

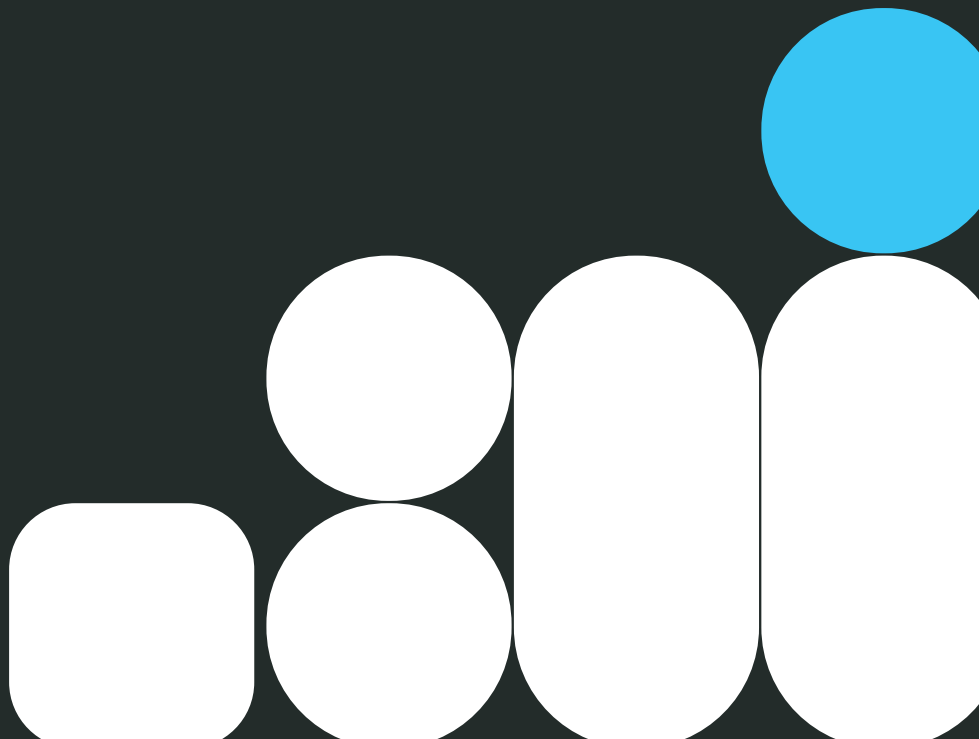


Puro.earth Certification Framework

# Puro.earth Certification Procedures

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# 1. Introduction

The Puro.earth Certification Framework establishes the governance structure under which Puro.earth operates as a certification facilitator and registry operator for carbon credit certification programs (e.g. EU Carbon Removals and Carbon Farming regulation (EU CRCF) or CCS+) that support the transition to a net-zero economy.

Within this framework, Puro.earth has established and operates the Puro Certification Program (Puro Standard), the world's first certification program dedicated to engineered carbon removals. The program defines the requirements for the quantification, verification, issuance, and management of carbon removal credits.

The Puro Certification Program includes methodologies developed and maintained by Puro.earth for specific engineered carbon removal pathways. These include, but are not limited to, Biochar, Geologically Stored Carbon, Carbonated Materials, Enhanced Rock Weathering, and Terrestrial Storage of Biomass.

Carbon credits generated under certification programs operating within the Puro.earth Certification Framework shall undergo independent validation and verification conducted by accredited Validation and Verification Bodies (VVBs). Validation and verification activities shall be conducted in accordance with the applicable program requirements and established audit procedures.

Following successful verification, carbon removal credits shall be issued and recorded in the Puro Registry. The registry provides a system for the issuance, tracking, transfer, and retirement of credits throughout their lifecycle, ensuring transparency and traceability.

Figure 1 illustrates the main stages of the Puro Certification Journey, including the roles and responsibilities of the relevant entities and the corresponding actions recorded in the Puro Registry.

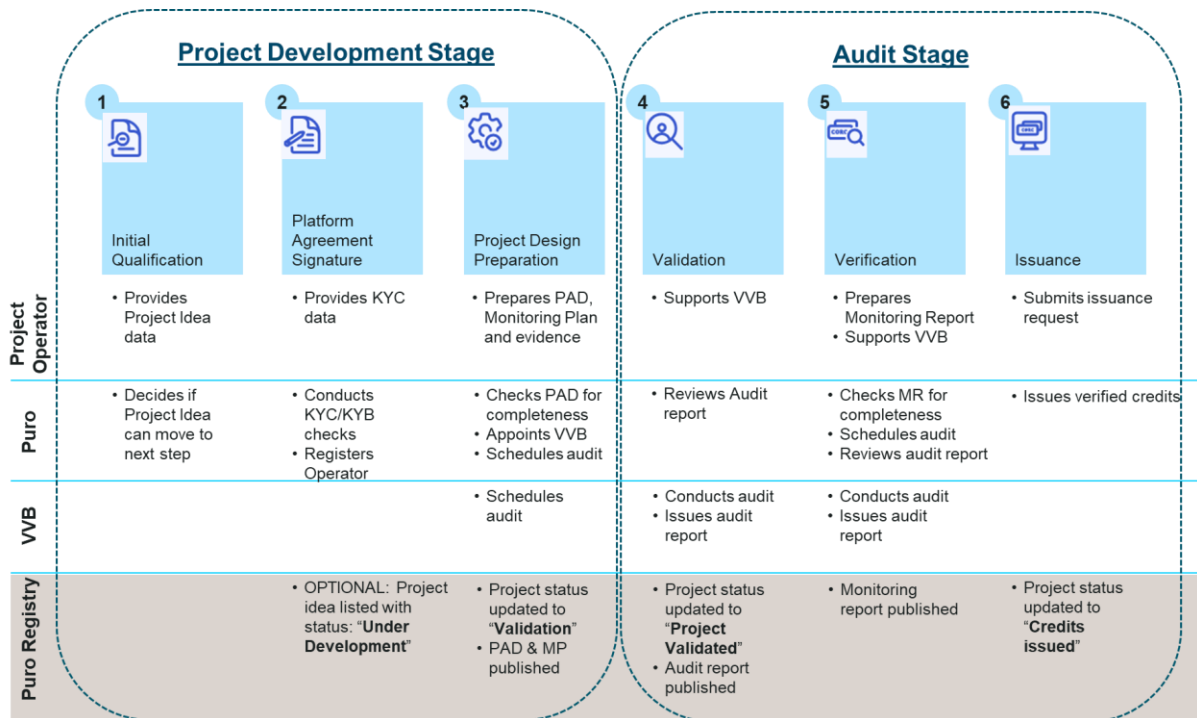


FIGURE 1. THE PURO CERTIFICATION JOURNEY

## 1.1. Purpose and Scope of this Document

This document establishes the procedures governing the certification and crediting processes under the Puro Certification Framework. It defines the governance arrangements and common procedures applicable to certification activities conducted within the Puro.earth Certification Framework.

The procedures are designed to enable Puro.earth to support external frameworks and initiatives, including but not limited to CORSIA, ICVCM, EU CRCF, CCS+, and other relevant frameworks.

## 1.2. Effective Date and Version

This version of the document was developed in 2025 and is published and effective as of 28 May 2026.

## 1.3. Relationship to Existing Standard

These Procedures build on the existing Puro Standard, including its General Rules and methodologies, and incorporate lessons learned from implementation to date.

The Procedures establish program-agnostic governance and certification processes, while allowing for methodology-specific and program-specific requirements where applicable.

They define the rules governing the certification journey, including the certification steps that lead to the issuance of certified carbon removal units.

## 1.4. Applicability

This document is a generic normative document applicable by default to all Programs operated by Puro.earth.

Where applicable, program-specific rules, including additional requirements, exemptions, or procedural modifications, are specified in the relevant Annex.

## 1.5. Normative Framework

These Procedures, together with the relevant Program Annex, Common Criteria (CC) and methodology-specific criteria, and other supporting assurance-related normative documents (including audit templates and evidence templates), form the normative framework governing certification and credit issuance under the Programs operated by Puro.earth.

**TABLE 1 NORMATIVE FRAMEWORK HIERARCHY**

| Hierarchy   | Document   | Description  | Publication Role     |
|---|--|--|----------------------|
| <b>Tier 1 (Generic Core)<br/>Generic governance instruments and shared normative resources. Apply to all programs unless a Programme Annex specifies otherwise.</b> | Governance Model   |  |                      |
|   | Consolidated Standard Rules  | Certification Procedures                                   | Public; Normative    |
|   |  | Registry Operating Rules                                   |                      |
|   |  | VVB Requirements   |                      |
| Common Criteria   | Common Criteria – Shared normative resource providing modules incorporated by reference by methodology documents. Does not govern operator obligations directly; obligations arise through methodology document incorporation. |  |                      |
|   | Definitions  |  |                      |
|   | Audit Guidance   |  | Public non-normative |
| <b>Tier 2 (Program Protocols)</b>   | Puro EU CRCF   | Program specific requirements that supersede generic core. | Public Normative     |
|   | Methodology Criteria   | Methodology documents – Primary normative                  |                      |

| Hierarchy  | Document     | Description   | Publication Role    |
|--|--------------|---|---------------------|
|  |              | authority for operator obligations. Each approved methodology document incorporates CC modules by reference and specifies pathway-specific criteria. Supersedes the unmodified CC for operator-facing obligations within its scope. |                     |
| <b>Tier 3 (Internal Derivative)</b><br>Not externally binding; implements Tier 1 and 2 | Internal SOP | Internal operating procedures followed to implement Tier 1 and 2 requirements.  | Internal Derivative |

## 1.6. Definitions

All definitions and abbreviations used in this document are provided in the Puro Definitions and Abbreviations Document.

## 2. Governance

### 2.1. Normative Documents

Methodologies are normative documents defining the requirements Operators must meet to be issued credits. Each approved methodology document shall include an explicit CC module incorporation statement identifying the CC modules it incorporates, the applicability category of each module, and any activity-conditional modules and the pathway characteristics that trigger their application, in accordance with the CC Normative Structure and any designations made in the relevant Programme Annex. This module incorporation statement is a condition of methodology approval. In addition to methodologies, other normative documents – including these Certification Procedures and the Common Criteria – establish the governance and shared normative resources within which methodologies operate.

2.1.1. Stakeholder Engagement shall be conducted where a Puro Program Normative Document is updated materially or a new document is released, specifically:

- A. Puro Methodologies
- B. The Puro Certification Procedures
- C. The Puro Common Criteria
- D. Other normative documents, to be decided on a case-by-case basis

2.1.2. Where Puro.earth adopts external methodologies or normative documents without modification, stakeholder consultation shall be conducted in accordance with the rules of the originating program or framework. Where Puro.earth introduces adaptations, implementation decisions, or additional requirements within its Certification Framework, the stakeholder engagement requirements set out in this Section shall apply to those elements.

2.1.3. Stakeholder Engagement shall be primarily implemented through an online public Stakeholder consultation period, during which Stakeholders may access and submit feedback on the document(s) under consultation.

