

Re Carbon Gözetim Denetim ve  
Belgelendirme Ltd. Şti.

Bagi's Plaza  
Muhsin Yazıcıoğlu Cad. 43/11  
TR / 06520 Balgat-Ankara

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## Handling of Complaints, Appeals and Disputes Procedure



Carbon Division


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### 1. Purpose

The purpose of this procedure is to ensure fast and appropriate handling of disputes, complaints and appeals relating to Re Carbon Ltd.'s validation and/or verification/certification activities communicated by a client and/or other possible validation/verification stakeholders.

### 2. Responsibility

- Quality Manager
- Sales Manager – Carbon
- Certification Manager
- General Manager
- Team Leader(s)

### 2. Application

#### 3.1. Definitions

Please see DOE Glossary of Terms

#### 3.2. Complaint process

Complaints are expressed and communicated to Re Carbon Ltd. either formally (written) or informally (verbal). The complaints can also be related to the validation or verification/certification services handled by Re Carbon Ltd. and in case of the complaints including the ones with regards to the validation or verification/certification services handled by Re Carbon Ltd., the following procedure is followed.

If complaint was made verbally, the complaint including the one against validation or verification/certification services handled by Re Carbon Ltd. will be recorded using the “**Complaint/Appeal/Dispute Record Form**” by the personnel receiving the complaint and it will be passed to the Sales Manager - Carbon.

After that, the Sales Manager – Carbon sends a copy of the completed form to the complainant in order to obtain verification whether the complaint was appropriately stated and seeks confirmation.


On the other hand, an “**External Complaints Form**” is also available on Re Carbon Ltd.'s website. For written complaints, the complainant shall complete this form and send it to the Sales Manager – Carbon via email.

In both cases (complaints made written or verbally), the complaint is recorded by the Sales Manager Carbon using the “**Complaint/Appeal/Disputes Record Form**” and the process continues as defined below.

The validity of complaints is assessed by the Quality Manager, in terms of whether the system is at fault or not. This is important as trends will be monitored in the nature of complaints to reduce repetitive causes and used as an incentive to improve the quality of the service provided.

Validity of complaints is based on criteria specified below:

- Delays in delivery of the service,
- Violation of conflict of interest,
- Competency of the validation/verification team,
- Customer service.
- Actions that are contrary to the UNFCCC-CDM, legislative requirements and/or Re Carbon Ltd. validation & verification procedures,

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- Comments during the publicly available comment period, which Re Carbon Ltd. has not taken into account
- Actions carried out or caused by Re Carbon Ltd. personnel relating to CDM PPs (non-professional behaviour, unethical behaviour, breaches of confidentiality, etc)

Upon receiving the complaint, the Sales Manager – Carbon sends the complainant a confirmation of the received complaint, within five business day, via email. At the same, it is also informed by the Sales Manager - Carbon to the complainant that the decision regarding the complaint shall not result in any discrimination and/or different attitude against the complainant and the complaint shall be assessed based on the confidentiality principle.

Simultaneously, an internal committee comprised of the Certification Manager, Quality Manager and the Sales Manager – Carbon, will initiate an internal investigation via using the “**Root Cause Analysis Report Form**”,

The internal committee will ensure that:

- Complainant was informed that the complaint has been received,
- Sufficient information is obtained from involved parties,
- Validity of the complaint is verified,
- Appropriate investigation is carried out,
- Details of the complaint are recorded, and
- Appropriate corrective/preventive action is requested, if necessary.

If needed, the internal Committee may ask for technical information assistance from a team leader and/or validator/verifier and/or a technical expert with the required technical competence.

The Committee will complete their investigation within 15 business days of the meeting date. However, if the additional time is required by the Committee to assess the complaint completely and to resolve it, then the Sales Manager – Carbon shall inform the complainant about this issue.

The decision regarding the complaint is taken mutually by the Committee members. However, if the Committee can't reach a mutual decision, then the final decision is taken by the Quality Manager.


Similarly, in case, the complaint is against the Sales Manager- Carbon, Quality Manager or Certification Manager, the assessment of the complaint and decision taking processes are handled solely by the General Manager.

If the complaint is against the General Manager, the validity of the complaint is assessed by the Quality Manager and the decision is taken by the other members of the Committee other than the General Manager and submitted to General Manager for his (her) final view to be submitted the complainant.

The full responsibility including all stages regarding the relevant complaint is taken by Re Carbon Ltd.

In each case, if the decision is ruled for the complainant, an appropriate corrective action will be taken by the Carbon Department and the effectiveness will be monitored by the Quality Manager. This is communicated by the Sales Manager to the complainant.

In each case, if the decision is ruled against the complainant, the Sales Manager – Carbon informs the complainant about the outcome with the reasons of the Committee meeting and discusses a solution.

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The complaint is settled when the complainant accepts the suggested solution or if the parties reach a mutual agreement. In case, the complainant doesn't accept the proposed solution, then the appeal process or lawsuit process can be initiated by the complainant.

Committee meeting results including the root cause analysis and the corrective/preventive actions, if applicable, are noted in the “**Meeting Minutes Form**” by the Quality Manager, which are kept as a record in the Carbon Department.

### 3.3. Appeal process

The appeal procedure is applicable only to clients which have signed service agreements with Re Carbon Ltd..

The appeals regarding the decisions on complaints submitted to Re Carbon Ltd. and/or the final opinions on validation/verification activities are assessed by the external Appeal Committee and it has been comprised of three members including the Chairman.

Following the reception of the appeal request, the appeal is recorded by the Sales Manager – Carbon using the “**Complaint/Appeal/Dispute Record Form**”.

