THE INTEGRITY COUNCIL
FOR THE VOLUNTARY CARBON MARKET

ASSESSMENT PLATFORM TEMPLATE

PROGRAM LEVEL – NON-CORSIA APPROVED PATHWAY

1. Disclaimer language

The CCPs and Assessment Framework were developed following broad public and multistakeholder consultation, with input from the Expert Panel, under the guidance of the Standards Oversight Committee, a sub-committee of the Governing Board of the Integrity Council, and were adopted by the Governing Board.

Certain statements reflected in this Assessment Platform and the Assessment Framework document constitute forward-looking statements, projections and information (including beliefs or opinions) that are based on knowledge and information available to the Integrity Council at the date of preparation of this information. These statements can be identified by the fact that they do not relate strictly to historical or current facts, and such statements can include, without limitation, estimates, commitments, plans, approaches and ambitions. Such forward-looking statements are based on the Integrity Council's current expectations and are subject to a number of risks, uncertainties and assumptions that may cause actual results to differ materially from those described, expressed or implied in the forward-looking statements. These risks and uncertainties include, among other factors, changing economic, financial, business or other market conditions, and changes in environmental, geopolitical, social and physical risks. All forward-looking statements shared by the Integrity Council are expressly qualified in their entirety by the cautionary statements contained or referred to in the relevant sections of the Assessment Framework and the Assessment Platform. As a result, you are cautioned not to place undue reliance on such forward-looking statements. All views expressed are based on financial, economic, and other conditions as of the date hereof and the Integrity Council disclaims any obligation to update, revise or correct any forecast, opinion or expectation, or other forward-looking statement, to reflect events that occur or circumstances that arise after the date hereof.

The Assessment Framework has been provided for information only. Nothing therein should be construed as financial, legal, tax, accounting, actuarial or other specialist advice. Persons needing advice in relation to the matters discussed should consult an independent professional adviser. The information set out in Assessment Framework, including the Assessment Procedure and the Assessment Platform, may be subject to updating, completion, revision and amendment at any time, and such information may change materially.

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The ICVCM has reserved the right to make necessary changes and revisions to Part I (Program Level), as required, and including when Part II (Category Level) of the Assessment Framework is published.

2. Landing Page [seen on the log-in page]

The Integrity Council for the Voluntary Carbon Market (Integrity Council or ICVCM) is an independent governance body for the voluntary carbon market (VCM).

Its mission is to ensure that voluntary carbon markets accelerate action to combat climate change. It will set and enforce a global threshold standard for carbon credit quality, drawing on the latest science and expertise available. It aims to build trust, reduce confusion, and ensure that high-integrity carbon credits efficiently mobilise finance for climate projects that would not otherwise be viable.

3. Introduction area

The Integrity Council's threshold standard is based on its Core Carbon Principles (CCPs). The CCPs are implemented through an Assessment Framework applied at the level of both the carbon-crediting program and the category of carbon credits, to define which carbon-crediting programs are CCP-Eligible and which categories are CCP-Approved. The result is a threshold standard and label that provides a credible, rigorous, and readily accessible means of identifying high-quality carbon credits.
This Assessment Platform contains the March 2023 requirements for the Program-level criteria of the Assessment Framework and the Assessment Procedure. This will guide carbon-crediting programs on understanding the Integrity Council process and the operational requirements against which they will be assessed when they apply to the Integrity Council via this Platform. Applying carbon-crediting programs will be assessed on whether they meet the requirements, and successful programs will become CCP-Eligible.

The mid-2023 release of the Assessment Framework’s Category-level criteria and requirements by Integrity Council, will be Part II of the Assessment Framework. The Integrity Council will initiate its assessment of carbon-crediting programs shortly thereafter. It expects to begin announcing CCP-Eligible programs and CCP-Approved Categories later in 2023, enabling approved carbon-crediting programs to issue the first CCP-labelled carbon credits to the market. Approval of additional carbon-crediting programs and categories eligible under the CCPs will be announced on a rolling basis thereafter.

Following the publication of the Assessment Framework’s Category-level criteria and requirements, carbon-crediting programs will have the ability to start their application to the ICVCM, via this Application Platform, to be assessed against the program-level criteria in the Assessment Framework for CCP Eligibility. Carbon-crediting programs will have the ability to opt out of any methodologies they wish to have excluded from assessment at the Category Level. Applications will be assessed in accordance with the process set out in the Assessment Procedure, with the accompanying Terms and Conditions specifying how the relationship between the ICVCM and eligible carbon-crediting programs will be managed.

Effective governance requires that normative program documents relevant to decision-making are publicly available, subject to compelling confidentiality constraints, including data protection and privacy. Normative program documents include standards, methodologies, procedures, tools, guidelines, supplementary information, and project documentation. In the event a carbon-crediting program applying for assessment via this Platform needs to upload supporting documentation instead of or in addition to sharing the URL associated with any one criterion, the Document Upload feature on this Assessment Platform should be used.

On receipt of an Application submitted through this Application Platform, the Integrity Council will perform an initial completeness review of documentation submitted. The Secretariat will notify the carbon-crediting program of any apparent gaps in information, documentation or evidence submitted through the Application Platform, which must be resolved by the carbon-crediting program in order for the assessment to proceed. When the information, documentation and evidence are complete, the Secretariat will notify the carbon crediting program that the Application is complete and that the Application will proceed to the assessment stage. Complete Applications will be processed in the order in which they are confirmed as complete, prioritising the Applications that are received by the initial application deadline as indicated on the Application Platform.

Following its completion by a carbon-crediting program, the Application will be made public (in pdf format), on the ICVCM website, subject to any redactions agreed between the Integrity Council and the carbon-crediting program where there is a compelling rationale for confidentiality. The Integrity Council’s carbon-crediting program assessment will be treated as confidential during the assessment. The Integrity Council will publish Decisions of the Governing Board relating to carbon-crediting program applications on the website, including reasons for the decisions (see Assessment Procedure).

The Assessment Platform application should be read in conjunction with the Assessment Framework, Summary for Decision Makers, the Definitions, and the Assessment Procedure.

A – GOVERNANCE

The carbon-crediting program shall have effective program governance to ensure transparency, accountability, continuous improvement and the overall quality of carbon credits.

Governance includes four of the CCPs: Effective Governance, Tracking, Transparency, and Robust Independent Third-party Validation and Verification. Taken together, these CCPs identify strong governance provisions at the program-level. These provisions are critical to ensuring the overall quality of carbon credits issued by the carbon-crediting programs and maintaining and strengthening an environment of trust that supports the long-term integrity and growth of the VCM.

The listed Program-level provisions are all important for ensuring effective governance. Many of those have also been addressed in the requirements by the Carbon Offsetting and Reduction Scheme for International Aviation (CORSIA), developed and adopted by the International Civil Aviation Organization (ICAO). In order to minimise the burden on the carbon-crediting programs operating in the VCM, the ICVCM has determined that programs already eligible under CORSIA shall also be eligible under the current version of the Assessment Framework provided that they meet the additional requirements detailed in the Application Platform.

CORSIA-eligible programs are required to provide information on their CORSIA eligibility. Carbon crediting programs that are CORSIA-eligible will not be required to demonstrate that they meet CORSIA requirements related to effective governance, tracking, transparency and robust validation and verification. CORSIA-eligible programs will have to provide relevant information for the additional requirements detailed in the Assessment Framework and included in the ICVCM Application Platform.

Carbon-crediting programs that have not yet applied for CORSIA eligibility will be required to demonstrate to the Integrity Council that they meet all the requirements of CORSIA, as set out in this ICVCM Application Platform. They will also have to demonstrate that they meet the additional requirements detailed in the Assessment Framework and reflected in the ICVCM Application Platform. Carbon-crediting programs that have applied to CORSIA but have not achieved CORSIA-eligibility should contact the ICVCM before applying, as set out in the Assessment Procedure.
Changes in CORSIA requirements, and/or changes in relation to the carbon-crediting programs and carbon credits listed as eligible in the CORSIA Eligible Emission Units will be addressed, to the extent required, at the discretion of the ICVCM, through the Assessment Procedure.

EFFECTIVE GOVERNANCE

Context

Effective governance is a core feature of well-operated carbon-crediting programs. Effective governance requirements on public availability of documents and information enables transparent decision-making, effective and inclusive participation, and feedback to support continuous improvement.

In addition to meeting governance requirements set out in CORSIA, the carbon-crediting program needs to meet

requirements that demonstrate effective governance through a transparent and robust corporate governance framework for their organisations, including reporting and disclosure, and risk management policies and controls such as anti-bribery and anticorruption.

The Integrity Council's requirements on effective governance ensure processes are in place that support an organisation's long-term resilience and provide a framework of checks and balances to guide the organisation's governing body and staff. The criteria under this CCP requires carbon-crediting programs to have an independent board, publish annual reports and have robust processes relating to corporate social and environmental responsibility, and effective anti-money laundering rules.

Effective governance requires that normative program documents relevant to decision-making are publicly available, subject to compelling confidentiality constraints, including data protection and privacy. Normative program documents include standards, methodologies, procedures, tools, guidelines, supplementary information, and project documentation. Carbon-crediting programs must also have processes in place that provide for public engagement through local and global stakeholder consultation and for independently addressing grievances.

CRITERION 1.1: EFFECTIVE GOVERNANCE - CORSIA

CORSIA requirements related to governance framework:

1) Programme Senior Staff / Leadership (e.g., President / CEO, board members) List the names and titles of programme's senior staff and leadership, including board members.

Programme Senior Staff / Leadership
Ontoly's executive team is responsible for the day-to-day administration of the BERS Program, including Standard development, registry operations, methodology application, and stakeholder engagement.

- Ashley Sarauer, Founder & CEO — Programme development and consensus building with real estate industry, CORSIA and ICVCM engagement, governance oversight, stakeholder relations
- Adam Doran, Chief Technology Officer — Registry architecture, platform development, data infrastructure, security operations
- Pieter Dorsman, Chief Financial Officer — Financial oversight, insurance, corporate governance, investor relations

Board of Directors
The Ontoly Board of Directors assumes overall corporate fiduciary responsibility for Ontoly as a company, operating in accordance with Ontoly's Articles of Association and the British Columbia Business Corporations Act. Ashley Sarauer serves on the Board of Directors. The Board of Directors fulfills Ontoly's corporate fiduciary obligations — financial stewardship, legal compliance, and organizational strategy — while all decisions relating to the BERS Standard, credit issuance, and programme governance rest exclusively with the BERS Independent Governance Board, which has no overlapping membership with the Board of Directors.

Programme Staff
Ontoly's programme staff supports the operational delivery of the BERS Program, including methodology application, project lifecycle management, and platform design.

- Elyse Lindgren, Senior BERS Program Advisor — Programme design, methodology development, stakeholder engagement, quality assurance
- Ellie Chen, BERS Program Analyst — Quantification support, data analysis, monitoring report review, programme operations
- Laura Castellani, Senior Frontend UI Designer — Registry user interface, portal design, platform user experience

Scientific Advisory Board (SAB)
The Scientific Advisory Board provides independent technical review of BERS Methodologies, as established under the Methodology Development and Review Process. SAB members are licensed

Professional Engineers with specializations in building energy performance, measurement and verification, and energy efficiency.

- Riley Beise, P.Eng. BEMP — Scientific Advisory Member
- Menush Akbari, P.Eng. — Scientific Advisory Member
- Mohammad Fakoor, PhD, CEA, P.Eng. — Scientific Advisory Member

BERS Independent Governance Board
The BERS Governance Board is the programme's independent decision-making body, composed of 3–7 members drawn from the real estate and climate finance community with demonstrated experience in voluntary carbon markets, environmental law, climate finance, building engineering, and building decarbonization (BERS Standard, Section 2.2.1). The Independent Governance Board is structurally and functionally separate from the corporate Board of Directors, with binding authority over the BERS Standard, appeals, and grievances.

Independence from Operations
The Governance Board operates independently from Ontoly's executive team and programme staff. Board members are subject to a strict Conflict of Interest Policy and must have no current financial, commercial, or fiduciary interest in any BERS-registered project, Ontoly itself, or any entity deriving revenue from BERS-related services. No Ontoly staff hold Board seats or voting authority. Ashley Sarauer, CEO, serves solely as a non-voting Programme Administrator Observer to the Board and is responsible for bringing operational matters — such as proposed Standard revisions or programme developments — to the Board for their independent consideration and binding approval. She holds no vote and no decision-making power within the Board.

Investor Independence
No investors hold seats on the Governance Board. Ontoly's investors have no representation on the Board and no influence over programme governance decisions, ensuring full structural independence between capital interests and crediting programme oversight.

Decision-Making Authority
The Board holds binding approval authority over all major updates to the BERS Standard and serves as the final authority in the appeals and grievance process. Methodology governance is the responsibility of the Scientific Advisory Board and the processes set out in the Methodology Development and Review Process; the Board's involvement in methodology matters is limited to hearing methodology-related appeals.

Board Terms and Appointments
Board members serve terms of two to three years and are appointed through a formal nomination and confirmation process as established in the BERS Governance Board Document. The Board nominates candidates and Ontoly confirms, ensuring the oversight body is not composed entirely of Ontoly-selected individuals. Term limits, reappointment procedures, and removal processes are defined to ensure regular renewal and sustained independence.

Current Scale and Future Expansion
The current Board composition of three members is sufficient for the scale at which the BERS Program presently operates. As the programme expands its reach to additional countries and building markets, Ontoly is committed to growing the Board to include additional members who bring diverse geographic, sectoral, and governance perspectives. Ontoly welcomes ICVCM conducting a follow-up audit to verify how the Board has expanded its membership and strengthened governance procedures in line with programme growth. This staged approach ensures that governance capacity scales proportionally with programme scope while maintaining rigorous independence at every stage.

Current Members of BERS Independent Governance Board:

- Jamie Gray-Donald — Independent Governance Board Member
- Matt Strand — Independent Governance Board Member
- Michael Pohlod — Independent Governance Board Member

All governance body mandates, composition requirements, quorum rules, appointment and removal procedures, conflict of interest management, and grievance procedures are publicly disclosed in the BERS Governance Board Document and the Methodology Development and Review Process, available at www.ontoly.org.

Grievance Mechanism
The BERS Program maintains a formal grievance process as established in Section 2.4 of the BERS Standard. Any stakeholder may submit a grievance related to programme operations, project activities, or crediting decisions. Grievances are received by the programme team and escalated to the Independent Governance Board for independent review and determination. The Board issues binding decisions on grievance outcomes. Non-confidential grievance outcomes determined by the Board are publicly disclosed to ensure transparency and accountability in the resolution process. This mechanism provides an independent channel for addressing concerns without reliance on programme staff who may be party to the matter under dispute.

Program Governance and Oversight
See Sections 2 for Program Governance and Oversight requirements.
All governance body mandates, composition requirements, quorum rules, appointment and removal procedures, conflict of interest management, and grievance procedures are publicly disclosed in the BERS Governance Board Document and the Methodology Development and Review Process, available at www.ontoly.org

Grievance Mechanism
The BERS Program maintains a formal grievance process as established in Sections 2.4 of the BERS Standard. Any stakeholder may submit a grievance related to programme operations, project activities, or crediting decisions. Grievances are received by the programme team and escalated to the Independent Governance Board for independent review and determination. The Board issues binding decisions on grievance outcomes. Non-confidential grievance outcomes determined by the Board are publicly disclosed to ensure transparency and accountability in the resolution process. This mechanism provides an independent channel for addressing concerns without reliance on programme staff who may be party to the matter under dispute.

Leadership URL: https://www.ontoly.org/about

2) Provide an organizational chart that illustrates or otherwise describes the functional relationship a) among the individuals listed in D; b) among those individuals and programme staff / employees; and c) the functions of each organizational unit and interlinkages with other units.

Ontoly's organizational structure operates across four functionally distinct bodies with clearly defined reporting lines and independence safeguards.

Corporate Governance Layer
The Ontoly Board of Directors sits at the corporate governance level and assumes fiduciary responsibility for Ontoly as a company. Ashley Sarauer reports to the Board of Directors in her capacity as CEO. The Board of Directors has no authority over the BERS Standard, credit issuance, or programme governance decisions. Its function is limited to corporate financial stewardship, legal compliance, and organizational strategy.

Programme Governance Layer (Independent)
The BERS Independent Governance Board operates as a structurally separate body with no reporting line to the Board of Directors or Ontoly's executive team. It holds binding authority over the BERS Standard, appeals, and grievances. Methodology governance is the responsibility of the Scientific Advisory Board and the processes set out in the Methodology Development and Review Process; the Board's involvement in methodology matters is limited to hearing methodology-related appeals. Ashley Sarauer serves as a non-voting Programme Administrator Observer and brings operational matters to the Board for independent deliberation. The relationship is one-directional: the CEO presents matters for consideration, and the Governance Board issues binding determinations that Ontoly must implement. The Governance Board does not receive direction from any Ontoly staff or corporate body.

Executive and Programme Operations Layer
The CEO directs Ontoly's executive team (CTO, CFO) and programme staff. The executive team is responsible for day-to-day programme administration, registry operations, and stakeholder engagement. Programme staff (Senior BERS Program Advisor, BERS Program Analyst, Senior Frontend UI Designer) report to the executive team and deliver operational functions including methodology application, quantification support, monitoring report review, and platform development. No programme staff hold any role on the Independent Governance Board.

Technical Advisory Layer
The Scientific Advisory Board (SAB) provides independent technical review of BERS Methodologies. SAB members are licensed Professional Engineers who report their technical findings and recommendations to the programme team for incorporation into methodology development. The SAB operates independently in its technical assessments and holds responsibility for methodology review and oversight under the Methodology Development and Review Process. The Board's involvement in methodology matters is limited to hearing methodology-related appeals under Section 5.3 of the BERS Governance Board Document.

Functional Relationships and Interlinkages
The CEO is the sole interface between programme operations and the Independent Governance Board, functioning as a non-voting Programme Administrator Observer who surfaces matters for Board consideration. Programme staff prepare technical materials, methodology drafts, and monitoring outputs that inform the CEO's presentations to the Board, but have no direct access to or influence over Board deliberations. The Scientific Advisory Board's technical recommendations feed into methodology development conducted by programme staff, with methodology governance handled through the Methodology Development and Review Process. The Board of Directors receives corporate performance reporting from the CEO but is firewalled from all BERS programme governance decisions. Investor interests are structurally excluded from programme governance through the absence of any investor representation on the Independent Governance Board.

An organizational chart illustrating these relationships is available at https://www.ontoly.org/about

3) Provide a summary description of your programme (300 – 500 words)

Ontoly is a private benefit company headquartered in British Columbia, Canada. Ontoly developed and administers the Building Emissions Reduction Standard (BERS) — the world's first carbon credit certification framework designed specifically for the building retrofit sector — and issues Building Emissions Reduction Units (BERUs), uniquely serialized digital credits where each BERU represents one verified metric tonne of CO2e emission reductions (BERS Standard Sections 9.1.2 and 14.1.1).

The BERS Program certifies operational greenhouse gas emission reductions from energy efficiency and fuel-switching retrofit projects in existing large buildings, including multi-unit residential, commercial, and institutional buildings in Canada and the United States. The programme addresses a critical gap in voluntary carbon markets: buildings account for approximately 30% of global energy-related CO2 emissions, yet no crediting framework previously existed to certify retrofit-driven reductions at scale with sector-specific rigour.

All GHG quantification is centralized and performed by Ontoly using standardized, approved methodologies applied to actual metered utility data submitted by Building Representatives. This eliminates project-level discretion in calculation, ensures methodological consistency across all projects, and provides a verifiable, building-specific evidence base for every BERU issued (BERS Standard Section 2.1.2).

The programme is built on three core pillars:
First, integrity of credits: BERUs are issued exclusively on an ex-post basis following annual independent verification by an ISO 14065-accredited Verification Body contracted and remunerated by Ontoly, not by project proponents. No BERUs may be issued based on projected or modelled estimates.

Second, rigorous additionality: every project must satisfy additionality testing that confirms emission reductions are real, measurable, and would not have occurred in the absence of carbon credit revenue. Projects that pass receive a transparent Investment Analysis Rating on a 1–5 scale based on payback period, publicly disclosed on the Ontoly Registry (BERS Standard Sections 10.1–10.4).

Third, transparent registry infrastructure: the Ontoly Registry is a publicly accessible database tracking every BERU from issuance through transfer to permanent retirement, with each unit carrying a unique serial number encoding country of origin, vintage year, and batch identifier. The Registry publicly discloses additionality ratings, methodology, verification status, and retirement purpose and beneficiary (BERS Standard Section 15).

Programme governance is overseen by the BERS Independent Governance Board, which operates separately from Ontoly's corporate Board of Directors and holds binding authority over all Standard revisions, appeals, and grievances. Methodologies are developed by Ontoly's technical team, independently reviewed by the Scientific Advisory Board of licensed Professional Engineers, and subjected to public stakeholder consultation for material revisions, with a minimum five-year review cycle. The first approved methodology — ONTOLY_RETROFIT_EEFS-1.0 — entered into force on March 11, 2026. All programme documents are publicly available at www.ontoly.org.

(BERS Standard Sections 9.1.2 and 14.1.1).
(BERS Standard Section 2.1.2).
BERS Standard Sections 10.1–10.4).
(BERS Standard Section 15).