2.1.4. Limited stakeholder outreach may be applied for updates that are not material in nature or where full public consultation is not proportionate. Limited consultation may be applied in any of the following cases:

- A. Updates that are editorial, clarificatory, or technical in nature;
- B. Updates that do not materially affect environmental integrity, eligibility criteria, or quantification outcomes;
- C. Updates that are required to align with:
  - i. applicable laws or regulatory requirements;
  - ii. recognised standards or external frameworks;
  - iii. updates, revisions, or methodological changes in external programs, standards, or methodologies with which the Puro Framework maintains alignment or interoperability;

2.1.5. Limited consultation is defined as targeted engagement with relevant stakeholders, without a formal public consultation process. Such engagement may include any of the following:

- A. The Puro Advisory Board
- B. VVBs
- C. Operators or project developers

D. Subject matter experts or other relevant stakeholders.

2.1.6. The determination of whether full public consultation or limited consultation is applied shall be made by Puro based on the criteria set out above. The rationale for this determination shall be documented.

2.1.7. For all stakeholder consultations, Puro.earth shall conduct all of the following steps:

- A. document the type of consultation applied;
- B. document the justification for the chosen approach;
- C. maintain records of stakeholder input received;
- D. publish a summary of consultation outcomes.

## 2.2. External Methodologies and Programs

2.2.1. Puro.earth may adopt external methodologies as further defined in this sub-section.

2.2.2. Before adoption, Puro.earth assesses whether an external methodology is materially different from existing Puro Methodologies and delivers sufficient climate and financial impact. Only external methodologies meeting these criteria will be considered for adoption. External methodologies developed by national or intergovernmental bodies, or by initiatives or programs that Puro.earth aligns with, may be adopted even if not materially different. A material difference is defined as addressing a CO<sub>2</sub> removal (or reduction) pathway not covered by existing approved methodologies at the time of assessment.

2.2.3. Approved external methodologies follow the same development and review process as Puro Methodologies, except where a Board of Directors decision alone may be sufficient as per rule 2.2.4, provided that such methodologies are adopted without modification.

2.2.4. External methodologies developed by initiatives or programs that Puro.earth aligns with may be adopted following a Board of Directors decision to adopt the external Program or initiative, provided that such methodologies are adopted without modification. The Puro.earth Advisory Board may be consulted prior to adoption or where changes to the Puro Program are required, however implementation responsibility shall rest with the Leadership Team.

## 2.3. Validation, Verification and Oversight

2.3.1. All Validation and Verification Audits are conducted by independent third-party VVBs accredited in accordance with Section 7.1. Additional requirements may apply for specific Programs operated by Puro.earth.

2.3.2. Puro.earth's Certification Office, being the function responsible for managing certification processes, internal review, and VVB oversight, oversees VVB accreditation and compliance. A list of approved VVBs per Program is published on the Puro website.

## 2.4. Transparency and Public Disclosure

- 2.4.1. VVB oversight decisions may result in VVB eligibility status updates which shall be reflected publicly in the Puro website.
- 2.4.2. Audit Reports, including non-conformities and resolutions, are published unless otherwise specified by the applicable external Program.
- 2.4.3. Public Consultation notices, outcomes, and responses are published on the Puro website.
- 2.4.4. Approved Methodologies, rule changes, and clarifications are made publicly available in the Puro Document Library.

## 2.5. Conflict of Interest

- 2.5.1. Puro.earth shall handle potential conflicts of interest in accordance with the [Puro.earth Conflict of Interest Policy](#).

## 2.6. Complaints

- 2.6.1. Puro.earth shall handle complaints and grievances in accordance with the [Puro Standard Grievance Policy](#).
- 2.6.2. Both submitted grievances and any resolutions shall be made public on the Puro.earth website.

# 3. Scope of Certification

## 3.1. Certification Programs & Carbon credits

The Puro.earth Certification Procedures provide rules for the certification of Project Activities and their performance under different programs and their corresponding carbon removal methodologies.

Currently available in Puro.earth Certification Procedures are:

- A. Puro Program
- B. Puro.earth CRCF Program

Puro.earth has not been recognised as a Certification Scheme under the EU CRCF Regulation and will therefore only be able to certify Project Activities under that framework once approved.

- 3.1.1. Each Program which Puro.earth operates defines the attributes of the type of credit that may be issued in the respective Certification Protocol Annex to this Document. Currently available Carbon credit types are shown in Table 2.

**TABLE 2. CREDIT TYPES WHICH CAN BE ISSUED UNDER THE PURO.EARTH CERTIFICATION PROCEDURES**

|  | CORC Engineered CO <sub>2</sub> removal | Certified Unit (CU) |
|--|---|---------------------|
| <b>Puro Standard &amp; Methodologies</b> | CORC1000+<br>CORC200+<br>CORC100+       | N/A                 |

|   |     |                      |
|---|-----|----------------------|
| EU CRCF Standard Methodologies <sup>1</sup> | N/A | Permanent removal CU |
|---|-----|----------------------|

## 3.2. Crediting Period

- 3.2.1. The duration of the Crediting Period shall be defined by the applicable Program and Methodology. Where no crediting period is defined in the applicable Methodology, the crediting period shall be 10 (ten) years.
- 3.2.2. The Crediting Period shall begin on the Project Start Date. Issuance of carbon credits for any period prior to completion of the Validation (Certification) Audit shall be subject to a positive Validation outcome in accordance with Rules 5.3.5 or 5.3.6, as applicable.
- 3.2.3. Upon a positive Validation (Certification) Audit outcome, the start date and the end date of the Crediting Period shall be documented in the Project Activity Description, confirmed in the Validation Audit Report, and published in the Puro Registry.
- 3.2.4. Where a Project Activity transfers from another registry, the Crediting Period in the Puro Registry shall begin immediately after the end date of the crediting period under the previous registry, provided that no overlap of credited volumes occurs and sufficient evidence is provided to demonstrate the closure of the previous crediting period.
- 3.2.5. The Crediting Period may be renewed, subject to successful completion of a new Validation Audit against the applicable version of the Methodology at the time of renewal.
- 3.2.6. The Crediting Period shall not overlap with another Crediting Period.
- 3.2.7. Where a Methodology is revised, the Operator may request a new Validation Audit within the existing Crediting Period to demonstrate compliance with the revised Methodology, provided that at least 18 (eighteen) months remain in the Crediting Period at the time of the request.

## 3.3. Geographic scope

- 3.3.1. These Certification Procedures are applicable globally. Any geographic restrictions that may be imposed by Programs which Puro.earth operates are listed in the Annexes to this Document.

<sup>1</sup> The CRCF Regulation includes more Certified Unit types. However, as there are no adopted methodologies to generate those units and Puro is not planning on seeking recognition under those initially, we have not included them in the overview.

## 4. Pre-Certification

The Project Activity certification lifecycle is shown in Figure 2 while the individual steps are described in Section 4 (Pre-Certification) and Section 5 (Certification Process and Audits).

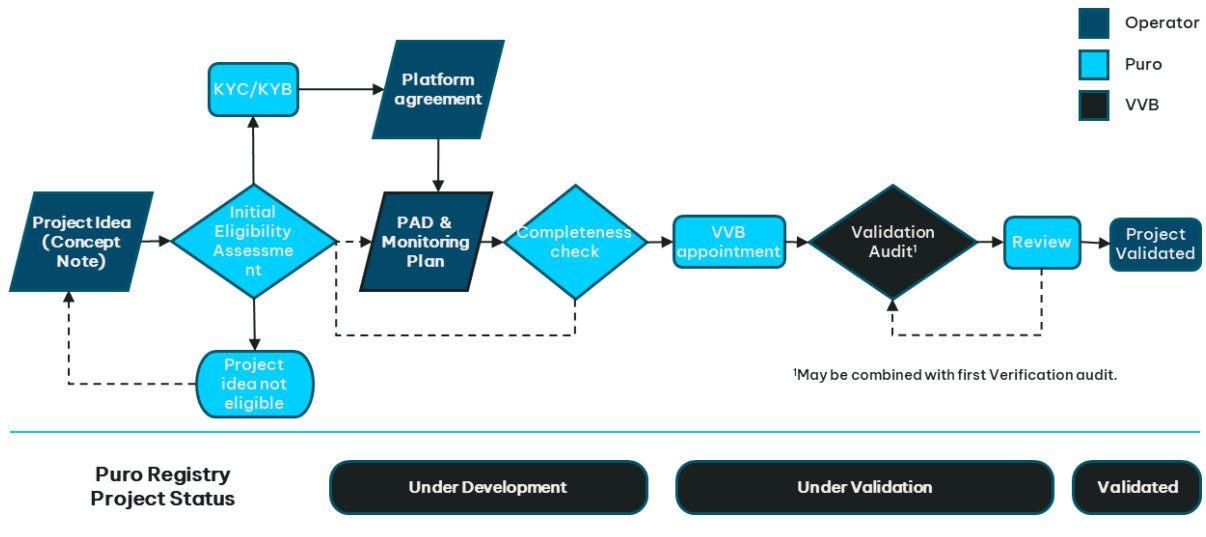


FIGURE 2. PROJECT ACTIVITY CERTIFICATION PROCESS

### 4.1. Initial Qualification

The goal of the Initial Qualification is to determine whether a Project Activity can start the certification journey, primarily by considering the availability of an approved relevant methodology and the status of the project activity.

4.1.1. The Operator shall complete a Project Concept Note (PCN) with the necessary information for the qualification of the Project Activity. The PCN is a brief description of the project including plans for stakeholder engagement prior to the development of the Project Activity Description (PAD).

4.1.2. The PCN shall include:

- A. Operator entity and contact details
- B. Brief non-technical summary of the Project Activity, including the applicable methodology or methodologies and credit generation estimates
- C. Expected Project Activity implementation timeline, including plans for stakeholder engagement and PAD development
- D. Information on previous attempts at certification of the Project Activity with a different certification scheme, including by the Operator’s legal predecessor
- E. Declaration that the Project Activity is not certified against another scheme or proof of deregistration from another scheme

- 4.1.3. The Operator shall disclose information on previous attempts to certify the project activity under another program, including cases where it has failed its audits. Disclosure requirements also apply to the legal predecessors of the Operator.
- 4.1.4. Puro shall assess the eligibility of the Project Activity based on the applicable Certification Program requirements and the information provided and confirmed in writing by the Operator, and decide whether the Operator can move to the next stage, conducting KYC checks prior to the signature of a Platform Agreement and listing of the Project Activity in the Puro Registry. The absence of an applicable approved Methodology, Project Activities expected to generate negligible annual credit volumes, and/or previous audit failures with another certification scheme for the same Project Activity may constitute grounds for not proceeding to the next stage, including but not limited to rejection of the Project Activity<sup>2</sup>.

