item at any point in time of the process, at his/her discretion. This will be noted in the register and the item marked complete. Withdrawn items should not be deleted from the register.

Observations concerning Opal Australian Paper's Chain of Custody processes may include aspects related to fibre sources, general products, or the use of Logos.

2.2 Observations where third-party responses are required

Observations made directly to Opal Australian Paper will be responded to within the same time frames as shown above. This includes responding to issues which relate to a supplier to Opal Australian Paper but the response from the Opal Australian Paper supplier may not be available within the designated time frame shown above.

Opal Australian Paper will endeavor to have responses completed by the due date. Delays however might occur due to processes requiring investigation by the supplier.

A more detailed response including Opal Australian Paper's supplier information may not be available for up to four weeks after the observation made to Opal Australian Paper.

All responses will be via Opal Australian Paper if the original observation was made to Opal Australian Paper.

In the event that a supplier to Opal Australian Paper with a confirmed non-conformance fails to implement necessary corrective measures, Opal Australian Paper will exclude that supplier from the supply chain and cancel the use of the supplier's goods or services.

2.3 Escalation for FSC related complaints

Opal Australian Paper will investigate the complaint and specify the proposed actions in response to the complaint within 3 months. If more time is needed to complete the investigation, the complainant and the organisation's certification body will be notified. For all serious complaints Opal Australian Paper will notify the complainant and the certification body when the complaint is considered addressed and closed. If a resolution by Opal Australian Paper is not possible, the assigned staff member will notify the CoC

Opal.	Title: Complaints and NCR System
System: CoC - All Document Type: Manual	Doc ID: 72; Version: 10; Status: Approved Approval By: Sustainability Coordinator

Management Representative who will notify the FSC, with a recommendation on the complaint. FSC will go about their due process in resolving the complaint as per FSC-PRO-01-008 (V2-0) EN “Processing Complaints in the FSC Certification Scheme”. If the complainant is not satisfied with the outcome of the process, he/she may appeal the decision according to FSC-PRO-01-005(V3.0) EN “Processing Appeals” Corrective and Preventative Actions.

The staff member initially assigned the item in conjunction with the relevant subject matter expert (SME) will propose corrective actions if required, and preventative actions designed to prevent a recurrence of the issues identified through investigation of the complaint. The **Complaints and NCRs** register is used to inform and assign the actions to the relevant Opal Australian Paper personnel for follow up, and to collect evidence by way of notation of the follow up actions taken. Once the actions have been completed and notes added to the register, the assignee marks the entry *Complete*.

3. Procedure – Controlled Wood stakeholder complaints

This procedure is relevant to Opal Australian Paper’s Maryvale mill only.

Maryvale mill will ensure adherence to section 7.1 and 7.2 of the CW standard to handle comments and complaints from stakeholders related to DDS.

On the receipt of a stakeholder complaint, Opal’s CoC Management Representative at Central Office will take lead and determine the pathway as per the requirements of the latest FSC Controlled Wood standard.

If Maryvale mill receives the complaint directly from a stakeholder, they will notify the CoC Management Representative at Central Office and undertake the required process as determined by CO. The following steps will be taken once a stakeholder complaint is received:

- a. Acknowledge the receipt of complaints to the complainant.
- b. Inform stakeholders of the complaint procedure, and providing an initial response to complainants within a time period of two (2) weeks;

If a complaint is related to the FSC NRA, Opal’s CoC Management Representative will forward the complaints to FSC Australia and steps c) - j) will not apply.

- c. Conduct a preliminary assessment to determine whether evidence provided in a complaint is or is not substantial, by assessing the evidence provided against the risk of using material from unacceptable sources;
- d. Initiate a dialogue with complainants that aims to solve complaints assessed as substantial before further actions are taken;
- e. Forward substantial complaints to the certification body and relevant FSC National Office for the supply area within two (2) weeks of receipt of the complaint. Information on the steps to be taken by the organization in order to resolve the complaint, as well as how a precautionary approach will be used, shall be included with the complaint;

