



COMPLAINTS PROCEDURE

Climate Neutral Certification Program

(vs 1.0 - Nov 2020)

Climate Neutral Group (CNG) wants to accelerate the transition to a net-zero carbon economy. We help our clients to reduce their carbon emissions and their environmental impact, by offering 4 services: (1) we calculate your carbon footprint, (2) we advise you how to reduce your emissions, (3) we offer credible offsets for emissions that cannot be reduced (yet), and finally, (4) we offer a practical and impactful certification program that allows certified Clients to proudly use the Climate Neutral Trademark. For more information, see: <http://www.climateutralgroup.com/en>.



This **Complaint Procedure** is a key program document pertaining to the **Climate Neutral Certification Program** and is effective from the 1st of January 2021 onwards. This document is only available in English, which should be considered as the official and binding version. For more (general) information related to the Climate Neutral Certification Program, please consult our website: www.climateutralcertification.com or mail to: certification@climateutralgroup.com.

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APPROVED BY:	CNG - SALES & MARKETING DIRECTOR
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EXPIRATION DATE:	TBC - CNG SHALL REVIEW THIS DOCUMENT AT LEAST ONCE EVERY FOUR YEARS, BUT RESERVES THE RIGHT TO AMEND THIS DOCUMENT EARLIER.

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1 Introduction

This document stipulates the procedure for filing complaints (and grievances¹) related to the Climate Neutral Certification Program. The procedure is open to anyone who has a complaint against the following parties: (1) a certified client of the Climate Neutral Group (CNG) or a client in the process of certification, (2) a Footprint Calculator (FC), (3) an eligible Certification Body (CB), or (4) against CNG itself. The aim of this Complaints Procedure is to provide a transparent and impartial process to complaint and appeal handling, geared towards credible, efficient and solution-oriented arbitration (and mediation) between complainant/ appellant and defendant.

The timelines of this procedure are indicative and no legal enforcements may be derived from these timelines. This procedure is subject to Dutch law. By submitting a complaint or appeal, the submitter accepts the provisions of this procedure.

2 Scope of complaints

The complaint must originate from the certification program's rules, policies or procedures stipulated in the Program Documents², or the implementation thereof. This entails for instance complaints about:

- A. The development process of the (revised) Climate Neutral Certification Program;
- B. Content of these Program Documents, or misunderstanding in the interpretation of these documents;
- C. The outcome of the footprint calculation calculated by the FC, or other disagreements related to the content of the footprint, such as the scope and boundaries, data sources, etc;
- D. The certification decision issued by the CB, or other disagreements related to the verification and certification process.
- E. Misuse or abuse of the trademark or inappropriate claims by certified clients or other, (non-certified) entities.

The complaint cannot be about:

- Contractual obligations between any of the parties mentioned under section 1 other than CNG, for instance, a conflict between a client and CB or FC resulting from one party not adhering to the contractual agreements.
- Requests for financial compensation from CNG, for instance if any of the parties mentioned under section 1 incurs losses or has to make extraordinary expenses related to the certification program.

¹ Where 'complaint' is mentioned in this procedure, this may be substituted by 'grievance', if relevant.

² I.e. Climate Neutral Standard, Assurance Protocol, Trademark & Claims Policy, or other formal documents applicable to the Climate Neutral Certification Program.

3 Procedural steps - Complaints

1. **Amicable resolution:** CNG encourages the complainant to first seek amicable resolution with involved party/parties, prior to invoking the procedural steps for submitting a formal complaint. If desired, CNG can assist in the process of settlement.
2. **Complaint mechanism of CB or FC:** If the complainant wants to submit a complaint against a CB or FC (see e.g. section 2.1, point 3 and 4) and no amicable resolution can be achieved, the issue shall first be dealt with through the CB's or FC's own complaint mechanism without involvement of CNG. If this does not result in a satisfactory outcome for the complainant, the below procedural steps apply:
3. **Submission of a complaint:** The complainant can submit a complaint at any moment by filling in below details in the Complaint Form (Annex 1 - also available in a downloadable format on our website), and sending it to: communication@climatenutralgroup.com:
 - A. name and contact details of the complainant (unless the grievance is submitted anonymously);
 - B. name or description of the person or entity the complaint is filed against (defendant);
 - C. description of the complaint;
 - D. description of the complainant's request (what does he/ she want or what is a satisfactory outcome for the complainant);
 - E. supporting evidence (optional, but recommended);
 - F. description of the steps already taken to resolve the complaint at an informal or direct level;
4. **Review of the complaint:** Upon receipt of the complaint, CNG will review if the complaint is eligible, which is the case if:
 - A. the complaint is within the defined scope (see section 2);
 - B. the submitter has first sought an informal (re-)solution;
 - C. the submitter has first used the CB/s or FC's complaint mechanism (if applicable), and
 - D. the complaint has been submitted correctly using the Complaint Form;
 - E. the complaint is clear and

Within 10 working days after receipt of the complaint, CNG will inform if the complaint is eligible. If the complaint is found ineligible, CNG will provide an explanation and if possible, a recommendation as to how to submit the complaint correctly.