## 4.2. Platform Agreement and Project Activity listing

- 4.2.1. Once the initial qualification step is completed, the Puro.earth shall conduct KYC checks on the Operator in line with the Puro Know your business, know your customer and Anti-money laundering policies.
- 4.2.2. If the KYC checks are satisfactory, the Operator shall sign a Platform Agreement committing to undergoing certification of the Project Activity under the relevant Certification Program(s) that Puro operates and thereby agrees to the fee schedule.
- 4.2.3. The applicable version of each methodology, including any associated components, shall be determined and fixed at the time of signature of the Platform Agreement. This version shall remain applicable for the duration of the first crediting period, unless the Operator elects, in accordance with Section 5.3.2, to apply a more recent version of the methodology at the time of Validation.
- 4.2.4. Upon signature of the Platform Agreement, and upon request by the Operator, Puro shall publicly list the Project Activity with a status “Under Development” in the Puro Registry including the information provided in the PCN. This step provides transparency regarding project development stages and allows the tracking of compliance with relevant criteria on the timing of project activities.
- 4.2.5. Puro reserves the right to repeat or update the KYC check at any time where it considers that there exist reasonable grounds to do so.

## 4.3. Project Documentation Development

- 4.3.1. The Operator shall prepare the Project Documentation appropriate to the type of audit (validation and/or verification) as described in Section 5 of this document.
- 4.3.2. Project Documentation shall comply with the minimum content requirements specified in the applicable methodology document and in accordance with the Common Criteria modules incorporated therein.
- 4.3.3. Where Puro.earth has developed and published templates to be used for the preparation of Project Documentation, Operators shall use the latest version of such templates as published on the Puro.earth website.
- 4.3.4. Puro.earth shall maintain a Compatibility Matrix as a versioned instrument published on the Puro website recording for each approved methodology version and submission type the applicable template and criteria versions. The Matrix governs which versions apply where multiple are in circulation. Where the Matrix has not yet been published, Puro shall provide written confirmation of the applicable entry to the Operator on request; that confirmation has the same standing as a published Matrix entry for the purposes of this clause.

## 4.4. Project Ownership

- 4.4.1. The Project Operator shall demonstrate that it holds the exclusive legal right to the credits generated by the Project Activity for the duration of the Crediting Period, including the authority to access the Registry and to receive hold, transfer, or retire such credits.
- 4.4.2. The Project Operator may designate another entity to represent the Operator and act on their behalf for the purposes of the Puro.earth framework.
- 4.4.3. Project ownership shall be documented and verifiable. Evidence may include, as applicable:
- A. Contractual agreements;
  - B. Land-use rights or land-tenure documents;
  - C. Licences, concessions, or government permits;
  - D. Partnership or joint-venture agreements;
  - E. Declarations supported by legal evidence that no competing claims exist.
- 4.4.4. Project ownership, or part thereof, may be transferred to another legal entity provided that:
- A. The Project Operator formally notifies Puro of the intent to transfer;
  - B. The Project Operator provides legal documentation evidencing the transfer; and
  - C. The new legal entity satisfactorily passes Puro's KYC/KYB process
- 4.4.5. Upon receipt of a formal transfer of project ownership notification, Puro.earth shall suspend further issuance of credits from the Project Activity until the transfer of project ownership is completed.
- 4.4.6. If competing ownership claims arise, issuance and Registry transactions of credits from the Project Activity shall be suspended until the dispute is resolved and ownership is clearly demonstrated.
- 4.4.7. Suspension shall result in the temporary restriction of credit issuance and Registry transactions until the relevant issue is resolved.
- 4.4.8. Puro may require additional documentation, legal opinions, or third-party evidence from the Operator to determine Project ownership.

## 5. Certification Process and Audits

### 5.1. Application for Certification

- 5.1.1. To apply for Certification, the Operator shall submit an application identifying the Project Activity, the applicable Certification Program and methodology, and the requested scope of certification.
- 5.1.2. The application for certification shall include the following project documentation and evidence in English :
- A. Project Activity Description (PAD)
  - B. Monitoring Plan (MP)
  - C. Information to be made public in the Puro Registry
  - D. Monitoring Report (MR) – only if Validation is combined with Verification

<sup>2</sup> The different Programs that Puro operates may have different criteria, those are available in the respective annexes to this Document

- 5.1.3. As part of the application for certification, the Operator shall submit a completed Template Version Declaration confirming the methodology version applied and the version of all templates used in the preparation of the Project Documentation.
- 5.1.4. The Operator may request that their Project Activity be Validated against more than one approved methodology adopted by Puro.earth.
- 5.1.5. If the Operator would like to validate the Project Activity under more than one Program/methodology, the application and documentation will need to prove compliance with all the relevant criteria of each methodology.

## 5.2. Application Review, VVB Selection and Appointment

- 5.2.1. Upon receiving the application for certification, Puro.earth shall conduct a review of the documentation submitted by the Operator with the aim of determining whether the documentation is complete and sufficient to attempt a Validation and/or Verification audit.
- 5.2.2. Puro.earth shall allocate a VVB following a successful review of the submitted documentation for audit and the Operator shall confirm acceptance of the allocated VVB.
- 5.2.3. In case of a non-successful review of the Application, Puro.earth shall communicate to the Operator the reasons why the Application was deemed insufficient. The Operator may then revise and resubmit the Application.
- 5.2.4. If after multiple revision cycles the Application is still deemed insufficient, Puro.earth reserves the right to deregister the activity or take any other necessary action to preserve Puro.earth's integrity. Such actions, if taken, shall be communicated in writing to the Operator.

## 5.3. Validation / Certification

- 5.3.1. All Project Activities shall undergo Validation, the process for evaluating the reasonableness of the assumptions, limitations and methods that support a statement about the outcome of future activities, as described under ISO 14064-3: 2019.
- 5.3.2. Validation and verification audits shall be conducted at a level of reasonable assurance.
- 5.3.3. The VVB shall prepare a validation and/or verification report for each audit conducted.
- 5.3.4. At a minimum, the audit report shall include a summary of the audit and:
- A. Administrative and identification information
    - a. Name and details of the VVB;
    - b. Identification of the audited entity (project proponent);
    - c. Unique identifier of the project, activity, or facility;
    - d. Audit report identifier, version, and date of issue;
    - e. Applicable methodology and version;
    - f. Monitoring period (for verification);
    - g. Reference to the PAD and monitoring plan, including version and identification numbers.
  - B. VVB & Audit team
    - a. Identification of the audit team, including lead auditor;

- b. Accreditation status of the VVB, including accreditation body and scope/reference;
    - c. Statement confirming independence and absence of conflict of interest.
  - C. Scope and methodology of the audit
    - a. Description of the audit scope and objectives;
    - b. Audit date(s), duration, and sites visited;
    - c. Description of audit activities performed, including site visits where applicable;
    - d. Description of documents and data reviewed;
    - e. Reference to applicable standards and scheme requirements;
    - f. Statement of the level of assurance applied.
  - D. Information on the activity and results
    - a. Description of the activity and applied methodology;
    - b. Expected/verified net carbon removal benefit or emission reduction benefit;
    - c. Sustainability co-benefits associated with the activity;
    - d. Definition of system boundaries;
    - e. Baseline determination;
    - f. Assessment of additionality;
    - g. Quantification of emission reductions or removals;
    - h. Monitoring approach and results;
    - i. Assessment of data quality and uncertainty.
  - E. Safeguards and stakeholder aspects
    - a. Summary of stakeholder consultation (if applicable);
    - b. Assessment of environmental and social safeguards.
  - F. Findings and conclusions
    - a. Summary of audit findings, including non-conformities and corrective actions;
    - b. Resolution of findings from previous audits (where applicable);
    - c. Final audit conclusion on conformity with applicable requirements.
  - G. Audit outcome and certification elements
    - a. Outcome of the audit, including certification validity period where applicable or required corrective actions;
    - b. Statement supporting the certification decision;
    - c. Any limitations, qualifications, or conditions;
    - d. Signature and/or stamp of the issuing party

- 5.3.5. In accordance with rule 4.2.3, the Operator may elect, at the time of validation, to apply the most recent published version of the applicable methodology. Any such election shall be made prior to the start of validation and shall apply to the relevant crediting period in its entirety.
- 5.3.6. The Operator may request the Validation of the Project Activity under more than one methodology of the same removal or reduction pathway and shall submit a Project Activity Description (see CC 1.1 of the Common Criteria) and Monitoring Plan (see CC 1.2) with the required evidence, for each.
- 5.3.7. As a result of a positive Validation opinion, credits may be issued to the Project Activity during the entire Crediting Period referencing the version of the applicable Methodology.
- 5.3.8. The validation step shall be completed within three (3) years of the Commitment Date, except for activities mentioned in 5.3.8 or in case the relevant Certification Program operated by Puro has different rules as described in an Annex to this document.
- 5.3.9. The Operator of Project Activities which require a significantly longer development time, specifically BioCCS and DACCS activities, shall complete Validation within five (5) years of the Commitment Date.
- 5.3.10. Validation shall be performed again at the beginning of any subsequent crediting period, unless crediting period removal is not allowed under the relevant methodology applied..
- 5.3.11. When applying for a crediting period renewal, Operators shall submit a Renewal Assessment (RA) prepared in accordance with the applicable methodology document and CC 1.4, including a re-evaluation of assumptions and baseline calculations.
- 5.3.12. During the Validation required for the renewal of the crediting period, the most recent version of the methodology shall be used.
- 5.3.13. During Validation, the VVB shall review the PAD and Monitoring Plan, as well as any evidence required to demonstrate conformity to all Puro Certification Program and Methodology requirements. The minimum content of the PAD and Monitoring Plan are specified in the applicable methodology document in accordance with CC 1.1 and CC 1.2, respectively. All requirements for VVBs on the validation process are provided in Section 5.3 and Section 7.
- 5.3.14. During Validation, the VVB may issue clarification requests to the Operator where additional information or evidence is required. The Operator shall respond to such requests in a timely manner.
- 5.3.15. The VVB shall submit the evaluation of the Project Activity as a Validation Audit Report.

## 5.4. Verification / Re-certification

The purpose of a Verification audit is to verify that the quantification of ex-post carbon removals or GHG reductions are relevant, complete, transparent, accurate and conservative for a given Monitoring Period.

- 5.4.1. Monitoring periods shall be contiguous and all Project Activities, once operational, must undergo verification at least every twelve (12) months. Verification may be conducted more frequently, and frequency may vary depending on Operator issuance needs.

- 5.4.2. The monitoring period shall not overlap with previous monitoring periods. No credits shall be issued for removals or reductions that were credited in previous monitoring periods.
- 5.4.3. The first Monitoring Period shall begin on the Crediting Period start date.
- 5.4.4. The first Verification Audit may occur in tandem with the Validation audit upon request by the Operator.
- 5.4.5. The first Verification Audit may cover a period of up to 24 (twenty-four) months.
- 5.4.6. For a Verification Audit, the Operator shall submit a Monitoring Report and supporting information for a specified monitoring period (see CC 1.3).
- 5.4.7. The Monitoring report shall include the number of credits generated during the relevant monitoring period, the methodology applied for calculating the number of units under which the Project Activity wants to be verified, and any relevant information on the compliance of the Project Activity with methodology specific requirements. The minimum content of the Monitoring Report is specified in the applicable methodology document in accordance with CC 1.3..
- 5.4.8. The VVB shall review the Monitoring Report and evidence required to demonstrate conformity to all relevant Program requirements. If non-conformities are detected, the non-conformity management process is triggered as described in Section 6. For audit and certification process details, see Section 5.
- 5.4.9. Where the VVB issues a clarification request during the Verification Audit, the Operator shall provide the requested information, corrections, or supporting evidence. Failure to respond may delay or prevent the completion of the Verification Audit and issuance of credits.
- 5.4.10. Once all non-conformities are resolved or mitigated, and the verification conclusions are reviewed and signed off by the VVB's independent reviewer, the VVB shall prepare a Verification Audit Report.
- 5.4.11. The VVB shall submit the Verification Audit Report to the Certification Office, who will initiate the Internal Review process as part of its VVB oversight.

