



APPROVED
CEO, Prism Carbon Solutions FZ-LLC

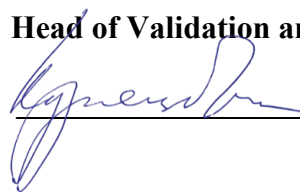
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"1" August 2024.

Complaints and Appeals
Greenhouse Gas Validation and Verification Body

VVBP_3_V1_2024

DEVELOPED
Head of Validation and Verification body



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"1" August 2024 г.

Table of contents

Introduction	3
1. General provisions.....	3
2. Normative references.....	3
3. Abbreviations, terms, definitions.....	4
4. Scope of application	4
5. Complaints management procedures.....	4
5.1 General provisions	4
5.2 Rules for filing a complaint	4
5.3 Procedure and timeframes for organising work to review complaints.....	5
6. Appeals management procedures	6
6.1 General provisions.....	6
6.2 Rules for Appeals	6
6.3 Procedures and timeframes for organising work on appeals	6
6.4 Rules for the conduct of the Commission's meeting and decision making	7
7. List of records established by this ND.....	7
Annex A. Log of complaints and appeals received	8

Introduction

This normative document defines the rules for receiving complaints and appeals related to the validation and verification body on the basis of PRISM Carbon Solutions FZ-LLC (hereinafter referred to as VVB) and the procedure for their consideration, decision-making and control over the execution of decisions made by the Appeals Commission (hereinafter referred to as Commission).

1. General provisions

1.1 Complaints and appeals are considered in cases of motivated disagreement of the client, applicant, or any other party with the course, results of validation and verification activities of the validation and verification body on the basis of PRISM Carbon Solutions FZ-LLC.

1.2 The consideration of complaints is carried out at the level of VVB. Consideration of appeals is carried out at the level of PRISM Carbon Solutions FZ-LLC, namely CEO and Chairman of PRISM Carbon Solutions FZ-LLC. The independence of decision-making on the results of the appeals review is ensured by the Commission assembled by the CEO of PRISM Carbon Solutions FZ-LLC when an appeal is received.

2. Normative references

Internal regulatory documents (in current editions):

OP_1_V1_2024_Documents and Records Management

VVBP_1_V1_2024_Quality Management Manual.

VVBP_2_V1_2024_Reference Use Guide

VVBP_3_V1_2024_Complaints and Appeals.

VVBP_4_V1_2024_Impartiality Guide.

VVBP_5_V1_2024_Corrective Actions.

VVBP_6_V1_2024_Personnel Management.

VVBP_7_V1_2024_Internal Audits.

VVBP_8_V1_2024_Validation and Verification Procedure.

VVBP_9_V1_2024_Advisory Board Regulation.

Impartiality Commitment

Quality Policy

Quality Goals

External regulatory documents (in current editions):

ISO 14064-1 Greenhouse gases. Part 1. Requirements and guidance for quantifying and reporting greenhouse gas emissions and removals at the level of the organisation.

14064-2 Greenhouse gases. Part 2. Requirements and guidance for quantification, monitoring and reporting requirements for projects to reduce greenhouse gas emissions or increase their uptake at the project level.

14064-3 Greenhouse gases. Part 3. Requirements and guidance for validation and verification of greenhouse gas statements.

ISO 14065 Greenhouse gases. Requirements for greenhouse gas validation and verification bodies for use in accreditation or other forms of recognition.

ISO 14066 Greenhouse gases. Requirements for the competence of greenhouse gas validation and verification teams.

ISO 17029 Conformity assessment - General principles and requirements for validation and verification bodies.

3. Abbreviations, terms, definitions

The following **abbreviations** are used in this document:

VVB - Validation and Verification Body PRISM Carbon Solutions

ND - Normative Document

The following **terms and definitions** are used in this document:

Appellant - an individual, organisation or its legal representative who files an appeal.

Appeal - a technically justified (reasoned) written application of the applicant organisation, signed by the head of the organisation or other responsible person, for a review of the decision made by the VVB regarding the applicant.

A **complaint** is an expression of dissatisfaction with the VVB's activities, namely in the validation and verification work process.

Complaint Applicant - an individual, organisation or its legal representative filing a complaint.

Appeals Commission - a body formed by the CEO of PRISM Carbon Solutions LLC to consider disagreements related to the actions of VVB.

4. Scope of application

4.1 This ND establishes the requirements for the VVB's activities with regard to the procedure for registering complaints and appeals received by the VVB, reviewing, deciding on them in relation to conformity assessment activities and monitoring the implementation of decisions.

4.2 The requirements of this document are binding for all participants within their competence.

5. Complaints management procedures

5.1 General provisions

The complainant may fill a complaint with the VVB:

- on VVB's activities in terms of compliance with the conformity confirmation procedure,
- on the professional competence of VVB experts when making decisions in the validation and verification process.

