

Name, organization, and contact details (email and telephone) of the complainant

Jeff Norton
Vice President – Business Development
V-Grid Energy Systems, Inc.
Phone: [+1 \(616\) 272-1501](tel:+16162721501)
jeff.norton@vgridenergy.com

Any request for confidentiality/anonymity of complainant with reasons

None.

Description of the grievance

Puro.earth has retroactively retracted CORCs from VGrid for seven months between June 2022 and January 2023, claiming a gap in our certification. VGrid’s position is that delays at Puro.earth primarily caused this gap. VGrid was responsive to all data requests and, in fact, reached out to Puro.earth proactively several times to schedule audits in a timely manner. In other words, VGrid is penalized for a protracted annual audit process caused by Puro.earth.

VGrid completed its initial audit in August 2022, with the understanding that the next annual audit would occur in August 2023. After not hearing from anyone at Puro.earth, Jeff Norton reached out to Roosa Räisänen on November 2, 2023 (attachment one). Included in that email was documentation of biochar sales from January 2023 to October 2023. Subsequently, during the audit process, biochar sales were submitted from November 1, 2023 to February 29, 2024.

After not receiving a reply from Roosa Räisänen to the email on November 2, 2023, Jeff Norton sent three follow-up emails (Nov. 21, Nov. 28, and Dec. 7). See attachment two. The first acknowledgment was on Dec. 8, however no auditor was assigned. On January 9, 2024, Jeff Norton sent another email to Roosa Räisänen requesting an update. This is over two months from the initial inquiry. See attachment three.

The first contact with the auditor (Bill Chatterton, 350 Solutions) occurred on January 12, 2024. See attachment four. VGrid then worked directly with 350 Solutions on the audit from mid-January to mid-March. The final documentation was submitted to Puro.earth on March 29, 2024. It’s important to note that VGrid is also being penalized CORCs while in the middle of a protracted annual audit process.

Looking at the big picture, regardless of this perceived audit gap, VGrid has been continuously producing and selling biochar with the same equipment, in the same location, with the same processes, and with the same feedstock. We’ve had two audits by 350 Solutions verifying this. VGrid has submitted all sales with invoice backup. There is no technical reason that these CORCs should not be issued. This is biochar-captured carbon that is sequestered in the ground!

Timing of grievance/complaint

Reporting Period: January 1, 2023, to February 29, 2024.

The principle, requirement, or procedure (if known) allegedly breached

Timely scheduling and completion of annual audit by Puro.earth and its assigned auditor, 350 Solutions.

Nature of grievance and perceived impact

As a result of this delay, Puro.earth is not issuing 170 CORCs that VGrid earned. Because of this, VGrid cannot fulfill its pre-purchase agreement with TIME/CO2. The resulting cash shortfall negatively impacts VGrid's ability to continue as an ongoing business.

Supporting evidence and documentation

Please refer to attachments 1-4 referenced in the above narrative.

- Please reference the complete audit packages submitted to Puro.earth and 350 Solutions.

Declaration of any potential or perceived conflict of interest

None.

Declaration that information being provided is true, accurate, and made in good faith.

I declare that the above information is true, accurate, and made in good faith.

Jeff Norton
Vice President – Business Development
VGrid Energy Systems
513 Calle San Pablo, Camarillo, CA 93012 U.S.A.