



COMPLAINTS, GRIEVANCES AND APPEALS PROCEDURE



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Complaints, grievances and appeals

Preamble

Carbon Standards International AG (CSI) has a well-established, transparent, and fair process for handling complaints, grievances, and appeals, while ensuring confidentiality where appropriate. Professional processing of complaints is key to maintaining customer satisfaction. Containment action mitigates further damage and establishes communication with the complainant while suitable corrective actions are derived from the root cause analysis. The individual stages in the process are an important component of continual improvement for CSI.

Definition

Grievances/Complaints:

The term "grievance" hereby referred to as "complaint" expresses dissatisfaction. Complaints arise by clients or third parties regarding the general process of services or standard-issues.

Appeals:

Appeals are a formal request from a client to review or reconsider a decision made by an endorsed Validation or Verification Body (VVB)/Certification Body (CB).

Purpose

This procedure sets out how individuals or organisations can submit complaints or appeals relating to the application, interpretation or modification of standards, decisions or activities. The procedure ensures transparency, accountability, and continuous improvement.

Scope

This document sets out the procedure to be followed for the effective and timely resolution of complaints or appeals relating to:

- Non-compliance with CSI principles, procedures or standards
- The rules and requirements of CSI
- Misconduct or unethical behaviour by CSI personnel
- External parties (service users, organisations, suppliers, etc.)
- The performance of CBs/VVBs endorsed by CSI or their authority (if applicable)

Guiding Principles

- **Independency:** The case must be handled by impartial individuals. Anyone involved in the original complaint may not participate in processing the complaint.
- **Impartiality:** All complaints and appeals shall be handled objectively, without bias or conflict of interest. Any individuals involved in the investigation and/or decision-making process surrounding a grievance/complaint declares any conflict of interest they may have in the proceedings and disqualify themselves accordingly.
- **Confidentiality:** As far as possible the information has to be confidential. Reports are logged securely, access is restricted to authorized staff.
- **Protection:** Persons concerned must have their rights protected.
- **Traceability:** Every case is documented and tracked from receipt to closure. Results are strictly confidential.
- **Timeliness:** All submissions will be acknowledged and resolved within a reasonable timeframe.
- **Non-retaliation:** Individuals will not face retaliation or discrimination for submitting a complaint or appeal in good faith.
- **No fees:** No applicable fees will be charged for complaints or appeals, unless the investigation reveals a non-conformity that would result in further expenses.

Decisions must take into account relevant considerations and mitigating circumstances and ignore irrelevant considerations.

Any retributions or reprisals against complainants or appellants are prohibited and will not be tolerated.

The following are the guiding criteria for dealing with complaints and grievances: Building trust with the stakeholder groups for whom they are intended and ensuring accountability for the fair conduct of grievance processes. The process is accessible to all stakeholders on our website, with adequate assistance provided for those who may face particular barriers to access.

1. Types of complaints

- a) Complaints on the standards or methodologies or projects → Complaints relating to standards / methodologies or projects will be handled through the review and change request process. See development and update of standards and methodologies for more information.
CSI invites and welcomes comments or suggestions on any CSI standard, or methodology being developed or implemented from any individual, stakeholder or organization following the procedure outlined in the standard development procedures. CSI will decide how comments should be responded to. These requests should be submitted to standards@carbon-standards.com
- b) Complaints on the services provided by CSI

→ They will be handled by the Chief Operating Officer (COO) who may delegate the case to an adequate team member of CSI.

Complaints should be submitted to service@carbon-standards.com.

CSI is a very service-oriented organization and constantly tries to improve its services. CSI is happy to receive comments and proposals for improving its services.

c) Complaints on the Validation and Verification Body (VVB)/Certification Body (CB) of CSI

General complaints about the behavior or services provided by a VVB/CB should first of all be addressed to the respective VVB/CB. However, if the complainant feels that the concern was not addressed correctly he/she can submit a complaint to CSI. Complaints should be submitted to service@carbon-standards.com

→ They will be handled by the Chief Operating Officer (COO) who may delegate the case to an adequate team member of CSI.

2. Procedure for handling complaints

2.1. Submit the complaint

Complainants may include clients, authorities, label schemes, or other third parties, and submissions can also be made anonymously. The processing of complaints is free of charge. General complaints should be directed to service@carbon-standards.com, while any complaints specifically related to standards should be submitted to standard@carbon-standards.com.