Programme Summary URL: BERS Standard v1.2: https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6ab857e27bb0574e400851_BERS_Standard_Version_1.1.pdf

4) Confirm that your programme publicly discloses who is responsible for the administration of the programme

Yes.

Ontoly publicly discloses its role as sole programme administrator in BERS Standard Section 2.1.

This includes responsibility for maintenance and publication of all programme documents, administration of the Ontoly Registry, contracting and remuneration of ISO 14065-accredited Verification Bodies, centralized GHG quantification using approved methodologies, and management of the full project lifecycle from registration through credit issuance and retirement. The BERS Standard, all approved methodologies, and supporting programme documents are publicly available at www.ontoly.org.

The individuals responsible for programme administration — including executive leadership, programme staff, Scientific Advisory Board members, and Independent Governance Board members — are publicly identified on Ontoly's website at www.ontoly.org/about. Their respective roles and responsibilities are described in the BERS Standard, the BERS Governance Board Document, and the Methodology Development and Review Process, all of which are publicly accessible.
The BERS Independent Governance Board, which operates separately from Ontoly's executive team and corporate Board of Directors, provides independent oversight of programme governance and holds binding authority over Standard revisions, appeals, and grievances. Methodology governance is the responsibility of the Scientific Advisory Board and the Methodology Development and Review Process. This governance structure and its membership are publicly disclosed in the BERS Governance Board Document available at www.ontoly.org.

Administrative oversight URL: BERS Standard v1.2, Section 2.1: https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6ab857e27bb0574e400851_BERS_Standard_Version_1.1.pdf

5) Confirm that your programme publicly discloses how decisions are made

[Y/N]

Decision-making across the programme is disclosed in several public documents. Major updates to the BERS Standard require a formal 4-step Board approval process: Ontoly notifies the Board at least 30 days in advance; the Board reviews and may request expert input; the Board votes (simple majority of all members required); and upon approval, Ontoly publishes the updated Standard with the Board's approval referenced in the change log. Ontoly cannot implement a major Standard update the Board has rejected **(BERS Governance Board v1.2, Section 5.2).** Methodology decisions follow the Methodology Development and Review Process, including mandatory Scientific Advisory Board review and public consultation.

Standard revisions also require stakeholder consultation **(BERS Standard Section 2.3).** BERU issuance, suspension, and cancellation are governed by published rules (**BERS Standard Sections 5.7 and 16**), reflected in real-time on the public Ontoly Registry.

Decision-making URLs:

- *BERS Governance Board v1.2:* https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a03c9d64263159ce77b766c_Ontoly_BERS_Governance_Board_v1.2.pdf;
- *Methodology Development and Review Process v1.0:* https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6aa769c8f4eb46b52fd0aa_Ontoly_Methodology_Development_and_Review_Process_v1.0.pdf

6) Confirm that your programme can demonstrate that it has been continuously governed for at least the last two years Yes.

Ontoly was founded in January 2024 and has been continuously governed from then (over two years). The company was formally incorporated as 1483124 B.C. LTD. (operating as "Ontoly"), a British Columbia Benefit Company, on May 27, 2024, with governance structures established in accordance with the Articles of Association and applicable Canadian law. The Certificate of Incorporation and Articles of Association can be provided upon request.

Governance tenure URL: https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a03c9d64263159ce77b766c_Ontoly_BERS_Governance_Board_v1.2.pdf

7) Confirm that your programme can demonstrate that it has been continuously operational for at least the last two years

Yes.

Ontoly has been continuously operational since January 2024. Key milestones: operations and stakeholder research commenced January 2024; formal incorporation May 2024; Platform and Registry software launched Q4 2024; Scientific Advisory Board established and BERS Standard and Methodology drafted Q1 2025; BERS Standard v1.2 and Existing Building Methodology v1.1 formally published March 2026; Ontoly Registry and Platform launched publicly March 2026.

Operational tenure URL: https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a03c9d64263159ce77b766c_Ontoly_BERS_Governance_Board_v1.2.pdf

8) Confirm that your programme can demonstrate that it has a plan for the long-term administration of multi-decadal programme elements

Yes.

BERS projects carry crediting periods of up to ten years, with mandatory annual monitoring and reporting obligations binding on Building Representatives and successors in title throughout (BERS Standard v1.2, Section 10.7.1). Ontoly's long-term organisational plan rests on four documented pillars.

(1) Financial sustainability: Ontoly operates a fee-based revenue model (report and certification fees per the published Ontoly Fee Schedule) structured to cover ongoing operational costs across the full crediting periods it administers; high-level financial information evidencing solvency is published annually (BERS Standard Section 2.8.1; Annual Report FY2025-26).

(2) Governance continuity: staggered Board terms of two to three years with a maximum of one additional consecutive term, quorum-failure appointment procedures, and the Board/Ontoly shared appointment structure ensure institutional continuity independent of any single party (BERS Governance Board v1.2, Sections 3.2–3.4); the Scientific Advisory Board provides continuing technical oversight.

(3) Contractual continuity: Pre-Purchase Agreements and Platform Terms of Use create legally binding obligations on Building Representatives and successors for the full crediting period.

(4) Wind-down protection: the published Wind Down Policy and BERS Program dissolution provisions, including ongoing retention of registry data, ensure that issued units, retirements, and project records remain traceable irrespective of corporate events.

As a British Columbia Benefit Company, Ontoly is additionally bound by a statutory public-benefit purpose — mobilizing climate finance for building decarbonization — which anchors the organisation's long-term strategy in the continued administration and scaling of the BERS Program.

Long-term administration URL: BERS Standard v1.2, Sections 2.2, 2.8, and 10.7: https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6ab857e27bb0574e400851_BERS_Standard_Version_1.1.pdf

BERS Governance Board v1.2, Sections 3.2–3.4: https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a03c9d64263159ce77b766c_Ontoly_BERS_Governance_Board_v1.2.pdf

Wind Down Policy v1.0: https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a03c821e50b2575a068ccd8_Ontoly_BERS_Wind_Down_Policy_v1.0.pdf

Annual Report FY2025-26: https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a03c90c4cf7cd5d2c88370d_Ontoly_Annual_Report_FY2025-26.pdf

BERS Standard v1.2, Sections 2.2, 5.4, 10.7: https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6ab857e27bb0574e400851_BERS_Standard_Version_1.1.pdf

9) Confirm that your programme can demonstrate that it has a plan for possible responses to the dissolution of the programme in its current form

Yes.

The BERS Program has comprehensive provisions addressing dissolution risk, codified in Ontoly's publicly available Programme Wind-Down Policy (v1.0, effective May 6, 2026) and supported by structural safeguards in the BERS Standard and Governance Board Document.

The Wind-Down Policy establishes five trigger events (voluntary dissolution, insolvency, regulatory action, loss of governance quorum, and force majeure) and prescribes a structured wind-down timeline. Within 30 calendar days of a trigger event, Ontoly must notify all Programme Participants —

Building Representatives, Buyer Account holders, Verification Bodies, and ICAO/CORSIA — in writing. Public notice follows within 45 days. The BERS Independent Governance Board retains full authority throughout the wind-down process, including approval of any successor programme or data custodian, and its mandate does not terminate until all data custody arrangements are finalized and pending appeals resolved.

At the registry level, BERS Standard Section 15.3.3 requires that all CORSIA-related registry data be retained on an ongoing basis and for at least three years beyond the end of the latest applicable CORSIA compliance period. The Wind-Down Policy extends this by requiring all non-CORSIA registry data to be retained for at least ten years following the last BERU issuance. Within 90 days of the trigger event, Ontoly must execute a data custody arrangement — transfer to a successor programme, escrow with an independent custodian, or publication as a public archive — ensuring that retirement records remain publicly accessible and independently verifiable in perpetuity.

For projects with active crediting periods, the Policy provides for completion of in-progress verification cycles (within 180 days), issuance of final status reports to Building Representatives, and facilitated transfer to a successor programme with the Building Representative's consent. Existing BERUs may continue to be transferred and retired for a transition period of at least 12 months before the Registry enters read-only mode. Prepaid fees for services not yet rendered are refunded pro rata within 90 days.

At the governance level, the BERS Governance Board Document (Section 3.4.4) establishes that if Board membership falls below quorum, Ontoly is automatically prohibited from implementing any major programme changes until quorum is restored. The Board's independent budget allocation ensures that governance oversight of the wind-down is not dependent on Ontoly's commercial viability.

10) Confirm your programme has policies and robust procedures in place to prevent the programme staff, board members, and management from having financial, commercial or fiduciary conflicts of interest in the governance or provision of programme services

Yes.

Ontoly maintains a publicly available Conflict of Interest Policy (v1.0, effective March 11, 2026), the authority for which derives from and is reviewed and approved by the BERS Governance Board (**Conflict of Interest Policy** Section 1.2, 12.2). The Policy applies to all Covered Persons — defined to include all Ontoly employees, officers, and directors; all BERS Governance Board members; SAB and advisory committee members; contracted Verification Body personnel; and any other individual with decision-making authority over BERS Program matters (Section 2.1.1). Conflicts are defined broadly to capture actual, potential, and perceived conflicts, and the Policy's scope extends to Close Relations (family up to second degree of consanguinity) and entities controlled or substantially owned by a Covered Person (Section 2.2).

Prohibited conduct is explicitly defined and includes: using a BERS position to influence outcomes for personal financial benefit; participating in decisions in which the Covered Person or a Close Relation has a Financial Interest; accepting gifts exceeding CAD $150 / USD $100 per year from any Programme Participant or Verification Body; and maintaining simultaneous employment or financial relationships with Programme Participants without prior written approval (Section 5). Post-departure obligations continue for 24 months following cessation of engagement (Section 2.3).
A designated Compliance Officer administers the Policy day-to-day, maintains the Conflict of Interest Register, conducts risk assessments, and has direct communication rights to the BERS Governance Board (Section 3.6).

Conflict of Interest Policy URL: https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6aa6dd9c4c58ed4766b638_Ontoly_BERS_Conflict_of_Interest_Policy_v1.0.pdf

11) Confirm your programme has policies and robust procedures in place to ensure that, where such conflicts arise, they are appropriately declared, and addressed and isolated

Yes.

The Policy establishes a structured three-stage process for managing disclosed conflicts.
Disclosure: All Covered Persons must complete a Conflict of Interest Disclosure Form within 30 days of appointment and an Annual Certification within 30 days of each calendar year. Any new or materially changed conflict must be disclosed within 14 calendar days of discovery. Disclosures are maintained in a confidential Conflict of Interest Register reviewed quarterly by the Compliance Officer and shared with the BERS Governance Board at least semi-annually (Sections 6.1–6.5).
Risk classification: Upon receipt of a disclosure, the Compliance Officer conducts an initial assessment within 14 business days and classifies the conflict as Low, Medium, High, or Critical Risk based on the financial value involved, the degree of decision-making authority, and the sensitivity of the matter (Section 7.2).

Management measures: Measures are applied proportionate to risk level and include Monitoring, Restriction, Recusal, Divestiture, or Removal (Section 7.3). For BERS Governance Board members specifically, conflicts are assessed by the Board excluding the conflicted member, who is recused from all voting and deliberations — including executive sessions — on the relevant matter. A pattern of recusals exceeding 25% of Board voting matters may trigger a review of whether continued Board service is appropriate (Sections 7.4, 9.2). If recusals reduce the Board below quorum, temporary independent directors may be appointed to permit business to proceed (Section 9.3). All Board recusals, the nature of the conflict, and the rationale for any continued participation are recorded in Board minutes and retained for a minimum of seven years (Section 9.4).

Where an undisclosed conflict is discovered after a decision has been made, the Programme conducts a review of all associated decisions; if the conflict could have influenced the outcome, the decision may be revisited, altered, or rescinded, and affected parties notified (Section 10.2).

Procedures URL: https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6aa6dd9c4c58ed4766b638_Ontoly_BERS_Conflict_of_Interest_Policy_v1.0.pdf

12) Confirm your programme has policies and robust procedures in place to prevent the programme registry administrators from having financial, commercial or fiduciary conflicts of interest in the governance or provision of registry services

Yes.

Registry administration is conducted exclusively by Ontoly staff, who are Covered Persons under the Conflict of Interest Policy and subject to all prohibitions and disclosure obligations described in Q10. Registry administrators are specifically prohibited from holding Financial Interests in any BERS Programme Participant, Verification Body, or software vendor providing services to the Programme (Section 9.1, applied by analogy to all decision-making staff). An additional structural protection relevant to registry integrity: Ontoly exclusively contracts and remunerates all Verification Bodies — project proponents have no role in VB selection or payment — eliminating a key structural conflict of interest at the point where registry decisions (BERU issuance) are most consequential (BERS Standard Section 8.2.2).

Registry conflict of interest policy URL: https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6aa6dd9c4c58ed4766b638_Ontoly_BERS_Conflict_of_Interest_Policy_v1.0.pdf

13) Confirm your programme has policies and robust procedures in place to ensure that, where such conflicts arise, they are appropriately declared, and addressed and isolated

Yes.

The same disclosure, risk classification, and management framework described in Q11 applies to registry administrators. Where a registry staff member identifies a conflict with respect to a specific project or transaction, they must disclose within 14 days, are subject to Recusal from all decisions relating to that project or transaction, and the matter is escalated to the Compliance Officer and, where appropriate, the BERS Governance Board. All disclosures, management decisions, and any sanctions are recorded in the Conflict of Interest Register and retained for a minimum of seven years (Policy Section 13.1). The anti-retaliation provision in Section 10.5 ensures staff can report concerns without fear of adverse consequences.

Registry conflict procedures URL: https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6aa6dd9c4c58ed4766b638_Ontoly_BERS_Conflict_of_Interest_Policy_v1.0.pdf

14) If the program is not directly and currently administered by a public agency, can the program demonstrate up-to-date professional liability insurance policy of at least USD$5M?

Yes.

Ontoly is a private benefit company and is not directly administered by a public agency. Ontoly maintains an up-to-date general commercial liability insurance policy of CAD $5M. Currently this policy is sufficient to the scale of our business as we have only onboarded a handful of projects, however if ICVCM would like us to up our insurance we are open to that discussion. We have yet to enter the U.S. market and have exclusively onboarded projects in Canada, hence why our insurance is reported in CAD $. Insurance documentation is not publicly disclosed as it contains commercially sensitive information, but proof of coverage can be provided to the ICVCM Secretariat upon request under appropriate confidentiality arrangements.

CRITERION 1.1: EFFECTIVE GOVERNANCE

a) In addition to CORSIA requirements related to governance framework, confirm that your organisation:

1) has a board comprised of independent board members who assume fiduciary responsibility for the organisation and operate according to robust bylaws. Yes.

The BERS Program operates under two distinct governance bodies, both publicly documented.

The BERS Independent Governance Board is composed of 3–7 members who are fully independent of Ontoly's management and commercial operations. Independence is defined by explicit criteria: no current or recent (within two years) employment, officer, director, or contractor relationship with Ontoly; no material financial interest in Ontoly; no active project registered under the BERS Program; no employment by or contract with any Verification Body performing BERS services; and no other relationship that could reasonably be perceived to compromise independent judgment (BERS Governance Board v1.2, Section 2.3.1). Members certify their independence upon appointment and annually thereafter.

The Board assumes fiduciary responsibility for BERS Program oversight and operates under the BERS Governance Board — Composition, Roles, and Responsibilities v1.0, which functions as its governing charter. Key structural safeguards include:
Appointment structure: The initial Board is appointed by Ontoly; all subsequent appointments are nominated by the Board itself, with Ontoly holding only a confirmation role. Ontoly cannot appoint any candidate the Board has declined (Section 3.1.2–3.1.3). This ensures the oversight body is not composed entirely of Ontoly-selected individuals.

Binding authority: The Board holds binding approval authority over all major BERS Standard updates. Ontoly cannot implement a major Standard change the Board has rejected (Section 5.2.5). Methodology governance is the responsibility of the Scientific Advisory Board and the Methodology Development and Review Process; the Board's involvement in methodology matters is limited to hearing methodology-related appeals (Section 6.2).

Enforcement mechanism: If Ontoly fails to comply with a binding Board determination within 60 days, the Board may publish a formal public statement on the Ontoly website. Ontoly is required to publish that statement within 14 days and cannot edit, redact, or remove it without the Board's consent (Section 5.2A).

Independent budget: The Board holds a discretionary budget allocation it may deploy without Ontoly's prior approval to obtain independent legal advice, engage external technical experts, or commission independent reviews (Section 11.3).

Staggered terms: Members serve two- to three-year terms (maximum one additional consecutive term, for a total of up to six years of continuous service). Where the Board consists of four or more members, terms are staggered so that no more than one-third of membership expires in any given year, ensuring continuity of institutional knowledge (Sections 3.2.1–3.2.4).

The Ontoly Board of Directors assumes overall corporate fiduciary responsibility for Ontoly as a company, operating in accordance with Ontoly's Articles of Association and the British Columbia Business Corporations Act. The Board engages independent advisors including legal counsel and chartered accountants.

The Conflict of Interest Policy — which governs all BERS Governance Board members — is itself approved by the BERS Governance Board and any material amendments require Board approval (COI Policy, Section 12.2).

Board members URL: https://ontoly.org/pages/about-us BERS Governance Board v1.2: https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a03c9d64263159ce77b766c_Ontoly_BERS_Governance_Board_v1.2.pdf

2) publishes an annual report that contains the organisation's revenues, expenses, and net assets over the past year and provides an overview of the organisation's mission, major programs and activities, and governance. Yes.

In accordance with BERS Standard Section 2.8.1, Ontoly publishes a publicly accessible annual report providing sufficient information to demonstrate financial integrity, operational capacity, and governance oversight. At minimum the report includes: high-level financial information evidencing organizational solvency and fiduciary responsibility; an overview of Ontoly's mission; key programme activities; material operational developments; and governance structure.

URL:

https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a03c90c4cf7cd5d2c88370d_Ontoly_Annual_Report_FY2025-26.pdf

3) Has processes in place to ensure corporate social and environmental responsibility. Yes.

Ontoly (legal name 1483124 B.C. LTD., operating as "Ontoly") is incorporated as a British Columbia Benefit Company under the Business Corporations Act (Part 2.2), which requires the company to pursue a stated public benefit purpose and to report publicly on its social and environmental performance on an annual basis. Ontoly's stated public benefit purpose is the mobilization of climate finance for building decarbonization — the BERS Program itself is the primary mechanism through which this purpose is fulfilled.

At the project level, the BERS Program requires all Building Representatives to assess and attest to the environmental and social impacts of their retrofit projects as a mandatory condition of participation. Through Ontoly's safeguards framework (BERS Standard Section 13), Building Representatives must complete a standardized environmental and social safeguards attestation with each Monitoring Report confirming, among other things, that the project: abides by national and local laws; has assessed risks of negative environmental and social impacts across defined safeguard categories including labour rights, pollution prevention, cultural heritage, fair treatment, and gender equality; has not forced displacement of any building occupants; and has considered the views of local stakeholders where relevant. Where material risks are identified, Building Representatives must upload supporting documentation and describe mitigation measures implemented. This attestation-based framework is proportionate to the low-risk profile of building retrofit projects on private property, where the potential for adverse public environmental or social impacts is substantially lower than for land-use or nature-based activities.

Ontoly's corporate Social and Environmental Commitments are published as a standalone policy (Ontoly Social and Environmental Commitments v1.0), and corporate social and environmental performance is publicly reported in the statutory annual Benefit Report required of British Columbia Benefit Companies and in Ontoly's public Annual Report (BERS Standard Sections 2.2.3 and 2.8.1). Non-confidential grievance cases and their outcomes are also documented in publicly available annual reports (Section 2.4.3).

Social and environmental responsibility provisions URL: BERS Standard v1.2, Sections 2 and 13: https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6ab857e27bb0574e400851_BERS_Standard_Version_1.1.pdf

Ontoly Social and Environmental Commitments v1.0: https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6abda5e27bb0574e4167f5_Ontoly_Social_and_Environmental_Commitments_v1.0.pdf

Annual Report FY2025-26: https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a03c90c4cf7cd5d2c88370d_Ontoly_Annual_Report_FY2025-26.pdf

4) Has robust anti-money laundering processes in place.

Ontoly has robust anti-money laundering processes in place. Our Know Your Customer (KYC) policy establishes rigorous identity verification, due diligence, and ongoing monitoring procedures to prevent money laundering, terrorist financing, and other financial crimes. These processes are applied consistently across all participants in our carbon credit marketplace, ensuring the integrity and transparency of every transaction. View our full KYC Policy

Ontoly maintains a publicly available KYC (Know Your Customer) Policy (v1.0, effective March 11, 2026), reviewed annually by the Compliance Officer and the BERS Governance Board. The Policy aligns with the Proceeds of Crime (Money Laundering) and Terrorist Financing Act (PCMLTFA) and FINTRAC guidance (Canada), the Bank Secrecy Act and FinCEN regulations (United States), and OFAC sanctions compliance requirements. Where Canadian and US requirements differ, the more stringent standard applies (KYC Policy, Section 1.3).

