CARBON BORDER ADJUSTMENT MECHANISM

PROCEDURE FOR EVALUATING COMPLAINTS AND OBJECTIONS CTR.PR.CBAM.1.4

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1. PURPOSE AND SCOPE

The purpose of this procedure is to define the process by which complaints and objections from clients (operators), authorities, or other relevant parties regarding CBAM verification activities conducted by CTR Verification are received, evaluated, and resolved in an impartial, consistent, and non-discriminatory manner.

2. DEFINITIONS

Complaint: A complaint is any situation in which an individual or organization expresses dissatisfaction with CTR's operations or personnel (excluding objections).

Objection: A request by the customer (operator) for a reassessment of a decision (e.g., a negative confirmation opinion) given by CTR regarding their request (emission report).

3. GENERAL PRINCIPLES

Accessibility: The complaint and appeals process should be publicly available and accessible to all requesting parties.

Responsibility: CTR is fully responsible for all decisions in the process of handling complaints and appeals.

Impartiality: The examination and resolution of complaints or appeals must be carried out by personnel who were not involved in the conduct of the activity in question.

Confidentiality: All information regarding the complainant and the subject of the complaint must be protected as a "trade secret" and must not be shared except in cases of legal necessity.

4. COMPLAINT AND APPEAL PROCESS

4.1. Application and Registration

- Complaints and objections must be submitted in writing via CTR's website, email, or official letter.
- CTR confirms receipt of the complaint or objection and informs the relevant party of the situation.
- All incoming applications are recorded in the "Complaint and Appeal Tracking Form".

4.2. Validity Assessment

- CTR gathers all necessary information to determine whether the application is relevant to its own verification activities.
- If the complaint or objection is deemed valid, the evaluation process will begin. Invalid applications will be notified to the applicant along with the reasons for their invalidation.

4.3. Review and Evaluation

- The appointed independent staff/committee reviews all evidence, internal verification documentation, and relevant regulatory requirements.
- Any discriminatory practices are avoided during the evaluation process.
- **Indicative Timeline:** Applications must be processed within a maximum of **30 calendar days from the date of receipt** (this period must be specified in the procedure in accordance with CBAM regulations).

4.4. Decision and Notification

- The decision reached as a result of the review, along with the reasons for it, is communicated in writing to the person making the objection/complaint.
- If an error is identified, corrective actions are initiated immediately.

5. CBAM SPECIAL NOTIFICATION OBLIGATIONS

Annual Reporting: CTR must submit a Management Report to the National Accreditation Body (NAB) by July 31st each year, summarizing all complaints received and actions taken during that year.

NAB Intervention: If a complaint reaches the competent authority or the Commission directly, the NAB is obliged to evaluate and conclude the complaint within 3 months; **CTR** must provide all requested information and documents during this process.

6. CORRECTIVE ACTIONS AND RECORDS

The causes of all irregularities arising from complaints or objections must be identified, corrected, and their recurrence prevented.

All records should be securely stored for at least six years to assess whether any circumstances affecting the verification report have occurred.