5.2 Rules for filing a complaint

5.2.1 The complaint shall be submitted in writing in an arbitrary form and shall obligatorily contain (or through a website prism.lc):

- the name and contact details of the person filing the complaint,
- description of the subject matter of the complaint,
- the evidence supporting the complaint,
- data on the parties to the conflict,
- proposed solutions (where appropriate),
- information about the need for anonymity about the initiator of the complaint in relation to the client/applicant to whom the complaint relates.

The complaint must be dated and signed by the complainant.

5.2.2 VVB may accept a formalised complaint both on paper and a scanned copy in electronic form. The VVB shall post on the website information about the physical and electronic mailing addresses to which the complaint can be delivered.

5.2.3 Initially, the complainant may contact VVB by any available method (telephone, e-mail, website). The VVB employee who receives such an appeal shall inform the complainant about the rules of filing and reviewing the complaint. The maximum term for filing a complaint is 1 month from the date of the event that caused the complaint.

5.3 Procedure and timeframes for organising work to review complaints

5.3.1 Complaints shall be registered by the Head of VVB or other person specially appointed by the Head of VVB in the complaints registration log in the form adopted by VVB (Appendix A).

5.3.2 The Head of VVB shall initiate the complaint addressing procedure by forming a working group that includes VVB specialists who are competent in the subject matter of the complaint, but who are not related to the subject matter of the complaint and potential conflicts of interest. The Head of VVB shall appoint the head of the working group, whose task shall be to communicate information on the progress of the complaint to the Head of VVB. If the complaint is not directly related to the actions of the Head of VVB, all decisions on the progress of the complaint shall be made by the Head of VVB. In other cases, the CEO shall make the decision. The complaint decision maker shall not participate in the complaint process.

5.3.3 The review of a complaint shall include:

1. Checking the correctness of the complaint filed.
2. Confirmation or denial that the complaint relates to VVB activities.
3. assessing the validity of the complaint.
4. Preparation and dispatch of the initial response on the complaint, containing the decision on acceptance or rejection of the complaint, terms of its consideration, the procedure of actions to resolve the complaint.

The investigation into the subject matter of the complaint includes:

1. Gathering all necessary information to make a decision on the subject matter of the complaint and preparing a draft decision on the complaint.
2. Notifying the complaint complainant of the progress of the complaint and the final decision to close the complaint.

5.3.4 The timeframe for reviewing a complaint and preparing an initial response is 1 month from receipt of the complaint. The timeframe for investigating the subject matter of the complaint is no more than 6 months from receipt of the complaint.

5.3.5 When investigating complaints about VVB's activities with regard to compliance with the compliance confirmation procedure, the working group shall identify internal and/or external causes of the complaint and propose corrective and preventive actions to eliminate the causes.

When investigating complaints about the professional competence of VVB experts and non-compliance with ethical conduct, the working group proposes decisions regarding the status of the expert staff, training programme, composition of expert groups, etc.

5.3.6 Based on the results of the complaint investigation, the working group shall form a conclusion, which shall be agreed and signed by the decision-maker (clause 5.3.2). The conclusion shall reflect data on the undertaken and proposed methods of correction, corrective and preventive actions with indication of timeframes, a request for the complainant's consent to the proposed actions (with indication of the timeframe for response to this request). The conclusion shall be sent to the complainant by the head of the working group.

5.3.7 If the complainant agrees with the proposed measures and if the complainant fails to respond within 10 days of sending the report, after the planned measures have been implemented, the complaint shall be closed. The decision to close the complaint shall be made by persons not involved in the complaint review (Head of VVB in accordance with clause 5.3.2).

5.3.8 The head of the working group investigating the complaint shall control the implementation of the assigned measures to eliminate the complaint within the established timeframe. The fact of fulfilment of the assigned measures shall be recorded by the Head of VVB or the person responsible for registration of complaints in the complaints registration log.

5.3.9 If the complainant reasonably disagrees with the proposed measures, the working group shall carry out additional work to review the complaint, taking into account the suggestions and comments of the complainant. Following the results of the additional review, the complainant shall be notified in writing. At the same time, the final decision on the complaint shall be made no later than 30 days after receiving a response from the complainant.

5.3.9 In case of disagreement with the final decision on the complaint, the complainant may appeal to PRISM Carbon Solutions FZ-LLC.

6. Appeals management procedures

6.1 General provisions

The appellant may appeal to PRISM Carbon Solutions FZ-LLC against decisions made by the VVB concerning the results of validation and verification and complaint decisions.

6.2 Rules for Appeals

6.2.1 An appeal shall be submitted in writing in any form (or through a website prism.lc) and shall necessarily contain:

- name of the organisation/enterprise, legal and postal address,
- e-mail address, telephone number, contact details of the responsible person,
- A statement of the subject matter of the appeal,
- annexes containing documentary reasons for the appeal.

The appeal must be signed by a responsible person from the applicant organisation and stamped with the organisation's seal.