## 5.5. Reporting delays

- 5.5.1. A delay in submitting a Monitoring Report at least once every 12 months shall result in the Project Activity being suspended (see rule 4.4.7).
- 5.5.2. A delay in submitting a Monitoring Report beyond 18 months shall result in the Project being withdrawn.
- 5.5.3. A suspension of a Project Activity can be lifted if the Operator submits a Monitoring report, provided that the Project activity has not been withdrawn.
- 5.5.4. The Operator may reapply for certification but shall first undergo a new Validation Audit if the project was withdrawn by Puro due to a reporting delay.
- 5.5.5. Specific time schedules may apply in periods or areas where a pandemic, natural disaster or other force majeure reasons restrict access to the Project site or data.

## 5.6. Internal Review of audit findings

- 5.6.1. Puro.earth shall conduct an internal review of the Audit Report, focusing on non-conformities, quantification results, and the completeness and consistency of the audit conclusions.

- 5.6.2. Puro.earth will only accept the Audit Report once all clarification requests have been addressed and any potential VVB non-conformities identified as part of the VVB Oversight process resolved.
- 5.6.3. Following review by Puro.earth, the Validation Audit Report(s) and the corresponding Project Documentation (Project Activity Description and Monitoring Plan) will be made public in the Puro registry, and the status of the Project Activity will be updated to “Validated” listing all methodologies under which the Project Activity has been validated. This step is recorded as the “validation date”.
- 5.6.4. Similarly, after a successful review by Puro.earth, the Verification Audit Report and the corresponding Project Documentation (Monitoring Report) will be made public in the Puro Registry, and we will update the status of the Project Activity to “Verified”. This step is recorded as the “verification date”.
- 5.6.5. The Operator may request redacting Audit reports and Project Documentation before publication in the Puro Registry to preserve commercially sensitive information.
- 5.6.6. If an Operator would like to redact Project Activity documentation before publication in the Registry, the Operator shall submit a public version of the respective documents with the relevant edits at the time of submission of the relevant Audit documentation.
- 5.6.7. The Operator shall not redact the following information:
- A. Calculation equations, formulas, and logic.
  - B. All parameter values used in calculations, whether default or site-specific.
  - C. Calculation spreadsheets or functionally equivalent artefacts with formulas intact.
  - D. Baseline scenario options, selection rationale, and assumptions.
  - E. Uncertainty assessment methods, inputs, and results.
  - F. Leakage sources considered, quantification methods, and deductions applied.
  - G. Monitoring methodologies and data required to reproduce calculations.
  - H. Methodology versions and justified deviations.
- 5.6.8. The Operator may redact the following information:
- A. Personal data.
  - B. Commercially sensitive pricing, cost, or contractual terms.
  - C. Internal deliberative notes or draft assessments.
  - D. Security-sensitive details unrelated to calculation outcomes.
- 5.6.9. The Operator may request subject to approval by the Certification Office the conditional redaction of the following information:
- A. Raw monitoring datasets, where anonymisation or aggregation does not affect calculated results.
  - B. Precise geospatial coordinates, where masking does not affect boundary definition or emissions estimates.
  - C. Emission factors from a proprietary database with limits in its public disclosure as per its end-user licence agreement.
- 5.6.10. The Certification Office shall review whether transparency requirements have been met with the redacted versions and will upload the documents to the Registry.

## 5.7. Crediting period renewal

- 5.7.1. To initiate crediting period renewal, the Operator shall submit the following documents to Puro.earth:
- A. Renewal Assessment prepared in accordance with the applicable methodology document and CC 1.4, covering the full scope required for the new crediting period
  - B. The final Monitoring Report of the expiring crediting period, prepared in accordance with the applicable methodology document and CC 1.3, covering all monitoring periods within the expiring crediting period for which a Monitoring Report has not already been submitted
  - C. The current approved Monitoring Plan, including all amendments approved during the expiring crediting period,
  - D. Any updated or new PAD annexes required by the RA (e.g., updated financial model, updated reversal risk assessment, revised regulatory analysis).
- 5.7.2. The Operator shall submit the renewal submission package to Puro no later than 90 days before the end of the expiring crediting period.
- 5.7.3. Upon receipt of the renewal submission package, Puro.earth shall conduct a review of the submitted documentation, before a VVB audit can be scheduled.
- 5.7.4. The VVB shall conduct a Validation audit of the Renewal Assessment and any updated PAD and MP to confirm continued compliance with all relevant requirements.
- 5.7.5. The VVB shall also conduct a Verification Audit based on the final Monitoring Report.

## 5.8. Post-Certification changes

- 5.8.1. Material changes to the Project Design or implementation, as identified by VVBs during Verification audits or Monitoring Audits, which affect the compliance of the Activity with relevant Program rules after successful Validation, shall require an update to the PAD and/or Monitoring Plan and resubmission of the Project Activity for Validation.
- 5.8.2. A Project Operator is responsible for immediately informing Puro about material changes in the Project Activity, which might impact the attributes of issued credits or compromise Environmental and Social Safeguards or the future issuance of credits.
- 5.8.3. Where material changes are identified through VVB Oversight activities or submitted grievances, Puro.earth shall assess whether the changes affect the validated scope of the Project Activity. Where they do, Puro.earth shall suspend the Project Activity and notify the Operator in writing, specifying the nature of the change, whether a new Validation Audit is required and its scope, and the conditions for lifting the suspension. Where a new Validation Audit is required, the suspension shall remain in effect until it is successfully completed and reviewed by Puro.earth.

## 6. Non-conformity management

### 6.1. Overview of non-conformities

- 6.1.1. In addition to clarification requests a VVB may identify, as a result of an Audit, a critical, major or minor non-conformity with a certain criterion if:
- A. the Operator is deemed to be insufficiently compliant with that criterion, or
  - B. the Operator fails to provide the requested evidence to prove compliance within the agreed timeframe.
- 6.1.2. The VVB may escalate the status of a non-conformity from a minor to a major or from a major to a critical non-conformity in the case the non-conformity is detected repeatedly during two or more consecutive audits.
- 6.1.3. Non-conformities may also be identified by Puro.earth as part of the VVB oversight procedure and review of project activity documentation (see Section 8).
- 6.1.4. In all cases, Puro.earth will confirm the classification of all identified non-conformities during the internal review of Audit Reports.
- 6.1.5. Each non-conformity shall be treated in an adequate way with proportionate consequences, including remediation measures and sanctions, where relevant, as described in the following sections.
- 6.1.6. In the event of deliberate fraud or failure to pay invoices on time Puro.earth reserves the right to enforce immediate suspension, withdrawal or rejection of the Project Activity.

### 6.2. Critical non-conformity

- 6.2.1. A critical non-conformity shall consist in a violation of a Program's Methodology criteria, rules and/or procedures stipulated in another Normative Document that jeopardises the integrity of the Puro Program, or other Programs that Puro.earth operates, such as fraud, irreversible non-conformity or violation that jeopardises the integrity of the Puro.earth Framework.
- 6.2.2. Critical non-conformities shall include but not be limited to, any of the following categories:
- A. non-compliance with relevant Program procedures and criteria, including methodology specific criteria
  - B. deliberate misstatement of Project activity description
  - C. falsification of GHG data
- 6.2.3. If a critical non-conformity is identified during a Validation audit, the Project Activity shall be Rejected.
- 6.2.4. If a critical non-conformity is identified during a Verification or Monitoring audit, or through Puro.earth's internal monitoring or complaints process, the Project Activity shall be Withdrawn from the relevant Program, and no further credits shall be issued.
- 6.2.5. Any issued credits to a Project Activity which is found to have a critical non-conformity shall be subject to compensation measures defined in Section 9.10.
- 6.2.6. Operators of Project Activities which were not validated due to a critical non-conformity may re-apply for Validation after 12 months.

### 6.3. Major non-conformity

- 6.3.1. A major non-conformity shall consist in a violation of Program's Methodology criteria, rules and/or procedures stipulated in another Normative Document, that is potentially reversible and repeated and that reveals systematic problems, or aspects that alone, or in combination with further non-conformities may result in a fundamental systemic failure.
- 6.3.2. Major non-conformities represent serious issues that must be addressed with attention and resources as a priority, where CARs and FARs shall be implemented within an agreed timeframe (max. 3 months from the moment the non-conformity has been communicated to the operator).
- 6.3.3. Major non-conformities shall include, but not be limited to, any of the following categories::
- A. systematic problems with GHG data reported
  - B. omission of an Operator to declare its participation in other carbon credit certification schemes during the certification process
  - C. failure to provide relevant information to the VVB, such as the information needed for the purposes
- 6.3.4. If a major non-conformity is identified during a Validation audit, the Project Activity shall be rejected.
- 6.3.5. If a major non-conformity is identified during Verification or Monitoring audit, or through Puro.earth's internal monitoring or complaints process, no further credits shall be issued until the non-conformity is resolved.
- 6.3.6. Where an Operator does not implement the remediation action within 90 days from the notification, the Project Activity shall be withdrawn from the Program.
- 6.3.7. Any issued credits to a Project Activity which is subsequently found to have a major non-conformity, and which is withdrawn according to rule 6.3.6 may also be subject to the compensation measures defined in Section 9.10.
- 6.3.8. Operators of Project Activities which were not validated due to a major non-conformity may re-apply for Validation after 12 months, provided that the deadlines in rules 5.3.7 and 5.3.8 are respected.

### 6.4. Minor non-conformity

- 6.4.1. A minor non-conformity shall consist in a violation of Program's Methodology criteria, rules and/or procedures stipulated in another Normative Document that has a limited impact, constitutes an isolated or temporary lapse, and shall not result in a fundamental systemic failure if not corrected.
- 6.4.2. Minor non-conformities must be formally addressed through CARs and FARs, for which a timeframe shall be agreed between the operator and VVB.
- 6.4.3. Minor non-conformities may be either:
- A. resolved as part of the audit process, or
  - B. waived to the next audit, at the discretion of the VVB
- 6.4.4. Minor non-conformities include, but are not limited to, any of the following categories:
- A. Failure to provide sufficient evidence to prove compliance to a criterion that does not lead to systems delivery breakdown.

- B. Mistakes in applying assumptions, data or calculations which could influence future results (but are yet to be proven).
- C. Aspects needing verification in the next verification and certification cycle (e.g., foreseen modifications).

6.4.5. In the case of minor non-conformities, any remediation measures shall be implemented by a date agreed upon by the VVB and Operator which is within 12 months of notification or before the next Verification audit, whichever is earlier.

