



# Puro Standard Grievance Policy

Approved by	Board of Directors of Puro.earth Oy
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Policy owner	Head of Policy
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## Puro Standard Grievance Policy

### 1. Introduction:

- 1.1 Puro.earth is a crediting program within the carbon dioxide removal (CDR) space. The primary role is to a) develop and define approved methods for CDRs with high integrity and climate impact, and b) to operate a registry in which certificates based on approved CDR methods can be issued and recorded.
- 1.2 In its capacity as a crediting program, Puro.earth strives to provide services of the highest standards to its stakeholders and to conduct its methodology development and operation with maximum integrity. To reach this target, Puro.earth provides a mechanism by which stakeholders (including but not limited to suppliers, buyers of certificates, VVBs<sup>1</sup>, and intermediaries) may submit complaints on a variety of matters with regard to Puro.earth's role as standard setter and registry operator.
- 1.3 A guiding principle in the Grievance Policy is to achieve highest possible transparency in the grievance process and decision making to ensure that trust, credibility, and integrity is built into Puro.earth's CDR certificates and its registry. Moreover, the process around any complaint or appeal should follow a pre-defined timetable with swift handling of any submitted item.

### 2. Scope

- 2.1 The term "grievance" in the Grievance Policy covers any situation in which there is dissatisfaction with the Puro.earth procedure and functioning (including entities such as Puro.earth itself, and to Puro.earth linked subcontractors, VVBs, or market places and/or brokers. A "grievance" may relate to a decision taken by Puro.earth or an aspect of how Puro.earth operates a program.
- 2.2 The grievance procedure provides a formal process for addressing grievances on matters divided into two areas.
  - i. Credit eligibility and related processes, and
  - ii. Registry and ancillary services.

The above matters include (but is not limited to) the following:

- 2.2.1 *Credit eligibility and related processes:*
  - Adoption and alterations to methodology requirements, normative documents, and procedures
  - Scientific modelling, LCA analysis methodologies, and GHG emissions and removals accounting
- 2.2.2 *Registry and ancillary services:*
  - credit issuances and transactions in registry
  - Registration or deregistration of CO<sub>2</sub> Removal suppliers and other participants
  - VVBs processes and Puro.earth approval of such bodies

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<sup>1</sup> VVB = Validation and Verification Body

- Publication of documents, transparency and data privacy
  - Market data
  - Fees and payments
- 2.3 Project-related grievances as listed below do not fall within the scope of this Grievance Policy. In the following cases, stakeholders shall first submit concerns to the applicable VVB's grievance procedure:
- Non-compliance of standard requirements as applicable to a project
  - Findings of audit reports and calculations conducted.
- 2.4 It is not within the scope of this Grievance Policy to handle complaints regarding buyers' potential claims related to the utilization / retirement of any credit, nor any legal matters related to the utilization including, but not limited to, reporting, accounting, and specification of the credit.
- 2.5 It is not within scope of this Grievance Policy to handle stakeholder interests in relation to production facility activities. Any such grievance is handled according to other processes<sup>2</sup>.

### 3. Escalation order and decision making

- 3.1 Any grievance should be submitted according to the process described in Section 5.
- 3.2 *"Credit eligibility and related processes"*
- 3.2.1 Matters related *"Credit eligibility and related processes"* should be investigated, prepared and presented by Puro.earth's Head of Policy to the Advisory Board<sup>3</sup>.
- 3.2.2 The Advisory Board should resolve if the grievance should be dismissed and earlier decisions and / or processes should remain unchanged (*"negative decision"*) or if any amendments are required.
- 3.2.3 The decisions should be made in accordance with the *"Terms of Reference for Puro.earth Advisory Board"*<sup>4</sup> and the *"Conflict of Interest policy"*. Decisions shall be made public in the externally available *"Log of Current and Historical Grievance"*.
- 3.2.4 The Advisory Board may, in accordance with its Mandate and Authority, seek independent professional advice when needed as support when considering the grievance.
- 3.2.5 Any negative decision by Advisory Board in the matter can be appealed by the entity submitting the grievance.

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<sup>2</sup> Refer to Puro.earth's *"Stakeholder Engagement Requirement"*, see Puro.earth website [Document Library](#).

<sup>3</sup> Puro.earth's Advisory Board ensures high credit-level integrity and robust principles for science-based high-quality carbon removal verification and is authorized by Puro.earth's Board of Directors to manage the Puro Standard and Crediting Rules. Puro.earth Standard and Crediting Rules include project eligibility rules, quantification of carbon removal, validation and verification rules, conditions for issuance of credits and retirement of credits. The Advisory Board brings together a diverse group of experts in the carbon markets with a mix of skills and experience. They are independent and non-executive, meaning they are not Puro.earth employees. The Advisory Board reviews its membership on an annual basis and is responsible for independently nominating, evaluating and appointing new members through a majority vote. For detailed information on the current members of the Advisory Board refer to Puro.earth website <https://puro.earth/governance/>

<sup>4</sup> Refer to [Terms of Reference for Puro.earth Advisory Board](#)

- 3.2.6 The detail of the appeal and the rationale for the decision made by the Advisory Board should be presented by the Chair of the Advisory Board to the Board of Directors of Puro.earth Oy<sup>5</sup>.
- 3.2.7 The Board of Puro.earth Oy should resolve the matter in accordance with the "Board of Directors' Charter for Puro.earth Oy" and Puro.earth's "Conflict of Interest policy for Board of Directors". Decisions shall be made public in the externally available "Log of Current and Historical Grievance".