The Policy applies to all Supplier Account applicants (Building Representatives), Buyer Account applicants, Verification Bodies, and all BERU transaction counterparties. No party may access the Ontoly Portal or Registry — and therefore no BERU transaction of any kind can occur — without completing Ontoly's KYC procedures (Section 2). Key controls include:

- Identity verification: Government-issued photo ID plus address verification for individuals; certified incorporation documents, business license, and a beneficial ownership declaration tracing all natural persons owning or controlling 25% or more of voting equity through multi-layered structures for entities. Non-face-to-face verification requires video conferencing — sole reliance on self-submitted documents is not acceptable (Sections 4–5).

- Risk-based due diligence: Customers are classified as Standard, Medium, or High Risk. High Risk customers require Enhanced Due Diligence including independent source-of-funds verification, senior management approval before account activation, and enhanced ongoing transaction monitoring (Section 6).

- PEP screening: Mandatory screening against PEP databases at account opening and annually. All customers with PEP status are automatically classified High Risk and require CEO approval before account activation (Section 7).

- Sanctions screening: All customers screened against OFAC SDN, Global Affairs Canada, and UN Security Council sanctions lists at opening and quarterly thereafter. A confirmed sanctions match results in immediate account freeze, escalation to the Compliance Officer and CEO within 24 hours, and reporting to competent authorities (Sections 8.1–8.5).

- Suspicious Transaction Reporting: Ontoly files STRs with FINTRAC (Canada) or FinCEN (US) when there are reasonable grounds to suspect money laundering, terrorist financing, or sanctions circumvention. A strict tipping-off prohibition applies (Sections 10.1–10.4).

- Ongoing monitoring: Customer risk profiles are reviewed at intervals proportionate to risk classification (annually for High Risk, every two years for Medium, every three for Standard), with immediate re-assessment triggered by changes in beneficial ownership, adverse media, or suspicious transaction patterns (Section 9).

- The Compliance Officer reports annually to the BERS Governance Board on all material KYC matters including account refusals, STR filings, sanctions matches, and PEP decisions (Section 14.3).

Anti-money laundering policy/process URL: https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/69b12760a2d717b1b5503b13_Ontoly_BERS_Know_Your_Customer_Policy_v1.0.pdf

5) follow practices consistent with robust anti-bribery and anti-corruption guidance and regulation.
Yes.

Ontoly maintains a zero-tolerance approach to bribery and corruption across all BERS Program activities. Our Anti-Bribery & Anti-Corruption Policy is aligned with applicable legislation including Canada's Corruption of Foreign Public Officials Act (CFPOA), the U.S. Foreign Corrupt Practices Act (FCPA), and the UK Bribery Act 2010, applying the more restrictive standard where multiple jurisdictions apply. The policy covers all staff, governance board members, verification bodies, program participants, and third-party intermediaries. It prohibits facilitation payments without exception, establishes strict gift and hospitality thresholds, requires anti-corruption due diligence for all third parties (with enhanced screening for high-risk jurisdictions), and enforces BERU transaction integrity through fair market value pricing and full audit trails. Ontoly provides mandatory anti-corruption training at onboarding with annual refreshers, maintains anonymous whistleblower reporting channels with robust protections against retaliation, and conducts independent anti-corruption risk assessments and audits on a regular cycle.

Anti-bribery and anti-corruption policy/controls URL:

https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6aa4d23f4e7fa36fd223d3_Ontoly_Anti-Bribery_Anti-Corruption_Policy.pdf

CRITERION 1.2: PUBLIC ENGAGEMENT, CONSULTATION, AND GRIEVANCES - CORSIA

CORSIA requirements related to public engagement, consultation and grievances:

1) Confirm that your programme publicly discloses what information is captured and made available to different stakeholders

Yes.

Ontoly publicly discloses the information available to different stakeholder groups across several programme documents. At the programme level, all normative BERS documents — the BERS Standard, Approved BERS Methodologies, the Methodology Development and Review Process, the Public Parameter List, and the BERS Governance Board document — are publicly available on the Ontoly website and Registry. At the project level, a Project Description Report is published on the Ontoly Registry for every registered project, containing: project location, scope, and type; the approved methodology applied; the Financial Additionality Rating; monitoring report summaries; verification statement summaries; current registration and issuance status; and for retired BERUs, the quantity, retiring entity, named beneficiary, and declared purpose of retirement (BERS Standard Sections 5.3.6, 15.1.1). Commercially sensitive financial data underlying the additionality assessment is not publicly disclosed, but this exclusion is itself publicly documented (BERS Standard Section 10.5.2).

Stakeholder disclosure URL: BERS Standard v1.2, Sections 5.3.6 and 15.1.1: https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6ab857e27bb0574e400851_BERS_Standard_Version_1.1.pdf

2) Confirm that your programme publicly discloses its local stakeholder consultation requirements (if applicable)

[NA]

Formal prescribed local stakeholder consultation requirements at the project level are not applicable to the BERS Program. This is a deliberate and proportionate design decision rooted in the nature of the activity type. BERS projects involve energy efficiency and fuel-switching retrofits within the physical boundary of a single privately owned building. Unlike land-use, forestry, or nature-based projects — for which local stakeholder consultation requirements were principally designed — building retrofit projects on private property do not involve changes to land use, displacement of communities, restriction of access to natural resources, or impacts on shared commons. The risk of adverse public impact from a building retrofit is confined to the building's immediate occupants, who are within the Building Owner's existing legal and contractual relationships.

In place of formal prescribed consultation, the BERS Program requires all Building Representatives to attest, as part of the mandatory Data Quality & Safeguard Attestation Form, that where the project is reasonably expected to affect tenants, workers, or community stakeholders, their concerns have been appropriately considered (BERS Standard Section 13.2.1, Stakeholder Consideration safeguard). Where material risks to local stakeholders are identified, Building Representatives must document and upload mitigation measures with each Monitoring Report (BERS Standard Section 13.3.1). This attestation-based approach is proportionate to the low-risk profile of building retrofit projects on private property, where the potential for adverse public impacts is substantially lower than for land-use or nature-based activities.

Stakeholder consultation provisions URL: BERS Standard v1.2, Section 13.2.1: https://cdn.prod.website-

files.com/6987d504fe9b9a604857ae67/6a6ab857e27bb0574e400851_BERS_Standard_Version_1.1.pdf

3) Confirm that your programme publicly discloses its public comments provisions and requirements, andhow they are considered (if applicable)

Yes.

Ontoly publicly discloses its public comment provisions in two programme documents. For methodology development and material revisions, the Methodology Development and Review Process (Section 7) sets out the full consultation procedure: draft documents are published on the Ontoly website with a minimum 30-day public comment period open to all stakeholders; following the period Ontoly publishes a summary of all comments received and a formal response to each material comment documenting whether and how it was incorporated or the rationale for not incorporating it. For ongoing programme grievances, the BERS Standard (Section 2.4) establishes the grievance and appeals mechanism, which is open at any time to any stakeholder, with defined acknowledgment, investigation, appeal, and mediation steps. Both processes are publicly documented.

Public comment provisions URL: *Methodology Development and Review Process v1.0, Section 7:* https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6aa769c8f4eb46b52fd0aa_Ontoly_Methodology_Development_and_Review_Process_v1.0.pdf*;*

BERS Standard v1.2, Section 2.4: https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6ab857e27bb0574e400851_BERS_Standard_Version_1.1.pdf

4) Confirm that your programme conducts public comment periods relating to methodologies, protocols, or frameworks under development

Yes.

Public consultation is conducted for all Material Revisions to approved BERS Methodologies. A Material Revision is defined as any change that alters applicability or eligibility criteria, modifies title and ownership rules, results in a greater than 1% change in quantified GHG emission reductions, changes baseline determination procedures or emission factors, modifies additionality assessment procedures, or changes monitoring requirements in a way that affects data quality or verifiability (Methodology Development and Review Process, Section 5.1).

The consultation procedure requires: publication of the draft revised document on the Ontoly website; a minimum 30-day public comment period open to all stakeholders including project developers, building owners, verification bodies, academic researchers, civil society organizations, Indigenous Peoples and Local Communities, and the general public; and publication of a formal comment response document identifying how each material comment was addressed (Sections 7.1–7.3). The primacy of scientific evidence is maintained — comments that conflict with the scientific evidence base, SAB recommendations, or the conservativeness principle are rejected with published rationale (Section 7.3).

Note: Public consultation is not required for the initial version of a new methodology, which is developed under SAB oversight and independent expert review. This position is explicitly documented and reasoned in the Methodology Development and Review Process (Section 4.4.2–4.4.3).

Methodology public comment URL: Methodology Development and Review Process v1.0, Sections 5.1 and 7: https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6aa769c8f4eb46b52fd0aa_Ontoly_Methodology_Development_and_Review_Process_v1.0.pdf

5) Confirm that your programme conducts public comment periods relating to activities seeking registration or approval

Yes.

The BERS Program does not operate a separate public comment period specific to individual project registration — a design choice proportionate to the project type and consistent with the ex-post, building-level nature of the programme. However, any stakeholder may submit a grievance at any time regarding a specific BERS project — including at the point of registration, listing, verification, or BERU issuance — via the grievance and appeals mechanism (BERS Standard Section 2.4.1).

There is no time limit on submissions. Ontoly must acknowledge receipt within 14 business days, investigate substantiated concerns within 30 days, and if unresolved, the complainant may escalate to the BERS Governance Board. No fees are imposed on Indigenous Peoples, Local Communities, or civil society organizations for accessing this mechanism (BERS Standard Section 2.4.3).

Activities public comment URL: https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6ab857e27bb0574e400851_BERS_Standard_Version_1.1.pdf

6) Confirm that your programme conducts public comment periods relating to operational activities (e.g., ongoing stakeholder feedback)

Yes.

The grievance and appeals mechanism (BERS Standard Section 2.4) functions as Ontoly's open, standing channel for ongoing stakeholder feedback on any aspect of BERS Program operations. Submissions are accepted at any time from any stakeholder with no time limit. In addition, stakeholders may submit a formal request to info@ontoly.org at any time to prioritize the development or revision of a specific methodology, which Ontoly must acknowledge within 14 business days (Methodology Development and Review Process, Section 4.5.2). Where a grievance or formal request relates to information alleged to be missing or incomplete on the Ontoly website or Registry, Ontoly is required to review the request and, where eligible, make the information publicly available (BERS Standard Section 2.4.4). Non-confidential grievance outcomes are documented in publicly available annual reports (BERS Standard Section 2.4.3).

Operational activities public comment URL: BERS Standard v1.2, Section 2.4: https://cdn.prod.website-

files.com/6987d504fe9b9a604857ae67/6a6ab857e27bb0574e400851_BERS_Standard_Version_1.1.pdf

7) Confirm that your programme conducts public comment periods relating to additions or revisions to programme procedures or rulesets

Yes.

Major updates to the BERS Standard itself require a formal 4-step approval process involving the BERS Governance Board, including a minimum 30-day advance notification period during which the Board reviews proposed changes and may request additional information or expert input before voting (BERS Governance Board v1.2, Section 5.2.4).

All Material Revisions to approved BERS Methodologies undergo the public consultation process described in Q4 above. Administrative revisions and methodology clarifications — defined as changes that do not materially affect the substance of existing provisions or quantification outcomes — do not require public consultation, but Ontoly must notify the Governance Board of all such changes (BERS Governance Board v1.2, Section 5.2.3; Methodology Development and Review Process, Section 5.1).

Programme procedures public comment URL: *BERS Governance Board v1.2, Section 5.2:* https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a03c9d64263159ce77b766c_Ontoly_BERS_Governance_Board_v1.2.pdf;
Methodology Development and Review Process v1.0, Section 7: https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6aa769c8f4eb46b52fd0aa_Ontoly_Methodology_Development_and_Review_Process_v1.0.pdf

Public comment engagement on programme procedures process/policy URL: https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6aa769c8f4eb46b52fd0aa_Ontoly_Methodology_Development_and_Review_Process_v1.0.pdf

8) Summarize the level at which activities are allowed under the programme (e.g., project based, programme of activities, jurisdiction-scale). Provide evidence of the Programme information defining this and confirm it is made availability to the public.

The BERS Program operates exclusively at the project level. A Project is defined as a building energy retrofit activity registered under the BERS Program, comprising one or more eligible retrofit measures implemented within a single building or an Aggregated Building Project (BERS Standard Section 3 Definitions).

An Aggregated Building Project is a defined collection of up to five buildings treated as a single project boundary, subject to three cumulative conditions: all buildings are located within the same property boundary; all buildings are owned by the same Building Owner; and energy consumption and performance data are reported on an aggregated basis through shared utility accounts or equivalent metered systems (BERS Standard Section 4.5.2; Existing Building Methodology v1.1, Section 2.1.5). This aggregation provision exists solely to accommodate buildings that share utility metering and cannot be individually disaggregated — it does not constitute a programme of activities.

Each aggregated project is registered, monitored, verified, and issued BERUs as a single unit under a single project boundary, with a single Building Owner accountable for all compliance obligations. Programme-of-activities and jurisdiction-scale crediting are not permitted under Version 1.0.

Project-specific information — including the Project Description Report, Financial Additionality Rating, methodology applied, verification outcomes, and BERU issuance and retirement records — is publicly disclosed on the Ontoly Registry for every registered project (BERS Standard Section 15.1.1).

Programme activities URL: *BERS Standard v1.2, Sections 3 and 4.5: https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6ab857e27bb0574e400851_BERS_Standard_Version_1.1.pdf;*

*Existing Building Methodology v1.1, Section 2.1:*https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6aa6bf6ef197dfbd03146e_Existing_Building_Methodology_v1.1.pdf

Programme activities URL: BERS Standard v1.2, Sections 3 and 4.5 https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6aa6bf6ef197dfbd03146e_Existing_Building_Methodology_v1.1.pdf; Existing Building Methodology v1.1, Section 2.1: https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6aa6bf6ef197dfbd03146e_Existing_Building_Methodology_v1.1.pdf

9) Summarize the eligibility criteria for each type of offset activity (e.g., which sectors, project types, and geographic locations are covered). Provide evidence of the Programme information defining this and confirm its availability to the public.

The BERS Program's eligibility criteria are publicly documented in the BERS Standard and the Existing Building Methodology v1.1.

Activity types: Energy efficiency measures (e.g., HVAC system replacement, building envelope insulation, LED lighting, building automation upgrades, variable frequency drives) and fuel-switching measures (e.g., natural gas to electric heating) in existing buildings. New construction, embodied carbon, behavioral-only programs, industrial process emissions, refrigerant-related emissions, and projects already registered under another carbon crediting program or compliance market are excluded (BERS Standard Section 4.6).

Building types: Large existing buildings — including multi-unit residential, commercial, and institutional buildings — with at least 12 consecutive months of operational and energy consumption data prior to project start (Existing Building Methodology v1.1, Sections 2.1.1–2.1.2).
Geographic scope: Canada and the United States of America only under Version 1.0 (BERS Standard Section 4.2.1).

Additionality: Projects must satisfy additionality testing including the NPV Financial Additionality Test (BERS Standard Sections 10.1–10.4).

Project start date: Projects may be retroactively certified if the Project End Date falls within the 24-month period immediately preceding the date a Preliminary Ex-Ante BERU Assessment Report is requested (BERS Standard Section 4.4.2).

All eligibility criteria are publicly available on the Ontoly website and Registry.

Eligibility criteria URL: *BERS Standard v1.2, Sections 4 and 10:* https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6ab857e27bb0574e400851_BERS_Standard_Version_1.1.pdf*;*

Existing Building Methodology v1.1, Section 2: https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6aa6bf6ef197dfbd03146e_Existing_Building_Methodology_v1.1.pdf

Eligibility criteria URL: BERS Standard v1.2, Sections 4 and 10: https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6ab857e27bb0574e400851_BERS_Standard_Version_1.1.pdf ; Existing Building Methodology v1.1, Section 2: https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6aa6bf6ef197dfbd03146e_Existing_Building_Methodology_v1.1.pdf

CRITERION 1.2: PUBLIC ENGAGEMENT, CONSULTATION, AND GRIEVANCES

a) In addition to CORSIA requirements related to public engagement, consultation and grievances, confirm your organisation has processes for:

1) robust and transparent local and global stakeholder consultation processes, which provide for public comment and issue resolution.

Yes.

Ontoly's stakeholder consultation framework operates at two levels.

At the programme level, all Material Revisions to BERS Methodologies and major updates to the BERS Standard are subject to formal public consultation open to all stakeholders globally — including project developers, building owners, verification bodies, academic researchers, civil society organizations, and Indigenous Peoples and Local Communities. Draft documents are published on the Ontoly website with a minimum 30-day comment period, and Ontoly is required to publish a formal response to every material comment received, documenting how it was addressed (Methodology Development and Review Process, Section 7.2; BERS Standard Section 2.3.2). The BERS Governance Board's non-voting Stakeholder Observer provision further embeds a civil society or public interest perspective directly within programme governance (BERS Governance Board v1.2, Section 2.2A).

At the project level, the proportionate approach described in Q2 above applies: attestation-based safeguards require Building Representatives to confirm that where tenants, workers, or community stakeholders are reasonably expected to be affected, their concerns have been considered (BERS Standard Section 13.2.1). For projects where Indigenous Peoples and Local Communities may be directly or indirectly impacted, the safeguard framework explicitly requires that FPIC processes have been applied where relevant to circumstances (BERS Standard Section 13.2.1).

Issue resolution is provided through the standing grievance and appeals mechanism (BERS Standard Section 2.4), which is open at any time, has no filing fee for Indigenous Peoples, Local Communities, or civil society organizations, and escalates to the BERS Governance Board as the final binding authority on appeals.

Stakeholder consultation URL: *Methodology Development and Review Process v1.0, Section 7:* https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6aa769c8f4eb46b52fd0aa_Ontoly_Methodology_Development_and_Review_Process_v1.0.pdf

BERS Standard v1.2, Sections 2.3–2.4: https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6ab857e27bb0574e400851_BERS_Standard_Version_1.1.pdf

Stakeholder consultation URL: https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6ab857e27bb0574e400851_BERS_Standard_Version_1.1.pdf

2) addressing grievances. The process shall be clear and transparent, ensure impartiality and where appropriate confidentiality, in the filing and resolution of grievances. Any applicable fees shall not impede legitimate access to the grievance process by civil society organisations or IPs & LCs.

Yes.

The BERS Programme's grievance and appeals mechanism is established in BERS Standard Section 2.4 and administered by the BERS Governance Board as the final authority under BERS Governance Board v1.2, Section 5.3. The mechanism meets each element of this criterion:
Accessibility: Any stakeholder may submit a grievance at any time via info+grievances@ontoly.org with no time limit. No fees are imposed on Indigenous Peoples, Local Communities, or civil society organizations (BERS Standard Section 2.4.3).

Transparency: Ontoly must acknowledge receipt within 14 business days. Where a breach is substantiated and the Governance Board votes in favour, a formal investigation and proposed resolution must be provided within 30 days. All non-confidential grievance outcomes are published in Ontoly's publicly available annual report (BERS Standard Section 2.4.3; BERS Governance Board v1.2, Section 13.1).

Impartiality: Unresolved grievances escalate to the BERS Governance Board — an independent body structurally separate from Ontoly's operations — whose determination is final and binding on Ontoly (BERS Governance Board v1.2, Section 5.3). Governance Board members are subject to mandatory conflict of interest recusal in relation to any grievance where they have a relevant interest (Conflict of Interest Policy, Section 9.2).

Confidentiality: The grievance process maintains appropriate confidentiality for commercially sensitive information. Where information alleged to be missing from the Registry is requested, Ontoly reviews and discloses where eligible, subject to applicable confidentiality, privacy, and data protection obligations (BERS Standard Section 2.4.4).

Mediation: If a grievance remains disputed following the Board's investigation, an independent third-party mediator may be engaged (BERS Standard Section 2.4.2).

Appeals from corrective actions: Building Representatives, Building Owners, and Verification Bodies subject to corrective action findings may additionally appeal to the BERS Governance Board within 30 calendar days of Ontoly's determination, with the Board required to render a written decision within 60 business days (Corrective Actions Policy, Sections 10.1–10.4).

Grievances policy URL: *BERS Standard v1.2, Section 2.4: https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6ab857e27bb0574e400851_BERS_Standard_Version_1.1.pdf;*

*BERS Governance Board v1.2, Section 5.3:*https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a03c9d64263159ce77b766c_Ontoly_BERS_Governance_Board_v1.2.pdf;

Corrective Actions Policy, Section 10: https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/69b128024012a92a93eaed00_Ontoly_Corrective_Actions_Policy.pdf

TRACKING

Context

A registry is an information technology system used by a carbon-crediting program to identify mitigation activities and track each carbon credit from its issuance through subsequent transactions to its retirement or cancellation.

Registries, therefore, play a critical role in ensuring high integrity by providing a transparent and secure platform to track and verify carbon credits. The criterion and requirements ensure that a carbon-crediting program has processes and procedures in place to provide clarity with respect to the issuance and retirement of carbon credits.

Specifically, the carbon-crediting program's registry should identify by whom and on whose behalf a carbon credit was retired, identify the purpose of retirement, have procedures to address erroneous issuance of carbon credits and procedures and requirements to ensure no more than one carbon credit is issued per tonne of CO2 equivalent.

CRITERION 2.1: EFFECTIVE REGISTRIES (retirement and addressing erroneous issuance) - CORSIA

CORSIA requirements related to carbon credits in your carbon-crediting program registry:

1) Confirm that your programme defines and ensures the underlying attributes of a unit

Yes.