6.4.6. The Operator should implement CARs and FARs for each non-conformity within the agreed timeframe(s) and provide evidence to the VVB.

6.4.7. Failure to provide the required evidence within the agreed deadline may result in suspension of the Project Activity.

## **6.5. Non-conformity resolution process**

6.5.1. During the closing meeting, the VVB shall inform the Operator of any non-conformities identified during the Audit or Puro.earth's review of the Audit Report together with the necessary remediation measures to be implemented.

6.5.2. The Operator and VVB shall agree on the resolution deadlines, complying with all relevant timelines set in Section 6.

6.5.3. The VVB shall subsequently conduct a non-conformity review to check if the CARs and FARs (and the evidence) led to the desired results, i.e., if the Operator is (or can become) compliant again with the relevant criterion. In the case of multiple non-conformities, the Auditor can decide to review them all at once, or to review each resolution to a non-conformity separately upon receipt.

6.5.4. A non-conformity Review is not a new audit and shall only focus on the raised non-conformities.

6.5.5. The Auditor shall aim to complete the non-conformity Review as a desk-review and ensure that the scope, cost, and timing of the Review audit remains commensurate with the extent of the task..

6.5.6. Once the VVB reviews the resolutions (CARs and FARs, and evidence) for all non-conformities, the Auditor shall recommend either a positive or negative certification decision for the secondary reviewer (see also rule 7.2.2).

6.5.7. If the recommendation is positive and the Independent Reviewer concurs, Puro.earth shall review the updated Audit report and follow the process described in Section 5.6 focusing only on the relevant non-conformities and their resolution.

6.5.8. If the recommendation is negative and the Independent Reviewer concurs, the Project Activity shall not be Validated or Verified.

## 7. VVB Requirements

### 7.1. Accreditation requirements

- 7.1.1. VVBs conducting independent third-party audits shall be accredited under EN ISO/IEC 14065. Validation and verification activities shall be conducted in accordance with ISO 14064-3 and the applicable certification methodology.
- 7.1.2. The accreditation shall be valid throughout the validation and verification process and at the time of submission of the final audit report.
- 7.1.3. Audit Reports shall meet the minimum content requirements set out in the applicable Program Annex.

### 7.2. VVB Approval

- 7.2.1. VVBs applying to perform Validation and Verification Audits must be formally approved by, and in good standing with Puro.earth prior to completing any audits.
- 7.2.2. The approval process for VVBs is as follows:
  1. The VVB submits an Application for Validation & Verification Bodies, available on the Puro website. An initial completeness check is done by Puro to confirm that the VVB meets all document submission and eligibility requirements stipulated by the program the VVB wishes to apply for, i.e. for the VVB as a legal entity and for each (lead) auditor and second reviewer.
  2. As part of the approval process, auditors and second reviewers must complete a number of trainings (e.g. a training per each Certification Program and methodology they wish to audit for) followed by a Q&A session with Puro.earth.
  3. Puro.earth keeps track of the VVB, (lead) auditor and second reviewer approval status in a logbook and lists the Certification Programs and methodologies that they are approved for.
  4. Puro approves the VVB application, once the application is complete and a framework agreement (if applicable) is signed. To approve a VVB application, at least one (lead) auditor and one second reviewer shall also be approved for the VVB to be able to commence audit and certification activities.
  5. Puro.earth reserves the right to reject a VVB application should the preceding steps not be fulfilled to its satisfaction. Puro.earth shall provide justification to the VVB on the requirements that led to the rejection.
  6. Records of the approval process shall be retained for a minimum of 5 years.
  7. Puro.earth shall list approved VVBs on the Puro public website for each Certification Program.

### 7.3. (Lead) Auditor and Second Reviewer competencies

- 7.3.1. (Lead) auditors and second reviewers conducting and/ or certifying audits under the Puro Framework and applicable methodologies shall have carbon accounting competencies. The minimum requirements for demonstrating these are:
  - A. Curriculum vitae;
  - B. An Audit Log demonstrating experience with relevant, similar Certification Programs;
  - C. Successful completion of Puro.earth's training courses on the individual methodologies as well as these Puro Certification Procedures (and any other relevant normative document at the discretion of the Puro.earth).

- 7.3.2. Where the second reviewer role is performed by a VVB's internal Technical Committee or similar body, the committee shall collectively demonstrate the competencies required under 7.3.1..
- 7.3.3. The VVB is responsible for assigning individual (lead) auditors and second reviewers who meet the minimum requirements listed in this section.
- 7.3.4. Approved VVBs shall have access and shall use published relevant audit report templates, guidelines and clarifications developed by Puro.earth to guide VVBs.
- 7.3.5. To become and remain an approved VVB, Puro.earth makes training courses available to VVBs periodically, which must be completed before conducting an audit. To demonstrate auditors' compliance with the training requirements in the technical area or areas in which they are active, individual (lead) auditors and second reviewers shall pass the relevant examination required after each training course to demonstrate eligibility to conduct audits.
- 7.3.6. Puro.earth shall set and make available to the VVBs the evaluation criteria and thresholds required to pass the relevant examination.

## **7.4. Conflict of interest and independence of VVBs**

- 7.4.1. The Validation and Verification Body (VVB) shall act independently from the Project Operator and any related entity throughout the validation and verification process.
- 7.4.2. The VVB shall ensure that validation and verification activities are conducted free from commercial, financial, organizational, or other pressures that could influence the certification decision.
- 7.4.3. The VVB shall ensure that certification conclusions are based solely on objective evidence and applicable normative requirements.
- 7.4.4. The VVB shall not validate or verify a Project Activity for which it or an affiliated entity has provided or is providing advisory, technical, or design support.
- 7.4.5. The VVB shall not validate or verify a Project Activity where it holds a financial or beneficial interest in the certification outcome.
- 7.4.6. The VVB shall establish and maintain documented policies and procedures to identify, assess, manage, and mitigate conflicts of interest.
- 7.4.7. The VVB shall ensure structural separation between audit execution and certification decision-making functions.
- 7.4.8. The VVB shall ensure that validation and verification conclusions are subject to independent internal review prior to finalization.
- 7.4.9. The VVB shall ensure that personnel assigned to audits are competent and free from actual, potential, or perceived conflicts of interest.
- 7.4.10. The VVB shall conduct a conflict-of-interest assessment prior to accepting each audit engagement.
- 7.4.11. The VVB shall document identified risks to impartiality and the measures taken to mitigate them.
- 7.4.12. The VVB shall submit a declaration of independence and conflict-of-interest confirmation prior to commencing the audit.

- 7.4.13. The VVB shall disclose its independence declaration within the publicly available Audit Report.
- 7.4.14. The VVB shall monitor conflicts of interest throughout the duration of the audit engagement.
- 7.4.15. The VVB shall notify Puro.earth without undue delay if a new actual, potential or perceived conflict of interest arises.
- 7.4.16. The VVB shall cooperate with oversight, performance reviews, and witness audit activities related to independence and impartiality requirements.

## 8. VVB Oversight

### 8.1. Objective of the VVB oversight activities

The purpose of the oversight-function is to assure that VVBs operate under similar conditions, and the output of their work (audit findings, certification decisions and volume of issued carbon credits) is consistent and comparable within the context and rules of the relevant Certification Program. To achieve this, VVBs are continuously incentivized to re-assess their own approval and training status, own audit performance and to seek and implement points of improvements and appropriate remediation activities over time.

- 8.1.1. All VVB performance observations and performance results are collected, analysed and stored in Puro.earth's VVB Performance Tool. The tool is comprised of structured records and systems maintained by Puro.earth, to systematically record VVB data to derive performance conclusions from.
- 8.1.2. Puro.earth reserves the right to raise identified VVB non-conformities at any point in time.
- 8.1.3. Puro.earth may address a VVB's non-conformity immediately (and demand a nearby resolution date) or decide to investigate or address it through one of the monitoring activities. The latter is preferred to ensure that the non-conformity incident is accounted for in the regular VVB performance results.
- 8.1.4. In all cases, the issued non-conformities shall be logged through a non-conformity incident log mentioned in the VVB Annual Performance Report and addressed by the VVB in its Improvement Plan.

### 8.2. Audit report reviews

The intent of the review is to determine whether an Audit Report is complete and accurate and compliant with the relevant Program's normative requirements and if all identified non-conformities have been resolved or dealt with satisfactorily (see also section 5.6).

- 8.2.1. Audit Reports shall always be shared by the VVB with Puro.earth before being shared with an Operator.
- 8.2.2. Puro.earth shall review audit reports on an ongoing basis, upon receipt from the VVB.
- 8.2.3. To determine the review thoroughness, Puro.earth makes a distinction between a "full review" or "limited review", see Table 3 below.

- 8.2.4. Any review that goes beyond the “limited review” is considered a “full review”, which zooms in on any specifics, e.g. identified risks, specific methodology criteria, or previously identified non-conformities.
- 8.2.5. Puro.earth shall conduct a risk-assessment to define which audit reports are subject to a “full review”, regardless of the Certification Program. Audit reports deemed to be at higher risk due to some of the characteristics (i.e. the risk indicators) mentioned below shall always be subject to a “full review”:
- A. New client: always
  - B. Re-entrant (e.g. after suspension): always
  - C. New methodology: always
  - D. New VVB: always
  - E. High impact/ high volume client (as determined by Puro.earth): always
  - F. Major non-conformities detected during the previous audit cycle: always
  - G. Methodology specific components: decided on a case-by-case basis
  - H. Existing client: once every three years
  - I. Use of renewable energy/biomass: decided on a case-by-case basis
  - J. Risks detected during pre-assessment: decided on a case-by-case basis
  - K. Changes to the client’s operational scope since last audit cycle: decided on a case-by-case basis
- 8.2.6. For each (selected) Audit Report, Puro.earth first completes a technical review as per Table 3 below (providing the minimum review content, resulting in a recommendation for the review outcome.
- 8.2.7. Puro.earth reserves the right ask clarification questions to the VVB during the review process. During the review process several iterations may take place until all issues are resolved to Puro.earth’s satisfaction. Puro.earth reserves the right to publish this exchange of information between VVB and Puro.earth on the Puro website for transparency purposes.
- 8.2.8. Puro.earth shall review the recommendation for the review outcome and check if the procedure described in this section has been followed adequately, resulting in acceptance or rejection of the audit report for the purposes of registry actions and credit issuance. The approval or rejection decision shall be made by a Puro.earth staff member other than the one who conducted the review, who shall independently review the audit report and recommendation before deciding.
- 8.2.9. Where an Operator subject to a full review has multiple verification audits in a single year, the first verification audit in that year shall always be a full review. Subsequent verification audits in that same year may be limited reviews, provided that no additional risks have been identified by the VVB or Puro.earth at the time of each audit. A full review shall be reinstated for any audit where additional risks are identified (see section 8.2.11 below).
- 8.2.10. If risks are identified during a “limited review” process, Puro.earth can either decide to scale up to a “full review”, or in the case unresolved issues remain, the escalation path and decision-making process as part of the Puro Governance shall be activated via the Chief Operating Officer.
- 8.2.11. Puro.earth always reserves the right to change the scope of the review and add more review topics, depending on the conditions and risks of the operator’s project activities.

