

Folia Complaints Policy
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1. Purpose and Regulatory Framework

This policy establishes the procedure through which Folia receives, manages, and resolves complaints against operators and certification bodies participating in the Folia certification scheme.

The policy is established in accordance with:

- Regulation (EU) 2024/3012, which requires certification schemes to operate with integrity and transparency.
- Implementing Regulation (EU) 2025/2358, which requires certification schemes to maintain complaint and monitoring mechanisms (Article 4).
- Directive (EU) 2019/1937 of the European Parliament and of the Council on the protection of persons who report breaches of Union law, as transposed into Italian law by Legislative Decree 24/2023, in particular with regard to the right to anonymous submission.

This policy is designed to be read in conjunction with the Folia Whistleblowing Policy, the Non-Conformity Policy, the Conflict of Interest Policy, and the monitoring and reporting processes described in the Folia Certification Scheme.

2. Scope

2.1 Who may submit a complaint

Any of the following persons may submit a complaint under this policy:

- Operators participating in the Folia certification scheme.
- Certification bodies appointed under the scheme and their auditors.
- Any third party with a direct interest in the conduct of an operator or certification body in connection with the scheme.

2.2 Subject matter of complaints

Complaints may concern:

- Conduct by an operator that is alleged to be non-compliant with the rules or procedures of the Folia certification scheme.
- Conduct by a certification body that is alleged to be non-compliant with its obligations under the scheme, including impartiality requirements.
- Any other conduct by a participant in the scheme that may undermine the integrity, credibility, or correct functioning of the certification process.

Complaints that concern alleged violations of applicable law or Folia's internal policies by Folia staff or governance body members, rather than by operators or certification bodies, are managed under the Whistleblowing Policy.

3. Submission Channel

Complaints may be submitted via email to compliance@folia.earth. Each complaint is assigned a unique identification code upon receipt, and the complainant receives a written acknowledgement.

Complainants may submit a complaint anonymously. Anonymous complaints are processed to the extent practicable given the available information. Folia ensures the confidentiality of the complainant's identity in line with the confidentiality principles of Directive (EU) 2019/1937 and Legislative Decree 24/2023.

All documentation associated with each complaint is retained in the Monitoring and Complaints Register and made available, upon request, to the European Commission and to the Member State in which the complaint was submitted, in accordance with the requirements of Implementing Regulation (EU) 2025/2358.

4. Complaint Management Process

The following table sets out the steps, responsibilities, and timeframes for the management of each complaint.

Step	Activity	Responsible	Timeframe
1	Receipt of complaint and assignment of unique identification code	Head of Compliance	Within 5 business days of receipt
2	Acknowledgement to the complainant (where identity is known) and admissibility assessment	Head of Compliance	Within 10 business days of receipt
3	Investigation: review of documentation, contact with the subject of the complaint where appropriate	Head of Compliance, with CEO oversight	Within 40 business days of Step 2
4	Decision on outcome and, where applicable, corrective measures or referral to non-conformity procedure	CEO	Within 12 business days of Step 3
5	Notification of outcome to the complainant (where identity is known) and to the subject of the complaint	Head of Compliance	Within 8 business days of Step 4
6	Recording in the Monitoring and Complaints Register and closure of the case	Head of Compliance	Immediately following Step 5

The overall process must be completed within 60 calendar days of the acknowledgement of receipt. In cases of particular complexity, the Head of Compliance may extend this period by up to 30 additional calendar days, notifying the complainant in writing.

4.1 Admissibility assessment

At Step 2, the Head of Compliance assesses whether the complaint falls within the scope of this policy (Section 2.2) and whether it contains sufficient information to proceed. Complaints that fall outside scope or that are manifestly unfounded are closed. A written record is retained in the Monitoring and Complaints Register and the complainant, if identifiable, is notified of the closure and the reason.

4.2 Investigation

The investigation may include documentary review, requests for information addressed to the subject of the complaint, and, where appropriate, coordination with the relevant certification body. The subject of the complaint is informed of the complaint and given the opportunity to respond before a decision is taken, unless doing so would prejudice the integrity of the investigation.

5. Outcomes

Depending on the findings of the investigation, a complaint may result in one or more of the following outcomes:

- Identification of a non-conformity by an operator, managed in accordance with the Folia Non-Conformity Policy.
- Modifications to the internal monitoring process.
- Corrective measures or sanctions directed at the certification body, in accordance with the applicable provisions of the Folia Certification Scheme.
- Modifications to governance processes or to the certification scheme itself, subject to approval by the Board of Directors.
- Closure without further action, where the complaint is not substantiated.

6. Monitoring and Complaints Register

The Head of Compliance maintains the Monitoring and Complaints Register, which serves as the unified repository for complaints received under this policy and for the results of Folia's internal monitoring activities. For each complaint, the register records:

- The unique identification code and date of receipt.
- Whether the complaint was submitted anonymously.
- A description of the complaint and the parties involved.
- The steps taken during the investigation and the documentation reviewed.

- The outcome of the investigation and any corrective measures adopted.
- The date of closure and any referral to other procedures.

All records are retained for a minimum of five years. The register is made available, upon request, to the European Commission and to the competent authority of the Member State in which the complaint was submitted, in accordance with Implementing Regulation (EU) 2025/2358.

Aggregate information on complaints received — including the number of complaints, their subject matter, and the outcomes — is incorporated into the semi-annual internal monitoring report presented to the Board of Directors and into the Annual Operations Report published by Folia.

7. Related Documents

- Folia Whistleblowing Policy.
- Folia Non-Conformity Policy.
- Folia Conflict of Interest Policy.
- Folia Internal Monitoring Policy.
- Folia Certification Scheme.
- Monitoring and Complaints Register (maintained by the Head of Compliance, confidential).
- Folia Advisory Board Terms of Reference.
- Folia Technical Committee Terms of Reference.
- Folia CB Appointment Manual.