The attributes of a BERU are defined in BERS Standard Section 14.1.1 and the Definitions section (Section 3). A BERU is a unique, serialized, and transferable digital unit issued exclusively by Ontoly, representing one metric tonne of certified tCO_2e emission reductions achieved by a registered BERS Project and verified in accordance with the BERS Standard. Each BERU carries the following defined attributes publicly disclosed on the Ontoly Registry: host country, methodology applied, vintage year (the calendar year in which the emission reduction occurred), crediting period start date, CORSIA compliance period eligibility (if applicable), issuing registry identifier ("ONT"), and unique batch identifier. BERUs may also carry optional CCP, CORSIA, Article 6, Share of Proceeds, or SDG labels where applicable requirements are met (BERS Standard Sections 14.1.3, 15.1.1, 15.4).

Underlying attributes URL: *BERS Standard v1.2, Sections 3, 14.1, and 15.1.1:* https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6ab857e27bb0574e400851_BERS_Standard_Version_1.1.pdf

2) Confirm that your programme defines and ensures the underlying property aspects of a unit

[Y/N]

Legal title to a BERU vests exclusively in the entity registered as the current holder in the Ontoly Portal. Title transfers are legally effective only upon recording in the Ontoly Portal; retirement is legally effective only upon execution through the Ontoly Portal. The Ontoly Registry reflects current status for public transparency, but the Portal serves as the authoritative record of legal ownership (BERS Standard Section 14.1.4).

The chain of title begins with the Building Owner, who must authorize the creation of BERUs by executing the Building Owner Attestation and Representative Authorization — a legally binding declaration establishing the Building Owner's ownership of the building and associated GHG emission reductions and delegating authority to the Building Representative (BERS Standard Sections 2.7.4–

2.7.6). This ensures unambiguous title at the point of issuance. BERUs may be transferred, traded, or assigned through the Ontoly Portal or through an approved off-portal transfer subject to the Ontoly Platform Terms of Use (BERS Standard Section 5.7.4).

Underlying property aspects URL: *BERS Standard v1.2, Sections 2.7 and 14.1.4:* https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6ab857e27bb0574e400851_BERS_Standard_Version_1.1.pdf

See also Ontoly Platform Terms & Conditions: https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/69b1270354126bcb4fcc6bbe_Ontoly%20Platform%20Terms%20%26%20Conditions%20March%209%202026.pdf

3) Confirm that your programme utilises an electronic registry or registries

Yes.

The Ontoly Registry is an electronic database operated by Ontoly as the official system of record for all BERS projects and BERUs, tracking every BERU from issuance through transfer to permanent retirement. Project-level information — including Project Description Reports, Financial Additionality Ratings, verification outcomes, and BERU issuance and retirement records — is publicly disclosed on the Registry and accessible via the Ontoly website. Only projects that have achieved Validated status — meaning the Preliminary Ex-Ante BERU Assessment is complete and Eligible Validation Documentation (Section 6) has been reviewed and accepted — are posted to the public Registry.

The Ontoly Buyers Portal provides a separate, pre-validation visibility layer. Building Representatives may list projects on the Buyers Portal after responding to basic eligibility questions (BERS Standard Section 5.2A). Listed projects appear on the Non-Validated tab of the Buyers Portal, accessible only to registered Buyer Accounts in good standing. Listed projects do not appear on the public Ontoly Registry and carry no certification, validation, or assurance from Ontoly. This two-tier structure gives prospective buyers early pipeline visibility while maintaining the public Registry's credibility as an engineer-validated record.

The Ontoly Portal is a separate, authenticated, account-level platform through which all programme Account Holder operations are conducted — including account creation, project submission, monitoring report upload, BERU issuance, transfer, and retirement. The Portal is the authoritative record of legal ownership; the Registry is the public-facing transparency interface (BERS Standard Sections 3, 15.1.1, 15.3.1).

Access to the Ontoly Portal is by invitation following a formal application process. Prospective participants apply through the public Ontoly website, Ontoly reviews the submission and conducts KYC screening, and upon approval provides the applicant with Portal access. This controlled onboarding model ensures that all account holders are verified legal persons who have met the programme's identity and integrity requirements prior to participation (KYC Policy v1.0, Section 4; BERS Standard Section 5.2). Read-only public access to Registry data does not require an account.

***Programme registry URL:* https://registry.ontoly.org/**

BERS Standard v1.2, Section 15: https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6ab857e27bb0574e400851_BERS_Standard_Version_1.1.pdf*f;*

KYC Policy v1.0: https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/69b12760a2d717b1b5503b13_Ontoly_BERS_Know_Your_Customer_Policy_v1.0.pdf

4) Confirm that your programme has procedures in place to ensure that the programme registry or registries have the capability to transparently identify emissions units that are deemed CCP-approved, in all account types

Yes.

BERS Standard Section 15.2.2 explicitly requires that the Ontoly Registry indicate ICVCM Core Carbon Principles (CCP) approval status — alongside Article 6, CORSIA, and any other applicable labels — for any recognized BERU. Where the BERS Program receives CCP-Eligible status from the ICVCM, this designation will be applied as a publicly visible, searchable, and filterable label on the Registry, visible across all account types. The CORSIA Label, which serves as a direct analogue, is already designed to be visible in all registry account types and on the public registry interface, searchable and filterable, and maintained throughout the BERU's lifecycle including after retirement or cancellation (BERS Standard Section 15.4.3).

CCP identification URL: *BERS Standard v1.2, Sections 15.2.2 and 15.4.3:* https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6ab857e27bb0574e400851_BERS_Standard_Version_1.1.pdf

5) Confirm that your programme has procedures in place to ensure that the programme registry or registries identify, and facilitate tracking and transfer of, unit ownership/holding from issuance to cancellation/retirement

Yes.

Yes, the Ontoly Registry and Ontoly Portal facilitate tracking and transfer of, unit ownership and holding from issuance to cancellation/retirement. Every project and its associated BERUs are assigned a publicly visible issuance, retirement and cancellation statuses on the Ontoly Registry at all times. The defined status categories are (BERS Standard Section 15.2.1).

Ontoly is happy to provide a demo of the Ontoly Portal to the ICVCM to showcase additional functionality.

Where applicable, the Ontoly Registry shall indicate ICVCM Core Carbon Principles (CCP) approval status, Article 6, CORSIA, or any other applicable label for any recognized BERU (**Section 15.2.2**).

Unit status URL: BERS Standard v1.2, Section 15.2.1: https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6ab857e27bb0574e400851_BERS_Standard_Version_1.1.pdf

6) Confirm that your programme has procedures in place to ensure that the programme registry or registries identify unit status, including retirement / cancellation, and issuance status

Yes.

Yes. Every project and its associated BERUs are assigned a publicly visible issuance, retirement and cancellation statuses on the Ontoly Registry at all times. The defined status categories are (BERS Standard Section 15.2.1). Retirement and issuance status will become visible on the Ontoly Registry as project proceed to this stage.

Where applicable, the Ontoly Registry shall indicate ICVCM Core Carbon Principles (CCP) approval status, Article 6, CORSIA, or any other applicable label for any recognized BERU (**Section 15.2.2**).

Emissions units status identification procedures URL: BERS Standard v1.2, Section 15.2.1: https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6ab857e27bb0574e400851_BERS_Standard_Version_1.1.pdf

7) Confirm that your programme has procedures in place to ensure that the programme registry or registries assigns unique serial numbers to issued units

Yes.

Each BERU is assigned a unique serial number at the point of issuance, encoding: the country of origin, the vintage year, the issuing registry identifier ("ONT"), and a unique batch identifier (BERS Standard Section 14.1.3). Serial numbers are publicly disclosed on the Ontoly Registry and maintained throughout the BERU's lifecycle — including after retirement or cancellation. This serialization ensures that each tonne of emission reductions can be unambiguously identified, tracked, and audited at any point in the BERU's lifecycle.

Serial number URL: *BERS Standard v1.2, Section 14.1.3:* https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6ab857e27bb0574e400851_BERS_Standard_Version_1.1.pdf

8) Confirm that your programme has procedures in place to ensure that the programme registry or registries identify in serialization, or designate on a public platform, each unique unit's country and sector of origin, vintage, and original (and, if relevant, revised) project registration date

[Y/]

Each BERU's serial number encodes country of origin, crediting start year, and registry identifier at the unit level (BERS Standard Section 14.1.3). The Ontoly Registry additionally discloses for every BERU: host country, sector, vintage year, crediting period start year, crediting period length and other information about the project. This information is publicly available on the Registry without login credentials (BERS Standard Sections 15.1.1, 15.4.3).

Unit origin and vintage URL: *BERS Standard v1.2, Sections 14.1.3 and 15.1.1:* https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6ab857e27bb0574e400851_BERS_Standard_Version_1.1.pdf

9) Confirm that your programme has procedures in place to ensure that the programme registry or registries are secure (i.e. that robust security provisions are in place)

Yes.

The Ontoly Registry is the official system of record for issuance, holding, transfer, cancellation, and retirement of all BERUs and is subject to periodic independent security assessments (BERS Standard Section 15.3.1). Access to the Ontoly Portal — through which all BERU transfers affecting the Registry are executed — is restricted to accounts that have completed Ontoly's KYC procedures, including government-issued identity verification, beneficial ownership determination, PEP and sanctions screening, and a mandatory onboarding call (KYC Policy, Sections 4–7; BERS Standard Section 5.2). BERU transfers and retirements are executable only by duly authorized account holders, and legal title transfers are effective only upon recording in the Portal (BERS Standard Section 14.1.4).

In the event of a security breach affecting a CORSIA participant account holder, the Registry is required to notify affected account holders within 72 hours of breach confirmation and inform the ICAO Secretariat (BERS Standard Section 15.3.2).

Registry security URL: *BERS Standard v1.2, Sections 15.3.1–15.3.2:* https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6ab857e27bb0574e400851_BERS_Standard_Version_1.1.pdf*;*

KYC Policy v1.0: https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/69b12760a2d717b1b5503b13_Ontoly_BERS_Know_Your_Customer_Policy_v1.0.pdf

10) Confirm that your programme's registry(ies) conform to international data exchange standards

Yes.

The Ontoly Registry is designed to support interoperability and standardized data exchange as the programme scales. The Registry is aligned with CORSIA registry requirements. Current and planned conformance includes:
Current capabilities:

- **Structured data export:** The Ontoly Registry supports machine-readable data export in CSV and XLSX formats for BERU retirement records, available at no cost and without login credentials required (BERS Standard Section 15.1.2(b)). Retirement data is searchable by field, enabling standardized programmatic access to unit-level records including serial number, vintage, project identifier, retirement date, and beneficiary.
- **Unique serialization:** Every BERU is assigned a globally unique serial number at issuance, conforming to a structured format that encodes project jurisdiction, vintage year, and unit sequence. This supports deduplication and cross-registry identification consistent with practices adopted by established registries (e.g., Verra, Gold Standard, ACR).
- **Public accessibility:** All issued BERU data — including unit status, project details, and retirement records — is publicly accessible on the Ontoly Registry without authentication, consistent with ICVCM transparency requirements and the open-access principles underpinning the Climate Action Data Trust (CAD Trust).
- **RESTful architecture:** The Ontoly Registry is built on a RESTful API architecture using standard JSON data formats, enabling future integration with meta-registries, aggregators, and third-party platforms through well-documented endpoints.

Planned (scoping phase):

- **Climate Action Data Trust (CAD Trust) integration:** Ontoly is scoping participation in the CAD Trust or its successor framework to enable cross-registry deduplication and interoperability with other crediting programmes. Ontoly's data architecture has been designed with CAD Trust field mappings in mind.
- **API documentation and programmatic access:** Ontoly is scoping a publicly documented API that would allow authorized platforms, buyers, and compliance systems to query unit status, project data, and retirement records programmatically, consistent with emerging best practices across voluntary carbon market registries.

Ontoly recognizes that no single named international data exchange standard currently governs voluntary carbon market registries universally. The programme is actively monitoring developments from ICVCM, ICAO, and the CAD Trust to ensure timely conformance as standards are formalized. Ashley Sarauer, CEO, can be contacted at info@ontoly.org for further information on Ontoly's data architecture and interoperability roadmap.

Data exchange URL: BERS Standard v1.2, Section 15.1.2: https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6ab857e27bb0574e400851_BERS_Standard_Version_1.1.pdf

11) Confirm that your programme has provisions in place to ensure the screening of requests for registry accounts

Yes.

All requests for Supplier Accounts (Building Representatives) and Buyer Accounts are subject to Ontoly's KYC Policy before account activation. The screening process includes: government-issued identity verification; address verification; beneficial ownership determination tracing through all corporate layers to the ultimate natural person(s); PEP screening against commercial PEP databases; and sanctions screening against OFAC SDN, Global Affairs Canada, and UN Security Council lists. Supplier Accounts additionally require a mandatory onboarding call with Ontoly to confirm project eligibility and verify authorized users before access is granted (BERS Standard Section 5.2; KYC Policy, Sections 4–8). Accounts are not available for public self-registration.

Account screening URL: *KYC Policy v1.0, Sections 4–8:* https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/69b12760a2d717b1b5503b13_Ontoly_BERS_Know_Your_Customer_Policy_v1.0.pdf
BERS Standard v1.2, Section 5.2: https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6ab857e27bb0574e400851_BERS_Standard_Version_1.1.pdf

12) Confirm that your programme has provisions in place to restrict the programme registry (or registries) accounts to registered businesses and individuals

Yes.

Access to the Ontoly Portal and Registry is restricted to verified legal persons — registered businesses or identified individuals — who have successfully completed the KYC onboarding process. Ontoly may refuse account access where an applicant's identity cannot be verified, where a PEP or sanctions match cannot be resolved, or where there are reasonable grounds to suspect financial crime (KYC Policy, Section 11). Accounts with confirmed sanctions matches are permanently closed. Ontoly is not required to provide reasons for account refusal, protecting the integrity of its risk assessment procedures (KYC Policy, Section 11.3).

Account restriction URL: *KYC Policy v1.0, Section 11:* https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/69b12760a2d717b1b5503b13_Ontoly_BERS_Know_Your_Customer_Policy_v1.0.pdf

13) Confirm that your programme has provisions in place to ensure the periodic audit or evaluation of registry compliance with security provisions

Yes.

The BERS Standard requires the Ontoly Registry to be subject to periodic independent security assessments (Section 15.3.1). The KYC Policy additionally requires the Compliance Officer to conduct an annual independent review of the KYC/AML program's effectiveness and report findings to the BERS Governance Board, which provides ongoing oversight of the programme's integrity controls (KYC Policy, Section 14.2).

Ontoly is in the process of preparing for a formal third-party security audit of its Registry and Portal systems. A SOC 2 audit is planned and will be completed as the programme scales. Upon completion, audit results will be made available to the ICVCM Secretariat upon request. Ontoly is committed to maintaining registry security standards consistent with best practice for carbon credit registry operations and will update its programme documentation to reflect completed audit milestones.

Registry security audit URL: *BERS Standard v1.2, Section 15.3.1:* https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6ab857e27bb0574e400851_BERS_Standard_Version_1.1.pdf;

KYC Policy v1.0, Section 14.2: https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/69b12760a2d717b1b5503b13_Ontoly_BERS_Know_Your_Customer_Policy_v1.0.pdf

CRITERION 2.1: EFFECTIVE REGISTRIES (retirement and addressing erroneous issuance)

a) In addition to CORSIA requirements related to carbon credits in your carbon-crediting program registry, confirm that your organisation:

1) requires identification of the entity on whose behalf the carbon credit was retired

Yes.

Retirement of BERUs is a mandatory, documented process that requires disclosure of the final beneficiary. All retirement actions must include identification of the final beneficiary and the intended retirement purpose, executed through the Ontoly Portal by a registered Buyer Account holder (BERS Standard Sections 5.9.2, 5.9.3).

The Ontoly Registry publicly discloses for every retired BERU batch: the quantity retired, the retiring entity, the named beneficiary, and the declared purpose of retirement (BERS Standard Section 12.3.1). Where insetting is applicable — a Building Representative retiring BERUs for its own internal emissions accounting — a separate Buyer Account is not required, but the beneficiary is still identified (BERS Standard Section 5.9.3).

2) requires the identification of the purpose of retirement

Yes.

The purpose of retirement must be declared by the retiring party at the point of retirement execution in the Ontoly Portal. This information is publicly disclosed on the Ontoly Registry for every retired BERU batch alongside the quantity, retiring entity, and named beneficiary (BERS Standard Sections 5.9.2, 12.3.1). Retirement is permanent and irreversible — it cannot be reversed, re-issued, or re-credited (BERS Standard Section 5.9.4). Registry controls prevent any further transfer or re-activation of retired BERUs (BERS Standard Section 12.2.1).

Retirement purpose identification URL: *BERS Standard v1.2, Sections 5.9 and 12.3.1:* https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6ab857e27bb0574e400851_BERS_Standard_Version_1.1.pdf

3) has procedures to address erroneous issuance of carbon credits that identify remedial measures (e.g., cancellation, compensation through replacement) and the entities responsible for implementing these.

Yes.

Ontoly maintains a comprehensive erroneous issuance framework across the BERS Standard and the Corrective Actions Policy.

Where BERUs are identified as having been issued on the basis of fraudulent, materially inaccurate, or knowingly misrepresented data, Ontoly reserves the right to void or cancel those BERUs regardless of whether they have been sold, transferred, or reserved under contract (BERS Standard Section 16.3.1). Cancelled BERUs are transferred to a designated Cancellation Account in the Ontoly Registry and the cancellation and its rationale are publicly disclosed to preserve market integrity (Corrective Actions Policy, Section 12.1). All legal, financial, and contractual consequences — including replacement obligations or damages owed to third-party buyers — rest solely with the Building Representative; Ontoly bears no liability for commercial losses arising from cancellation (BERS Standard Section 16.3.1).

The Corrective Actions Policy establishes a three-tier non-conformance classification system — Minor, Major, and Critical — with defined remedial measures, timelines, and responsible entities for each tier. Critical non-conformances (including falsification of utility data, manipulation of GHG calculations, or fabrication of engineering reports) trigger immediate project suspension and BERU freeze, may result in permanent cancellation of all BERUs for the affected project and permanent removal from the Registry, and are referred to law enforcement where conduct constitutes fraud (Corrective Actions Policy, Sections 4.3, 6.3). Building Representatives bear full financial responsibility for compensating buyers of cancelled BERUs and for the costs of any independent assessments (Section 6.3(f)). Critical non-conformances are publicly disclosed on the Ontoly Registry (Section 12.1). Appeals against corrective action findings may be made to the BERS Governance Board within 30 days (Section 10.1).

Erroneous issuance URL: *BERS Standard v1.2, Section 16.3:*https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6ab857e27bb0574e400851_BERS_Standard_Version_1.1.pdf;

Corrective Actions Policy, Sections 4.3, 6.3, and 12: https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/69b128024012a92a93eaed00_Ontoly_Corrective_Actions_Policy.pdf

TRANSPARENCY

Context

The design and implementation of a mitigation activity is an intensive process requiring significant qualitative and quantitative documentation. Making this information publicly available through a registry is key to promoting transparency. The Assessment Framework's criterion on Transparency requires public disclosure of all relevant project documentation. To meet the requirements under this criterion, the carbon-crediting program needs to ensure the registry contains detailed information about each mitigation activity and is searchable by the general public.
By making this information publicly available interested stakeholders will be able to understand how the GHG emission reductions or removals are calculated, including how additionality is assessed, GHG emissions reductions or removals are quantified, and the environmental and social impacts of the mitigation activity.

Information about the activity should be publicly available electronically, subject to compelling confidentiality constraints. It is also important that information requests from stakeholders are appropriately addressed, and that stakeholders are provided with and directed to that information on the program's website, including on information from its website.

CRITERION 3.1: INFORMATION - CORSIA

CORSIA requirements related to transparency:

1) Confirm that your programme has the procedures in place to ensure that the results of validation and verification are made publicly available

Yes.

Ontoly makes validation and verification outcomes publicly available through two mechanisms:

1) For validation: every project undergoes independent third-party Validation by an accredited Validation Body contracted by Ontoly (BERS Standard v1.2, Section 6). Upon Ontoly's acceptance of a positive Validation Statement, the project attains Validated status and a summary of the Validation Statement is published on the Ontoly Registry together with the public Project Description Report (BERS Standard Section 6.4.4; BERS Validation and Verification Standard v1.1, Section 7.8.3).

2) For verification: the Ontoly Registry publicly discloses Verification Statement summaries for every project following each annual verification cycle, alongside monitoring report summaries, current BERU issuance status, and the Financial Additionality Rating (BERS Standard Section 15.1.1). Where a Validation Body or Verification Body is suspended or terminated, Ontoly publicly discloses the suspension and its rationale (BERS Standard Sections 6.3.8 and 8.2.5).

Note, Project Description Report also includes a non-technical summary, a building-level baseline and intervention summary, the assigned methodology, information on how the methodology has been applied to determine the baseline, demonstrate additionality, and quantify GHG emission reductions, and a social and environmental safeguards summary (Section 5.3.6). Commercially sensitive information is excluded subject to confidentiality, privacy, and data-protection obligations. Prior to validation, listed projects are publicly visible on the Registry with a public Project Listing Report.

