

Internal Claims & Labelling Procedure

This document sets the internal rules and procedures observed by Bonsucro and any third party (if applicable) with regards to Bonsucro's Claim & Labelling rules.

Authorisation Process

All public claims (except membership claims) that require Bonsucro authorisation associated to Bonsucro must be submitted to Bonsucro for monitoring purposes, and some public claims must be pre-approved by Bonsucro.

All Bonsucro Credit Claims must be submitted via the Bonsucro Credit trading platform www.bonsucrocredits.com

Other claims must be submitted through an online form available at the Bonsucro website <http://www.bonsucro.com/submit-claim-approval> or via e-mail at claims@bonsucro.com

Bonsucro Logo and Certification Mark License Agreement

Any claim user must sign the Bonsucro Logo and Certification Mark License Agreement, unless requirements are already covered by another Bonsucro licence or the Bonsucro Credit trading platform T&Cs. The objective of this license is to stipulate the rules and limits of use of Bonsucro logos and Certification Mark and to ensure Bonsucro's brand is protected.

Please refer to Claims and Labelling Rules claims scope table for a full list of pre-requisites to submitting a public claim (e.g. membership, certificate, licence agreement, etc).

In the event that either:

1. the company applying rejects to sign the Bonsucro Logo and Certification Mark License Agreement or;
2. the company wishes to request modifications to the standard Certification Mark License Agreement offered by Bonsucro;

a review by the CEO or a legal expert hired by Bonsucro will be required before the authorisation can be processed.

Any claim submitted will only be processed once any legal concerns regarding Bonsucro Logo and Certification Mark License have been cleared.

Information required

Bonsucro's written authorisation is required for the following types of public claims:

- > Physical product trades (on-product)
- > Credit trading trades (off-product claims only)
- > Benchmark claims
- > Any claims that deviate in terms of content, from the pre-approved models expressed in the Claims & Labelling Rules

At least the following information **MUST** be submitted:

- a) Name of organisation making the claims
- b) Name, position and contact information of the individual responsible for the claim authorisation request at that organisation
- c) Bonsucro certificate number (if applicable)
- d) Details around the type and scope of the claim (on-product / off-product claim, where will the claim be used, which products, will it be published online, etc)
- e) Intended markets (countries)
- f) The statement that is proposed to be used in the claim (claim wording)
- g) The artwork that will be used, including very clearly the location and display of Bonsucro's logos
- h) Intended date of publication/release and duration (if applicable)
- i) Attach signed Bonsucro Logo and Certification Mark License Agreement (if applicable)
- j) Online form <http://www.bonsucro.com/submit-claim-approval>: tick box "I acknowledge that by submitting this form I am aware that it is my responsibility to check local regulations and legislation on claims and labelling."

Additional information required for the following exception:

On-product and off-product claims for Physical product trades can also be made by Bonsucro members who buy and distribute own brand finished products including certified material, who are not required to become Mass Balance Chain of Custody certified (see MB ChoC Standard).

In such cases, the claim user must submit the following additional information:

- > Finished products suppliers' list including name, Bonsucro certificate number, contact details of the person responsible for Bonsucro certification.
- > Written commitment to provide Bonsucro with relevant purchase records to substantiate any volume or percentage claim, upon request from Bonsucro.
- > Written commitment to communicating claims approval evidence to suppliers for the benefit of their Bonsucro certification audit.

Internal review process

The Bonsucro Secretariat will strive to respond to claims' submissions within 5 business days to start processing the request and communicate its decision within 10 business days.

We recommend that your request is made as soon as possible and with enough leeway for the authorisation process to take place.

For claims not using a pre-approved statement, the internal process involves authorisation from two different departments responsible for communications and claims' credibility, which will take additional time to process. Please ensure the information listed above is provided in full.

The internal process will follow the steps below:

1. The application is received via the Bonsucro website, the Credit trading platform or e-mail (see above)
2. The Communications Team will log the request in Bonsucro internal systems and do an initial review to ensure that the pre-requisites (as per Claims and Labelling Rules Scope table) and the content requirement of the request (items A to J, above) were observed;
3. The Communications Team will then either:
 4. request any further information needed from the organisation requesting authorisation
 5. proceed with the authorisation process;
6. Once the request can be analysed (i.e. contains all required information for a decision to be made), the Communications Team will assess that the proposed artwork and usage of Bonsucro's logos is correct and follows the guidelines set in the Claims & Labelling Rules;
7. The Communications Team shall then notify the Head of Standards & Innovation for approval regarding the content of the claim message;
8. If approved, the Communications Team will inform the applicant of the successful authorisation;
9. If not approved, the Communications Team will request the needed corrections for the claim to be approved;
10. If the applicant does not agree to the proposed changes the authorisation process will be concluded (authorisation not granted) and the applicant will be notified of the decision.

Any questions or comments regarding the rules, the process or the status of a claims request can be addressed in writing to claims@bonsucro.com

Appeals

Should an applicant disagree with the decision of the Bonsucro Secretariat regarding the claim authorisation request, they will be required to submit an appeal in writing to Bonsucro CEO within 30 days of the Bonsucro Secretariat's decision.

Monitoring System

Bonsucro takes claims related to its systems and brands very seriously and wants to ensure that claims related to Bonsucro are truthful, credible, consistent, and efficient, equally for internal/non-public, consumer-facing and business-to-business claims.