- 8.2.12. Regardless of the review type, Puro.earth reviews the VVB’s conclusions stated in the Audit Report and determines if they concur with Puro.earth’s conclusions. For any discrepancies or questions Puro.earth shall contact the VVB for clarifications:
- A. The review result is successful if the conclusions are consistent with Puro.earth’s review findings
  - B. The review result is unsuccessful if the conclusions do not concur
- 8.2.13. Puro.earth’s observations and findings -including a proper justification- shall be logged in the VVB Performance Tool as part of documenting VVB performance.
- 8.2.14. Based on the review outcome, Puro.earth shall proceed with registry actions, including updating the status of the Project Activity, or rejecting the audit report for the purposes of registry actions and credit issuance. Puro.earth shall document the status of the operator in its Registry.
- 8.2.15. The audit report shall state which review type (“full review” or “limited review”) has been applied.
- 8.2.16. Records of reviews are retained by Puro.earth in their system for at least five (5) years from the date of the review outcome.
- 8.2.17. Operators wishing to submit a grievance about the outcome of their audit and certification process, can do so by submitting a grievance to the VVB directly. In case of an unsatisfactory response from the VVB, they can submit a grievance with Puro.earth using the Puro Standard Grievance Policy.
- 8.2.18. For avoidance of doubt, certification decisions and the issuance of carbon credits in accordance with the conditions described in this Certification Procedure document are independent of any delivery, transfer, or retirement deadlines and shall always take precedence over them. No commercial agreement, timing constraint, or stakeholder pressure may affect the certification process defined in this Framework.

**TABLE 3. MINIMUM AUDIT REPORT REVIEW CONTENT**

**ALL REVIEWS (LIMITED + FULL):**

- A. Puro.earth shall review that the information is correct in the Audit Report and in line with the information in the Puro Registry, i.e.:
  - a. Project Operator;
  - b. Project Activity;
  - c. Audit type: Validation or Verification;
  - d. Compliance with VVB eligibility and rotation requirements;
  - e. Methodology version;
  - f. Eligibility of CO<sub>2</sub> sources or biomass sources;
  - g. Credit estimation/ quantification calculations;
  - h. Monitoring period (avoid overlapping of monitoring periods) – **FOR VERIFICATION AUDIT ONLY;**
  - i. Changes to the PAD, if applicable – **FOR VERIFICATION AUDIT ONLY;**
  - j. Critical and major non-conformities raised by the VVB
  - k. The overall audit conclusion and second reviewer’s certification decision.

**ADDITIONAL FOR FULL REVIEW:**

- B. Puro.earth also reviews the completeness, relevance and/ or accuracy of:
  - a. Level of assurance stated (reasonable);
  - b. Additionality – **FOR VALIDATION AUDIT ONLY;**

- 
- c. Submitted PAD, life-cycle assessment, uncertainty and reversal risk, monitoring, stakeholder consultation, environmental and social safeguards, SDGs and any other methodology requirements – **FOR VALIDATION AUDIT ONLY**;
  - d. All non-conformities raised (and if they have been identified correctly) by the VVB, as well as the communication log between VVB and Operator, including any:
    - i. Clarification Requests (CL) and their corresponding replies;
    - ii. Corrective Action Requests (CAR);
    - iii. Forward Action Requests (FAR) or carry forward requests;
    - iv. Recommendations or suggestions for improvement;
  - e. The evidence documents that have been submitted to substantiate compliance with all criteria of the relevant Methodology.
- 

### 8.3. Observation of audits as part of oversight

Observing audits aims to identify VVB and auditor performance gaps, that is to detect if the VVB and the auditor have consistently and adequately interpreted and implemented the relevant program’s methodologies and other normative documents, have raised non-conformities correctly and have completed their tasks in due time according to prescribed timelines.

- 8.3.1. VVB audits shall be observed by a Puro Assessor (either sub-contracted or directly employed by Puro.earth) on a sample basis (see 8.3.6) aiming at 2% of the total number of VVB audit reports received in the previous calendar year, to ensure quality, consistency, and integrity of the work being conducted by the VVBs’ auditor.
- 8.3.2. During observation of audits, a Puro Assessor observes a VVB/ auditor during their normal audit process. The assessor joins and observes the performance of the auditor during the audit itself and watches and reviews the work. This helps assess whether the VVB/ auditor is following procedures, applying methodologies consistently, and engaging with Operators accordingly.
- 8.3.3. Puro.earth has the right to observe any audits either on-site or remotely, or to conduct spot-checks only.
- 8.3.4. VVBs shall therefore include in their contract with the operator that access to their premises shall be granted and the observing audits should be facilitated.
- 8.3.5. The minimum number of audits to observe shall be decided on a sample basis by the Puro Assessor and depending on available budget.
- 8.3.6. To decide which client audits to include in the sample, the Puro Assessor shall consider the following risk indicators as selection criteria:
  - A. new approved VVBs
  - B. new client
  - C. new methodology
  - D. high-value/ high impact projects

- 8.3.7. The Certification Office and Puro Assessor collectively plan the audit observation, considering available budget, the audit schedule maintained by the Certification Office, and the upcoming audits meeting the selection criteria.
- 8.3.8. Once the observation of an audit is agreed between the Certification Office and the Puro Assessor, the Puro Assessor contacts the VVB and the client at the latest one week prior to the scheduled audit starting date, to inform about the observation and to make further (logistical) arrangements.
- 8.3.9. During an audit observation, the Puro Assessor shall not intervene nor interrupt the audit process, to not influence the outcome.
- 8.3.10. During and after an audit observation, the Assessor shall fill out the Observation of Audit Checklist and include own conclusions and justifications for those conclusions. The assessor also prepares an observation audit report.
- 8.3.11. The completed checklists (and the observation of audit report, if applicable) shall be submitted by the Puro Assessor after completion of the witness audit to the Certification Office, for review and approval by Puro.earth.
- 8.3.12. Puro.earth shares the approved Checklist with the VVB and logs the conclusions and performance in the VVB Performance Tool.
- 8.3.13. Observation of audits may also be used for the Puro Monitoring, Evaluation and Learning (MEL) system (see Section 11) to ensure the quality of normative documents in the Puro Framework and provide recommendations for their improvement (e.g. With respect to technical or financial feasibility or auditability).

## 8.4. Consequences of oversight activity

- 8.4.1. At the end of each calendar year, the Puro Certification Office shall review the VVB Performance Tool and the data collected over the year resulting from audit report reviews and the witness audit results.
- 8.4.2. Based on the review of the VVB Performance Tool, the Certification Office shall prepare an Annual VVB Performance Report/ Statement for each VVB (to be submitted to each VVB latest on the 1st of June of the following year), containing at least:
  - A. Summary and results of all the audit reports and system reviews
  - B. Summary and results of all the witness audits conducted
  - C. An overview of all VVB non-conformities and corrections and corrective actions (and status thereof and deadlines) resulting from the monitoring activities.
  - D. A final performance conclusion and the consequences.
- 8.4.3. As a response to the Annual VVB Performance Report, the VVB shall share an Improvement Plan with Puro.earth no later than the 1st of August of the year following the year of the assessment, summarizing the status of improvements and resolutions for all VVB non-conformities, other issues detected or improvements imposed. Based on the actions formulated in the improvement plan, individual agreements are made with the VVB to decide on the follow-up contact moments.
  - A. At the end of each year or in the event of repeated VVB performance or quality issues with audit reports, auditors or second reviewers, audit activities or any other aspect of the audit, Puro.earth reserves the right to:
    - B. Issue a 'warning' to the VVB. Two consecutive warnings, may result in immediate suspension or withdrawal once the second warning is issued.
    - C. Suspend or revoke with immediate effect the VVB's approval and/or (lead) auditor approval. This may include, but not be limited to, the following cases::

- i. proven deliberate fraud and/ or severe misbehaviour
- ii. a VVB non-conformity identified by Puro.earth as critical
- iii. two consecutive warnings in a row.

8.4.4. Decisions on suspension or revocation are at the sole discretion of Puro.earth, unless stated differently in a separate Program Annex.

8.4.5. In case of suspension/ revocation, the VVB can re-apply one year after the date this was issued. To re-apply, the VVB shall then first demonstrate that the cause that led to the issuance of the suspension/ revocation has been remediated.

8.4.6. Warnings, suspensions or revocations are also published in the list of approved and eligible VVBs available on the Puro website.

8.4.7. Poor VVB performance shall also be reported to the appropriate Accreditation Body, if relevant.

8.4.8. A suspension or a withdrawal of a (lead) auditor, second reviewer or VVB approval shall be valid for a minimum of one year or until the issues have been rectified, whichever comes later.

8.4.9. Any decision to suspend or revoke a (lead) auditor from the approved auditor list or the VVB's approval may be appealed. VVBs can submit a complaint about the outcome of their performance reviews and the monitoring activities through the Puro Grievance procedures.

## 9. Registry Operating Rules

### 9.1. Registry Overview

9.1.1. Credits are uniquely identified in the Registry and each credit's chain of custody is tracked from when the credit is issued through to its Transfer or Retirement. All Transactions are subject to service fees as defined in the Platform Agreement.

9.1.2. Any legal entity may request the opening of an Account in the Puro Registry if the following conditions are met:

- A. The entity must satisfactorily pass KYC checks in line with Puro.earth's Know your business, know your customer and anti-money laundering policies, subject to rule 4.2.5.
- B. The entity must agree to the Terms and Conditions as defined in the Platform Agreement
- C. The entity must pay the annual fee for each period for which it wishes the Account to remain open.

9.1.3. For Project Operators, a Registry account will be opened automatically upon signature of the Platform Agreement and payment of relevant fees.

9.1.4. Puro.earth has the right to suspend the Account related to a Project Activity and the associated credits if reporting timelines (see section 5.5) or Terms and Conditions are not adhered to.

9.1.5. The Project/Certificate status shall be updated in the Registry as the Project Activity progresses through its development and the certification process. Table 4 summarizes the Project Activity status, the conditions that triggers its updates, and the documentation that shall be uploaded in the Registry to support the status.