Public disclosure of validation and verification URL: BERS Standard v1.2, Sections 5.3.6, 6.4.4, and 15.1.1: https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6ab857e27bb0574e400851_BERS_Standard_Version_1.1.pdf

BERS Validation and Verification Standard v1.1, Section 7.8: https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6a9d8bc4ccee04bf71c84d_BERS_Verification_Standard_v1.pdf

Ontoly Registry: https://registry.ontoly.org/

CRITERION 3.1: INFORMATION

a) In addition to CORSIA requirements, confirm that your organisation ensures that in relation to each mitigation activity that requests registration or that is registered, all relevant documentation relating to the mitigation activity is made publicly available (subject to confidentiality and proprietary, privacy and data protection restrictions) including:

1) all necessary information, such as spreadsheets used for calculations, to enable third parties to assess the social and environmental impacts of the mitigation activity and to replicate the GHG emission reduction or removal calculations (including baseline quantification), and assessment of additionality.

Yes.

The BERS Program operates a centralized quantification model in which all GHG calculations are performed by Ontoly — not by Building Representatives — using standardized, approved methodologies applied to metered utility bill data (BERS Standard Section 2.1.2). This design eliminates project-level discretion in calculation and ensures methodological consistency across all projects. Ontoly's centralized quantification models are independently verified by a third-party verification body to ensure conformance with voluntary market best practices.

The full information set necessary for a third party to assess and replicate the quantification logic is publicly available across four programme documents:

The Existing Building Methodology v1.1 sets out all quantification formulas, baseline determination procedures, weather and occupancy normalization approaches, emission factor sources, conservativeness provisions, and uncertainty treatment in full — including the complete equation set for electricity savings, fuel savings, and fuel switching calculations.

The Public Parameter List v1.1 discloses all standardized inputs used across every project: GWP values (IPCC AR6), discount rate, energy price escalation rates by fuel type and jurisdiction, equipment useful life values by technology type, and sensitivity analysis parameters with rationale and references.

The Methodology Development and Review Process v1.0 documents the scientific basis and governance process for all methodology decisions, including how emission factors are sourced, maintained, and updated.

The Project Description Report, published on the Ontoly Registry for every project that has achieved Validated status, discloses project-specific inputs including the building-level baseline summary, intervention technology description, assigned methodology, and information on how additionality was assessed and the baseline determined (BERS Standard Section 5.3.6).

Taken together, these documents enable any technically competent third party to understand, assess, and replicate the calculation logic for any BERS project.

One transparency boundary applies: the specific financial data inputs underlying the NPV Financial Additionality Test — capital cost, energy savings estimates, incentive amounts, and O&M costs — are confidential and not publicly disclosed at the individual project level, as they constitute commercially sensitive business information provided by Building Representatives (BERS Standard Section 10.5.2). Only the pass/fail result and the Investment Analysis Rating are publicly disclosed. This boundary is itself publicly documented. All financial inputs are subject to independent third-party verification annually by the contracted Verification Body (BERS Standard Section 10.3.5).

Regarding social and environmental impacts: Building Representatives complete a mandatory Data Quality and Safeguard Attestation Form covering all ICVCM safeguard categories. A safeguards summary is published in the Project Description Report on the Registry (BERS Standard Section 5.3.6(h)). Where material risks are identified, mitigation measures are documented in each Monitoring Report (BERS Standard Section 13.3.1).

Information disclosure URL: *BERS Standard v1.2, Sections 2.1.2, 5.3.6, 10.5.2, and 13:* https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6ab857e27bb0574e400851_BERS_Standard_Version_1.1.pdf

2) a mitigation activity design document that includes:

Yes.

i. a non-technical summary.

ii. detailed information on the mitigation activity, including its location and proponents.

iii. a description of the technology or practices applied.

iv. the environmental and social impacts.

v. the methodology used.

vi. information on how the methodology is and has been applied for the purpose of determining the baseline, demonstrating additionality and quantifying GHG emission reductions or removals.

The Project Description Report, generated by Ontoly and published on the Ontoly Registry for every project that has achieved Validated status (BERS Standard Section 5.3.6), constitutes the mitigation activity design document and addresses each required element:
i. Non-technical summary — Included as a mandatory element of every Project Description Report (Section 5.3.6(a)).

ii. Detailed information on the mitigation activity including location and proponents — Project Description Reports include proponent details and project location to the first three digits of the postal code or ZIP code, in accordance with applicable privacy laws (Section 5.3.6(c)).
iii. Description of the technology or practices applied — A description of the project technology is a mandatory element of every Project Description Report (Section 5.3.6(b)).

iv. Environmental and social impacts — A social and environmental safeguards summary drawn from the Building Representative's mandatory Safeguard Attestation Form is included in every Project Description Report (Section 5.3.6(h)). Where material risks are identified, mitigation measures are documented in ongoing Monitoring Reports (Section 13.3.1).

v. The methodology used — The assigned methodology is identified in every Project Description Report (Section 5.3.6(d)) and the full methodology is publicly available on the Ontoly website.
vi. How the methodology is applied to determine the baseline, demonstrate additionality, and quantify GHG emission reductions — This is explicitly a mandatory element of every Project Description Report (Section 5.3.6(j)), and the building-level baseline and intervention summary is also included (Section 5.3.6(e)).

Mitigation activity design document URL: *BERS Standard v1.2, Section 5.3.6:* https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6ab857e27bb0574e400851_BERS_Standard_Version_1.1.pdf

3) For Categories listed in 9.1 b) 1, information relating to the monitoring and compensation period

[N/A]

Under BERS Standard Version 1.0, only GHG emission reductions from building retrofit activities are certified — carbon removals are explicitly excluded (BERS Standard Section 11.1.1). Because the BERS Program certifies reductions rather than removals, there is no risk of non-permanence or reversal of sequestered carbon, and no buffer pool, compensation mechanism, or permanence monitoring period is required.

This is confirmed in BERS Standard Section 11.1.1: "Under Version 1.0, only GHG emission reductions are certified and carbon removals are excluded. The risk of non-permanence for BERUs does not apply to emission reductions."

Accordingly, the disclosure requirements for monitoring and compensation periods applicable to permanence categories under Criterion 9 are not applicable to the BERS Program.

Permanence provisions URL: *BERS Standard v1.2, Section 11:* https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6ab857e27bb0574e400851_BERS_Standard_Version_1.1.pdf

b) Confirm that your organisation shall ensure all relevant program documents are publicly available and has processes to ensure that where requests are made in relation to information that is missing from your website and/or registry, that information is provided (subject to confidentiality and proprietary, privacy and data protection restrictions) and made public alongside other relevant public information.

Yes.

All normative BERS Programme documents are publicly available on the Ontoly website (www.ontoly.org) and referenced on the BERS Program page. The complete set of published programme documents includes: the BERS Standard v1.2; the Existing Building Methodology v1.1; the Methodology Development and Review Process v1.0; the Public Parameter List v1.1; the BERS

Governance Board — Composition, Roles, and Responsibilities v1.2; the Conflict of Interest Policy; the KYC Policy; the Anti-Bribery and Anti-Corruption Policy; the Corrective Actions Policy; and the Programme Wind-Down Policy v1.0. New versions and amendments are published on the Ontoly website with version control and change logs (BERS Standard Section 1.1.7).

Where a stakeholder makes a request relating to information alleged to be missing or incomplete on the Ontoly website or Registry, Ontoly is required to review the request and, where the information is eligible for public disclosure, make it publicly available alongside other relevant public information — subject to applicable confidentiality, proprietary, privacy, and data-protection obligations (BERS Standard Section 2.4.4). This obligation is reinforced by the BERS Governance Board, which has information rights over all programme matters and the authority to require Ontoly to make information public where appropriate (BERS Governance Board v1.2, Section 10).

Requests relating to information on the website or Registry may be submitted via the grievance mechanism at info+grievances@ontoly.org or via the general contact at info@ontoly.org.

Information request URL: BERS Standard v1.2, Sections 1.1.7 and 2.4.4: https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6ab857e27bb0574e400851_BERS_Standard_Version_1.1.pdf

BERS Governance Board v1.2, Section 10: https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a03c9d64263159ce77b766c_Ontoly_BERS_Governance_Board_v1.2.pdf

ROBUST INDEPENDENT THIRD-PARTY VALIDATION AND VERIFICATION

Context

Third-party auditing of the design of mitigation activities and monitoring of GHG emission reductions or removals is critical to ensuring that each mitigation activity meets all of the relevant program rules specified in the normative program documents. To meet the criterion and requirements under Robust Independent Third-party Validation and Verification, the carbon-crediting program's normative documents must set out the rules for how VVBs become and remain accredited in relation to the carbon-crediting program, review the performance of VVBs, and set standards and develop procedures that guide VVBs in their work. These rules include provisions on VVB organisational structure and management, organisational resources, validation and verification processes, and information requirements, penalties for rule breaches and rules ensuring the impartiality of the VVB and the avoidance of conflicts of interest.

CRITERION 4.1: ROBUST INDEPENDENT THIRD-PARTY VALIDATION AND VERIFICATION - CORSIA

CORSIA requirements related to robust independent third-party validation and verification:

1) Confirm that your programme has standards, requirements, and procedures in place for the validation of activities

Yes.

Every project under the BERS Program must undergo independent third-party Validation conducted by an accredited Validation Body contracted and remunerated solely by Ontoly, in accordance with BERS Standard v1.2, Section 6, and the BERS Validation and Verification Standard v1.1 (the "V&V

Standard"), Section 7. Validation is an ex-ante assessment of the project design as a whole and must be conducted by a validation and verification bodies (VVBs) that is accredited by the current edition of ISO 14065 and ISO 14066. Validation covers at minimum: project eligibility under the BERS Standard and the applicable Approved BERS Methodology; the baseline scenario and supporting data; additionality, including the Regulatory Surplus Assessment and all elements of the Financial Additionality Assessment including the sensitivity analysis; environmental and social safeguard attestations; the monitoring plan; and Ontoly's ex-ante quantification (BERS Standard Section 6.3.4; V&V Standard Section 7.1.2).

Validation is structured in two required layers (BERS Standard Section 6.1.1).

- Layer one — Eligible Validation Documentation: professional engineering documentation (an IPMVP-adherent report, an IREE report, or equivalent) prepared and signed by a licensed Professional Engineer (Section 6.2). IPMVP — the International Performance Measurement and Verification Protocol — is the globally recognized industry standard for measuring and verifying building energy performance improvements, and these engineering assessments (typically costing $40,000–$70,000 per project) provide deep, sector-specific professional review of projected energy savings, baseline determination, and technology selection. This documentation constitutes required engineering input evidence to Validation; its acceptance by Ontoly does not itself constitute Validation (Section 6.2.3).
- Layer two — independent third-party Validation by the accredited Validation Body, which reviews the Eligible Validation Documentation for completeness, internal consistency, professional sign-off, and conformance with the applicable industry standard, and assesses the project design as a whole against the BERS Standard. A project attains Validated status on the public Registry only upon Ontoly's acceptance of a positive Validation Statement (Section 6.4.3).

Validation may occur before, or at the same time as, the project's first verification: where Ontoly and the Project Proponent agree, a single combined engagement may be commissioned in which the contracted VVB performs Validation concurrently with the first verification (BERS Standard Section 6.3.9; V&V Standard Section 7.7); under this pathway the project cannot enter Pre-Purchase Agreements before a positive Validation Statement is accepted, and no BERUs can be issued absent a positive Validation Statement, regardless of the verification outcome. The exclusively ex-post issuance model remains a further structural safeguard: no BERUs are issued based on ex-ante estimates (BERS Standard Sections 5.7.1, 14.1.2), Building Representatives may elect to sell only a portion of projected BERUs and implement buffers against underperformance (Section 5.4), and buyers are transparently informed that projected BERUs are estimates until ex-post verification completes.

The V&V Standard defines the validation process end to end: Validation Body eligibility and team requirements (Sections 4–6, 7.2); evidence-gathering and level of assurance (Section 7.3); cohorts and timeline (Section 7.4); findings classification and resolution — Material Non-Conformity, Minor Non-Conformity, Clarification Request, and Forward Action Request, with Forward Action Requests assessed at first verification (Section 7.5); validation outcomes (Section 7.6); reporting on the BERS Validation Report Template with public summaries (Section 7.8); and a per-project Validation Checklist (Appendix C).

VVB engagement and readiness: Ontoly has completed structured market engagement with multiple accredited validation and verification bodies, each accredited to the current edition of ISO 14065 and ISO 14066 by a full-member accreditation body of the International Accreditation Forum, with sectoral scopes covering buildings and energy efficiency. That engagement has included capability and independence screening, scoping of the validation work programme against the V&V Standard, and commercial terms, and Ontoly is operationally ready to execute a VVB engagement. Written records of these engagements are retained and will be provided to the Secretariat on request. Ontoly has deliberately sequenced execution of the VVB contract to follow the Secretariat's confirmation that the validation framework described above satisfies Criterion 4.1: committing an accredited VVB to procedures that the Secretariat might subsequently require to be amended would serve neither programme integrity nor the efficient use of accredited VVB capacity. The engagement will be executed promptly upon that confirmation and, in any event, before any project seeks Validated status or first verification.

Project staging: Consistent with the initial-screening conditions in ICVCM's FAQs for Applicant Carbon-Crediting Programs ("at least one registered project or at least one project that has requested registration"), the two projects currently listed on the Ontoly Registry are at the initial listing phase. Under the BERS Standard, neither project has yet reached the stage at which Validation or verification falls due: Validation is required before a project attains Validated status (Section 6.1.1) or, at the latest, concurrently with its first verification (Section 6.3.9), and no BERUs may be issued for any project absent Ontoly's acceptance of a positive Validation Statement and successful ex-post verification. Ontoly explained this project staging to the Secretariat during the recorded video conference of 24 June 2026 with the Secretariat's technical staff. Ontoly's contemporaneous and reasonable understanding from that discussion — on which it has relied in preparing this submission — is that the staging described was acknowledged as appropriate and would not, of itself, impede the progress of the application. Should the Secretariat's position differ, Ontoly requests prompt written notification under Section 2.13 of the Assessment Procedure so that any identified gap may be resolved.

Validation procedures URL: BERS Standard v1.2, Section 6: https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6ab857e27bb0574e400851_BERS_Standard_Version_1.1.pdf

BERS Validation and Verification Standard v1.1, Section 7: https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6a9d8bc4ccee04bf71c84d_BERS_Verification_Standard_v1.pdf

BERS Validation Report Template v1.0: https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6ad130eaab1133e8fb5943_BERS_Validation_Report_Template_v1_0.docx

2) Confirm that your programme has standards, requirements, and procedures in place for the verification of emissions reductions

Yes.

The BERS Validation and Verification Standard v1.1 establishes comprehensive mandatory requirements, procedures, and expectations for independent third-party ex-post verification of GHG emission reductions under the BERS Program. Verification is structured as a two-stream annual assessment conducted simultaneously (V&V Standard Section 1.4):

Stream 1 — Building-Level Data Input Verification (reasonable assurance): A sampling-based audit of utility data, metered performance data, and occupancy records submitted by Building Representatives. Procedures include source document cross-checking against original utility bills, independent recalculation of GHG emission reductions, baseline data review, occupancy and normalization assessment, and data completeness checks.

Stream 2 — Program-Level Model and Parameter Verification (limited assurance): Assessment of Ontoly's standardized quantification models, parameters, emission factors, and calculation processes for conformance with the BERS Standard and approved Methodology, including review of the Jurisdictional Regulatory Model and Financial Additionality Assessment calculations.

The verification process follows a defined seven-stage procedure: Engagement Initiation, Verification Planning, Data Request and Review, Detailed Assessment, Findings Management, Reporting, and Issuance and Closure (V&V Standard, Section 8). A 5% materiality threshold applies at the Cohort level (Section 11.1). Verification opinions are classified as Positive (Unqualified), Qualified, or Adverse, with defined consequences for each (Section 15.1).

Verification procedures URL: BERS Validation and Verification Standard v1.1, Sections 1 and 8–16: https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6a9d8bc4ccee04bf71c84d_BERS_Verification_Standard_v1.pdf

BERS Standard v1.2, Section 8: https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6ab857e27bb0574e400851_BERS_Standard_Version_1.1.pdf

3) Confirm that your programme has standards, requirements, and procedures in place for the accreditation of validators

Yes.

Validation Bodies are subject to the identical accreditation requirements applied to Verification Bodies. All Validation Bodies must: (a) be accredited to the current edition of ISO 14065 and ISO 14066 by an accreditation body that is a full member of the International Accreditation Forum (IAF); (b) conduct validations in accordance with ISO 14064-3; (c) have experience and training in the relevant sectoral scopes (energy demand, energy efficiency, and fuel switching in buildings); and (d) comply with the BERS Validation and Verification Standard, including its team, independence, conflict-of-interest, and rotation requirements (BERS Standard v1.2, Section 6.3.2; V&V Standard, Section 4). The same organization may be approved to perform both validation and verification services for a project, subject to the independence, personnel, and conflict-of-interest requirements of the V&V Standard and the Conflict of Interest Policy (BERS Standard Section 6.3.3). Evidence of current accreditation — accreditation body, identification number, scope, and expiry — is required as part of the contracting process (V&V Standard Section 4.1.3).

In addition, the Eligible Validation Documentation that serves as required engineering input evidence to Validation must be prepared and signed by a licensed Professional Engineer (BERS Standard Section 6.2). Professional Engineers operate under professional licensing frameworks in Canada and the United States that impose mandatory education, examination, experience, and continuing professional development requirements as conditions of licensure, and are legally and professionally accountable for their reports, with professional indemnity obligations under applicable provincial and state law. This professional assurance is additional to — not a substitute for — validation by the accredited Validation Body.

Validator accreditation URL: BERS Standard v1.2, Sections 6.2–6.3: https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6ab857e27bb0574e400851_BERS_Standard_Version_1.1.pdf

BERS Validation and Verification Standard v1.1, Section 4: https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6a9d8bc4ccee04bf71c84d_BERS_Verification_Standard_v1.pdf

4) Confirm that your programme has standards, requirements, and procedures in place for the accreditation of verifiers

Yes.

The BERS Validation and Verification Standard v1.1, Section 4, establishes mandatory accreditation requirements for all Validation and Verification Bodies (VVBs). All VBs must hold current accreditation to the following standards, issued by a national accreditation body that is a full member of the International Accreditation Forum (IAF):

• ISO 14065: General principles and requirements for bodies validating and verifying environmental information
• ISO 14066: Competence requirements for greenhouse gas validation teams and verification teams
• ISO 14064-3: Specification with guidance for the verification and validation of greenhouse gas statements (where applicable)

Accreditation must specifically include the sectoral scopes relevant to the BERS Program: energy demand-side management, energy efficiency, and fuel switching in buildings (Verification Standard Section 4.1.2). VBs must provide evidence of current accreditation — including accreditation body name, identification number, scope, and expiry date — as part of the annual contracting process with Ontoly (Section 4.1.3). If a VB's accreditation expires, is suspended, or is revoked during an active engagement, the VB must notify Ontoly within five business days and Ontoly may reassign the Cohort (Section 4.1.4).

VBs must additionally be legal entities with professional indemnity insurance covering their BERS verification scope, and must maintain documented quality management systems (Section 4.2). Identical accreditation requirements apply to Validation Bodies (BERS Standard v1.2, Section 6.3.2).

Verifier accreditation URL: *BERS Validation and Verification Standard v1.1, Section 4:* https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6a9d8bc4ccee04bf71c84d_BERS_Verification_Standard_v1.pdf

5) Confirm that your program has procedures in place to ensure that validation occurs prior to or in tandem with verification

Yes.

Validation by the accredited Validation Body occurs before, or at the same time as, the project's first verification — never after. Default pathway: validation before registration. A project attains Validated status on the public Registry, and becomes eligible for Pre-Purchase Agreements, only upon Ontoly's acceptance of a positive Validation Statement (BERS Standard v1.2, Sections 6.1.1 and 6.4.3). Optional pathway: where Ontoly and the Project Proponent agree, Validation may be performed concurrently with the first verification in a single combined engagement (BERS Standard Section 6.3.9; V&V Standard Section 7.7), with separately documented assessments and separate Validation and Verification Statements; Ontoly's acceptance of a positive Validation Statement is a precondition to acceptance of the first Verification Statement and to any BERU issuance. In all cases no BERUs may be issued for any project that has not received a positive Validation Statement, and BERU issuance additionally requires successful ex-post verification. This sequencing is binding and not subject to override.

This sequencing provides transparency at every stage: project documentation is independently assessed before the project achieves Validated status on the public Registry; buyers can review the Project Description Report and understand the projected savings basis; and no credits are issued until real utility performance data is collected and independently verified. Buyers are never exposed to credits that have not passed through both independent third-party validation of project design and independent third-party verification of actual performance.

Validation timing URL: BERS Standard v1.2, Sections 6.1, 6.3.9, and 6.4: https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6ab857e27bb0574e400851_BERS_Standard_Version_1.1.pdf

BERS Validation and Verification Standard v1.1, Section 7.7: https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6a9d8bc4ccee04bf71c84d_BERS_Verification_Standard_v1.pdf

6) Confirm that your program has procedures in place to ensure that mitigation is measured and verified by an accredited and independent third-party verification entity

Yes.

