

Re Carbon Gözetim Denetim ve
Belgelendirme Ltd. Şti.

Kızkulesi Sokak 28/3
TR / 06700 Kazım Özalp Mah. -
Çankaya – Ankara

Tel.: 0090-312-287 5122
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Handling of Complaints and Appeals Procedure




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1. Purpose

The purpose of this procedure is to ensure appropriate, fair and transparent handling of complaints and appeals related to re-carbon Ltd.'s validation and/or verification/certification activities that are raised by a client and/or other possible validation/verification stakeholders.

2. Responsibility

- Quality Manager
- Sales Manager
- Certification Manager
- General Manager
- Team Leader(s)
- Company lawyer

3. Definitions

Please see DOE Glossary of Terms

4. Complaint process

Complaints are expressed and communicated to re-carbon Ltd. (Company) either formally (written) or informally (verbal). Complaints shall be related to validation or verification/certification services executed by the Company and are processed as per the below described procedure:

4.1. Verbal Complaint:

A verbal complaint is recorded by the Company's personnel receiving the complaint through filling out the "**Complaints and Appeals Recording Form**" and passing this record to the Sales Manager.

After reception of such a recorded complaint, the Sales Manager sends a copy of the record to the complainant in order to obtain verification whether the complaint was appropriately stated and seeks confirmation.

4.2. Written complaint

By filling out and sending to the Sales Manager the "**External Complaints Form**", a written complaint is received. This form is available for download under <https://www.re-carbon.net/en/handling-of-complaints-and-appeals/>

In both cases, the process continues as defined below:

The validity of complaints is assessed by the Quality Manager, in terms of whether the company's Quality Management System is at fault or not. This is important, as trends can be monitored in the nature of complaints and in order to reduce repetitive complaints on the same matter. It is used as an incentive to improve the Quality Management System, if necessary.

Validity of complaints are based on the below specified criteria:

- Delays in delivery of the service,
- Violation of conflict of interest,
- Competence of the validation/verification team,
- Customer service,

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- Actions that are contrary to the Accreditation Body(ies) rules and requirements, legislative requirements and/or the Company's validation & verification procedures,
- Comments during the publicly available comment period, which the Company has not taken into account
- Actions carried out or caused by the Company's personnel related to PPs (e.g. non-professional behaviour, unethical behaviour, breaches of confidentiality, etc)

Within 5 (five) business days upon reception of a complaint, the Sales Manager sends (via email) the complainant a confirmation of the received complaint. Within this email the complainant is informed that any decision regarding the complaint will not result in any discrimination and/or different attitude against the complainant and that the complaint will be assessed based on the principle of confidentiality.

Simultaneously, an internal committee, comprised of the Certification Management Department, the Quality Manager and the Sales Manager initiates an internal investigation.

The internal committee will ensure that:

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

If necessary, the internal committee may ask for technical assistance from another team leader and/or validator/verifier and/or a technical expert with the required competence and knowledge.

The Committee will complete the investigation within 15 (fifteen) business days of the meeting date. In case additional time is required by the Committee (to assess the complaint completely and to resolve it), the Sales Manager informs the complainant accordingly.

A decision regarding the complaint is taken mutually by the Committee members. In cases where the Committee cannot reach a mutual decision, the final decision on the matter is being taken by the Quality Manager.


If there is a complaint about one of the Complaint Committee members, the rest of the Committee members will make the decision.

The Company takes the full responsibility, during all stages regarding the relevant complaint.

After the complaint is handled and examined, the need of corrective action is determined if necessary, and the **Corrective and Preventive Actions Procedure** is applied.

The complainant is informed via email, or a formal letter promptly after the investigation is complete by summarizing the investigation and presenting the findings.

The complaint is settled when the complainant accepts the suggested solution or if the parties reach a mutual agreement. In case, the complainant does not accept the proposed solution, either the appeal process (see below) or a lawsuit may be initiated by the complainant or the complainant is informed that it has the option of making a complaint to the related GHGRS organization.

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The committee's meeting results (including the root cause analysis and the corrective/preventive actions, if any) are being kept as a record in the Company.

4.3. Appeal process

The appeal procedure is applicable only to clients which have signed a service agreement with the Company.