5. **Appointment of Complaint Reviewer:** If the complaint is found eligible, CNG appoints a Complaint Reviewer responsible for handling the complaint in accordance with this procedure.
 - A. The Complaint Reviewer is expected to have appropriate contextual knowledge and is -as much as possible- impartial and free of any conflict of interest in relation to the complaint and the parties involved.
 - B. If the complexity of the case so requires, or impartiality cannot be safeguarded, CNG may decide to appoint a Committee of three Complaint Reviewers to handle the complaint. The number of reviewers shall be an odd number, in the case voting is needed.

Within 10 working days after informing the submitter that the complaint was found eligible, CNG communicates the name and contact details of the Complaint Reviewer (or within 20 working days in the case a Committee is appointed).

- 6. Inform defendant:** Upon his/her appointment, the Complaint Reviewer contacts the defendant to inform that a complaint has been submitted and shares the following:
- A. Name and contact details of the Complaint Reviewer (or the committee);
 - B. A copy of the Complaint Form submitted to CNG (made anonymous, if requested by the submitter);
 - C. A copy of this Complaints Procedure;
 - D. The invitation to submit a response to the Complaint Reviewer within 10 working days.

The defendant shall respond to the Complaint Reviewer within 10 working days, either with a request for extension, which will be accepted by the Complaint Reviewer if deemed reasonable, or with a written response (i.e. formal statement and/or supporting evidence). The Complaint Reviewer will forward the defendant's response to the complainant. None of the parties can submit additional evidence thereafter, unless requested by the Complaint Reviewer.

- 7. Friendly resolution between complainant and defendant:** Upon 30 days after his/her appointment, the Complaint Reviewer will contact the parties by e-mail or phone to attempt to informally resolve the issue, unless such an attempt is reasonably to be considered an unnecessary exercise. If the complaint cannot be resolved in an informal way, the parties are invited to share their final 'point of view' with additional supporting evidence to be submitted within 10 working days after the attempt for friendly resolution.

- 8. Complaint decision:** The Complaint Reviewer reviews the final 'points of view' and all supporting evidence, takes a final decision, and notifies the complainant and defendant in writing within 60 days after the attempt for friendly resolution took place, with:
- A. The final complaint decision;
 - B. The rationale or justification for the decision;
 - C. The follow up measures to be taken, e.g. an agreed Corrective Action Plan (if applicable).

The Complaint Reviewer reserves the right to extend the period for taking a decision, or may consult internal or external advice (i.e. still appoint a Committee) if the complexity of the case, or other specific reasons so require.

- 9. Follow up and closure of complaint:** In the event a Corrective Action Plan (with milestones or deadlines) was agreed as part of the resolution of the complaint, the Complaint Reviewer shall verify if the corrective actions have been implemented accordingly. Once completed, or if not applicable, the complaint is closed and all documentation is filed according to 5.A.

