



# Complaint Management Process

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## **1. Introduction**

The Fair Toys Organisation e.V. (FTO) relies on several elements with regard to human rights and environmental risks and violations in the supply chains of its member companies. Firstly, effective local complaint channels, because ideally complaints should be resolved at local level. Secondly, as local mechanisms are not always effective and / or feasible, members are also recommended to use back-up grievance channels to complement local structures. This can be either a company-owned or an industry-wide channel. Further information on the FTO's requirements and recommendations can be found in the Fair Performance Check Manual on the FTO website ([www.fair-toys.org](http://www.fair-toys.org)). As many FTO members do not yet have their own company channel and / or effective complaints channels do not exist in all toy producing countries, the FTO has developed another element, the complaints office of the Fair Toys Organization in Nuremberg.

## **2. Basic Principles of the FTO Complaint Management Process**

### **a. Confidentiality**

During the entire complaint process, i.e. from receipt of the complaint, the FTO protects the personal information and data of the person(s) who submitted the complaint, including the relevant data protection regulations. The personal information and data will only be passed on to third parties if this is necessary for further processing. For this purpose, it must be ensured that no disadvantage can arise for the person/persons who submitted the complaint. Anonymous reports and complaints are also generally possible via the FTO complaints office. However, it is essential that sufficient information is available to enable a thorough review. The FTO also guarantees that the person / persons making the report will not experience any negative consequences as a result of using the complaints office.

### **b. Central Terminology**

A complaint within the meaning of the FTO Complaint Management Process is an indication of either a potential or actual violation of the FTO Code of Conduct - to which all FTO members are committed - or of other violations of the FTO members' human rights or environmental due diligence obligations. It is important for the complaint to be related to the supply chains of the FTO members. The whistleblower (or several persons) is referred to as the complainant in the FTO complaints management process. The FTO Complaints Office in turn consists of an employee from the head office who is specifically responsible for complaints management.

## **3. Complaints Office of the Fair Toys Organisation e.V.**

Complaints to the Fair Toys Organisation can be reported to the FTO office via various channels. The following channels have been set up for this purpose:

- Complaint by e-mail to [complaints@fair-toys.org](mailto:complaints@fair-toys.org)
- Complaint by post to: Fair Toys Organisation, Head Office, Königstr. 64, 90402 Nuremberg, Germany

These channels can also be found on the FTO website under the 'Complaints' tab. Complaints can be submitted to the FTO in any language.

## **4. Examination of the Complaint**

### **a. Confirmation of Receipt**

The receipt of the complaint will be confirmed to the complainant within 7 days, provided that the complaints office has received sufficient contact details.

### **b. Examination of Credibility**

The Complaints Office first informs the Executive Board of the FTO that a potential complaint has been submitted and then examines the extent to which the complaint is credible and valid. It is particularly relevant whether the complaint is related to the FTO or a member of the FTO. To

this end, relevant stakeholders are interviewed (e.g. member companies) and the contextual situation (e.g. origin and time of the complaint, number of people affected) is analysed. If the complaint is not deemed credible, the complainant will be informed promptly. In this case, the FTO Executive Board will also be informed. If the complaint is classified as (largely) credible and valid, the complaints office will continue with the examination of the admissibility of the complaint.

### **c. Examination of Admissibility**

A complaint is considered admissible if the incident described therein is related to the FTO Code of Conduct or involves a violation of the FTO Code of Conduct AND if the complaint concerns an active member of the FTO or an active supplier (see FTO supply chain definition) of the FTO member OR a former member or a former active supplier of the member (no longer than 3 months or 90 days after the company left the FTO).

If the complaint is not admissible, the complainant will be informed in a timely manner. If the complaint is admissible, the complainant will also be informed promptly and the detailed factual examination of the complaint will begin. At the same time, the FTO Board will also be informed about the admissibility of the review and the next steps.

### **d. Detailed, factual Examination**

During the detailed, factual examination of the complaint, the following criteria, among others, are examined and analysed in more detail:

- Link to the FTO or to members of the FTO and their suppliers (in the case of manufacturer members)
- Severity of the potential grievance/violation and number of affected parties
- Contribution of the FTO members (and their Tier 1 suppliers) to the specific case and opportunities for both the members and the FTO to exert influence with a view to remediation and prevention
- Evidence of the incident and analysis of the extent to which this grievance is an isolated case or of a systematic nature and / or whether complaints have already been submitted several times in this specific case

The general rule here is: The more detailed the information in the complaint is, the faster and more effective the factual examination will be and the more likely it is that the complaint will be resolved. The following information is therefore helpful:

- Precise explanation of the specific case, including evidence and supporting documents
- Place and time of the incident
- Name/position of the person(s) concerned (anonymous is also possible at any time) and name/position of the accused person(s)
- Reference to the FTO member or the FTO and, if applicable, which criterion of the FTO Code of Conduct was violated

In principle, the facts of the case are investigated between the FTO employee (FTO Complaints Office) and the complainant. The FTO employee keeps the relevant stakeholders (including affected members and the FTO Executive Board) informed during the process. If there is a specific accused person(s) in the case, they can also be asked to comment and/or be involved in the case processing if this is desired by the relevant stakeholders.

In individual cases, external (local) service providers and staff may also be utilised for the investigation and examination of the facts, depending on the severity or country of the complaint / specific case. The costs of the investigation are borne by the FTO on the one hand and by the member concerned on the other.

The FTO Complaints Office endeavours to examine the specific complaint as quickly as possible and informs the complainant immediately of the outcome of the factual examination. If the complaint is rejected, this will not be done without a comprehensible explanation. All other relevant stakeholders will also be informed of the outcome of the factual examination.

#### **5. Action Plan & Remediation**

In the event that the factual examination was successful, the FTO will draw up an action plan together with the complainant and the relevant member. The aim of the action plan should be a) to remedy the grievance, if possible, and b) to make amends in the event of any damage suffered. To this end, clear objectives and deadlines are set out in the action plan and these are regularly monitored. If the measures have not led to success after the deadline has expired, the FTO can take further measures, not least to reduce the risk of recurrence.

Overall, a complaint is only considered resolved if all parties agree that the specific case has been resolved or remedied. The FTO Executive Board is informed of both the final action plan and the successful redress.

#### **6. Monitoring and Reporting**

The effectiveness of the complaints procedure is evaluated at regular intervals, at least once a year, together with the FTO office and the FTO Executive Board. Not least, the extent to which the channel is utilised and whether the complaints received have been resolved successfully and within the deadlines is also reviewed. External feedback is also obtained as part of this process, both within the FTO and from any external service providers involved.

The FTO Executive Board is regularly informed about the status of complaints at its meetings. All other members are informed about the number and topics of complaints once a year at the general meeting.