Complaints can be submitted in the following ways:

- in writing a letter by post or by email
- verbally by telephone: The complainant receives a request to submit a written complaint

2.2. Acknowledgement

CSI will confirm within 2 business days about the receiving of the complaint (except anonymously complaint).

2.3. Initial desk review

CSI conducts a desk review to determine the extent of the alleged breach of the requirements.

- If the complaint is found ineligible, CSI will provide an explanation and a recommendation on how to address the complaint correctly, if possible.
- A complaint against a decision by the VVB/CB is considered as an appeal and will be dealt with following the appeals procedure (see chapter 3.)

2.4. Assessment and Investigation

Once the initial review has determined the relevance and scope, CSI will conduct an assessment to decide whether an investigation is required.

CSI will then create an investigation plan. This will include, but not be limited to, the scope of the investigation, a list of other potential stakeholders to be queried and the resolution timeline. Additional information may be requested. All relevant parties may be consulted (using template in software Intact).

During the initial review and investigation of the complaint, CSI may request additional information from the complainant.

If the complaint cannot be resolved through informal discussion or mediation, CSI will resolve the complaint, within the indicative timelines.

CSI will conduct the investigation within 30 days of the initial review. CSI reserves the right to extend these deadlines as required. The complainant will be informed of the revised timeline and expected dates.

2.5. Decision and response

A written decision will be provided within 30-90 calendar days from acknowledgement.

Extended periods of slow or non-responsiveness will affect the overall timelines for the investigation. CSI shall communicate the decision regarding the resolution, including the reasons for the decisions, if applicable, any follow up actions and/or corrective measures to complainant and parties involved in the complaint (using template in software Intact).

Depending on the case, resolving the problem may take longer. However, CSI will inform the plaintiff about the next steps and the potential closure of the complaint.

2.6. Appeal (if applicable) against the decision of complaint

If the party is not satisfied, an appeal can be lodged within 14 days after the decision. It will be reviewed by the Impartiality Committee.

3. Procedure for handling appeals against decisions of VVBs/CBs

Appeals on certification/verification/validation decisions of a VVB/CB will only be accepted if the appeals process of the VVB/CB has been followed and the appeal with the VVB/CB was not successful.

An appeal against a certification/validation/verification decision can only be submitted by the client concerning decisions made during these services or enforcement actions.

1. Appeals should be submitted to service@carbon-standards.com.

2. CSI might contact the plaintiff and the VVB/CB to see if the issue can be solved through mediation.
3. If this proves unsuccessful or is deemed unhelpful, the product manager (PM) will conduct an initial review of the case. The PM will establish whether there is sufficient evidence to investigate the case. If not, additional documentation may need to be submitted. If the claimant does not respond for more than 30 days during the initial review or investigation, CSI reserves the right to close the appeal.
4. The Product Manager, and the Chief Operating Officer (COO) if necessary, will meet to discuss the case, after which the conclusion will be communicated to the plaintiff and the VVB/CB. The plaintiff will be informed of the timelines and any possible delays beforehand.

4. Procedure for handling appeals against projects

The CSI procedure does not cover the direct acceptance of project-related appeals. In these cases, stakeholders should submit their concerns via VVB's/CB's appeals procedure. CSI will forward any appeals regarding non-conform project activities to the VVB/CB involved and follows the case if necessary through during the VVB's/CB's audit.

Examples:

- non-compliance with standard requirements applicable to a project, including stakeholder consultations, the complaints mechanism, sustainable development impact and safeguards assessment, including monitoring activities;
- validation or verification decisions, including performance reviews, GHG emission reduction monitoring, calculation approaches and any other verification-related decisions;
- audit results of the VVBs/CBs.

5. Hierarchical principle

- Renewed appeal / complaint -> forward to Chief Operating Officer (CEO)
- The CEO may decide to involve the Board of Directors

6. Record Keeping

All complaints and appeals, including decisions and actions taken, shall be:

- Logged in a secure, traceable system
- Retained for a minimum of 10 years.
- Reviewed regularly to identify trends or areas for improvement

7. Continuous Improvement

Recurring complaints or systemic issues shall be analysed to identify the root causes. Preventive or corrective actions may then be implemented and reflected in updates to policies, standards or practices.

The professional processing of complaints is key to maintaining customer satisfaction. Taking containment action mitigates further damage and establishes communication with the complainant while suitable corrective actions are derived from the root cause analysis. Each stage of the process is an important component of continual improvement for CSI.