6.2.2 Initially, the appellant may contact PRISM Carbon Solutions FZ-LLC by any available method (via telephone, e-mail, website). The staff member who receives such an appeal shall inform the appellant about the rules of filing and consideration of the appeal. The deadline for filing an appeal is no later than 15 days from the date of receipt of the relevant decision from the VVB.

6.2.3 The appellant must be familiarised with this document when making an appeal.

6.3 Procedures and timeframes for organising work on appeals

6.3.1 An employee of PRISM Carbon Solutions FZ-LLC shall register the appeal in the log of incoming complaints and appeals in the form of Appendix A and notify the CEO of PRISM Carbon Solutions FZ-LLC of receipt of the appeal.

6.3.2 Within three working days from the moment of registration of the appeal in PRISM Carbon Solutions FZ-LLC, the CEO of PRISM Carbon Solutions FZ-LLC shall form an Appeals Commission (hereinafter referred to as the Commission).

In order to clarify issues requiring special knowledge, the Commission has the right to engage independent experts to conduct additional expert examinations, and also has the right to request additional laboratory tests.

6.3.3 The Secretary of the Commission is obliged to notify the appellant of the commencement of the work of the Appeals Commission and send a copy of the appeal and the documents attached to it to the VVB, which is the potential respondent, within 5 working days. The VVB is obliged to provide explanations for the submitted appeal within 15 days, supported by documentary justifications. In parallel, the secretary of the Commission shall agree the dates of the meeting of the Commission with its members.

6.3.4 After receiving the explanations from the VVB, the Secretary of the Commission shall form a package of documents to be sent to the members of the Commission, which shall include copies of the appeal, supporting documents, the VVB's explanations on the subject of the appeal, documents supporting the explanations, and notify the members of the Commission of the date of the meeting of the Commission. The general rules of the Commission meeting are specified in clause 6.4.

6.3.5 As part of the scheduled meeting, the Commission will review the available documents and decide on the appeal or on the additional action required to investigate the appeal, such as:

- requesting and reviewing additional documents and information materials,
- conducting additional laboratory tests and determining the party at whose expense these tests should be performed,

- involvement of independent experts, etc.

If the Commission decides to take additional actions to investigate the appeal, the date of the next meeting of the Commission shall be set. The final meeting of the Commission at which the final decision on the appeal is taken shall not exceed 30 working days.

6.3.6 Consideration of the appeal shall be limited to the technical and legal issues that are identified in the appeal.

6.4 Rules for the conduct of the Commission's meeting and decision making

6.4.1 The meeting of the Appeals Commission shall be attended by members of the Commission, independent experts (if necessary, without the right to vote) and, if desired, representatives of interested parties (without the right to vote). Participants of the meeting shall be notified of the place, date and time of the Commission meeting at least three days prior to the meeting.

6.4.2 The consideration of an appeal at a meeting of the Commission shall be confidential. The Commission shall make a decision on the results of the appeal based on the information provided and materials collected, including the results of additional examinations and tests. The decision of the Commission shall be taken by a simple majority of votes and approved by the Chairman of the Commission.

The Secretary of the Commission shall keep the minutes of the meeting and draw up a decision on its results. The minutes of the meeting shall be signed by all members of the Commission, the decision shall be signed by the Chairman of the Commission.

6.4.3 Within three working days after the final meeting of the Commission, the Secretary of the Commission shall bring the decision on the appeal to the attention of the parties concerned. The employee of PRISM Carbon Solutions FZ-LLC also makes a note of the results of the appeal in the log of incoming complaints and appeals in the form of Appendix A.

Secretary of the Commission within 10 working days:

- sends to the appellant the original decision on the appeal, the results of additional examinations/tests, if any, and an extract from the minutes of the commission meeting;
- submits to PRISM Carbon Solutions LLC the original minutes, a copy of the appeal decision, copies or second copies of the results of additional examinations/tests, if any;
- sends copies of the above documents to the other party involved.

6.4.4 The decision made by the Appeals Commission is final, non-appealable and binding on all parties involved. Should any of the parties concerned disagree with the decision of the Appeals Commission, the dispute shall be resolved in accordance with the applicable UAE legislation.

7. List of records established by this ND

Type of record	Shelf life (before archiving)	Carrier	Responsible for storage	Responsible for completing the record
Log of incoming complaints and appeals	permanently	Electronic	Person appointed by the CEO of PRISM Carbon Solutions FZ-LLC	CEO PRISM Carbon Solutions FZ-LLC

Annex A. Log of complaints and appeals received

Log of complaints and appeals received

1 №	2 Nature of application (complaint/appeal)	3 Name of the complainant/appellant	4 Date of submission	5 Description of the subject matter of the complaint/appeal

6 Place of storage of the complaint	7 Complaint/appeal referred to (position/name)	8 Date of closure of the complaint/appeal	9 Description of the decision taken and the activities assigned	10 A note on the implementation of the assigned activities