4 Procedural steps - Appeals

- 10. Submission of an appeal:** Similar to step 3 - Either party may appeal the decision of the Complaint Reviewer or the Committee, by submitting an appeal within 30 days after the notification of the complaint decision (step 8). The appellant can submit the appeal at any moment by filling in below details in the Appeal Form (Annex 2 - also available in a downloadable format on our website), and sending it to: communication@climateneutralgroup.com:
- A. name and contact details of the appellant;
 - B. reason for and grounds of the appeal;
 - C. supporting evidence (optional but recommended).
- 11. Review of the appeal:** Similar to step 4 - CNG informs the appellant within 10 working days after receipt of the appeal if the appeal is found eligible. The appeal is eligible if it is within the defined scope, and if the appeal has been submitted correctly. If the appeal is found ineligible, CNG provides a recommendation as to how to correctly address the appeal.
- 12. Appointment of Appeal Panel:** Similar to step 5 – The appeal is brought to the attention of the CNG Directors, who appoint an Appeal Panel consisting of at least 3 individuals, either CNG staff, members of CNG's Advisory Committee, or external experts. The Complaint Reviewer may not take seat in the panel. CNG communicates the names and contact details of the Appeal Panel within 20 working days to the appellant.
- 13. Inform defendant:** Similar to step 6 - The Appeal Panel contacts the defendant to inform that an appeal has been submitted and shares the names and contact details of the Appeal Panel, as well as a copy of the appeal, and allows the defendant 10 days to send in a written response and supporting evidence (which may be extended, if requested by the defendant).
- 14. Friendly resolution between appellant and defendant:** Similar to step 7 - The Appeal Panel first seeks friendly resolution amongst all parties involved. If the appeal cannot be resolved in an informal way, the parties are invited to share their final 'point of view' with additional supporting evidence to be submitted within 10 working days after the attempt for friendly resolution.
- 15. Appeal decision:** Similar to step 8 - If the appeal cannot be resolved in an informal way, the Appeal Panel informs, within 60 days after the attempt for friendly resolution took place, the parties by email of the final appeal decision taken, including the reasons for the decision and, if applicable, any follow up measures to be taken (such as a Corrective Action Plan). The appeal panel decides on the appeal by consensus. If no consensus is possible, the appeal panel will decide by majority vote. CNG reserves the right to extend the period for taking a decision, if the complexity of the case, or other specific reasons so require. The decision of the Appeal Panel shall be binding on all parties and no further complaint or appeal on the same matter will be accepted.
- 16. Follow up and closure of the appeal:** Similar to step 9 - In the event a Corrective Action Plan (with milestones or deadlines) was agreed as part of the resolution of the appeal, the Appeal Panel shall verify if the corrective actions have been implemented accordingly. Once completed, or if not applicable, the appeal is closed and all documentation is filed according to 5.A.

5 Other principles

- A. File control and documentation:** CNG keeps record of all written communication and takes minutes of all conversations related to the complaint or appeal. All documentation resulting from the complaint or appeal are filed by CNG according to its filing system and kept in file by CNG for a minimum of 3 years.
- B. Confidentiality:** CNG and external experts are obliged to keep all information related to the complaint or appeal confidential. Parties involved are requested to refrain from any public communication about the complaint or appeal until a final decision has been communicated by CNG to all involved parties.
- C. (Potential) conflict of interest:** To prevent potential or actual conflicts of interest, the Complaint Reviewer nor any of the members or the Complaint Committee or Appeal Panel shall have any direct relations with or other interests in either involved party. These individuals are expected to be impartial and free of any conflict of interest in relation to the complaint/ appeal and the parties involved. In case of doubt, a 'No-Conflict of Interest Declaration' may be requested.
- D. Withdrawal:** A complaint or appeal can be withdrawn at any moment in time by the complainant/ appellant by informing the Complaint Reviewer/ Committee or the Appeal Panel in writing.
- E. Protection from retaliation:** CNG prohibits any of the involved parties from retaliating against another party and will take severe measures if cases of retaliations are found, such as suspending Client's certificates or withdrawal of CB's approval to conduct audits. Suspension of retaliation may be brought to the attention of CNG anonymously, by contacting: communication@climatenutralgroup.com.
- F. Costs:** each party that bear the costs associated with the complaint or appeal. CNG reserves the right to charge administrative fees for handling complaints and appeals. Direct costs incurred by CNG shall be allocated to the complainant/ appellant.
- G. Continuous improvement:** After the complaint or appeal is resolved, learnings are documented and shared by CNG with relevant parties internally (and externally only after consent of the involved parties), to facilitate continuous improvement of the Climate Neutral Certification Program, and to prevent re-occurrence of the complaint or appeal.

Annex 1: Complaint Form

A Name and contact details of the complainant (unless the grievance is submitted anonymously):

B Name or description of the person or entity the complaint is filed against (defendant):

C Description of the complaint:

D Description of the complainant's request (what does complainant want or what is a satisfactory outcome for the complainant):

E Supporting evidence (optional but recommended). Please attach in separate documents and list all attachments hereunder:

F Description of the steps already taken to resolve the complaint at an informal or direct level:

G Other comments:

Download a fillable version of Annex 1 – [Complaint Form](#)

Annex 2: Appeal Form

A Name and contact details of the appellant:

B Reason for and grounds of the appeal:

C Supporting evidence (optional but recommended). Please attach in separate documents and list all attachments hereunder:

Download a fillable version of Annex 2 – [Appeal Form](#)

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