



Appeals and Complaints Procedure

Document Details:

Document Type	Procedure
Document Number	RG-106
Predecessor	N/A
Document Owner	Adrienne Headrick

Revision History:

Rev	Date	Description	Originator	Checker	Approver
1	2024-01-01	Egis Rebranding	KR	AF	
0	2023-09-26	Issued for Use	AH	ZX	BK

Paper copies of this document are uncontrolled. This copy is valid only at the time of printing. The controlled version of this document is stored on the Egis Document Control Server.

Table of Contents

1 Appeals	1
2 Complaints	1
3 Appeals and Complaints Process- Team Manager	1
4 Appeals and Complaints Process - Independent Review	2
5 Resolution or Closure	2

1 Appeals

Appeals on verifications or validations will be considered under the following circumstances:

- The appellant fundamentally disagrees with the validation or verification plan, conclusion, procedures, methods that have been conducted by the team methods that have been conducted by the team.
- The appellant believes that accepted auditing principles (e.g., impartiality, conservativeness, confidentiality) have been violated, such that the validation or verification process has been compromised.

2 Complaints

Complaints will be considered under the following Circumstances:

- Client or responsible party has a concern or procedural disagreement with the validation or verification process that has been conducted by the team. This may include, but not limited to, arbitrary or capricious requirements, inadequate record keeping, or lack of senior oversight.
- Responsible party has a concern or procedural disagreement with the validation or verification process that has been conducted by the team.

3 Appeals and Complaints Process- Team Manager

3 (a) Written Notice of the Complaints or Appeal must be emailed to adrienne.headrick@egis-group.com.

3 (b) Egis will provide a written acknowledgement to the complainant in the same from the complaint or appeal was received.

3 (c) The initial complaint or appeal will be received and reviewed by the Group Manager. If the Group Manager was not involved in the verification, they will review the complaint or appeal for validity.

3 (d) The manager will maintain the confidentiality of the appeal and complaint received if deemed necessary or required by the party sending the appeal and complaint. The manager will conduct a review of the documentation and interview personnel involved with the project specific to the complaint or appeal filed in that project folder to determine if the claim is valid.

3 (e) Within two weeks of the written notice by the appellant/complainant, the Leader must decide what actions are to be taken in response. Actions that may be completed are the following:

- Review Competency Checklists and personnel records of employees that worked on the verification or validation project.
- Review the Conflict-of-interest checklists and RG-103 Policy Statement on Impartiality of interest to consider if there has not been any contraventions of the ANAB and ISO 14064 requirements.
- Accepting additional evidence from the appellant/complainant regarding the GHG assertion
- Engaging a different Peer Reviewer to decide whether the previous outcome of the validation/verification should be changed.
- Interview the personnel involved in the validation/verification to obtain additional evidence or information as required.
- Notifying the appellant/complainant that there is insufficient evidence to support their appeal/complaint.

4 Appeals and Complaints Process - Independent Review

If the group manager participated in the validation/verification that is the subject of the appeal/complaint or is otherwise in a conflict-of-interest position, the appeal/complaint will be assigned to be reviewed by a Team Leader, that was not involved with the validation or verification.

If this is not possible, an Independent Verification/Validation Committee (IVC) will be pulled together, made up of senior Egis employees that are knowledgeable on Verification/Validation Process but independent to the project in question; Or an external Consultant (with no conflict-of interest identified) will be utilized. This group (or person) will be assigned the leader position for the Appeals and Complaints Process and will follow the same possible actions or steps as in Section 3 of this document.

5 Resolution or Closure

5 (a) The Group Manager (or assigned Leader/group) will be responsible for communicating with the individuals engaged in the process and will issue reports or formal notice of the final outcome to the appellant/complainant.

5 (b) Upon resolution and closure, the group manager or leader will notify the appellant/complainant, ANAB, and the GHG Program (if relevant) of the final resolution.

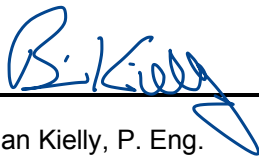
5 (c) This notification will list the Egis personnel involved in the appeal/complaint process.

5 (d) These individuals are responsible for ensuring that no discriminatory action, by Egis or its employees, results from the appeal/complaint.

5 (e) Should the appellant/complainant be dissatisfied with the result or handling of the appeal/complaint, the appellant/complainant may refer the matter to ANAB or the applicable GHG Program.

5 (f) If the GHG Program overturns the validation or verification as it was originally performed or stated, and Egis agrees with the findings, Egis reserves the right to revise the plan or re-issue the report/statement.

5 (g) If Egis disagrees with the Program's appeals body, Egis, via the Group Manager or assigned leader, will issue written notification to the appeals body (pursuant to the GHG Program and ANAB requirements) and the client.



Brian Kielly, P. Eng.
Executive Vice President, Energy



Adrienne Headrick, B.A., SC., EP
Manager, Regulatory & Environmental
Development, Energy

Signed this day, the 1st of February 2024.