

Japan EPD Program by SuMPO

Objection/Complaint/Dispute Resolution Rules

Document ID: JR-15-03

Sustainable Management Promotion Organization

Revision history

| Version | Date | Page | Details |
|---------|-----------------|------|---|
| 03 | April 1, 2022 | - | Modifications due to changes in the program name. |
| 02 | October 1, 2019 | - | Modifications due to changes in the program operator. |
| 01 | April 28, 2017 | - | Document created. Newly published following integration of EcoLeaf Program and CFP Program. |

(Objectives)

Article 1. These rules specify the processes for handling of objections and complaints filed or any disputes occurring in relating to activities under the Japan EPD Program by SuMPO (the “Program”) operated and administered by the Sustainable Management Promotion Organization (“SuMPO”).

(Resolving Objections and Complaints)

Article 2. SuMPO classifies objections and complaints filed in writing with specific criticisms into two main categories: minor issues related to administrative procedures and fees that should be handled within SuMPO, and issues fundamental to the Program that should be examined either by the advisory board or the review panel.

- (2) SuMPO shall be responsible for all decisions made at each stage in the objection and complaint resolution process.
- (3) An overview of the resolution processes for objections and complaints shall be accessible by the general public. The resolution process shall include, at the very least, the following components and methods:
 - Processes for receipt of objections and complaints, confirmation of validity, and investigation; decision process for appropriate resolution of the objections and complaints by considering the prior similar objections and complaints
 - Progress tracking and recording thereof for objections and complaints, including measures taken for their resolution
 - Reliable implementation of appropriate corrections and corrective actions
- (4) SuMPO shall ensure that the parties involved in the objection resolution process are different from the parties who conducted the PCR review or verification. Direct negotiations between the grievant and the organization that has registered and published a declaration are not permitted. If a complaint is made against an organization that has registered and published a declaration, the organization shall notify SuMPO immediately with information pertinent to the complaint, and SuMPO shall resolve the complaint following the rules prescribed in these rules.
- (5) Refusal by an organization that has registered and published a declaration to express its views on the complaint without a valid reason may be viewed as admitting the complaint, and may lead to the revocation of declaration registration or other measures.
- (6) SuMPO shall notify the grievant on the receipt of the objection or complaint as well as report its progress and provide matters that have been decided thus far. The decisions communicated to the grievant shall be made by parties who had no involvement in the objection or complaint, or, if performed by a party involved in the objection or complaint, undergo approval by review.
- (7) SuMPO shall provide a written response using the Objection/Complaint/Dispute Response Form to the grievant with the results of its resolution within 60 days from the date that the objection and complaint form was received. SuMPO shall also formally notify the grievant of the conclusion of the resolution processes for objections and complaints.

(Transition to Dispute)

Article 3. If the grievant and/or the organization that has registered and published a declaration disagree(s) with the response in the previous article, the objection or complaint will transition to

dispute resolution.

(Dispute Resolution)

Article 4. In the event of a dispute described in the preceding article, SuMPO shall decide whether the dispute should be referred to the advisory board or the review panel based on the nature of the dispute.

- (2) The committee to which the dispute is referred according to the preceding paragraph may establish a dispute resolution panel.
- (3) The dispute resolution panel in the preceding party may include additional third parties who are not involved in the Program.
- (4) SuMPO shall provide a written response using the objection/complaint/dispute response form with the results of its resolution to the grievant within 60 days from the date that the dispute was brought to SuMPO.

(Post-Dispute Process)

Article 5. If corrective or remedial measures are required as a result of the dispute resolution, the parties involved in the Program must take immediate action.

- (2) Revision or revocation of registration or publication as a result of the dispute resolution shall be carried out in accordance with the Declaration Registration and Publication Rules.