Annual independent ex-post verification by an ISO 14065-accredited Verification Body is a mandatory prerequisite for BERU issuance. No BERUs may be issued for any GHG emission reductions that have not been successfully verified (BERS Standard Section 8.1.2; Verification Standard Section 1.2).

A critical structural feature ensures independence that goes beyond most carbon crediting programs: Ontoly exclusively contracts and remunerates all Verification Bodies — Building Representatives and Building Owners have no role in VB selection, contracting, or payment (BERS Standard Section 8.2.2; Verification Standard Section 1.5). This structural separation severs the financial link between the verified party and the verifier, eliminating the most common source of VVB conflicts of interest in the voluntary carbon market.

Third-party measurement and verification URL: *BERS Standard v1.2, Sections 8.1–8.2:* https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6ab857e27bb0574e400851_BERS_Standard_Version_1.1.pdf; *BERS Validation and Verification Standard v1.1, Sections 1.5 and 5:* https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6a9d8bc4ccee04bf71c84d_BERS_Verification_Standard_v1.pdf

7) Confirm that your programme has procedures in place to ensure that ex-post verification of mitigation is required in advance of issuance of emissions units

Yes.

BERUs are issued exclusively on an ex-post basis following successful verification. This is an absolute requirement of the BERS Program with no exceptions: BERS Standard Section 8.1.2 states that Ontoly shall not issue BERUs for any GHG emission reductions that have not been successfully verified by an accredited Verification Body, and Section 14.1.2 states that BERUs shall only be issued on an ex-post basis. The Validation and Verification Standard (Section 1.2) confirms that verification provides an independent ex-post assessment of actual, monitored outcomes. No ex-ante BERU issuance occurs under the BERS Program.

This design reflects Ontoly's conviction that credit quality in the buildings sector is best assured by waiting for real data. Building utility bills provide an unambiguous, metered record of actual energy consumption — and by requiring that all data inputs come from real utility bills and real meters before any credits are issued, the BERS Program eliminates the estimation risk that plagues programmes issuing credits on projected or modelled performance. The combination of real measured data, independent third-party verification by an ISO-accredited VB, and Ontoly's centralized quantification model means that every issued BERU represents a verified, actual emission reduction — not a forecast.

Ex-post verification URL: *BERS Standard v1.2, Sections 5.7.1, 8.1.2, and 14.1.2:* https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6ab857e27bb0574e400851_BERS_Standard_Version_1.1.pdf

8) Confirm that your programme has provisions in place to manage and/or prevent conflicts of interest between accredited third-party(ies) performing the validation and/or verification procedures, and the programme and the activities it supports

Yes.

The BERS Program employs a multi-layer conflict of interest framework for all Validation and Verification Bodies (VVBs), addressed in the V&V Standard (Section 5), the Conflict of Interest Policy, and the Anti-Bribery and Anti-Corruption Policy. Prior to each validation, verification, or combined engagement, the VVB must complete and submit the signed VVB Conflict of Interest Disclosure Form v1.1, confirming that no member of the team has: provided consulting, design, engineering, or energy advisory services to any Building Owner or Building Representative within the assigned Cohort in the preceding three years; a direct or indirect financial interest in any project within the Cohort; a familial, employment, or business relationship with any Building Owner, Building Representative, or Project Proponent in the Cohort; or any other relationship that could impair or be perceived to impair impartiality (V&V Standard Section 5.3). For combined engagements, the disclosure covers both the validation and verification components. If a conflict is identified at any point during the engagement, the VVB must immediately notify Ontoly, which determines whether the conflict can be mitigated or the engagement must be reassigned (Section 5.4).

Two structural bars apply: any organization that has been involved in the development of a project, or that has been paid to assist in developing any part of a BERS Methodology or of the project's design or documentation, may not act as the Validation Body or Verification Body for that project (BERS Standard Section 6.3.1; V&V Standard Section 5.5). Mandatory rotation prevents conflicts from developing over time: a project may not work with a single VVB for longer than five consecutive years, and a given VVB may conduct verification for a project during no more than five out of any seven consecutive years (V&V Standard Section 5.6); in addition, under the Conflict of Interest Policy, the same personnel may not verify the same building for more than three consecutive verification cycles (COI Policy Section 8.3) — where the two rotation provisions differ, the stricter applies. VVBs are additionally prohibited from accepting gifts, hospitality, or other benefits from Building Representatives or Owners in projects being assessed, and may not provide advisory services to the same entities they validate or verify (Anti-Bribery Policy Section 8).

COI provisions URL: BERS Validation and Verification Standard v1.1, Section 5: https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6a9d8bc4ccee04bf71c84d_BERS_Verification_Standard_v1.pdf

VVB Conflict of Interest Disclosure Form v1.1: https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6ad0ebeaab1133e8fb4480_VB_COI_Disclosure_Form.pdf

Conflict of Interest Policy v1.0, Section 8: https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6aa6dd9c4c58ed4766b638_Ontoly_BERS_Conflict_of_Interest_Policy_v1.0.pdf

Anti-Bribery and Anti-Corruption Policy, Section 8: https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6aa4d23f4e7fa36fd223d3_Ontoly_Anti-Bribery_Anti-Corruption_Policy.pdf

9) Confirm that your programme has provisions in place requiring accredited third-party(ies) to disclose whether they or any of their family members are dealing in, promoting, or otherwise have a fiduciary relationship with anyone promoting or dealing in, the offset credits being evaluated

Yes.

The Conflict of Interest Disclosure completed by the Verification Body before each engagement requires disclosure of any direct or indirect financial interest held by the firm, its personnel, or their Close Relations (defined to include family members up to second degree of consanguinity — spouses, children, parents, siblings, grandparents, grandchildren) in any project within the assigned Cohort (Verification Standard Section 5.3(b); COI Policy Sections 3.2, 5.2). This captures the full scope of fiduciary and dealing relationships the ICVCM criterion contemplates — including personnel who are dealing in, promoting, or otherwise have a financial relationship with the BERUs being evaluated. VB personnel who have verified the same building for three consecutive cycles must be rotated to prevent excessive familiarity developing into implicit conflicts (COI Policy Section 7.5). Post-departure obligations continue for 24 months following cessation of engagement (COI Policy Section 2.3).

Fiduciary disclosure URL: *BERS Validation and Verification Standard v1.1, Section 5.3:* https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6a9d8bc4ccee04bf71c84d_BERS_Verification_Standard_v1.pdf*; Conflict of Interest Policy v1.0, Sections 3.2, 5.2, 7.5:* https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6aa6dd9c4c58ed4766b638_Ontoly_BERS_Conflict_of_Interest_Policy_v1.0.pdf

10) Confirm that your programme has provisions in place to address and isolate such conflicts, should they arise

Yes.

Where a conflict is identified at any point during a verification engagement, the Verification Body must immediately notify Ontoly in writing (Verification Standard Section 5.4). Ontoly determines, at its sole discretion, whether the conflict can be mitigated through team restructuring or partial reassignment, or whether the Cohort must be reassigned to a different Verification Body entirely. Conflicts identified at the individual verifier level trigger automatic recusal from all aspects of the affected project's verification; conflicts at the organizational level may trigger full Cohort reassignment.

For all Covered Persons under the Conflict of Interest Policy (including VB personnel), disclosed conflicts are risk-classified as Low, Medium, High, or Critical, with management measures ranging from Monitoring through Restriction, Recusal, Divestiture, and Removal (COI Policy Section 7.3). Critical conflicts — defined as those involving material decision-making authority over verification outcomes — are escalated to the BERS Governance Board (COI Policy Section 8.3, 8.4). A VB found to have conducted verification in violation of independence requirements may be suspended from new assignments pending investigation and permanently removed from the BERS verification panel for material violations (Anti-Bribery Policy Section 8.4; Corrective Actions Policy Section 9.4).

Conflict resolution URL: *BERS Validation and Verification Standard v1.1, Section 5.4:* https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6a9d8bc4ccee04bf71c84d_BERS_Verification_Standard_v1.pdf*;*
Conflict of Interest Policy v1.0, Section 7: https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6aa6dd9c4c58ed4766b638_Ontoly_BERS_Conflict_of_Interest_Policy_v1.0.pdf

11) Confirm that your programme has procedures in place requiring that the renewal of any activity at the end of its crediting period includes a re-evaluation of its baselines, and procedures and assumptions for quantifying, monitoring, and verifying mitigation, including the baseline scenario

[N/A]

BERS Standard Version 1.0 does not provide for crediting period renewal (BERS Standard Section 10.7.1). This is a deliberate design decision appropriate to the nature of building retrofit projects. A building energy retrofit is a one-time capital investment made at a specific point in time: equipment is installed, baseline performance is measured against the preceding 12–36 months of actual utility data, and the retrofit's performance is then monitored annually against that fixed baseline for a standard crediting period of up to ten years. The baseline and additionality determination are fixed at project registration and do not require periodic re-evaluation during the crediting period because the fundamental conditions of the investment decision do not change (BERS Standard Section 10.7.3).

The ten-year crediting period is proportionate and sufficient to capture the full financial and emissions benefit of a typical building retrofit, given equipment useful lives ranging from 15–25 years (as set out in the Public Parameter List). Requiring a renewal mechanism would add complexity and administrative burden without integrity benefit in a programme where the baseline is empirically established from actual historical utility data.

We marked this question 'yes' because future versions of the BERS may introduce crediting period renewal provisions as the programme evolves, with appropriate reassessment procedures at that time. This limitation is publicly documented in the BERS Standard.

Crediting period URL: *BERS Standard v1.2, Section 10.7:* https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6ab857e27bb0574e400851_BERS_Standard_Version_1.1.pdf

12) Confirm that your programme has procedures in place requiring that the same procedures apply to activities that wish to undergo verification but have not done so within the programme's allowable number of years between verification events (If yes, provide evidence, including identifying the allowable number of years between verification events)

Yes.

The BERS Program requires annual verification — there is a maximum allowable gap of one calendar year between verification events (BERS Standard Section 5.8.1; Verification Standard Section 2.2). Projects that fail to submit the Annual Monitoring Report by March 31 of the following year may be suspended at Ontoly's discretion (BERS Standard Section 5.5.6). Projects that are inactive for two or more consecutive monitoring periods without a Monitoring Report submission may have their eligibility for future BERU issuance terminated (Section 5.8.2). Late submissions may be permitted at Ontoly's sole discretion, but no BERU issuance occurs for any period that has not been successfully verified. There is no mechanism under the BERS Program for a project to "catch up" on multiple unverified years in a single subsequent verification event.

Verification timing URL: *BERS Standard v1.2, Sections 5.5.6, 5.8:* https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6ab857e27bb0574e400851_BERS_Standard_Version_1.1.pdf

13) Carbon credits that are issued ex-ante are not CCP eligible. If your organisation supports both ex-ante and ex-post issuance, confirm it has procedures in place to transparently identify units that are issued ex-post and are thus eligible under the ICVCM.

[N/A]

The BERS Program issues BERUs exclusively on an ex-post basis. No ex-ante BERU issuance is permitted under any circumstances (BERS Standard Sections 5.7.1, 14.1.2). Accordingly, all BERUs in the Ontoly Registry are by definition ex-post and CCP-eligible from an issuance-basis perspective. The distinction between ex-ante and ex-post units does not arise and no identification mechanism is required. The exclusively ex-post nature of BERU issuance is publicly disclosed in the BERS Standard, the Verification Standard, and the Ontoly Registry.

To reinforce this point: while the BERS Program does provide for Pre-Purchase Agreements (BERS Standard Section 5.4) that allow buyers to contractually reserve projected BERUs, these agreements are explicitly structured as forward commitments — no BERUs are issued, transferred, or made available for retirement until ex-post verification of actual performance is complete. Buyers entering Pre-Purchase Agreements are transparently informed that projected BERUs are estimates and that issuance is contingent on verified actual data. This ensures full market clarity and eliminates any risk of ex-ante credits entering circulation.

Ex-post issuance URL: *BERS Standard v1.2, Sections 5.7.1 and 14.1.2:* https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6ab857e27bb0574e400851_BERS_Standard_Version_1.1.pdf

CRITERION 4.1: ROBUST INDEPENDENT THIRD-PARTY VALIDATION AND VERIFICATION

a) In addition to CORSIA requirements, in relation to validation of mitigation activities and verification of GHG emission reductions and removals, confirm your organisation:

1) requires VVBs to be accredited by a recognised international accreditation standard (e.g., according to the current edition of ISO 14065 and ISO 14066, or per rules relating to the UNFCCC Kyoto Protocol Clean Development Mechanism or Paris Agreement Article 6, paragraph 4 Supervisory Body).

Yes.

All VVBs — Validation Bodies and Verification Bodies — performing validation or verification services under the BERS Program must hold current accreditation to ISO 14065, ISO 14066, and ISO 14064-3 (where applicable to the sectoral scope), issued by a national accreditation body that is a full member of the International Accreditation Forum (IAF), with sectoral scopes covering energy demand-side management, energy efficiency, and fuel switching in buildings (BERS Standard v1.2, Sections 6.3.2 and 8.2.1; V&V Standard, Section 4.1). Identical accreditation requirements apply to the validation and verification functions. Evidence of current accreditation is required as part of the contracting process (V&V Standard Section 4.1.3).

VVB accreditation URL: BERS Validation and Verification Standard v1.1, Section 4.1:
https://cdn.prod.website-

files.com/6987d504fe9b9a604857ae67/6a6a9d8bc4ccee04bf71c84d_BERS_Verification_Standard_v1.pdf

BERS Standard v1.2, Sections 6.3.2 and 8.2.1: https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6ab857e27bb0574e400851_BERS_Standard_Version_1.1.pdf

2) has a process for managing VVB performance, including systematic review of validation and verification activities, reports and remedial measures to address performance issues including measures to ensure that poor VVB performance is reported to the relevant accreditation body, and provisions to suspend or revoke the participation of a VVB in the program.

Yes.

Ontoly operates a formal VVB performance-management process covering both validation and verification activities, across the BERS Standard, the V&V Standard, and the Corrective Actions Policy.

Systematic review: Ontoly monitors all VVBs on an ongoing basis, evaluating quality and timeliness of Validation Reports and Verification Reports, consistency and rigor of findings, adherence to the V&V Standard, responsiveness to queries and corrective action requests, and systematic review of validation and verification activities, reports, and opinions (V&V Standard Section 17.1; BERS Standard Sections 6.3.8(a) and 8.2.4(a)).

Remedial measures: Where deficiencies are identified, Ontoly issues corrective action requests to the VVB with defined remediation requirements (V&V Standard Section 17.2; Corrective Actions Policy Section 9). Minor non-conformances (e.g., minor report deficiencies, late submission) are addressed with a 30-day corrective action request. Major non-conformances (e.g., incomplete scope, failure to follow the BERS Methodology) result in a formal warning letter, enhanced oversight of subsequent cycles, and potential re-assessment of affected projects at the VVB's expense. Critical non-conformances (e.g., issuance of a false statement, acceptance of prohibited benefits) result in suspension or permanent removal (Corrective Actions Policy Sections 9.2–9.4).

Reporting to accreditation body: Ontoly shall report significant and/or repeated VVB performance concerns, including any suspension or termination, to the relevant accreditation body (BERS Standard Sections 6.3.8(d) and 8.2.4(d); V&V Standard Section 17.4).

Suspension and revocation: Material breaches or repeated non-conformance may result in suspension or revocation of a VVB's participation in the BERS Program. All VVB suspensions and removals are publicly disclosed on the Ontoly Registry, including the effective date and the nature of the non-conformance (BERS Standard Sections 6.3.8(c) and 8.2.5; V&V Standard Sections 17.2–17.3; Corrective Actions Policy Section 12.4).

VVB performance management URL: BERS Validation and Verification Standard v1.1, Section 17: https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6a9d8bc4ccee04bf71c84d_BERS_Verification_Standard_v1.pdf

BERS Standard v1.2, Sections 6.3.8 and 8.2.4–8.2.5: https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6ab857e27bb0574e400851_BERS_Standard_Version_1.1.pdf

Corrective Actions Policy, Section 9: https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/69b128024012a92a93eaed00_Ontoly_Corrective_Actions_Policy.pdf

B – EMISSIONS IMPACT

ROBUST QUANTIFICATION OF GHG EMISSION REDUCTIONS AND REMOVALS (Program-Level)

Context

A crucial consideration in strengthening the integrity of the VCM is ensuring that GHG emission reductions or removals are robustly quantified so that their levels are not overstated. Carbon-crediting programs must, inter alia, address the level of uncertainty of emission reductions or removals and ensure the conservativeness of quantification methodologies. It is critical for carbon crediting programs to understand the level of uncertainty associated with the data and the assumptions used for quantifying GHG emission reductions or removals to ensure they are estimated conservatively.

Ensuring robust quantification requires that carbon-crediting programs have a thorough methodology approval process that includes public stakeholder consultations and reviews by independent experts. Moreover, carbon-crediting programs must have robust requirements and principles governing the quantification of GHG emission reductions and removals. In addition, robust quantification requires that carbon-crediting programs ensure that GHG emission reductions or removals are verified ex-post. Some carbon-crediting programs also issue carbon credits ex-ante. In such instances, only carbon credits issued ex-post may be CCP-Eligible.

CRITERION 5.1: METHODOLOGY APPROVAL PROCESS – CORSIA

CORSIA requirements related to Clear Methodologies and Protocols and their Development Process:

1) Confirm that your programme has qualification, quantification methodologies, and protocols in place, available for use, and are publicly disclosed.

Yes.

The BERS Program's first approved quantification methodology — ONTOLY_RETROFIT_EEFS-1.0, the Existing Building Methodology for Energy Efficiency and Fuel Switching in Buildings (Version 1.0) — entered into force on March 11, 2026, and is publicly available on the Ontoly website. The methodology was developed with reference to the Clean Development Mechanism AMS-II.E and adapted to meet the requirements of the BERS Standard, the ICVCM Core Carbon Principles, and applicable ISO standards (Existing Building Methodology Section 1.2).

Methodology disclosure URL: *Existing Building Methodology v1.1:* https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6aa6bf6ef197dfbd03146e_Existing_Building_Methodology_v1.1.pdf;

BERS Standard v1.2, Section 1.2: https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6ab857e27bb0574e400851_BERS_Standard_Version_1.1.pdf

2) Summarize the programme's process for developing further methodologies and protocols, including the timing and process for revision of existing methodologies.

Ontoly's methodology development and revision process is governed exclusively by the publicly available Methodology Development and Review Process v1.0. The process operates as follows:
New methodology development follows a six-stage workflow: (1) Scoping — Ontoly's internal technical team defines the methodology scope and objectives; (2) Drafting — Ontoly drafts the methodology, drawing on internal expertise in building science, energy systems, and GHG accounting;

(3) SAB Review — the independent Scientific Advisory Board reviews the draft and may issue a Formal Objection by majority vote where it determines a provision is scientifically unsound; (4) Independent Expert Consultation — Ontoly engages at least one independent subject-matter expert, external to Ontoly, to review the draft; (5) Final Approval by Ontoly, considering SAB findings and expert feedback; (6) Publication — the approved methodology is published on the Ontoly website and enters into force 30 days after publication.

Note: public stakeholder consultation is not required for the initial version of a new methodology, which is developed under SAB and independent expert oversight. Public consultation is mandatory for all Material Revisions to approved methodologies (Section 4.4.2).

Revision of existing methodologies is classified into three types. A Material Revision is any change that alters applicability or eligibility criteria, modifies title and ownership rules, exceeds the 1% Materiality Threshold for GHG quantification, changes baseline procedures or emission factors, modifies additionality procedures, or changes monitoring requirements in ways affecting data quality (Section 5.1). Material Revisions must undergo the full seven-step process: preparation, SAB review, independent expert review, minimum 30-day public consultation, formal response to comments, final approval, and publication. An Administrative Revision is a minor change — such as correcting a typographical error or clarifying existing language without altering requirements — documented in a change log without public consultation (Section 5.2). A Methodology Clarification provides guidance on the application of an existing methodology without amending the methodology itself (Section 11).

Periodic review: All approved BERS Methodologies are reviewed at a minimum of every five years, assessing conservativeness, eligibility criteria, monitoring requirements, and baseline procedures against current scientific evidence, regulations, and verified project performance data (Section 8). Affected projects are notified at least 60 days before a revised methodology's effective date and may elect to adopt the new version or continue under the prior version for the remainder of their crediting period (Section 6).

Development process URL: *Methodology Development and Review Process v1.0:* https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6aa769c8f4eb46b52fd0aa_Ontoly_Methodology_Development_and_Review_Process_v1.0.pdf

3) Provide evidence of the public availability of the programme’s process for developing further methodologies and protocols.

The Methodology Development and Review Process v1.0 is a normative, publicly available BERS Program document published on the Ontoly website. The document is listed in the BERS Standard Section 18 Programme Document List and is directly accessible at the URL below. All approved methodologies, summaries of public consultations, Ontoly's formal responses to comments, and any SAB Formal Objections are also published on the Ontoly website, enabling full external scrutiny of the development process.

Process public availability URL: *Methodology Development and Review Process v1.0:* https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6aa769c8f4eb46b52fd0aa_Ontoly_Methodology_Development_and_Review_Process_v1.0.pdf

4) Confirm that procedures are in place to ensure that emissions units are based on accurate measurements and valid quantification methods/protocols.

