

Document No.:	PONY-QS-2021-10	Date of issuance:	2021-3-30
Version:	1.0	Classification:	Public

Section J Measures for Handling of Complaints, Disputes and Appeals

1. Purpose

⁰¹¹⁸ This procedure is established and maintained to effectively handle complaints and grievances that come from stakeholders and ensure accurate and timely handle and continuously improve the work quality of the company to better meet clients' requirements. This procedure shall be public available on PONY website <http://www.ponytest.com/>.

2. Scope of application

⁰¹¹⁹ This is applicable to receiving and handling of complaints and grievances raised by clients or other parties about the impartiality, work attitude, work efficiency and validation/verification/certification work quality of the company.

3. Duties allocation

⁰¹²⁰ 3.1 All employees of the company have the responsibility and obligation to report to the supervisory committee for any complaints, dispute and appeals received.

⁰¹²¹ 3.2 All employees of the company have the duty and obligation to cooperate with the company on investigation and handling of complaints, disputes and appeals.

⁰¹²² 3.3 The supervisory committee is responsible for supervising the treatment of complaints, disputes and appeals.

⁰¹²³ 3.4 When significant appeals, complaints and disputes occur, correction plans shall be reported to president for approval.

⁰¹²⁴ 3.5 The general manager is responsible for:

- (1) Organizing investigation into appeals, complaints and disputes and formulating corrective and preventive actions;
- (2) Approving treatment about appeals, complaints and disputes, supervising preventive and corrective actions and reporting the results to president when major issues.

⁰¹²⁵ 3.6 The manager of the carbon verification department is responsible for:

- Setting up investigation teams for complaints, disputes and appeals, designating investigators, defining specific requirements for investigation work and report to the general manager for approval when cross-department investigation is involved;
- Organizing the investigation, handling and treatment of complaints, disputes and appeals, and developing corrective and preventive actions;

⁰¹²⁶ 3.7 The project management team of the carbon verification department is responsible for:

- receiving complaints, disputes and appeals;
- collecting and verifying information related to complaints, disputes and appeals;
- Forwarding the final resolution decisions on complaints, disputes and appeals to related parties;
- Conducting follow-up measures for resolution decisions on complaints,

disputes and appeals and keeping records related to handling and resolution of complaints, disputes and appeals.

⁰¹²⁷ 3.8 Investigator is responsible for :

- investigating complaints, disputes and appeals and collecting relevant evidence;
- Faithfully reporting investigation findings;
- Proposing solutions to matters investigated;
- Suggesting subsequent rectification and preventive and corrective actions.

4. Handling procedure

4.1 Principles of handling

⁰¹²⁸ (1) Complaints, disputes and appeals shall be handled based on facts and in accordance with the national laws and regulations and applicable certification system and standards issued by the UNFCCC Executive Board;

⁰¹²⁹ (2) Investigators and all related personnel involved in receiving, investigation and handling of complaints, disputes and appeals shall remain objective and impartial;

⁰¹³⁰ (3) The raising, investigation and resolution of complaints, disputes and appeals shall not result in any discriminatory acts against organizations/individuals to the raisers;

⁰¹³¹ (4) Nonpublic information, including information about the appellants and complaints and appeals and specific complaints involved shall be kept confidential;

⁰¹³² (5) Personnel involved in handling of complaints, disputes and appeals shall be

unrelated to the complaints, disputes and appeals (for example, personnel involved in handling of GHG/CDM complaints, disputes and appeals shall not be involved in audit of GHG/CDM project being complained, disputed or appealed, nor shall they participate in validation, verification/certification decision on such GHG/CDM project);

⁰¹³³ (6) The company is responsible for all decisions made at all levels during handling process;

⁰¹³⁴ (7) Progress reports and official notices issued in the process of accepting and handling appeals and complaints to the raisers shall be deemed to be agreed if no objections is raised within 10 working days as of the reports or notices;

⁰¹³⁵ (8) In case of any objection to the treatment results, complaint may be submitted to the company or EB.