**TABLE 4. SUMMARY OF PROJECT ACTIVITY STATUS IN THE REGISTRY**

| Project/Certificate Status | Trigger  | Registry upload / transparency  |
|----------------------------|--|---|
| Under Development          | Platform agreement & PCN   | PCN and basic project info, upon request  |
| Under Validation           | Completeness check of audit documentation done, audit scheduled                    | PAD/MP  |
| Validated                  | Successful Puro.earth review of Validation Report                                  | Validation Audit Report   |
| Verified                   | Successful Puro.earth review of Verification Report                                | Verification report & statement, issued credits,  |
| Rejected                   | Unsuccessful Puro.earth review, non-conformities open, double registration         | Puro.earth decision with justification (e.g. double registration, non-conformities)       |
| Suspended                  | Non-resolution of non-conformities in time, invoices unpaid, reversal notification | Puro.earth decision with justification (e.g. major non-conformities not resolved in time) |
| Expired <sup>3</sup>       | Automatic upon end of CP   | Automatic upon end of CP  |
| Terminated <sup>3</sup>    | Voluntarily cancelled by Operator  | Letter from Project Operator  |
| Withdrawn <sup>3</sup>     | Cancelled by CB/CS   | Decision from Puro.earth  |

## 9.2. Credit issuance

- 9.2.1. Puro.earth shall issue one (1) unit credit per verified metric ton of carbon dioxide removed based on the evaluation of the VVB's opinion with a reasonable level of assurance of the Project Activity's performance and its accompanied certification decision.
- 9.2.2. Credits are issued only after a successful review by the Puro.earth of the associated Verification Audit Report.
- 9.2.3. Credits are only issued to a certified Project Activity associated with a Registry Account held by an approved Account Holder.
- 9.2.4. Credits are always issued based on a Verification Audit Report for a specified Monitoring Period for a certified Project Activity quantifying the Net CO<sub>2</sub> Removal or reduction. The CO<sub>2</sub> removals or reductions and the greenhouse gas emissions associated are quantified using the rules defined in the corresponding Methodology.
- 9.2.5. Credits are issued to certified Project Activities that have been verified to meet the requirements set in the normative documents for the relevant program operated by Puro.earth.
- 9.2.6. Each credit shall specify the following Attributes:
- Unique identifier / Serial Number.
  - Issuance Date.
  - Certification Program used
  - Applied Methodology and its version.
  - A label to communicate the storage durability of the Methodology, if applicable.
  - Project Activity identifier, name, and location of the Project Activity.
  - Host country and sector of the Project Activity.

<sup>3</sup> CRCF Requirement for Certificate of Compliance

- H. Monitoring Period (i.e. first and last dates of the Output Report).
- I. Specific information as may be specified in the corresponding Methodology.
- J. Other Attributes as required, such as labels linked to frameworks that Puro.earth has been approved by as a certification scheme or others.

9.2.7. To initiate the process of credit Issuance, a Project Operator with a certified Project Activity shall submit to Puro.earth a Monitoring Report and supporting documentation at least every twelve (12) months and Puro.earth shall initiate the verification procedure for the Monitoring Period as specified in Section 5.4.

9.2.8. Following a successful Verification and internal review outcome conducted by Puro.earth as part of VVB Oversight procedures, Puro.earth shall issue the number of credits corresponding to the verified credit volume in the Verification Audit Report to the Project Operator's Account associated with the Project Activity.

9.2.9. Credits are issued as integer digits. Any leftover from a specific Project Activity, representing a volume less than 1 metric tonne, is recorded, and added into the Issuance volume of the following Issuance for that Project Activity.

Once credits are issued, Puro.earth will update the Registry to show the number of issued credits. The Project status remains "Verified".

### 9.3. Credit transfer

A Credit Transfer is a transaction that moves specific issued credits from one Account to another within the Puro Registry.

- 9.3.1. Account Holders may transfer credits from their Account(s) to other Accounts within the Puro Registry.
- 9.3.2. The Account Holder, or a party authorized by the Account Holder, shall initiate a Transfer by submitting a Transfer request in the Puro Registry.
- 9.3.3. The Transfer request shall specify the type, vintage and number of credits to be transferred along with the recipient Account Holder's name and Account number.
- 9.3.4. The transfer request is executed automatically, ensuring continued tracking of issued credits.
- 9.3.5. Puro.earth is entitled to alter the details of credits to rectify any errors that have occurred in the Issuance or Transfer process subject to approval of both the transferring and receiving account Holders.

### 9.4. Credit retirement

- 9.4.1. Retirement removes credits from circulation and entitles the Beneficiary exclusive ownership of the quantity and other Attributes of the credit; therefore a retired credit cannot be used further.
- 9.4.2. An Account Holder may retire credits for their own benefit or on another Beneficiary's behalf.
- 9.4.3. The Account Holder, or a party authorized by the Account Holder initiates the Retirement by submitting a Retirement request to Puro.earth via the online Puro.earth platform.
- 9.4.4. The Retirement request shall specify the type, vintage and number of credits, including their Unique IDs, to be retired along with the following Retirement information:
  - A. Beneficiary entity name.
  - B. Use purpose: identification of the purpose of the Retirement.
  - C. Use period: identification of the period of the Retirement.

D. Use country: identification of the country of the Retirement.

9.4.5. The Retirement Request is executed automatically and the credits are removed from circulation. The Retirement information is made available publicly through the Registry and a Retirement confirmation is sent to the party which initiated the Retirement.

9.4.6. Puro may alter, upon request by the party which initiated the Retirement, the details of Retirement to rectify any minor errors (such as typographical or grammatical errors) provided that the alteration does not change the climate impact of the credit. The alteration request must be submitted in writing within two business days from receipt of the Retirement confirmation.

## 9.5. Credit Withdrawal

9.5.1. To maintain the accuracy and veracity of the System, Puro.earth has the right to withdraw credits from an Account Holder's Account.

9.5.2. Withdrawal of credits from an Account Holder's Account can take place in case of any of the following circumstances:

- A. An error has occurred in the issuing, transferring or other processing of the credit.
- B. Due to a breach of Puro Framework documents which results in excess issuance.
- C. To balance the accounts in case of reversals according to Section 9.10 of these procedures.

## 9.6. Credit transition between Puro.earth operated Programs

Project Operators may request to transition credits between Programs operated by Puro.earth and their associated Methodologies, subject to the requirements set out in this Section and without compromising double-counting prevention rules.

9.6.1. A Project Operator may request credits that have been issued, but not retired, for a specific Monitoring Period to be cancelled and reissued under another Methodology for which the Project Activity has been validated.

9.6.2. Transitioning issued credits shall only be permitted where the Project Activity complies with the monitoring rules and criteria of the target Program and Methodology and is eligible for Verification under that Methodology. The Project Operator shall hold a valid Validation Audit Report for each applicable Methodology.

9.6.3. The cancellation request shall include the total number of issued credits for a specific Monitoring Period or a proportion (fixed percentage) of that number.

9.6.4. Where the total number of issued credits for a specific Monitoring Period is cancelled, the full number of credits, as quantified in accordance with the target Methodology, shall be issued.

- 9.6.5. Where a proportion of issued credits for a specific Monitoring Period is cancelled, the same proportion of credits for that Monitoring Period, as quantified in accordance with the target Methodology, shall be issued.
- 9.6.6. Where a Project Activity transitions from one Methodology to another, the VVB shall determine whether a new Verification Audit is required to demonstrate compliance with the target Methodology. Where the existing audit record does not sufficiently demonstrate compliance with the requirements of the target Methodology, a new Verification Audit shall be conducted.
- 9.6.7. Puro.earth shall ensure that any transition between Methodologies is transparently disclosed in the Registry, including at a minimum the source Methodology, the target Methodology, and the effective date of the transition.
- 9.6.8. Any transition between methodologies shall be recorded and reconciled with the double-counting prevention mechanisms set out in Section 9.8, including the registry log, to ensure that no duplicate issuance or attribution of credits occurs.
- 9.6.9. Credits that have been retired prior to the transition shall not be eligible for transition to a new Methodology under any circumstances.

## 9.7. Termination of certification of a Project Activity

- 9.7.1. An Operator may request the termination of a Project Activity. Puro.earth will confirm receipt and implement the request within 30 (thirty) calendar days.
- 9.7.2. Once the termination request is implemented, the Operator shall receive a document of Termination from the Registry stating from which date the Project activity is no longer certified under the Puro Program or another program operated by Puro.earth. Any issued credits in the Registry account of the Operator shall remain valid and can still be traded as long as the Account in the Registry is still active. In any event, issued credits remain valid regardless of the status of a Project.
- 9.7.3. In all cases, the operator shall complete any Audits still due and to pay any fees still due.

## 9.8. Preventing Double counting

The aim of using the Registry to track Project activity and credits is to prevent the possibility of double counting. All processes aim to exclude the possibility of more than one credit being issued for the same volume of CO<sub>2</sub> Removal or Reduction for the same Monitoring Period and that a credit issued represents the sole proof of ownership of the credit and associated credit Attributes.

### Preventing double registration within the Registry

- 9.8.1. Puro.earth shall control that the same Account Holder shall not register the same Project Activity more than once and that two Account Holders shall not register the same Project Activity in the same location for the same Crediting Period.
- 9.8.2. The Registry logs proof of ownership of the Project Activity to be certified, and legal rights to the credits resulting from the activity of all parties in the supply chain.

## Preventing double registration or double issuance outside the Registry

- 9.8.3. Puro.earth shall control that the same Account Holder has not registered the same Project Activity for the same period with another registry. The same Project activity may register with another registry for a different Crediting Period.
- 9.8.4. Puro.earth requires submitting prior registrations of the same Project activity with other crediting schemes. The Operator registering a Project activity shall clearly state in the PAD if the same activity is currently registered or in the process of registering with another carbon-crediting scheme and inform Puro.earth of any changes.
- 9.8.5. The Operator shall also state if they have applied to be registered with another carbon-crediting scheme within the previous 3 (three) years, but the Activity was rejected and the reason for rejection.
- 9.8.6. In the case of a Project activity transferring from another registry to the Puro Registry, the Monitoring period shall not overlap.
- 9.8.7. The Operator shall provide a document of deregistration from the other Registry stating from which date the Project activity is no longer credited under the other carbon-crediting program. Credits produced after the date of registration in the Puro Registry and the corresponding Monitoring period shall be credited under a Program operated by Puro.earth.
- 9.8.8. When the Project activity is deregistered from the Puro Registry, and transferred to another carbon-crediting scheme, the Operator shall receive a document of deregistration from the Registry stating from which date the Project Activity is no longer certified under a Program operated by Puro.earth.
- 9.8.9. The Registry does not allow the transfer of credits outside of the Registry.
- 9.8.10. The Registry does allow simultaneous registration with other crediting programs that are crediting activities other than carbon, such as biodiversity credits, or renewable energy credits. In such cases, the Registry requires disclosure of simultaneous registrations.
- 9.8.11. Double issuance of credits where another scheme has issued credits for the same project activity and the same period shall be prevented as described above in rule 9.8.4.

## Preventing double retirement and use

- 9.8.12. Credits are issued in the Registry, where the full lifecycle is tracked from Issuance to Retirement, ensuring avoidance of double Retirement and use.
- 9.8.13. Each credit shall be uniquely identified with a serial number, and the Retirements are published with Beneficiary and the Retirement purpose.
- 9.8.14. A credit cannot be retired more than once in the Registry.

## Preventing double use within the supply chain

- 9.8.15. The Operator is responsible for ensuring that double use or double reporting of the CO<sub>2</sub> credit within the supply chain is prevented by contracts, statements, or other measures.
- 9.8.16. Where a physical product or material stores the removed CO<sub>2</sub>, the product/material shall not be associated with any claims of CO<sub>2</sub> Removal nor other Attributes represented by the relevant credit unless the corresponding credits have been retired on behalf of this physical material/product.