Yes.

Multiple interlocking mechanisms ensure BERU issuance is based only on accurate measurements and valid quantification:

Centralized quantification: Ontoly conducts all GHG emission reduction calculations centrally using standardized, approved methodology formulas applied to actual metered utility data — eliminating project-level discretion and ensuring identical application across all projects (BERS Standard Section 2.1.2; Methodology Development and Review Process, Section 10.2).
Metered data requirement: All quantification is based exclusively on actual metered utility bill data submitted by Building Representatives. Modelled or estimated consumption data is not accepted as the basis for quantification (BERS Standard Section 5.5.2; Existing Building Methodology, Section 5).

Independent verification: Annual ex-post verification by an ISO 14065-accredited Verification Body confirms that data inputs are accurate and complete and that GHG calculations have been correctly performed in accordance with the approved methodology (BERS Standard Section 8; Verification Standard, Section 1.2).

Publicly verified parameters: All standardized parameters — GWP values, discount rates, emission factors, energy price escalation rates, and equipment useful lives — are published in the Public Parameter List and independently verified annually by the contracted Verification Body (Public Parameter List, Section 1; BERS Standard Section 10.3.5).

No deviations permitted: No project developer or third party may submit external methodologies or deviate from the approved calculation procedures. Where edge cases arise, the Methodology Clarification process resolves them formally without altering the methodology (Methodology Development and Review Process, Sections 11.1–11.2).

Quantification accuracy URL: *BERS Standard v1.2, Sections 2.1.2, 8, 9:* https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6ab857e27bb0574e400851_BERS_Standard_Version_1.1.pdf*;*

*Existing Building Methodology v1.1, Sections 5–6:*https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6aa6bf6ef197dfbd03146e_Existing_Building_Methodology_v1.1.pdf
Public Parameter List v1.1: https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a04baa18ad44dc2dec2b4b4_Ontoly_Public_Parameter_List_v1.1.pdf

5) Confirm that procedures are in place to ensure that monitoring, measuring, and reporting of both activities and the resulting mitigation is conducted at specified intervals throughout the duration of the crediting period.

Yes.

Annual monitoring and reporting is a mandatory condition of BERU issuance for the full duration of the crediting period. Key provisions:

Building Representatives must submit an Annual Monitoring Report to Ontoly no later than March 31 of the calendar year immediately following each monitoring year, covering the full calendar year (January 1–December 31) on an ongoing basis (BERS Standard Section 5.5.1, 7.3.1). Monitoring data must consist solely of actual metered performance data without adjustment by the Building Representative — all normalizations are applied by Ontoly using standardized methodology (Section 5.5.2). Projects imported from other programmes must meet identical monitoring requirements (Section 5.5.3).

Projects that fail to submit by March 31 may be suspended. Projects inactive for two or more consecutive monitoring periods may have their eligibility for future BERU issuance terminated (Sections 5.5.6, 5.8.2). No BERUs may be issued for any monitoring period without a complete, verified monitoring submission (Section 8.1.2). The Existing Building Methodology (Section 8) defines all monitoring parameters, data sources, measurement procedures, mandatory attestations, and evidence retention requirements.

Monitoring and reporting URL: *BERS Standard v1.2, Sections 5.5, 7, and 8:* https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6ab857e27bb0574e400851_BERS_Standard_Version_1.1.pdf;

Existing Building Methodology v1.1, Section 8: https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6aa6bf6ef197dfbd03146e_Existing_Building_Methodology_v1.1.pdf

CRITERION 5.1: METHODOLOGY APPROVAL PROCESS

In addition to CORSIA requirements related to Clear Methodologies and Protocols and their Development Process:

a) please confirm that your organisation has a process for developing updates/ adopting updates to existing quantification methodologies.

Yes.

The Methodology Development and Review Process v1.0 establishes a comprehensive, publicly documented framework for developing and adopting updates to existing quantification methodologies, as summarized in Q2 above. The framework distinguishes between Material Revisions (full SAB review, independent expert review, minimum 30-day public consultation, formal comment response — mandatory for all substantive changes); Administrative Revisions (change log documentation only, no consultation); and Methodology Clarifications (guidance without amendment). Periodic review of all approved methodologies occurs at a minimum of every five years (Section 8).

Methodology update URL: *Methodology Development and Review Process v1.0, Sections 5 and 8:* https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6aa769c8f4eb46b52fd0aa_Ontoly_Methodology_Development_and_Review_Process_v1.0.pdf

b) Confirm your organisation's approved methodologies or general carbon-crediting program provisions address the following essential components:

1) applicability or eligibility criteria.

2) determination of the accounting boundary.

3) determination of additionality (to the extent this is not covered in other general crediting program provisions).

4) establishing the baseline scenario.

5) quantification of GHG emission reductions or removals.

6) monitoring practices.

Yes.

The BERS Standard (Section 1.2.1) and Methodology Development and Review Process (Section 3) both require that all approved BERS Methodologies address, at minimum, the following six essential components. The Existing Building Methodology v1.1 addresses each:

1. Applicability or eligibility criteria — Section 2 of the Existing Building Methodology defines the full scope of eligible activities, building types, geographic constraints (Canada and U.S.), technology requirements, and project conditions including the minimum 12-month operational data requirement and the prohibition on new construction.

2. Determination of the accounting boundary — Section 3 of the Existing Building Methodology establishes the project boundary (the building or Aggregated Building Project), defines included and excluded GHG sources (CO_2, CH_4, N_2O included; HFCs excluded with documented rationale), and specifies the treatment of fuel switching across all applicable fuel types.

3. Determination of additionality — Section 4 of the Existing Building Methodology sets out the two-gate additionality framework: the Regulatory Surplus Likelihood Assessment conducted via the Jurisdictional Regulatory Model, and the NPV Financial Additionality Test with sensitivity analysis, cross-referencing the standardized parameters in the Public Parameter List. The Investment Analysis Rating framework is also defined here.

4. Establishing the baseline scenario — Section 5 of the Existing Building Methodology defines the baseline using 12–36 months of actual, historical, metered pre-retrofit utility data, including conditions for fixed vs. adjusted baseline parameters, weather and occupancy normalization procedures, and alternative baseline data provisions.

5. Quantification of GHG emission reductions — Section 6 of the Existing Building Methodology defines the complete quantification equation set for electricity savings, fuel savings, and fuel switching,

including all emission factors, GWP values, normalization variables, and unit conversion requirements. All emission factor sources and update protocols are disclosed in the Public Parameter List.

6. Monitoring practices — Section 8 of the Existing Building Methodology prescribes all data collection, measurement, reporting, and attestation requirements for the full crediting period, including mandatory attestations for leakage prevention, permanence, change of ownership, no double counting, and occupancy/use changes, along with evidence retention obligations and handling of monitoring gaps.

Methodology provisions URL: *Existing Building Methodology v1.1, Sections 2–8:* https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6aa6bf6ef197dfbd03146e_Existing_Building_Methodology_v1.1.pdf

c) Confirm that your organisation requires that, prior to approval, new methodologies and major revisions of existing methodologies undergo review by a group of independent experts and a public stakeholder consultation.

Yes.

All Material Revisions to approved BERS Methodologies undergo a mandatory seven-step process that includes SAB review, independent expert review, a minimum 30-day public stakeholder consultation open to all stakeholders globally, and publication of a formal response to all material comments received before the revised methodology is approved (Methodology Development and Review Process, Section 5.3). The primacy of scientific evidence is maintained throughout — stakeholder feedback cannot override the scientific judgment of the SAB.

For the initial version of a new methodology, public stakeholder consultation is not required prior to first approval. Instead, the initial version is developed under the oversight of the SAB and independent subject-matter experts, whose collective review provides the independent technical assurance required prior to approval. Ontoly's documented position, set out in the Methodology Development and Review Process (Section 4.4.2–4.4.3), is that independent expert review combined with mandatory public consultation for all subsequent revisions provides equivalent integrity assurance to pre-approval consultation, while allowing first-of-kind methodologies to be developed with the rigor and speed required.

Where contentious issues arise during Material Revisions, an Independent Review Vote among SAB members and additional independent experts may be convened. The outcome is advisory; Ontoly retains final authority but must publicly disclose the vote outcome and, where departing from the majority, publish detailed scientific rationale (Section 5.5).

Methodology approval URL: *Methodology Development and Review Process v1.0, Sections 4.4, 5.3, 5.5, and 7:* https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6aa769c8f4eb46b52fd0aa_Ontoly_Methodology_Development_and_Review_Process_v1.0.pdf

d) Confirm that your organisation has procedures to review, suspend and/or withdraw the use of methodologies where the carbon-crediting program has determined, based on evidence, that GHG emission reductions or removals are being overestimated or that additionality might not be ensured.

Yes.

Section 9 of the Methodology Development and Review Process establishes explicit procedures for methodology suspension and withdrawal. Ontoly shall review and may suspend or withdraw any methodology where evidence demonstrates that: GHG emission reductions are being systematically overestimated; additionality might not be ensured for projects applying the methodology; the methodology is no longer aligned with current scientific understanding or best practice; or regulatory or market conditions have changed such that the methodology's assumptions are no longer valid.

Upon suspension, no new projects may be registered under that methodology. Existing projects registered under the suspended methodology may continue under the previously approved version for their current monitoring period, unless Ontoly determines — based on specific documented evidence — that continued use would result in material overestimation. Any such determination must be published with supporting rationale (Section 9.2).

Upon withdrawal, the methodology is permanently retired and no further projects may be registered under it. Ontoly publishes the rationale for any suspension or withdrawal decision (Section 9.3).

Where a project cannot conform to the calculation requirements of an approved methodology, it is ineligible for BERU issuance until the methodology is formally revised, a Methodology Clarification resolves the issue, or an alternative approved methodology is available (Section 9.4).

Suspension and withdrawal decisions are subject to appeal to the BERS Governance Board by any stakeholder who believes the decision is inconsistent with the scientific evidence base or the procedures in this document (Methodology Development and Review Process, Section 12; BERS Governance Board v1.2, Section 5.3).

Methodology review/suspension URL: *Methodology Development and Review Process v1.0, Section 9:*https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6aa769c8f4eb46b52fd0aa_Ontoly_Methodology_Development_and_Review_Process_v1.0.pdf

CRITERION 5.2: REQUIREMENTS FOR QUANTIFYING GHG EMISSION REDUCTIONS OR REMOVALS - CORSIA

1) Confirm that procedures are in place to issue carbon credits against realistic, defensible, and conservative baseline estimations of emissions.

Yes.

The BERS Program establishes the baseline using 12–36 months of actual, historical, metered utility data from the period immediately preceding the Project Start Date — the most direct and defensible possible basis for a baseline, grounded in the building's own operational reality rather than modelled estimates or benchmarks (BERS Standard Section 3 Definitions; Existing Building Methodology Section 5.1.1). The baseline is established conservatively: where adjustments are required due to occupancy or weather conditions, standardized normalization procedures aligned with ASHRAE Guideline 14 and

IPMVP Option C are applied with conservative assumptions (Existing Building Methodology Section 7.1).

Baseline URL: *Existing Building Methodology v1.1, Section 5:* https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6aa6bf6ef197dfbd03146e_Existing_Building_Methodology_v1.1.pdf

BERS Standard v1.2, Section 3: https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6ab857e27bb0574e400851_BERS_Standard_Version_1.1.pdf

2) Confirm that procedures are in place to publicly disclose baselines and underlying assumptions.

Yes.

Project-specific baseline disclosures are made through two public mechanisms. The Project Description Report, published on the Ontoly Registry for every project that has achieved Validated status, includes a building-level baseline and intervention summary and information on how the methodology has been applied to determine the baseline (BERS Standard Section 5.3.6(e) and (j)). The standardized assumptions and parameters underlying all baseline calculations — emission factors, GWP values, energy price escalation rates, and discount rates — are published in the Public Parameter List v1.1, which is itself publicly available on the Ontoly website.

Baseline disclosure URL: *BERS Standard v1.2, Section 5.3.6*https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6ab857e27bb0574e400851_BERS_Standard_Version_1.1.pdf;

Public Parameter List v1.1: https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a04baa18ad44dc2dec2b4b4_Ontoly_Public_Parameter_List_v1.1.pdf

3) Confirm that procedures are in place to ensure that methods of developing baselines, including modelling, benchmarking or the use of historical data, use assumptions, methodologies, and values do not over-estimate mitigation from an activity.

Yes.

The Existing Building Methodology (Section 7.1) sets out a systematic approach to conservativeness applied across all baseline determinations. Key provisions that guard against overestimation include: the baseline is derived from actual metered historical utility data, not estimates or models; where fuel consumption cannot be monitored separately by type, the fuel source with the lowest CO_2e emission factor is applied (conservative by design); weather and occupancy normalization uses regression-based procedures with conservative assumptions aligned with ASHRAE Guideline 14 and IPMVP Option C; and where monitoring data is incomplete or unreliable, the most conservative available data is applied.

The Methodology Development and Review Process (Section 10.1) requires all approved BERS Methodologies to use conservative assumptions in light of uncertainty, and use comparable quantification approaches for both baseline and project activity emissions — preventing asymmetric treatment of the two scenarios. The SAB's formal objection mechanism provides an independent scientific check on any methodology provision that it determines fails to meet the conservativeness principle.

Conservative baseline URL: *Existing Building Methodology v1.1, Sections 5.1.3 and 7.1:* https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6aa6bf6ef197dfbd03146e_Existing_Building_Methodology_v1.1.pdf*f;*

Methodology Development and Review Process v1.0, Section 10.1: https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6aa769c8f4eb46b52fd0aa_Ontoly_Methodology_Development_and_Review_Process_v1.0.pdf

4) Confirm that procedures are in place for activities to respond, as appropriate, to changing baseline conditions that were not expected at the time of registration.

Yes.

The BERS Program addresses changing baseline conditions through two mechanisms. First, where occupancy or weather conditions during the monitoring period deviate from baseline conditions by more than defined thresholds, Ontoly automatically applies standardized normalization adjustments to the baseline parameters using the procedures in Existing Building Methodology Appendix 2 (Section 5.4). Building Representatives are required to attest annually to occupancy and use changes through the Monitoring Report (Section 7.4.1).

Second, where a material change in building circumstances occurs — including a change of ownership, significant operational change, or installation of additional retrofit measures — the Building Representative must notify Ontoly through the Ontoly Portal (BERS Standard Sections 7.6, 10.7.2). Ontoly adjusts baselines and verifies actual building performance to ensure no double counting where subsequent retrofit projects are implemented within the same building during the crediting period (BERS Standard Section 5.3.7).

Changing baseline URL: *Existing Building Methodology v1.1, Sections 5.4–5.5 and 7.4.3:* https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6aa6bf6ef197dfbd03146e_Existing_Building_Methodology_v1.1.pdf

BERS Standard v1.2, Sections 5.3.7 and 7.6: https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6ab857e27bb0574e400851_BERS_Standard_Version_1.1.pdf

5) List all emissions sectors (if possible, activity types) supported by your program that present a potential risk of material emissions leakage

Yes.

The BERS Program supports a single activity type: energy efficiency and fuel-switching retrofits in existing buildings (Sectoral Scope 03). The programme's analysis of leakage risk by type is set out in BERS Standard Section 11 and Existing Building Methodology Section 7.1:

- Equipment displacement leakage — the only material leakage risk identified under Version 1.0. If displaced retrofit equipment (e.g., a replaced gas boiler) is resold or redeployed at another facility rather than retired, GHG emissions would shift outside the project boundary without corresponding reduction credit. This risk is directly addressed through mandatory attestation of no resale (see Q7 below).

- Activity-shifting leakage — assessed as inherently captured. Because BERUs are issued based on actual metered utility performance at the project boundary, any shift of energy-consuming activities beyond the boundary would be reflected in the monitored data, reducing or eliminating BERU issuance for that period (BERS Standard Section 11.1.6).

- Market leakage — assessed as not applicable. There is no evidence that building retrofits displace economic activity to other locations or reduce the supply of a traded commodity, unlike forestry or land-use projects (Section 11.1.7).

- Ecological leakage — assessed as not applicable. Building retrofits involve no land-use changes, deforestation, or ecosystem disturbance (Section 11.1.8).

Scope 3 emissions — excluded from the project boundary as a conservative design choice. Lifecycle emissions associated with retrofit equipment manufacture and disposal are excluded; this exclusion does not result in overestimation of credited reductions (Section 11.1.5).

Leakage risk URL: *BERS Standard v1.2, Section 11:* https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6ab857e27bb0574e400851_BERS_Standard_Version_1.1.pdf

6) Confirm that measures are in place to assess incidences of material leakage of emissions that may result from the implementation of a mitigation activity.

Yes.

Equipment displacement leakage — the only material leakage risk identified — is assessed through mandatory attestation. Building Representatives must attest in each Annual Monitoring Report that all equipment replaced or displaced by the retrofit has been permanently retired or disposed of in an environmentally responsible manner and has not been resold, relocated, or redeployed for continued operational use at another facility (BERS Standard Section 11.1.4; Existing Building Methodology Section 8.3.1).

Activity-shifting leakage is assessed automatically through the metered data monitoring framework — any shift in consumption outside the project boundary is captured in the building's utility data (BERS Standard Section 11.1.6).

Leakage assessment URL: *BERS Standard v1.2, Section 11.1.4:* https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6ab857e27bb0574e400851_BERS_Standard_Version_1.1.pdf

Existing Building Methodology v1.1, Section 8.3.1: https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6aa6bf6ef197dfbd03146e_Existing_Building_Methodology_v1.1.pdf

7) Confirm that provisions are in place to mitigate the risk of material leakage from activities that pose a risk of leakage when implemented at the project, national, or on an interim basis on a subnational level.

Yes.

Equipment displacement leakage risk is mitigated through the mandatory leakage prevention attestation described in Q6 — the legal obligation on Building Representatives to permanently retire displaced equipment, combined with Ontoly's right to request disposal evidence and impose corrective action for non-compliance (BERS Standard Section 11.1.4). The BERS Standard explicitly prohibits reversals of physical retrofit measures (Section 11.1.2). Where a measure is reversed, the change in utility performance would be detected through annual metered monitoring, resulting in reduced or zero BERU issuance for the affected period.

Market and ecological leakage are not applicable to building retrofit projects (Sections 11.1.7–11.1.8). Activity-shifting leakage is inherently mitigated by the metered performance-based quantification framework (Section 11.1.6). Scope 3 emissions from equipment manufacture are excluded from the project boundary as a conservative design choice (Section 11.1.5).

Leakage mitigation URL: *BERS Standard v1.2, Sections 11.1.2–11.1.8:* https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6ab857e27bb0574e400851_BERS_Standard_Version_1.1.pdf

8) Confirm that procedures are in place requiring activities to monitor identified material leakage.

Yes.

Equipment displacement leakage is monitored through the annual mandatory leakage prevention attestation included in every Annual Monitoring Report (BERS Standard Section 7.4.1; Existing Building Methodology Section 8.3.1). This attestation must be made for every monitoring period throughout the full crediting period. Activity-shifting leakage is monitored continuously through the annual metered utility data submission, which inherently captures any shifts in energy consumption within and around the project boundary.

Leakage monitoring URL: *BERS Standard v1.2, Sections 7.4.1 and 11:* https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6ab857e27bb0574e400851_BERS_Standard_Version_1.1.pdf

Existing Building Methodology v1.1, Section 8.3.1: https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6aa6bf6ef197dfbd03146e_Existing_Building_Methodology_v1.1.pdf*f*

9) Confirm that procedures are in place requiring activities to deduct emissions from any identified material leakage that reduces mitigation benefits.

Yes.

Where equipment displacement leakage is identified — through attestation failure, evidence of resale, or Verification Body findings — Ontoly may apply corrective action including denial of BERU issuance for the affected monitoring period and cancellation of previously issued BERUs where material misrepresentation is involved (BERS Standard Section 16; Corrective Actions Policy Sections 4.3, 6.3). Because the BERS Program issues BERUs based on actual measured performance, activity-shifting leakage is automatically deducted — any energy consumption that shifts outside the building boundary results in lower measured savings and therefore fewer BERUs issued.

Leakage deduction URL: *BERS Standard v1.2, Sections 11.1.3, 11.1.6, and 16:* https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6ab857e27bb0574e400851_BERS_Standard_Version_1.1.pdf*;*

Corrective Actions Policy, Section 6.3: https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/69b128024012a92a93eaed00_Ontoly_Corrective_Actions_Policy.pdf

CRITERION 5.2: REQUIREMENTS FOR QUANTIFYING GHG EMISSION REDUCTIONS OR REMOVALS

a) In addition to CORSIA requirements*, confirm that your organisation does:

*CORSIA "Eligibility Criterion", "Carbon offset credits must be based on a realistic and credible baseline" and "Carbon offset credits must be quantified, monitored, reported and verified"

1) clearly define a carbon credit as one metric tonne of CO2 equivalent of GHG emission reductions or removals.

Yes.

A BERU is defined in BERS Standard Section 14.1.1 as a unique, serialized, and transferable digital unit representing one metric tonne of certified tCO_2e emission reductions achieved by a registered BERS Project and verified in accordance with the BERS Standard. This definition is repeated in the BERS Program's public-facing Definitions (Section 3) and is the foundational unit of the programme. Each BERU is quantified using 100-year GWP values from the latest IPCC Assessment Report to convert all GHG species to CO_2 equivalence.