### 3.3 "Registry and ancillary services"

- 3.3.1 Matters related to "Registry and ancillary services" should be investigated, prepared and presented by Puro.earth's Head of Policy to Puro.earth's CEO.
- 3.3.2 The CEO should decide if the grievance should result in a negative decision or if any amendments are required.
- 3.3.3 The decisions should be made in accordance with the "Instruction for the CEO" and "Conflict of Interest policy". Decisions shall be made public in the externally available "Log of Current and Historical Grievance".
- 3.3.4 Any negative decision by CEO in the matter can be appealed by the entity submitting the grievance.
- 3.3.5 The detail of the appeal and the rationale for the decision made by the CEO should be presented by the CEO to the Board of Directors of Puro.earth Oy.
- 3.3.6 The Board of Directors of Puro.earth Oy should resolve the matter in accordance with the "Board of Directors' Charter for Puro.earth Oy" and "Conflict of Interest policy".

## 4. Eligibility

- 4.1 Any stakeholder may submit a grievance to Puro.earth following the procedure outlined in this Grievance Policy. By submitting a grievance, the complainant agrees to the provisions of this Grievance Policy.
- 4.2 A Stakeholder can opt to be anonymous upon written request in the Puro.earth's external reporting of the complaint.
- 4.3 Puro.earth reserves the right to reject submissions that are:
  - anonymous if they do not include justification for anonymity and substantive evidence to support the allegations, or
  - related to matters already resolved through this Grievance Policy unless new evidence is provided.

## 5. Grievance procedure

- 5.1 Any stakeholder may submit a grievance in writing to Puro.earth at any time. Such grievance must include the following information:
  - Name, organization and contact details (email and telephone) of the complainant.
  - Any request for confidentiality/anonymity of complainant with reasons
  - Description of the grievance including:
    - Timing of grievance/complaint

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<sup>5</sup> The Board of Puro.earth consists of representatives from Nasdaq Inc., Fortum Oy and independent board members with specific expertise within the CDR-market. For detailed information of the current Board of Directors Refer to Puro.earth website <https://puro.earth/board/>

- The principle, requirement, or procedure (if known) allegedly breached.
- Nature of grievance and perceived impact
- Supporting evidence and documentation.
- Declaration of any potential or perceived conflict of interest
- Declaration that information being provided is true, accurate and made in good faith

- 5.2 The submission should be made via e-mail to [grievance@puro.earth](mailto:grievance@puro.earth) with the word "Grievance" in the subject line.
- 5.3 Puro.earth will conduct an initial review and within 20 calendar days reply to the complainant to confirm whether the grievance is deemed to be complete (i.e. in scope and that the supporting evidence and documentation is sufficient).
- 5.4 If grievance is deemed complete, Puro.earth shall within a further 30 calendar days make an investigation.
- 5.5 Puro.earth reserves the right to extend the investigation deadlines, if required. The complainant will be informed about the revised timeline.
- 5.6 After resolution according to Section 3, Puro.earth will inform the complainant of the decision in writing.
- 5.7 Any appeal by the complainant must be submitted in writing within 30 calendar days after their receipt of the initial decision. The appeal should be submitted according to section 5.

## 6. Records and transparency

- 6.1 Within 7 calendar days after a grievance has been confirmed complete, Puro.earth should make the grievance public on its website<sup>6</sup> with access to supporting documentation unless the complainant has requested confidentiality.
- 6.2 Puro.earth will update information on status in investigation on an ongoing basis and make any additional documentation available (subject to any confidentiality requirement).
- 6.3 After resolution according to Section 3, Puro.earth should make the decision public on its website (in "Log for Current and Historical Grievance").
- 6.4 When / if rectifying measures have been taken (and verified if required), such completion of measures (and any verification) should be disclosed.
- 6.5 Any identified Conflict of Interest in the resolution process, refer to Section 3, should be included in Puro.earth's written response to the grievance and publicly disclosed.

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<sup>6</sup> Information will be made public in "Log for Current and Historical Grievance"

## 7. Confidentiality and data privacy

- 7.1 Any information provided by the complainant in connection with its grievance may be used throughout the investigation and reporting processes (in particular, it may be disclosed to other entities (including Nasdaq Group entities) in connection with required support related to legal, regulatory, or other types of advice and proceedings).
- 7.2 Such information will not be treated as confidential, and may be made publicly available, unless specifically requested by the complainant.
- 7.3 Applicable data protection legislation and relevant Puro.earth and Nasdaq Privacy Policies shall be followed in relation to grievances.