## Preventing double counting in the context of Paris Agreement Article 6

- 9.8.17. Article 6 of the Paris Agreement enables international cooperation between signatory countries to the Paris Agreement so the world can achieve the goal of net-zero emissions by the second half of this century.
- 9.8.18. Credits used in the context of Article 6 mechanism shall meet the relevant requirements relating to double counting and corresponding adjustments.
- 9.8.19. The public or private entities that wish to register the Project activity as an Article 6 activity shall follow the procedures in [Article 6 Procedures Document](#) which defines the procedures for the use of credits for Nationally Determined Contributions (NDCs) and other international mitigation purposes under Article 6 of the Paris Agreement.

## Preventing scheme hopping

- 9.8.20. Operators shall disclose in the PAD any previous certifications or attempts to certify a Project Activity in the preceding five (5) years with another Certification Framework or Program. If the information is not provided by the Operator, the Project Activity shall not be certified.
- 9.8.21. Project Activities shall not be certified where the Operator or their legal predecessor has failed a certification audit under another certification scheme within the previous three (3) years and, where that certification scheme is still operational.
- 9.8.22. Project Activities cannot be certified under a Certification Program which is operated by Puro.earth if they are certified for the same activity by a different Certification Program which is not part of the Puro Framework (“no scheme hopping”) unless they deregister from that Program.
- 9.8.23. Where a project Activity did not achieve certification but applied to another Certification Framework or Program in the preceding five (5) years, it shall disclose the reason for any Audit failures.
- 9.8.24. Once Validated, project activities and carbon credits must remain exclusive to the Puro Certification Framework and cannot be re-certified or transferred elsewhere, unless the Project Activity is deregistered and/or any issued credits have been cancelled, following Section 9.6.
- 9.8.25. Any breach of the above rules, including undisclosed dual certification, shall result in suspension of the Project Activity and may result in rejection or withdrawal, and shall trigger compensation measures for any excess credits issued in accordance with Section 9.10..

## 9.9. Public Registry Reports

- 9.9.1. Puro.earth shall maintain a publicly accessible Registry providing transparent information on all Project Activities and issued, transferred, and retired credits across all Programs operated by Puro.earth.
- 9.9.2. The Registry shall make publicly available, at a minimum, the following information for each Project Activity, subject to the provisions of Rule 9.9.4:
- A. Project Activity name and unique identifier;
  - B. Project Operator;
  - C. applicable Program and Methodology;
  - D. status of the Project Activity;
  - E. Crediting Period start and end dates;
  - F. Certificate of Compliance status (including issuance, suspension, or withdrawal);
  - G. quantity of credits issued, transferred, cancelled, and retired;

- H. monitoring and verification history, including validation and verification audit reports, subject to applicable confidentiality provisions;
  - I. any transition between Methodologies in accordance with Section 9.6.
- 9.9.3. The information referred to in Rule 9.9.2 shall be updated on an ongoing basis and, at a minimum, following each issuance, transfer, cancellation, or retirement of credits, as well as any change in certification status.
- 9.9.4. Where a credit has been issued to a beneficiary, Puro.earth may, upon request of the Project Operator, apply a temporary embargo on the public disclosure of the beneficiary's identity for a period not exceeding 12 (twelve) months from the date of issuance. Following the expiry of the embargo period, all information shall be made publicly available.
- 9.9.5. Puro.earth shall provide account holders with access to account statements reflecting all transactions associated with their Registry account, including issuance, transfer, cancellation, and retirement of credits.
- 9.9.6. Puro.earth shall provide account holders with retirement statements confirming the permanent retirement of credits, including the quantity, unique identifiers, date of retirement, and, where applicable, the beneficiary.
- 9.9.7. All public Registry information and account statements shall be maintained to ensure accuracy, traceability, and consistency with Puro.earth's double-counting prevention mechanisms set out in Section 9.8.

## 9.10. Compensation for Excess Issuance or Reversals

Compensation measures are remediation measures specifically applicable to Project Activities which have already issued credits, where an error or non-conformity is discovered after the issuance date. The same provisions apply to Project Activities which have suffered a reversal event. By requiring compensation, Programs ensure integrity and that all certified outcomes remain consistent with applicable methodologies, verification criteria, and the overarching principles of transparency, accuracy and conservativeness.

- 9.10.1. Project Activities with issued credits which are, post-issuance, found to have an error, a critical non-conformity or a major non-conformity which has led to excess issuance shall be subject to compensation measures defined in rules 9.10.6 to 9.10.9.
- 9.10.2. Project Activities which suffer a reversal event shall also be subject to the compensation measures defined in rules 9.10.6 to 9.10.9.
- 9.10.3. When an Operator detects a Reversal event or error, they shall without delay act to:
  - A. Prevent further reversals or errors from occurring.
  - B. Notify Puro.earth of any Reversal event or error within 5 days of detection.
  - C. Determine the failure that caused the Reversal event or error.
  - D. Calculate the Reversal or excess quantity (in tCO<sub>2</sub>e).
- 9.10.4. When Puro.earth detects an error, or is notified of an error or reversal event, Puro.earth shall suspend the Project Activity and the Operator's account(s) holding active units issued for a Project Activity that is suspected of reversal event or excess issuance.

- 9.10.5. Puro.earth shall review the excess Issuance concerns or the Reversal notification and confirm the Reversal or Excess Compensation Quantity. Puro.earth may seek clarifications from the relevant VVB(s) to form the final opinion, and this may require reopening the Audit and revising Audit report.
- 9.10.6. Puro.earth shall undertake the following steps until the full Compensation Quantity is recovered:
- A. subtract the Compensation Quantity from the verified number of credits for the relevant Monitoring Period in which the Reversals or Excess issuance occurred, or the subsequent Monitoring Period
  - B. withdraw from the Operator's Account active credits issued to the Project Activity in question equal to Compensation Quantity.
  - C. Where a sufficient number of credits are not available in the Operator's Account, the Operator shall deposit credits of the same type or, if unavailable, of comparable permanence in the Account and Puro.earth shall withdraw units until the Compensation Quantity is recovered
- 9.10.7. Where the reversal event notification concerns geological carbon storage, Puro.earth shall assess the storage permit obligations to recover the climate impact in case of a reversal. In jurisdictions where, in the event of leakage from a storage site, permitted storage operators are obliged to surrender emissions allowances equivalent to the released amount or to effectively neutralize the climate impact by other means, Puro.earth shall not execute any other remedial actions listed in rule 9.10.6. The following jurisdictions are *a priori* considered as having robust legal obligations for reversal recovery:
- A. Any member state of the European Economic Area (EEA) Agreement
  - B. The United Kingdom of Great Britain and Northern Ireland
- 9.10.8. If the specific type of credits is unavailable, other unretired verified carbon removal credits of comparable physical storage permanence and comparable low risk of reversal may be used by the Operator, subject to Puro.earth's prior approval, which shall not be unreasonably withheld.
- 9.10.9. The Puro Registry will identify all credits used towards replenishment of a reversal or excess issuance by their source registry identification numbers.
- 9.10.10. Puro.earth shall make public any compensation measures applied to a Project Activity in the Registry.
- 9.10.11. Compensation measures shall not affect credits that have already been retired by third parties.
- 9.10.12. Puro may establish a program-level buffer pool mechanism for specific programs or activity types as an additional compensation instrument for unavoidable reversal events in activities classified as Tier III under CC 5.1. Where established, the operational rules governing contributions, drawdown conditions, and activation shall be specified in the Certification Procedures and applicable methodology-specific criteria.

## 10. Document Management System

- 10.1.1. Puro.earth shall establish and maintain a documented record-keeping policy covering all normative documents, audit documentation, registry records, and supporting evidence under the Certification Framework.
- 10.1.2. Puro.earth shall retain all records relevant to the issuance, transfer, and retirement/cancellation of credit units for at least three years beyond the end date of the latest CORSIA compliance period in which such units are eligible.
- 10.1.3. Puro.earth shall ensure that all retained records remain accessible, legible, and protected against loss, alteration, or unauthorized access throughout the retention period.
- 10.1.4. Puro.earth shall implement version control procedures for all normative documents, methodologies, templates, and forms.
- 10.1.5. Puro.earth shall ensure that superseded document versions are archived and retrievable.
- 10.1.6. Puro.earth shall document and retain evidence of all material changes affecting program procedures, registry systems, governance, or eligibility scope.

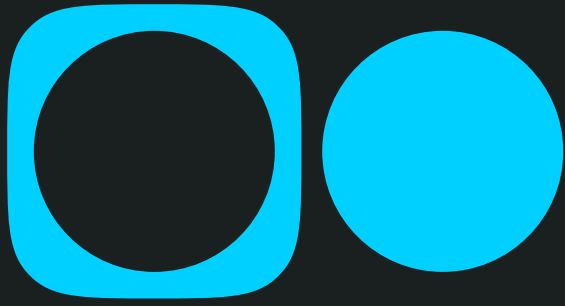
## 11. Monitoring, Evaluation and Learning (MEL) system

- 11.1.1. Puro.earth shall establish and maintain a Monitoring, Evaluation and Learning (MEL) system to provide a structured and systematic approach to monitor, evaluate and improve the design and implementation of the Puro Framework.
- 11.1.2. As part of the MEL system a range of program components are reviewed systematically, with the aim to detect reoccurring issues and challenges to improve the design and implementation of a certification program, all with the purpose of evaluating if the program makes the desired impact and has maximized its impact potential.
- 11.1.3. The MEL system shall cover, at a minimum:
  - A. Program governance, rules and procedures.
  - B. Methodologies and other normative documents.
  - C. Verification and certification activities, including VVB oversight (see Section 8).
  - D. Registry and information management practices.
  - E. Program impact and performance against Puro.earth's stated objectives and principles (or adopted programmes if applicable).
- 11.1.4. The MEL system shall support continuous improvement and shall feed into the revision of methodologies, procedures and guidance documents where relevant.

## Document History

The new version of the document is effective on Issue Date.

| Version | Issue Date | Comment                                 |
|---------|------------|---|
| V 1.0   | 28.05.2026 | Initial version developed and published |



# puro earth

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Puro.earth is the world's leading market infrastructure provider for engineered carbon dioxide removal (CDR). Backed by Nasdaq, we provide the certification frameworks, scientific standards, and digital systems that allow engineered CDR to scale and operate as an investment-grade market.

At the core of this infrastructure is the Puro Standard - the world's first dedicated standard for engineered carbon removals. Our methodologies are used by suppliers to certify their carbon removal solutions that durably store carbon dioxide for at least 100 years, and in many cases, over 1000 years. We have certified over 100 engineered carbon removal projects to date, resulting in the issuance of CO<sub>2</sub> Removal Certificates (CORCs) in the Puro Registry as verified, traceable, investable assets. Our infrastructure is trusted by over 600 companies worldwide to purchase carbon removals with confidence, including Microsoft, McKinsey and BCG. It supports both voluntary and compliance pathways, including integration with CCS+ methodologies and readiness for emerging frameworks such as the EU CRCF.

Puro.earth is an ICVCM Eligible Carbon Crediting Programme.  
For more information, visit <https://puro.earth>, and follow us on LinkedIn.