To achieve this objective Bonsucro is implementing an internal Monitoring System to:

1. Keep track of authorised claims' use
2. Monitor the use of the Bonsucro logos and other related copyright material
3. Monitor the statements being used in relation to Bonsucro's systems, products, and services
4. Uncover and take corrective action on potential misuse of Bonsucro's logos and/or misleading or untruthful claims.

For the purposes above, the Bonsucro Secretariat will implement the following:

- > A Log of Claims (a control sheet of all claims approved, disapproved, under consideration, as well as any claims that the Secretariat is aware of but that didn't require an authorisation from Bonsucro). This must include:
 - Name of organisation/member doing the claim
 - The statement used
 - The logos used
 - A copy/link to the artwork used (if applicable)
 - Date of receipt of the authorisation request
 - Date of approval/rejection (if applicable)
 - Date of expiry of claim (if applicable)
- > An annual claims & labelling review, including at least:
 - Review of the Claims Log (KPIs to be defined)
 - Review of any complaints received
 - Review of any accusations received (see Whistleblowing procedure below)
 - Assurance review (part of Assurance System procedures)
 - A review of the overall Claims & Labelling Document against ISEAL's Sustainability Claims' Good Practice Guide
 - External searches (web crawling) for use of:
 - Bonsucro's logos (image/picture search)
 - Bonsucro's name and products (keyword/reference search)
 - Bonsucro's website and copyright material (link search)

External Whistleblowing procedure

The purpose of this procedure is to outline ways in which all Bonsucro stakeholders or interested parties can express concerns about any alleged malpractice, wrongdoing, fraud, abuse, or other inappropriate acts/omissions in relation to Bonsucro's Claims & Labelling Rules and to encourage them to raise these concerns before Bonsucro in a confidential manner.

These external whistleblowing procedures apply to stakeholders' concerns regarding past, current, and potentially future (i.e. likely to happen) occurrences of misuse of Bonsucro's logos or the use of inappropriate, inaccurate/misleading, and wrong claims in association with Bonsucro.

If you wish to denounce, confidentially, an alleged untruthful or misleading claim as well as any misuse of Bonsucro's logos, please contact claims@bonsucro.com, with the following information:

1. Their name, company/organisation (if applicable), and contact details
2. Details about the concern/accusation and the company/person who is allegedly misusing Bonsucro's logos or claims¹
3. Any evidence of misuse or misleading statements or information on which the accusation is based

Once received, the accusation will be reviewed and investigated by a member of Bonsucro's Senior Management Team (there is no deadline for this review) and any necessary actions will be taken, the whistle-blower will be informed of the progress on the case.

Members of Bonsucro's Senior Management Team and the CEO have to disclose any potential conflict of interest in dealing with the accusation before it is assigned to a Senior Management Team member. As guidance, but not exhaustive, the following can be considered a conflict of interest:

1. A personal relationship with the person doing the accusation
2. A personal or professional interest in the result of the procedure
3. Owning stocks or shares or the company accusing or accused

Your personal details will be protected and will not be shared with the organisation allegedly misusing Bonsucro's logos or making an untruthful claim. Bonsucro guarantees that the details of the whistle-blower will NOT be shared with the accused, with Bonsucro's governance bodies, with external stakeholders, nor made public.

¹ See: https://www.isealalliance.org/sites/default/files/resource/2017-11/ISEAL_Claims_Good_Practice_Guide.pdf

Penalties for Misuse of Claims and Bonsucro's Logos

Bonsucro's governance documents have clear rules regarding abuse of claims and misuse of Bonsucro's logos by Bonsucro members, which may ultimately lead to expulsion.

Likewise, Bonsucro's license agreements (for example with certification bodies, benchmarking schemes, credit trading sellers and buyers, etc.) also provide rules around potential penalties for the misuse of claims and Bonsucro's logos, which may ultimately lead to loss of license.

Any case of misuse of claims or logos will be addressed by the Bonsucro Board. Deliberate misuse of claims or logos may lead to suspension or ultimately expulsion from Bonsucro membership and/or loss of license and/or certification.

The Bonsucro logos (and claims relating to Bonsucro) may not be used in any manner that is misleading, including (but not limited to):

1. Confusing the Bonsucro logos or any claims relating to Bonsucro certification with any other label, trademark, brand or logo
2. Associating the Bonsucro logos with products that are not certified by Bonsucro
3. Implying that non-certified products or processes are certified by Bonsucro

In the case of misuse by both Bonsucro members and non-members, Bonsucro reserves its rights to seek legal action.

Anyone is free to make truthful and accurate textual references to Bonsucro and its certification systems provided such references are not likely to cause error or confusion or mislead the recipient of the communication.

No party may use the Bonsucro Certification Mark or organisational logos in a manner that is likely to cause error or confusion about the intended purpose of the logo or design or imply an inaccurate relationship between a party and Bonsucro.

Written materials developed or approved by Bonsucro for the implementation of its certification systems may be reproduced and distributed but may not be altered in any way that affects the integrity, purpose or accuracy of the materials.

Members will be held responsible for the accuracy of information and claims they share with journalists, academics, and media professionals, should this information reference Bonsucro and be used in publications such as an article, academic paper, etc.

Review and Improvement of Claims & Labelling documents

The responsibility for the reviews carried out annually and overall management of the Claims & Labelling system are shared between the Head of Corporate Services and the Head of Standards and Innovations. Every year the two teams must agree a process and division of work to carry out the reviews.

They must also report back to Bonsucro's Senior Management Team with any recommendations of changes and improvements to the Claims & Labelling System.