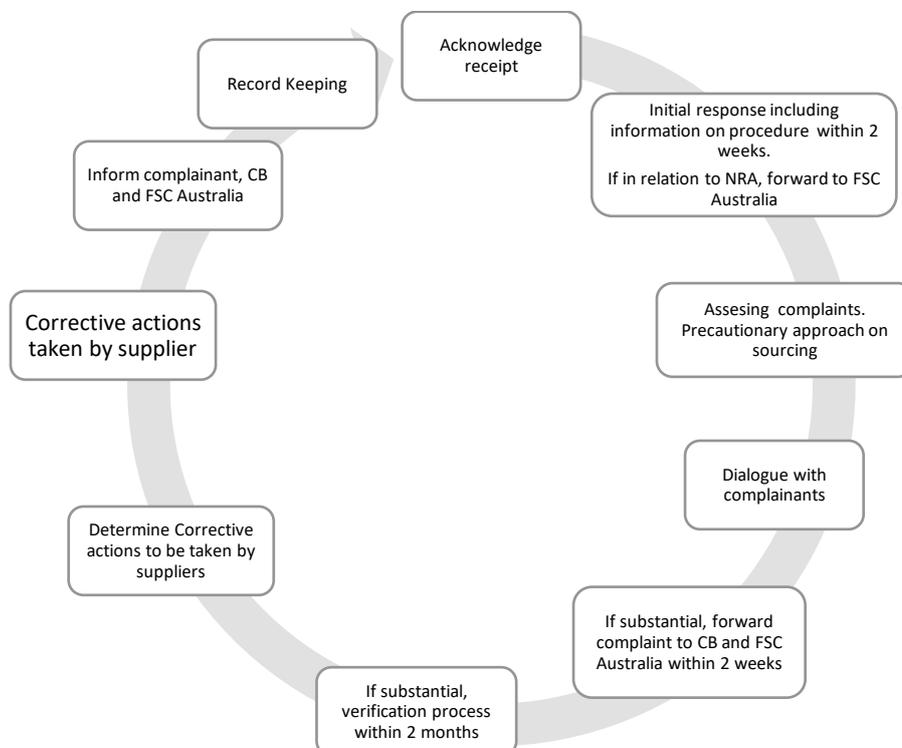
Opal.	Title: Complaints and NCR System
System: CoC - All Document Type: Manual	Doc ID: 72; Version: 10; Status: Approved Approval By: Sustainability Coordinator

- f. Employ a precautionary approach towards the continued sourcing of the relevant material while a complaint is pending;

NOTE: This includes a description of how the precautionary approach is employed by the organization when a complaint is active.

NOTE: A complaint is pending if it has been considered to be substantial (according to Clause 7.2 d), and no effective corrective action (according to Clauses 7.2 h) - k) has been taken yet.

- g. Implement a process (e.g. field verification and/or desk verification) to verify a complaint assessed as substantial by the organization, within two (2) months of its receipt;
- h. Determine the corrective action to be taken by suppliers and the means to enforce its implementation by a supplier if a complaint has been assessed and verified as substantial. If a corrective action cannot be determined and/or enforced, the relevant material and/or suppliers shall be excluded by the organization;
- i. Verify whether corrective action has been taken by suppliers and whether it is effective;
- j. Exclude the relevant material and suppliers from the organization’s supply chain if no corrective action is taken;
- k. Inform the complainant, the certification body, and the relevant FSC National Office of the results of the complaint and any actions taken towards its resolution, and for maintaining copies of relevant correspondence.



Opal.	Title: Complaints and NCR System
System: CoC - All Document Type: Manual	Doc ID: 72; Version: 10; Status: Approved Approval By: Sustainability Coordinator

4. Records

All records of observations received are kept in the Central Office **Complaints & NCRs** register in SharePoint.

5. Complaints & NCR Handling Responsibilities

Table 1 – Subject Matter Experts

Complaint Type	Maryvale	Opal Australian Paper Web	Head Office	Preston
Fibre Sourcing <ul style="list-style-type: none"> ➤ Questions regarding our FSC supplies ➤ Complaints regarding Suppliers Claims ➤ Complaints about supplier's misuse of logo ➤ OAP Risk Assessment process 	Business Systems Manager/Wood Manager, MV	Business Systems Manager/Wood Manager, MV	Business Systems Manager/Wood Manager, MV	Purchasing Manager Preston/Strategic Procurement Manager
Fibre Sourcing <ul style="list-style-type: none"> ➤ Complaints about FSC controlled wood material ➤ Maryvale Mill's Controlled Wood Due Diligence System 	Business Systems Manager/Wood Manager, MV	N/A	Business Systems Manager/Wood Manager, MV	N/A
Paper Sourcing <ul style="list-style-type: none"> ➤ Questions regarding FSC credentials ➤ Complaint regarding suppliers FSC Claims ➤ Complaints about supplier's misuse of Logo ➤ Complaint about Risk Assessment Process 	Business Systems Manager/Strategic Procurement Manager	Purchasing Manager Preston/Strategic Procurement Manager	Purchasing Manager Preston/Strategic Procurement Manager	Purchasing Manager Preston/Strategic Procurement Manager
Logo Use - on Product <ul style="list-style-type: none"> ➤ Complaints about the misuse of any logos used on products 	Sustainability Manager	Sustainability Manager	Sustainability Manager	Sustainability Manager
Logo Use – off Product <ul style="list-style-type: none"> ➤ Complaints about the misuse of any logos used in marketing material, websites, invoices. 	Sustainability Manager/National Marketing Manager	Sustainability Manager/National Marketing Manager	Sustainability Manager/National Marketing Manager	Sustainability Manager/National Marketing Manager

Opal.	Title: Complaints and NCR System
System: CoC - All Document Type: Manual	Doc ID: 72; Version: 10; Status: Approved Approval By: Sustainability Coordinator