

Summary of the complaints procedure

Conflict resolution and the investigation of complaints are essential for the SUSTAINABLE RESOURCES Verification Scheme GmbH to ensure the reliability and integrity of the SURE-EU system

Protecting the SURE-EU system from abuse is important to ensure that those who have invested time and resources in complying with the requirements of the SURE-EU system are safely identified and their interests are protected.

SURE is interested in resolving conflicts through dialogue with the parties concerned before formal proceedings are initiated.

The complaint must be sent in writing, including all verifiable information, to the office of SUSTAINABLE RESOURCES Verification Scheme GmbH, clearly marked as a complaint e. g. submit digitally to ims@sure-system.org (up-to-date contact options can be found at <https://www.sure-system.org/en/contact.html>).

A prerequisite for the investigation of a complaint is objective evidence and as comprehensive and concrete information as possible. A complaint based solely on hearsay or rumor is not sufficient for further investigation by SURE.

Where the appeal is against the action or decision of a certification body registered by SURE, all appeal and objection procedures of that certification body must first have been followed. Only when these procedures have been concluded with a written decision SUSTAINABLE RESOURCES Verification Scheme GmbH may be approached.

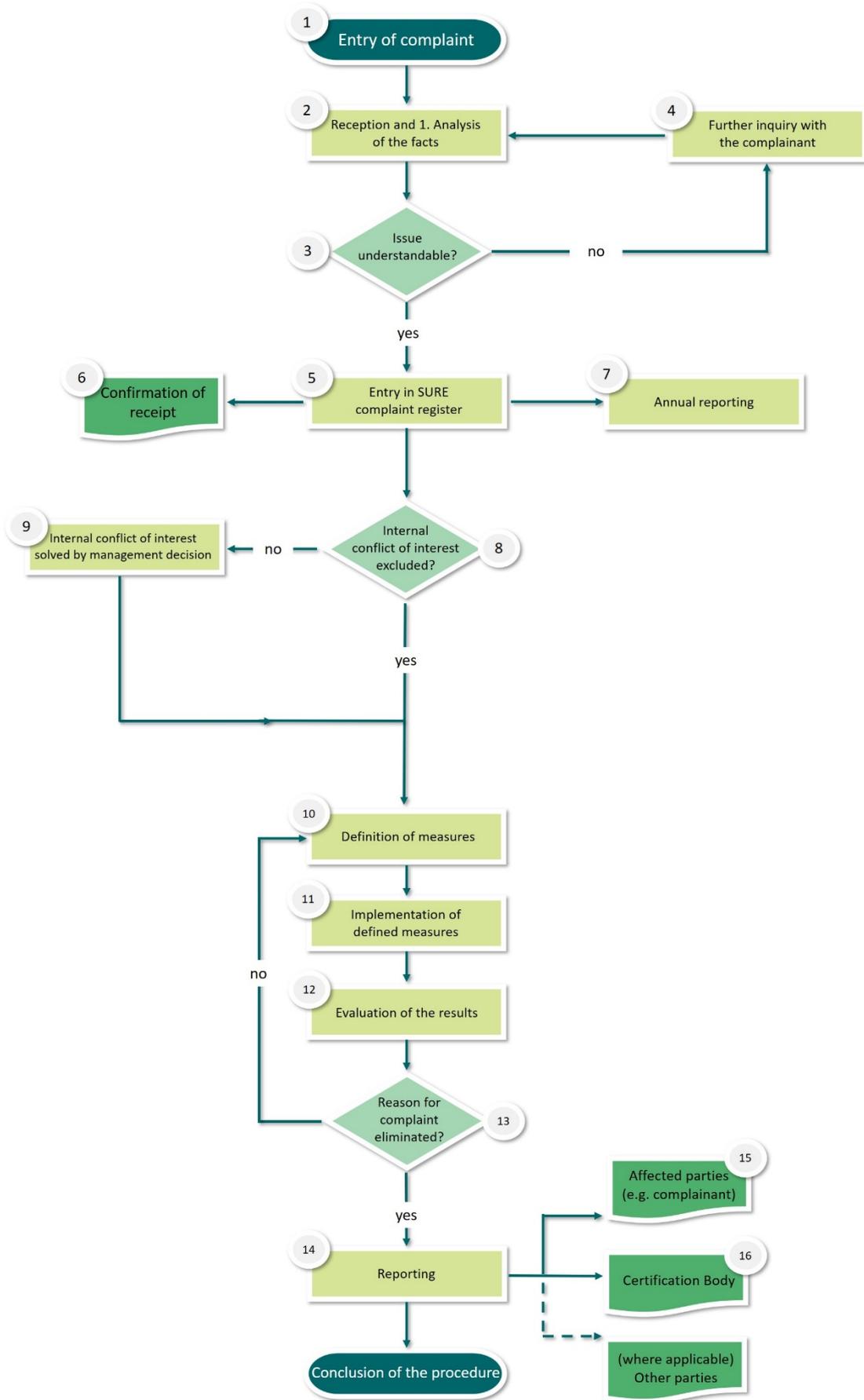
The complaints process is confidential in principle, i.e. neither the complainant nor the interested party or parties named in the complaint will be disclosed to third parties by SURE during the pending proceedings unless required by law of the competent authorities or regulations of the EU Commission.