Upon receiving the appeal, the Sales Manager – Carbon sends the appellant a confirmation of the received appeal, within five business days via email.

At the same, it is also informed by the Sales Manager - Carbon to the appellant that the decision regarding the complaint shall not result in any discrimination and/or different attitude against the appellant.

Followed by sending the confirmation, the Sales Manager - Carbon informs the Appeal Committee members by issuing a call for a committee meeting via e-mail. It will be ensured that the committee meets in the shortest possible time.

The appeals are evaluated with respect to the confidentiality policy and its validity. The validity of appeals is based on its link to the related service and/or project.

The Committee will investigate the case and assess the accuracy of the relevant information, make an analysis and conduct an on-site investigation, if necessary.


The Committee will complete their investigation within 30 business days of the meeting date and submit their opinion in a report format to the Sales Manager – Carbon. However, if the additional time is required by the Committee to assess the appeal completely and to resolve it, then the Sales Manager – Carbon shall inform the appellant about this issue.

The appellant is informed formally by the Sales Manager – Carbon about the outcome of the investigation and result of the appeal.

Committee meeting decisions are noted in the “**Meeting Minutes Form**”, which are kept as a record in the Carbon Department.

In each case, if the decision is ruled for the appellant, an appropriate corrective action will be taken by the Carbon Department and the effectiveness will be monitored by the Quality Manager. This is communicated by the Sales Manager to the appellant.

In each case, if the decision is ruled against appellant, the Sales Manager – Carbon informs the complainant about the outcome of the Committee meeting and discusses a solution.

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The appeal is settled when the appellant accepts the suggested solution or if the parties reach a mutual agreement. In case the appellant is not satisfied with the decision of the Appeal Committee, appellant has an option of complaining to the CDM Executive Board.

### 3.4. Evaluation of dispute

Any dispute which may occur during the validation/verification activities and did not reach a consensus are recorded by the Team Leader with justification of both parties and submitted to the Sales Manager - Carbon.

Dispute(s) is (are) recorded using the “**Complaint/Appeal/Dispute Record Form**”.

Simultaneously, an internal Committee comprised of the Certification Manager, Quality Manager and the Sales Manager – Carbon, will initiate an internal investigation via using the “**Root Cause Analysis Report Form**”.

The Committee assesses whether dispute is valid based on criteria specified below, including gathering and verifying all necessary information:

- If the dispute relates to a disagreement or argument between the client and Re Carbon Ltd. about a decision Re Carbon Ltd. or client has made
- Any matter or issue in dispute between the parties arising out of or connected with the service agreement
- Incorrect application of a CDM methodology by the validation/verification team,
- Non-fulfilment of a clear CDM requirement.

Disputes shall be considered invalid:

- If the above mentioned criteria are not verified, or
- If Re Carbon Ltd. was acting in a manner necessary to fulfill the CDM requirements and the decision regarding the dispute was justified.


If a dispute is deemed to be valid, an investigation will be carried out by the Committee.

The Committee will ensure that:

- Disputant was informed that the disputed matter has been received
- Sufficient information is obtained from involved parties,
- Validity of the dispute is verified,
- Appropriate investigation is carried out,
- Details of the dispute are recorded, and
- Appropriate corrective/preventive action is requested, if necessary.

The Committee, will complete their investigation within 15 business days of the meeting date. However, if the additional time is required by the Committee to assess the dispute completely and to resolve it, then the Sales Manager – Carbon shall inform the disputant about this issue.

The decision regarding the dispute is taken mutually by the Committee members. However, if the Committee can't reach a mutual decision, then the final decision is taken by the Quality Manager.

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The disputant is informed formally by the Sales Manager – Carbon about the outcome of the investigation and result of the dispute.

In each case, if the decision is ruled against the disputant, the Sales Manager – Carbon informs the disputant about the decision of the Committee meeting and discusses a solution.

The dispute is settled when the disputant accepts the suggested solution or if the parties reach a mutual agreement. In case, the disputant doesn't accept the proposed solution, then the lawsuit process can be initiated by the disputant.

Committee meeting results including the root cause analysis and the corrective actions, if applicable, are noted in the “**Meeting Minutes Form**” by the Quality Manager, which are kept as a record in the Carbon Department.

As a general principle, the Committee members involving in the assessment of complaints, disputes and appeals are different from those who carried out the validation or verification/certification activities.

Re Carbon Ltd. policy and procedures in handling appeals, complaints and disputes are publicised on its website.

All complaints, disputes and appeals are recorded by the Sales Manager – Carbon in the “**Complaint/Appeal/Dispute List**” and the records of complaints, appeals and disputes are to be kept according to the “**Control of Records Procedure**”.

All complaints, disputes and appeals are discussed during the Management Review Meetings and the required analysis is carried out accordingly.

#### 4. Related Documents

- CDM Accreditation Standard Version 07.0 Section 14
- F-C-078 Meeting Minutes Form
- F-C-068 Root Cause Analysis Report Form
- F-C-075 Complaint/Appeal/Dispute Record Form
- F-C-076 External Complaints Form
- L-C-03 Complaint/Appeal/Dispute List
- DOE Glossary of Terms

#### History of the document

Version No.	Date	Summary of the revision	Prepared by	Approved by
00	03.05.2017	Initial version of the document	Anıl Söyler Sales Manager - Carbon	Christian Johannes General Manager
01	16.07.2018	Revision of CDM Accreditation Standard version number in Section 4	Anıl Söyler Certification Manager	Christian Johannes General Manager