Appeals regarding the decisions on complaints submitted to the Company and/or the opinions/decisions on validation/verification activities are assessed by the Appeal Committee, comprised of three members including its Chairman (Company Lawyer).

The appeal should be based on clear grounds and address issues directly related to the original decision or process. It should not be based on unrelated grievances or general dissatisfaction.

Following the reception of an appeal request, -if it is not communicated in written form- the appeal is recorded by using the “**Complaints and Appeals Recording Form**” and the Sales Manager sends the appellant a confirmation of the received appeal, within five business days via email.

Simultaneously the Sales Manager informs the appellant that a decision regarding the appeal shall not result in any discrimination and/or different attitude against the appellant.

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

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

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

- If the appeal relates to a disagreement or argument between the client and the Company staff about a decision,
- Any matter or issue between the parties arising out of or connected to the service agreement
- Incorrect application of a methodology by the validation/verification team,
- Non-fulfilment of a clear accreditation requirement.

Appeals shall be considered invalid:


- the above-mentioned criteria are not fulfilled, or
- the Company was acting in a manner necessary to fulfill the accreditation requirements and the decision regarding the appeal was justified.

If the appeal is deemed “valid”, an investigation is being carried out by the Committee.

The Committee investigates the case and assess the accuracy of the relevant information, makes an analysis and conducts an on-site investigation, if necessary.

If necessary, the Committee may ask for technical assistance from another team leader and/or validator/verifier and/or a technical expert with the required competence and knowledge.

The Committee completes its investigation within 30 business days of the meeting date and submits its opinion in form of a report to the Sales Manager. In cases where additional time is required by the Committee to assess

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the appeal completely and to resolve it, the Sales Manager informs the appellant accordingly.

The appellant is informed via email, or a formal letter promptly after the investigation is complete by summarizing the investigation and presenting the findings by the Sales Manager.

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, the appellant may complain directly to the Accreditation Body.

After the appeal is handled and examined, the need of corrective action is determined if necessary, and the **Corrective and Preventive Actions Procedure** is applied.

4.4. General

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

Should it be necessary to get an opinion and expertise on the case, the related committee may ask for help from another technical personnel someone who knows the process and someone is independent.

In order to maintain objectivity and fairness, decisions regarding complaints and appeals are made or reviewed and approved by individuals who were not involved in the original incident.

All complaints and appeals are recorded by the Quality Manager in the “**Complaint/ Appeal List**” and the records of complaints & appeals are kept according to the “**Control of Records Procedure**”.

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

In case of not receiving any complaints/appeals within the last 2 years and in order to verify the effectiveness of the related Committee’s operations, a mock complaint/appeal is created and submitted to the related Committee to see if the process proceeds in line with this procedure.

The Company’s policy and procedure about handling of complaints and appeals are published on www.re-carbon.net.

5. Related Documents

- ISO 14065:2020, Clause 9.10
- ISO 14065:2020, Clause 9.9
- ISO/IEC 17029:2019, Clause 9.9
- ISO/IEC 17029:2019, Clause 9.10
- P-C-13 Corrective and Preventive Actions Procedure
- F-C-056 Complaints and Appeals Recording Form
- F-C-057 External Complaints Form
- L-C-03 Complaint/Appeal List

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History of the document

Version No.	Date	Summary of the revision	Prepared by	Approved by
00	23.01.2023	Initial publication of the procedure within Re Carbon Ltd. documentation in accordance with the requirements of ISO 14065:2020 and ISO/IEC 17029:2019 standards and the CDM Accreditation Standard	Aslı Bingöl Quality Manager	Christian Johannes General Manager
01	11.12.2023	The complainant's option to file a complaint to the relevant GHGRS body is mentioned in clause 4.2.	Aslı Bingöl Quality Manager	Christian Johannes General Manager
02	23.09.2024	Dispute-related sections have been excluded from the entire procedure. Root Cause Analysis Form is excluded from the QMS. Reference has been made to the Corrective and Preventive Actions Procedure. Extensive explanations have been provided for how complaints and appeals are handled and assessed.	Aslı Bingöl Quality Manager	Christian Johannes General Manager