4.2 Complaints

4.2.1 Criteria for valid complaints

⁰¹³⁶ (1) The complainant shall raise complaints to the manager of carbon verification department or the project management team with respect to the events involved in the complaint, and shall provide details related to the complaint such as documentary evidence and signature/seal whenever possible;

⁰¹³⁷ (2) Complaints shall be in written form and signed/sealed by the complainant in principle. In case of oral complaints, the complainant needs to provide contact details, including name, employer, address, telephone number, fax number and email address, etc.

⁰¹³⁸ (3) Anonymous complaints is not considered as valid in principle.

4.2.2 Acceptance and confirmation of complaints

⁰¹³⁹ When receiving written or oral complaints with required information, receiver shall promptly acknowledge the receipt of complaint and record related information, and fill out the “*Appeal/Complaint/Dispute Registration Form*”;

⁰¹⁴⁰ Preliminarily judge whether the complaint is related to operations or personnel of the company, evaluate the severity, complexity and risks of the complaint, and require the complainant to provide written complaint materials or additional necessary materials if required;

⁰¹⁴¹ Collect and verify all information required to confirm whether the complaint refers to client of the company;

⁰¹⁴² Make preliminarily decisions on whether to proceed treatment process or not and select investigators for the complainant who are different from those who carried out the validation and/or verification/certification activities and report to general manager for approval.

4.2.3 Investigation and handling of complaints

⁰¹⁴³ Investigation into complaints shall be conducted by designated investigator;

⁰¹⁴⁴ The investigator is responsible for determining investigation plan, which will be executed after being approved by general manager or president when necessary;

⁰¹⁴⁵ The investigator is responsible for investigating complaints, obtaining and verifying evidences, as well as making detailed records of the information collected in each

investigation process such as time and place of investigation, and names and positions of individuals investigated, collecting necessary documents, records and other evidences, and properly keeping information, evidences and all records collected.

⁰¹⁴⁶ The investigator shall make conclusion on whether the complaint is verified by analyzing information investigated and collected, and submit written treatment or improvement suggestions to general manager and president if necessary for approval.

4.2.4 Tracking of complaint investigation process

⁰¹⁴⁷ Where the complaint investigation process cannot be completed in accordance with the schedule, the investigator shall modify the investigation plan and conduct following the new plan after approved.

⁰¹⁴⁸ The supervisory committee supervises and tracks the complaint investigation process. If the complaint cannot be resolved in a short time, effective solutions shall be provided by communicating with the complainant timely.

4.2.5 Execution and feedback of complaint handling results

⁰¹⁴⁹ When a complaint has no effect on the final decisions of the company, client involved shall report the results of corrective actions taken to the company within the period specified by the organization.

⁰¹⁵⁰ If the corrective actions taken by the involved client due to complaints are fail to meet relevant requirements so that the final decisions of the company is influenced, suspending, revoking or issuing of negative decisions will subsequently occur.

⁰¹⁵¹ If a complaint also involves activities of the company general manager will organize the implementation of necessary corrective actions according to the related requirements of the “*Corrective and Preventive Actions*”.

⁰¹⁵² As required, the project management team of the carbon verification department is responsible for informing the complainant of the progress and results of complaint treatment process at appropriate stages during the process or after completion of complaint handling.

4.2.6 Publicity of complaints

⁰¹⁵³ The organization shall determine with clients involved and complainants whether to disclose the complaints and the disclosure extent.

4.3 Disputes

4.3.1 Criteria for valid disputes arising in onsite service

⁰¹⁵⁴ Disputes arising in onsite service are generally negotiated by the team leader of the onsite service. The team leader needs to verify the disputes onsite and negotiate with the customers according to the handling suggestions of the company.

⁰¹⁵⁵ If the negotiation fails to reach a consensus, the dispute shall be reported to the manager of the carbon verification department, and the manager shall raise solutions or opinions and agree with the customer through consultations.

⁰¹⁵⁶ If both sides still cannot reach an agreement, the client may file the dispute in writing to the supervisory committee of the company within 10 days of occurrence of the dispute.

⁰¹⁵⁷ Responsible persons shall report details and related information about the dispute to the involved department in writing within 10 days of occurrence of the dispute.

4.3.2 Criteria for disputes arising on other occasions

⁰¹⁵⁸ Both sides shall negotiate to resolve disputes according to the procedures and related national requirements applicable as well as related requirements of EB.

