



GRIEVANCE REDRESS POLICY

UCR CARBON OFFSET UNIT (CoU) STANDARD

Ver 01: August 2022

All Complainants are requested to provide UCR with the following information, via the email address info@ucarbonregistry.io

LEGAL DISCLAIMER This Policy is not intended to substitute, circumvent, or override the legal rights of any party within its local jurisdiction to use judicial mechanisms, where available and appropriate.

SECTION A. Description of Complaint

A.1. Process and Timeline >>

If the person submitting a complaint to UCR (the “Complainant”) is already a party to an agreement with UCR and that agreement specifies a dispute resolution procedure, then the Complainant must follow that procedure. Disputes arising from a separate agreement with UCR are therefore not included in the scope of this Policy.

UCR expects the Complainant to provide all necessary information or documents to support the allegations or show a “good arguable cause.” UCR reserves the right to update the Complainant on the progress of the matter, as deemed appropriate by UCR.

Where the Complainant submits a Complaint (as defined below), which relates to an agreement that it has with a third-party that it is complaining about, the Complainant must first seek to resolve the Complaint in accordance with the terms of that agreement and obtain an enforceable court judgment or arbitral award.

UCR is never a party to agreements between counterparties (i.e. project owners, consultants, verifiers or exchanges) and will not act as an intermediary in relation to commercial disputes between counterparties.

“Complaint” means an objection to a decision taken by UCR or an aspect of how it operates its program(s); a claim that relevant program rules have had an unfair, inadvertent or unintentional adverse effect; or a dispute or grievance that may arise during the Project Activity registration and issuance stage.

A Complainant must be one of the following:

- a) National Authorities*
- b) Local Stakeholders*
- c) Project Proponents*
- d) Authorized Representatives*
- e) Registry Users*
- f) Unrelated Parties*

UCR retains the sole discretion to determine whether the Complainant has standing to lodge a Complaint under this Process **or to even entertain the Complaint submitted.** UCR will review information submitted by the Complainant to assist with its determination and may, in its sole discretion, seek further information from the Complainant.

Complainants are allowed to submit anonymous Complaints. However, UCR notes that anonymous Complaints may restrict UCR's ability to understand or assist with the resolution of the issues.

If UCR determines that the claim of anonymity is unjustified because, for example, the anonymity is used to make a spurious Complaint that does not support UCR's intervention, UCR may reject the anonymous Complaint.

UCR may also need to ask a Complainant to provide further information or documents. If so, UCR will contact the Complainant as appropriate.

UCR reserves the right to reject any Complaints if:

- a) Complaints which do not substantiate evidence to support the allegations or show a “good arguable cause” (as that term is defined below);
- b) Complaints which do not contain the information requested above;
- c) Complaints submitted with insufficient information and
- d) any other Complaints which, in UCR's sole discretion is considered not suitable for being addressed through its Complaints process.

The Complainant must establish to UCR's satisfaction at the point of submitting the Complaint that:

- (a) the Complaint satisfies the definition of a “Complaint” in this Policy,
- (b) subject to subsection (c) below, the Complainant has followed the Project Grievance Process (if applicable), and the Complainant has provided evidence thereof to the satisfaction of UCR in its sole discretion; and
- (c) the Complaint is not governed by a separate and more appropriate dispute resolution clause as agreed between the Complainant and the counterparty it is seeking redress against; and
- (d) the Complainant has a case for which there is sufficient likelihood that a decision would be obtained that is or will be enforced through the process of a court that justifies UCR's intervention (a “good arguable case”).

The requirement for a good arguable case shall not apply if:

- i. The Complaint is brought by a Local Stakeholder, a National Authority or an Affected Community who is not a project proponent, UCR Registry account holder or Authorized Representative of the project proponent; and
- ii. UCR accepts, in its discretion, that there is a dispute as to the interpretation of the relevant UCR Program rules or dispute regarding a project.

By submitting a Complaint, the Complainant irrevocably agrees to the provisions of this Policy. Further, the Complainant agrees that a failure to conform to the correct process for lodging the Complaint will result in UCR dismissing the Complaint.

Only if UCR determines that the Complaint is justified and based on feedback from the UCR Board or external legal advisors engaged at UCR's sole discretion, further instructions or updates will be communicated to the Complainant for further action.

Timeline:

Step 1

- UCR receives the Complaint.
- Within 30-60 days of receipt, UCR will contact the Complainant, confirming receipt of the Complaint and provide contact details of the UCR specific staff to coordinate further handling of the Complaint within UCR.
- In relation to a Project Legal Dispute, UCR may note the Complaint on the relevant Registry project website (i.e. Update Section).

Step 2

- A UCR staff member will review the Complaint.
- UCR, at its sole discretion, may notify any known affected parties of the Complaint, as appropriate.
- UCR, at its sole discretion, may seek input from all affected parties.
- UCR, at its sole discretion, will undertake all reasonable efforts to draft a response to the Complaint **within 90 days of receipt of the Complaint.**
- UCR, at its sole discretion, may publish the response on the UCR website or, in relation to a Project Legal Dispute, on the relevant project page on the UCR Registry ecosystem.
- UCR may withhold responses to anonymous complaints to protect the identity of the Complainant, as necessary.

A.2. Format of Complaint >>

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Full name of the Complainant	
Full name(s) of all organization(s) involved, where relevant	
Contact information (including, postal address and email address) for the Complainant	
Details of the Complaint (i.e., what are the key issues)	
Applicable UCR project identification number (if there is one)	