APPEALS AND COMPLAINTS POLICY AND PROCEDURES

Revision Details

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1 POLICY

1.1 Appeals

CoZero shall have in place a documented process of receiving, evaluating and making decisions on appeals arising from the verification process, and this process shall be made available to the clients and the analysts. The appeal will be acknowledged via email. No client shall be prejudiced by the fact that they have appealed. The following are grounds for appeals that arise during verification process:

- Errors resulting from a misinterpretation of information, incorrect insufficient or inappropriate information/evidence received which, if corrected, will result in a change of emission level or client satisfaction.
- Request by the client to submit more information.
- Difference of opinion regarding the interpretation of the ISO Standards between the Validation or Verification Team and the measured entity.

1.2 Complaints

CoZero shall ensure that all complaints are appropriately addressed and resolved timely, from the day the complaint has been lodged. This policy is aimed at protecting all parties involved against errors, omissions or unreasonable behaviour, and is also aimed at giving confidence to the verified entities and other users of the verification certificates (third parties) that complaints have been appropriately addressed and resolved in a timely manner. A description of the process and the procedure for handling complaints shall be made available to all Validation or Verification Analysts, clients and third parties (refer to the Validation or Verification Service Agreement, 00CZ00-MA-0001, and the CoZero website).

The following are the complaints that may arise during the verification process:

- Miscommunication (not explaining our requests clearly to the clients).
- Lack of feedback to the client.
- Significant difference of opinion resulting in unacceptable behaviour.
- General misbehaviour.

- Unprofessionalism.
- Not meeting agreed deadlines.
- Negligence.

2 PROCEDURES

2.1 Appeals

2.1.1 Lodging an Appeal

When CoZero issues a provisional report to the client, the client is given 5 days in which they can appeal the validation or verification decision. This appeal is in the form of disputing/disagreeing with CoZero's technical interpretation or evaluation of evidence / supporting documentation. The Complaint will be acknowledged bu=y Cozero via email to the client. The submission of an additional "transaction" for recognition is regarded as a scope adjustment. The introductory kick-off e-mail specifies that the Sales Director, who is independent from the validation or verification team, must be contacted in order to lodge an appeal or complaint via email, fax or telephone. The client will be notified of receipt of the appeal.

2.1.2 Investigation of Appeal

Once the appeal has been received and independently validated and evaluated by the Sales Director in consultation with an independent Technical Signatory, the relevant Validation or Verification Manager / Validation or Verification Analyst shall be contacted and the appeal will be discussed and an appropriate course of action will be agreed upon.

CoZero will ensure that investigation and decision on appeals do not result in any discriminatory actions against the Client.

2.1.3 Minor Appeals

Minor appeals (e.g. a request by the client to submit more information, correction of factual information or an interpretation thereof, etc.) shall be handled by the analyst. When all the issues raised on the appeal have been addressed, the Validation or Verification Manager will review the file again, and an updated provisional report will be sent. If 5 days elapse, and there is no appeal during those 5 days, then the final report and certificate may be issued, unless agreed otherwise with the client. Appeals should be resolved within 10 working days from receipt thereof.

2.1.4 Complex Appeals

Complex appeals (like serious disagreement regarding the interpretation of the evidence given), shall be discussed by the Validation / Verification Committee. The Validation or Verification

Committee members that were not involved in the issue before, will bring further impartiality and fresh input into the matter and will display and exercise objectivity and impartiality in reaching an outcome. The Validation or Verification Manager, or if need be a Validation or Verification Manager not initially involved, shall communicate the outcome to the client and resolve the matter and monitor progress until the matter is finalised. The analyst will make the necessary changes under the guidance of the Validation or Verification Manager. An updated provisional report will then be issued. In the case where an impasse is reached, CoZero shall issue the report as per the view of the Validation or Verification Committee. The Validation or Verification Committee should ensure that the client is not subjected to any prejudice by the verification team, following an appeal.

2.1.5 Tracking of Appeals

Appeals are discussed between the analyst and the manager, and more complex appeals are discussed by the Validation or Verification Committee, and thus CoZero can identify recurring issues or personnel inadequacies in order to take corrective action. Root causes and recommendations are reflected in the Corrective Action Register (00CZ00-MF-0003).

2.2 Complaints

2.2.1 Lodging a Complaint

A complaint may be received at any point during the verification process. The introductory kick-off e-mail specifies that the Sales Director, who is independent from the verification team, must be contacted in order to lodge an appeal or complaint via email, fax or telephone. The complaint will be kept strictly confidential. The affected party will only be informed of the complaint if action is required from him/her, such as providing of evidence or attending a disciplinary hearing.

2.2.2 Investigation of Complaint

The Sales Director or Independent appointed person shall present the complaint to a member of the Validation or Verification Committee who is independent of the relevant verification team and the said Verification Manager will investigate the validity of the complaint and decide on a course of action. Minor complaints (e.g. not meeting deadlines, lack of feedback to the client, etc.) shall be handled by the Validation or Verification Manager with the Validation or Verification Analyst involved.

At the onset of the investigation, it should be established by the V/V Committee that the complaint does relate to activities related to the validation or verification. If not, the complaint should be deferred to the appropriate body.

The root-cause of the complaint will be analysed (e.g. work overload, incompetence, bad attitude or negligence), and a course of action will be suggested. This could include re-allocation of the project, prioritising thereof, further training of the analyst or a disciplinary action in the case of

misconduct. More complex complaints like unprofessional conduct or gross misbehaviour shall be discussed by the Validation or Verification Committee and a decision regarding a course of action shall be taken. If need be, the Committee will appoint a Validation or Verification Manager who was not involved in the issue before, who will bring impartiality and fresh input into the process. The Validation or Verification Committee shall, taking into consideration the complexity of the case, stipulate the timeframe within which the complaint should be concluded after the complaint was lodged.

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2.2.4 Resolving of Complaints

The resolutions of complaints is made by/ reviewed / approved by individuals not involved in the complaint. The Validation or Verification Manager shall communicate with the client, outlining the course of action to be taken, including the time frames, frequency of feedback, persons engaged, provision of reports, etc. Action to resolve the issue shall be taken immediately (i.e. gathering and verifying information). Once the issue has been resolved the Validation or Verification Manager shall give the complainant notice of the outcome and report back to the Validation or Verification Committee.