SURE carefully documents the individual steps of the complaint process. The complainant and, if applicable other parties involved (e. g. competent authorities or the EU Commission) will be informed of the outcome of SURE's investigation of the complaint.

Complaints are inadmissible if

- ✓ the requirements as to form and content are not met. This includes complaints and appeals that are not adequately supported by objective and sufficient evidence necessary to gain a clear understanding of the situation at hand.
- ✓ the complaint seeks adjustments to the recognised SURE-EU system.
- ✓ the complaint seeks to modify sanctions imposed by SURE for violations or infractions of SURE requirements.
- ✓ the reason for the complaint does not explicitly relate to SUSTAINABLE RESOURCES Verification Scheme GmbH or to activities carried out under SURE.

Complaints procedure in the SURE-EU system



Explanation of the complaints procedure

- ① The following communication channels are available to complaint initiator to submit his complaint to the scheme operator: e-mail, fax, postal letter
- ② The scheme operator decides whether the submission meets the definition of a complaint. If so, it documents the receipt of the complaint and generates a progress report in which all other measures and incidents related to the complaint are entered chronologically and linked to the relevant information and accompanying documents:
 - ✓ the complaint initiator (including contact detail)
 - ✓ the reason for the complaint (information on the companies involved, types and quantities of biomass/biomass fuels or electricity/heat, time periods and other details)
 - ✓ possible causes of the complaint (as long as this can be determined with certainty at that time)
 - ✓ potential magnitude of the complaint with respect to the integrity of the SURE system
- ③ The complaint is understandable and admissible according to the SURE guidelines for complaints.
- ④ If the complaint is not sufficiently clear, the person who initiated the complaint is contacted and an attempt is made to obtain the missing information from the perspective of the complaint initiator.
- ⑤ SURE keeps a register of complaints received and measures taken, which ensures a transparent procedure for reducing conflicts of interest and the possibility of monitoring.
- ⑥ If the complaint is sufficiently substantive and convincing, the complainant will receive a letter within five working days confirming receipt of the complaint and assuring him that the complaint will be further investigated and that information on its progress will be provided.

- ⑦ SURE is obliged to provide a summary of the registered complaints to the Commission through the annual reporting process for transparency reasons.
- ⑧ Possible conflicts of interest are analyzed.
- ⑨ If internal conflicts of interest are identified, a management resolution rules them out. (e.g. the complaint is directed against a SURE employee who has been released from handling the complaint by management instruction)
- ⑩ The scheme operator determines measures to permanently eliminate the reason for the complaint and its causes.
- ⑪ The reason for the complaint must be explained and eliminated by the person concerned (e.g. scheme participant or certification body).
- ⑫ The scheme operator reviews the complaints of the person who submitted the complaint or directly checks the implementation and effectiveness of the measures specified by the person or identified by the scheme operator.
- ⑬ If the assessment of the effectiveness of the measures (e.g. result of another audit) is not satisfactory, a new cycle of measures (see 10) is initiated in accordance with the PDCA cycle (Plan-Do-Check-Act).
- ⑭ Before the complaint procedure is concluded, a summary report is created.
- ⑮ The parties involved (complainant as well as the person against whom the complaint is directed) will be informed of the result of the processing of the complaint.
- ⑯ If the complaint concerns a system participant, the responsible certification body will be informed of the result of the processing of the complaint in order to be able to investigate complaint-relevant facts (e.g. implemented measures) in a regular or commissioned special audit at the request of SURE.