

BONSUCRO INTERNAL CLAIMS & LABELLING PROCEDURES

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

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

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

Claims' authorisation requests can be made through an online form available at the Bonsucro website (<http://www.bonsucro.com/submit-claim-approval/>) or via e-mail at claims@bonsucro.com

At least the following information MUST be submitted:

- a) Name of organisation making the claims
- b) Name and contact information of the individual responsible for the claim authorisation request at that organisation
- c) Bonsucro Chain of Custody certificate number
- d) Details around the scope of the claim
- e) Intended markets (countries)
- f) The statement that is proposed to be used in the claim
- 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) Confirmation that the company applying agrees to the Certification Mark License Agreement

The internal process will follow the steps below and Bonsucro will strive to decide on the authorisation within 5 business days:

1. The application is received via the website or e-mail (above)
2. The Communications Manager will do an initial review to ensure that the content requirement of the request (items A to F, above) was observed
3. The Communications Manager will then either:
 - 3.1 request any further information needed from the organisation requesting authorisation
 - 3.2 proceed with the authorisation process
4. Once the request can be analysed (i.e. contains all required information for a decision to be made), the Communications manager will assess that the proposed

artwork and usage of Bonsucro's logos is correct and follows the guidelines set in the Claims & Labelling Document.

5. In the event that either: a) the company applying rejects to sign the Certification Mark License Agreement or; b) 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.
6. The proposed claim being cleared of any legal concerns or risks it shall then be submitted to the Standards & Innovation Director for approval regarding the content of the claim message.
7. If approved, the Communications Manager will inform the applicant of the successful authorisation.
8. If not approved, the Communications Manager will request the needed corrections for the claim to be approved;
9. If the applicant does not agree to the proposed changes the authorisation process will be concluded (authorisation not granted) and a copy of the Complaints' Resolution Process will be sent to the applicant should he/she wish to appeal the decision.

COMPLAINTS & APPEALS

As explained above, should an applicant disagree with the decision of the Bonsucro Secretariat regarding the claim authorisation request and/or should they want to start a formal complaint before the Bonsucro Board of Directors, they will be required to write to complaints@bonsucro.com providing the information described in Bonsucro's [Complaint Resolution Process](#).

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:

- Keep track of authorised claims' use
- Monitor the use of the Bonsucro logos and other related copyright material
- Monitor the statements being used in relation to Bonsucro's systems, products, and services
- 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 Guide¹
 - 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 Document 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.

To initiate the procedure, a concerned stakeholder needs to send a message to 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 claims
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 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 See: https://www.isealliance.org/sites/default/files/resource/2017-11/ISEAL_Claims_Good_Practice_Guide.pdf

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

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.

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 Organisational Effectiveness Director and the Standard and Innovations' Director. 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.