⁰¹⁵⁹ When both sides cannot reach an agreement, the organization requesting/accepting validation or verification/certification or GHG validation/verification or CDM validation/certification may submit the details of the dispute to supervisory committee of the company in writing within 10 days of occurrence of the dispute.

⁰¹⁶⁰ **4.3.3 Disputes shall be handled according to the complaint handling process and principle as set forth herein.**

4.4 Appeals

4.4.1 Criteria for valid appeals:

⁰¹⁶¹ Appeals shall be filed to the company within 10 working days after receiving the decisions of the company;

⁰¹⁶² Appeals shall be filed in writing, signed and sealed by the appellant, indicating the reasons for objection accompanied with related evidence;

⁰¹⁶³ The appellant shall be the party directly connected with the matter of appeal.

4.4.2 Receiving, confirmation and acceptance of appeals

⁰¹⁶⁴ When receiving an appeal, it shall be recorded promptly by completing the

“*Appeal/Complaint/Dispute Registration Form*” and acknowledged the receipt.

- ⁰¹⁶⁵ Collect and verify all necessary information related to the matter of appeal, and require the appellant to provide additional information when necessary, confirm whether the matter of appeal is clear;
- ⁰¹⁶⁶ Preliminarily judge the severity, complexity and possible risks of the matter of appeal;
- ⁰¹⁶⁷ Establish an independent appeal panel responsible for the appeal process making sure the persons engaged in the appeal process differ from those who conducted the validation or verification/certification, including the technical review and final decision-making;
- ⁰¹⁶⁸ The company ensures submission, investigation and decision on appeals do not result in any discriminatory actions against the appellant;
- ⁰¹⁶⁹ Preliminarily confirm the matter of appeal, require the appellant to provide additional information when necessary, and report to the manager of carbon verification department and general manager within 2 working days.

4.4.3 Investigation and handling of appeals

- ⁰¹⁷⁰ The appeal panel communicates and coordinates with the investigated department/personnel to determine the investigation plan and obtain his or her consent, which plan shall be submitted to the general manager or president when necessary for approval;
- ⁰¹⁷¹ The appeal panel is responsible for investigating, obtaining and verifying evidence,

documenting the detailed information collected such as time and place of investigation, and names and positions of individuals investigated, collect necessary documents, records and other evidences. Evidence and all records collected shall be properly kept.

⁰¹⁷² Ensuring that the final decision as well as the solutions to the appeal and suggestions on actions to conduct shall be made by the independent appeal panel. If he investigation points towards a non-conformity, appropriate corrections and corrective actions are taken to eliminate the gaps in the system, especially if the investigation points towards any gaps in the system;

⁰¹⁷³ Safeguarding the confidentiality of appellants and the subjects of the appeal. This process shall be subject to requirements for confidentiality;

⁰¹⁷⁴ Providing progress reports on the appeal investigation and handling to the appellant and providing information/notice on the final decision;

⁰¹⁷⁵ The appeal panel shall submit the final treatment conclusion to general manager or president when necessary for approval while the supervisory committee is responsible for supervising appeal handling process and the implementation of corrective action and its effectiveness.

4.4.4 Execution and feedback of appeal handling results

⁰¹⁷⁶ The general manager is responsible for arranging corrections to be made if any according to related requirements of the “*Corrective and Preventive Measures*”.

⁰¹⁷⁷ After completion of appeal handling, the project management department of the carbon verification department shall officially notify the appellant in writing.

4.4.5 Tracking of appeals

⁰¹⁷⁸ The supervisory committee supervises and tracks the progress of appeal handling process until the end of the handling process.

4.5 Handling of objections to the results of appeals

⁰¹⁷⁹ In cases where the appellant is not satisfied with the decision, the DOE shall inform the appellant that it has the option of making a complaint to the Board

5 Keeping of complaint, dispute and appeal handling records

⁰¹⁸⁰ After the end of the complaint, dispute and appeal handling process, the records and evidences collected during investigation and handling process, including all records and evidences of communication with related parties, as well as confirmation information and feedback contents sent out shall be properly kept.