

> Complaints and Appeals Processes

Complaints Process

Parties with an interest in Brightspot's verification activities may file complaints to express dissatisfaction relating to these activities. Complainants and the subject of the complaint are kept confidential, per Brightspot Climate Inc.'s Confidentiality Policy and investigation and resolution of complaints will not result in any discriminatory actions.

The complaints process is as follows:

1. A complaint is made in writing by an external party (the Complainant).
2. The Quality Manager (i.e., the person responsible for managing the complaints process and ensuring appropriate action is taken) emails a copy of the Complaints and Appeals Form (APP-002-*Complaints and Appeals*) to the Complainant within five business days of receiving the complaint.
3. Within five business days of receiving the Complainant's completed Complaints and Appeals Form, the Quality Manager:
 - a. emails the Complainant:
 - i. confirmation that the completed Complaints and Appeals form was received;
 - ii. confirmation that the complaint relates to Brightspot's verification activities;
 - iii. a description of the complaint-handling process, including a statement stating that investigation and resolution of the complaint will not result in any discriminatory actions against the Complainant; and
 - iv. the names of the Complaint Committee members.
 - b. convenes, via email, a Complaint Committee composed of three Brightspot employees who were not involved in the verification activity (subject of complaint).
4. Once convened, the Complaint Committee starts the investigation within five business days. The Committee is responsible for gathering all necessary information to determine whether complaint is substantiated.
5. The Complaint Committee will complete its investigation within 30 business days and submit its opinion in a report to the Quality Manager. If the Complaint Committee requires additional time to assess and resolve the complaint, the Quality Manager will inform the Complainant of the delay and provide an estimated completion date.
6. Once the investigation is complete, the Quality Manager will inform the Complainant of the outcome of the investigation and the Complaint Committee's decision.
7. Committee decisions are recorded in the Complaints and Appeals Evaluation form (APP-003-*Complaints and Appeals Evaluation*), which is archived by Brightspot for a minimum of seven years.

8. If the decision rules for the Complainant, Brightspot will take appropriate corrective actions. The Quality Manager will monitor the actions' effectiveness and communicate this information to the Complainant.
9. If the decision rules against the Complainant, the Quality Manager will inform the Complainant about the outcome of the Committee investigation and discuss a solution. If the Complainant is not satisfied with the Complaint Committee's decision, the Complainant may complain to the jurisdiction where the verification activities took place.

Appeals Process

The process to appeal a verification opinion applies only to clients that have signed service agreements with Brightspot Climate Inc. Appellants and the subject of the appeal are kept confidential, per Brightspot Climate Inc.'s Confidentiality Policy and investigation and resolution of appeals will not result in any discriminatory actions.

The appeals process is as follows:

1. An appeal is requested in writing by an external party (the Appellant).
2. The Quality Manager (i.e., the person responsible for managing the appeals process and ensuring appropriate action is taken) emails a copy of the Complaints and Appeals Form (*APP-001-Complaints and Appeals*) to the Appellant within five business days of receiving the appeal request.
3. Within five business days of receiving the Appellant's completed Complaints and Appeals Form, the Quality Manager:
 - a. emails the Appellant:
 - i. confirmation that the completed Complaints and Appeals form was received;
 - ii. a description of the appeals-handling process, including a statement stating that the appeal decision will not result in any discriminatory actions against the Appellant; and
 - iii. the names of the Appeal Committee members.
 - b. convenes, via email, an Appeal Committee composed of three Brightspot employees who were not involved in the verification (subject of appeal).
4. Once convened, the Appeal Committee starts the investigation within five business days. The Committee is responsible for gathering all necessary information to determine whether appeal is substantiated.
5. Appeal Committee will complete its investigation within 30 business days and submit its opinion in a report to the Quality Manager. If the Appeal Committee requires additional time to investigate the appeal, the Quality Manager will inform the Appellant of the delay and provide an estimated completion date.
6. Once the investigation is complete, the Quality Manager informs the Appellant of the outcome of the investigation and what actions (if any) are to be taken in response.

7. Appeal Committee decisions are recorded in the Complaints and Appeals Evaluation form (*APP-003-Complaints and Appeals Evaluation*), which is archived by Brightspot for a minimum of seven years.
8. If the decision rules for the Appellant, Brightspot will take appropriate corrective actions. The Quality Manager will monitor the actions' effectiveness and communicate this information to the Appellant.
9. If the decision rules against the Appellant, the Quality Manager informs the Appellant about the outcome of the Committee investigation. If the Appellant is not satisfied with the Appeal Committee's decision, the Appellant may complain to the jurisdiction where the verification took place.