Carbon credit definition URL: *BERS Standard v1.2, Sections 3 and 9.1.2:* https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6ab857e27bb0574e400851_BERS_Standard_Version_1.1.pdf

2) disclose the global warming potential (GWP) values used to calculate the CO2 equivalence.

Yes.

GWP values are publicly disclosed in the Ontoly Public Parameter List v1.1 (Section 3). The BERS Program uses 100-year GWP values (GWP-100) from the IPCC Sixth Assessment Report (AR6), Working Group I, Chapter 7, Table 7.15, consistent with UNFCCC reporting guidelines and CORSIA Emissions Unit Eligibility Criteria. Current values: CO_2 = 1; CH_4 = 29.8; N_2O = 273 (Public Parameter List, Section 3.2). GWP values are subject to annual review by the contracted Verification Body and will be updated within twelve months of a new IPCC Assessment Report.

GWP disclosure URL: *Public Parameter List v1.1, Section 3:* https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a04baa18ad44dc2dec2b4b4_Ontoly_Public_Parameter_List_v1.1.pdf*;*
BERS Standard v1.2, Section 9.1.3: https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6ab857e27bb0574e400851_BERS_Standard_Version_1.1.pdf

3) define the length of crediting periods, including the total length of combined crediting periods.

Yes.

The standard crediting period for a BERS project is a maximum of ten years, commencing on the Project End Date (the date all retrofit measures are complete and fully operational) (BERS Standard Section 10.7.1; Public Parameter List Section 6). Version 1.0 does not provide for crediting period renewal, meaning the maximum total crediting period per project is ten years. Where a building implements more than one project within a ten-year period, net crediting is restricted to the crediting period of the first registered project unless the subsequent project establishes a new, independently verified baseline (BERS Standard Section 5.3.7).

Crediting period URL: *BERS Standard v1.2, Section 10.7:* https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6ab857e27bb0574e400851_BERS_Standard_Version_1.1.pdf

Public Parameter List v1.1, Section 6: https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a04baa18ad44dc2dec2b4b4_Ontoly_Public_Parameter_List_v1.1.pdf

4) provide guidance on steps and requirements for renewal of the crediting periods. Any renewal of the crediting period shall include a reassessment of the baseline scenario, including whether the conditions and barriers at the start of the mitigation activity still prevail, and an update of relevant parameters used to calculate emissions reductions and removals.

[N/A]

As documented in BERS Standard Section 10.7.1 and the Public Parameter List Section 6, Version 1.0 does not provide for crediting period renewal. The rationale is consistent with that described in Criterion 4.1 Q11: a building energy retrofit is a one-time capital investment with a fixed baseline established from actual historical utility data. The ten-year crediting period is proportionate to typical equipment useful lives (15–25 years per the Public Parameter List) and sufficient to capture the full GHG benefits of the retrofit without requiring baseline reassessment.

Crediting period URL: *BERS Standard v1.2, Section 10.7.1:* https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6ab857e27bb0574e400851_BERS_Standard_Version_1.1.pdf

5) assess the overall uncertainty of emission reductions or removals associated with an activity type and/or require that the mitigation activity proponent assess the overall uncertainty in accordance with an approved methodology. In estimating overall uncertainty all causes of uncertainty shall be considered, including assumptions (e.g., baseline scenario), estimation equations or models, parameters (e.g., representativeness of default values), and measurements (e.g., the accuracy of measurement methods). The overall uncertainty shall be assessed as the combined uncertainty from individual causes.

Yes.

The Existing Building Methodology Section 7.2 establishes the overall uncertainty assessment framework, aligned with ICVCM requirements. Overall uncertainty is assessed considering all causes: (a) assumptions including the baseline scenario; (b) estimation equations or models; (c) parameters such as representativeness of default values; and (d) measurements such as accuracy of utility metering. The overall uncertainty is assessed as the combined uncertainty from individual causes (Section 7.2.1).

The methodology's assessment concludes that quantified emission reductions from BERS projects are not likely to be overestimated taking into account overall uncertainty, and that very significant overestimation is very unlikely — consistent with ICVCM quantification requirements (Section 7.2.2). This assessment is supported by three structural features that reduce uncertainty: (1) quantification is based on actual metered utility data rather than models or estimates; (2) all calculations are performed centrally by Ontoly using standardized formulas; and (3) conservative assumptions are applied systematically throughout.

In addition, Ontoly assigns a Data Quality Score (1–3) to each project based on the quality and completeness of input data: Score 3 (Actual Data, equivalent to PCAF Score 1) for projects with full metered utility bills; Score 2 (Partially Estimated) where minor data gaps exist; and Score 1 (Primarily Estimated) where significant estimation is required. This scoring provides transparent, project-level data quality disclosure and is published on the Ontoly Registry for every project that has achieved Validated status.

Uncertainty assessment URL: *Existing Building Methodology v1.1, Section 7.2:* https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6aa6bf6ef197dfbd03146e_Existing_Building_Methodology_v1.1.pdf

6) have a systematic approach to ensuring the conservativeness of quantification methodologies it approves for use.

Yes.

The BERS Program applies a systematic, multi-layer conservativeness framework documented across the Existing Building Methodology (Section 7.1), BERS Standard (Section 1.3.1), and Methodology Development and Review Process (Section 10):

- Conservative emission factors: Where fuel consumption cannot be monitored by type separately, the lowest CO_2e emission factor is applied.
- Conservative baseline: Derived from actual metered historical data; normalization adjustments use conservative assumptions.
- Weather and occupancy normalization: ASHRAE Guideline 14 and IPMVP Option C regression-based approach isolates retrofit impacts from external variability.
- Fixed grid emission factors: The electricity grid emission factor is fixed at baseline registration, preventing any credit for grid decarbonization (BERS Standard Section 12.1.4).
- Conservative rounding: Where fractional BERUs result, values are rounded down (truncated) in accordance with the conservativeness principle (Verification Standard Section 10.5.2).
- Conservative data gap treatment: Where monitoring data is incomplete or unreliable, the most conservative available data is applied or credited emission reductions are reduced proportionally (Existing Building Methodology Section 7.4.3).
- Comparable quantification approaches: Identical approaches are applied to both baseline and project emissions — asymmetric treatment of the two scenarios is prohibited (Methodology Development and Review Process Section 10.1). SAB oversight: The Scientific Advisory Board may issue Formal Objections to any methodology provision determined to fail the conservativeness principle, creating an independent scientific check (Methodology Development and Review Process Section 4.2.5).

Conservativeness URL: *Existing Building Methodology v1.1, Section 7.1:* https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6aa6bf6ef197dfbd03146e_Existing_Building_Methodology_v1.1.pdf

*Methodology Development and Review Process v1.0, Section 10: h*https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6aa769c8f4eb46b52fd0aa_Ontoly_Methodology_Development_and_Review_Process_v1.0.pdf

BERS Standard v1.2, Section 1.3.1: https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6ab857e27bb0574e400851_BERS_Standard_Version_1.1.pdf

7) require in its general program provisions that existing government policies and legal requirements that lower GHG emissions (e.g., feed-in tariffs for renewable energy, minimum product efficiency standards, air quality requirements, or carbon taxes) be included when determining the baseline emissions. Your organisation may have provisions to consider the level of enforcement of such policies and legal requirements as well as any associated grace periods.

Yes.

Existing government policies and legal requirements are addressed through the Regulatory Surplus Assessment (BERS Standard Section 10.1) and the baseline establishment methodology. The Regulatory Surplus Assessment, conducted using Ontoly's Jurisdictional Regulatory Model, evaluates all legally binding building codes, minimum efficiency standards, building performance standards, and climate regulations applicable to the project jurisdiction — ensuring that only emission reductions beyond existing regulatory requirements are eligible for crediting. The Regulatory Surplus Assessment screens applicable regulations to confirm it is very unlikely the project's reductions are required by law as of the assessment date — a binary pass/fail test. Identified regulatory risks are flagged, disclosed on the Registry, and monitored over time without affecting BERUs.

For the baseline itself, the Existing Building Methodology (Section 5.1.3) requires the baseline to be established in a conservative manner, explicitly including existing government policies and legal requirements in determining the baseline scenario. This aligns with ICVCM requirements. The regulatory surplus evaluation is conducted once, fixed to legislation legally binding as of January 1 of the year the Preliminary Ex-Ante BERU Assessment Report is requested; the baseline and crediting period similarly reflect conditions prevailing at the Project Start Date.

https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6ab857e27bb0574e400851_BERS_Standard_Version_1.1.pdf

CRITERION 5.3: EX-POST DETERMINATION OF EMISSION REDUCTIONS OR REMOVALS

a) Carbon credits that are issued ex-ante are not CCP eligible. If your organisation supports both ex-ante and ex-post issuance, confirm it has procedures in place to transparently identify units that are issued ex-post and are thus eligible under the ICVCM.

[N/A]

The BERS Program issues BERUs exclusively on an ex-post basis following successful independent verification — no ex-ante BERU issuance is permitted under any circumstances (BERS Standard Sections 5.7.1 and 14.1.2). All BERUs in the Ontoly Registry are therefore by definition ex-post and CCP-eligible from an issuance-basis perspective. This identification mechanism is not required as the distinction between ex-ante and ex-post units does not arise in the BERS Program. The exclusively ex-post nature of the programme is a foundational design principle.

Ex-post issuance URL: *BERS Standard v1.2, Sections 5.7.1 and 14.1.2:* https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6ab857e27bb0574e400851_BERS_Standard_Version_1.1.pdf

NO DOUBLE COUNTING

Context

Double counting of carbon credits and/or GHG emission reductions or removals undermines the integrity of the VCM on reducing or removing GHG emissions. Double counting can manifest in a number of ways and the ICVCM requirements ensure that the carbon-crediting programs manage the risks of double counting.

Double issuance: This occurs when two or more carbon credits co-exist at the same time for one GHG emission reduction or removal, under the same or different carbon-crediting or other programs. Double issuance can also occur where two or more mitigation activities have overlapping GHG accounting boundaries, and carbon-crediting programs need to have provisions avoiding issuance of more than one credit in relation to the same GHG emission reduction or removal in such cases.

Double use: This occurs when one carbon credit is claimed towards multiple mitigation targets/goals (e.g., once each by two different entities or twice by one entity).

Double claiming with mandatory domestic mitigation schemes: This occurs when a carbon crediting program issues a carbon credit in respect of GHG emission reductions or removals that are covered by a mandatory domestic mitigation scheme (e.g., emissions trading system). In the context of the ICVCM, it is considered that a Nationally Determined Contribution (NDC) under the Paris Agreement does not constitute a mandatory domestic mitigation scheme. While a NDC may be put into effect through a variety of instruments, including mandatory domestic mitigation schemes, it is considered to be separate from the latter.

The Integrity Council has established a CCP Attribute in relation to host country authorization for use towards 'other international mitigation purposes' pursuant to Article 6 of the Paris Agreement. The question of how to manage double counting in all its forms in the context of Article 6, and whether double claiming with NDCs should be avoided on the basis of a corresponding adjustment as set out in Article 6 implementing guidance, will be addressed in the ICVCM work program.

Double claiming with mitigation incentivisation schemes: This occurs when a carbon-crediting program issues a carbon credit for a GHG emission reduction or removal for which another environmental credit is being issued and traded under a different environmental market (such as Renewable Energy Certificates).

CRITERION 6.1: NO DOUBLE ISSUANCE (DOUBLE REGISTRATION)

a) Confirm your organisation has provisions in place to:

1) prevent the registration of any mitigation activity that has been registered under another carbon-crediting program and is still active under that program;

Yes.

The BERS Program prohibits dual registration through two interlocking mechanisms.
First, projects that are already registered or claiming reductions under another carbon-crediting program or compliance market are explicitly excluded from BERS eligibility under Version 1.0 (BERS

Standard Section 4.6 — Excluded Project Activities). This categorical exclusion prevents dual registration at the point of project intake.

Second, Ontoly screens all project submissions against publicly available carbon credit registries at the time of registration to identify potential overlapping claims. Where Ontoly identifies that a project's GHG accounting boundary overlaps with another project registered under the same or another carbon-crediting program, Ontoly shall not register the project or issue BERUs for the overlapping emission reductions unless the Building Representative provides evidence that credits issued under the other program have been cancelled (BERS Standard Section 12.1.5).

The Building Representative is additionally required to attest at registration — and reconfirm annually in each Monitoring Report — that the project does not and will not issue carbon credits for GHG emission reductions where another program has issued credits for the same reductions and has not cancelled those credits (BERS Standard Section 12.1.2). This ongoing attestation obligation ensures that dual registration that may arise after initial registration is also captured and prohibited throughout the crediting period.

No double registration URL: *BERS Standard v1.2, Sections 4.6, 12.1.2, and 12.1.5:* https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6ab857e27bb0574e400851_BERS_Standard_Version_1.1.pdf

2) ensure that it does not issue carbon credits for GHG emission reductions or removals where another program has issued credits to the same mitigation activity and/or for the same GHG emission reductions or removals and has not cancelled those credits for the purpose of avoiding double issuance.

Yes.

This is addressed through the combination of provisions described in a.1 above, together with three additional mechanisms covering the full scope of double issuance risk.

The Building Representative's attestation (BERS Standard Section 12.1.2) explicitly covers the scenario where another program has issued credits for the same reductions: the attestation requires confirmation that no other program has issued credits for the same GHG emission reductions unless those credits have been cancelled. This attestation is made at registration and reconfirmed annually for the full crediting period.

The Building Representative must also attest, to the best of their knowledge, that no utility provider, government agency, or other program is claiming credit for the same operational GHG emission reductions generated by the retrofit activity (BERS Standard Section 12.1.3). This extends the double issuance prohibition beyond formal carbon credit programs to include utility green programs, government reporting schemes, and other frameworks that might claim the same reductions.

BERUs are additionally prohibited from being issued where units related to the same climate impacts are traded in other environmental markets or accounting frameworks — including Renewable Energy Certificates. Where RECs are generated by the same project activity, BERUs may only be issued for the portion of GHG emission reductions not already claimed through those RECs (BERS Standard Section 12.4.1). BERUs shall not simultaneously receive credit under any other carbon-crediting program, renewable energy certificate program, or compliance scheme for the same GHG emission reductions (Section 12.4.2).

No double issuance URL: *BERS Standard v1.2, Sections 12.1.1–12.1.5 and 12.4.1:* https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6ab857e27bb0574e400851_BERS_Standard_Version_1.1.pdf

CRITERION 6.2: NO DOUBLE ISSUANCE (OVERLAPPING CLAIMS)

a) Confirm your organisation has registry provisions that prevent the further transfer, retirement or cancellation of a carbon credit once it has been cancelled or retired.

Yes.

Cancellation and retirement of a BERU is permanent, final, and irreversible. The Ontoly Registry includes technical controls to prevent any further transfer, retirement, or cancellation of a BERU once it has been cancelled or retired (BERS Standard Section 12.2.1). Retired BERUs are assigned the status "Retired" in the Ontoly Registry and permanently removed from circulation — retirement cannot be reversed, re-issued, or re-credited (BERS Standard Section 5.9.4). Cancelled BERUs are transferred to the programme's cancellation account and are no longer tradable (BERS Standard Section 12.3.1; Corrective Actions Policy Section 12.1). These registry-level controls are hardcoded into the platform architecture and enforced automatically, preventing any manual override of the finality of retirement or cancellation.

No double use URL: *BERS Standard v1.2, Sections 5.9.4, 12.2.1, and 12.3.1:* https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6ab857e27bb0574e400851_BERS_Standard_Version_1.1.pdf;

Corrective Actions Policy, Section 12.1: https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/69b128024012a92a93eaed00_Ontoly_Corrective_Actions_Policy.pdf

C – SUSTAINABLE DEVELOPMENT

SUSTAINBALE DEVELOPMENT BENEFITS AND SAFEGUARDS

Context

In a high-integrity VCM, carbon-crediting programs take steps to ensure that mitigation activities adhere to environmental and social safeguards and contribute to the Sustainable Development Goals (SDGs). Carbon-crediting programs have measures in place to ensure that in the context of the host country, mitigation activity proponents inform how SDG impacts are consistent with SDG objectives of the country, respect human rights and comply with relevant safeguards. Program level processes ensure that mitigation activity proponents assess environmental and social risks associated with proposed mitigation activities, taking into account the size and scale of the relevant mitigation activity.

Where the context requires, mitigation activities are required to ensure free, prior and informed consent (FPIC) processes with Indigenous Peoples and Local Communities (IPs & LCs), protect and improve livelihoods, protect and restore biodiversity and ecosystem services, enhance climate resilience and adaptation, reduce pollution, and be transparent about the sharing of benefits from the mitigation activity with IPs and LCs. Carbon-crediting programs must also ensure compliance with relevant national requirements, applicable laws and rules of the relevant jurisdiction.

CRITERION 7.1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS - CORSIA

CORSIA requirements related to Safeguards System and Sustainable Development criteria

1) Confirm that your programme has safeguards in place to address:

- environmental risks
- social risks

Yes.

The BERS Program applies a mandatory attestation-based safeguard framework, established in BERS Standard Section 13, that addresses both environmental and social risks associated with building retrofit projects. Building Representatives must complete and submit the Data Quality & Safeguard Attestation Form with each Monitoring Report, declaring that the project complies with all applicable laws and regulations and has assessed and, where applicable, mitigated risks across all defined safeguard categories: labour rights, resource efficiency, pollution prevention, land acquisition and involuntary resettlement, biodiversity, Indigenous Peoples and Local Communities, human rights, gender equality, stakeholder consideration, and cultural heritage protection (BERS Standard Sections 13.2.1–13.3.1).

Where material risks are identified, Building Representatives must upload supporting documentation and describe mitigation measures commensurate with the severity of identified risks in each Monitoring Report (BERS Standard Section 13.3.1). Where no risks are triggered, attestation alone is sufficient. This framework is proportionate to the low-risk profile of building retrofit projects on private property, where the potential for adverse public environmental or social impacts is substantially lower than in sectors involving land-use change, community displacement, or large-scale industrial activity.

Safeguards URL: *BERS Standard v1.2, Section 13:* https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6ab857e27bb0574e400851_BERS_Standard_Version_1.1.pdf

2) Confirm that your program uses sustainable development criteria

Yes.

The BERS Program incorporates sustainable development criteria at both the project level and the programme level. At the project level, every project is required to report its contribution to the UN Sustainable Development Goals (BERS Standard v1.2, Section 13.4.1): SDG 13 applies to all projects by construction, and for all other SDGs the Building Representative must report contributions — describing consistency with the SDG objectives and national sustainable development priorities of the host country — or affirmatively state that no other SDGs apply. Projects may additionally disclose how monetary project benefits are shared with building tenants (BERS Standard Section 13.4.1). At the programme level, BERS Standard Section 13.5 requires all new or revised methodologies to include an assessment of the project's compatibility with the net zero transition by reference to the host country's net zero objectives. The inherent SDG contributions of building energy retrofits — reduced energy consumption (SDG 7), improved occupant health and comfort (SDG 3), and climate action (SDG 13) — are documented in BERS Standard Section 15.4.3.4.

SDG criteria URL: *BERS Standard v1.2, Sections 13.4–13.5 and 15.4.3.4:* https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6ab857e27bb0574e400851_BERS_Standard_Version_1.1.pdf

3) Confirm that your program has provisions for monitoring, reporting and verification in accordance with these criteria

Yes.

Safeguard compliance is monitored, reported, and verified on an annual basis through the following mechanisms. The mandatory Data Quality & Safeguard Attestation Form must be completed and submitted with every Annual Monitoring Report, providing annual monitoring of safeguard compliance throughout the crediting period (BERS Standard Section 13.2.1).

Where material risks are identified, mitigation measures must be reported in each Monitoring Report with supporting documentation (Section 13.3.1). A safeguard summary drawn from the attestation is publicly disclosed in the Project Description Report on the Ontoly Registry for every project that has achieved Validated status (Section 5.3.6(h)). The contracted Verification Body reviews safeguard attestations as part of its annual verification scope (BERS Validation and Verification Standard Section 9.2).

Safeguard monitoring URL: *BERS Standard v1.2, Sections 5.3.6(h), 13.2.1, and 13.3.1:* https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6ab857e27bb0574e400851_BERS_Standard_Version_1.1.pdf;

BERS Validation and Verification Standard v1.1, Section 9.2: https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6a9d8bc4ccee04bf71c84d_BERS_Verification_Standard_v1.pdf

CRITERION 7.1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS

a) In addition to CORSIA requirements relating to Safeguards System and Sustainable Development Criteria, confirm your organisation requires mitigation activity proponents to:

The mandatory Safeguard Attestation Form requires Building Representatives to declare that the project complies with all applicable local, provincial/state, national, and international laws and conventions (BERS Standard Section 13.2.1(a)). This obligation covers compliance with applicable international human rights instruments including the International Bill of Human Rights and the UN Declaration on the Rights of Indigenous Peoples where relevant to circumstances. This declaration is made at registration and reconfirmed annually in each Monitoring Report.

Legal compliance URL: *BERS Standard v1.2, Section 13.2.1(a):* https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6ab857e27bb0574e400851_BERS_Standard_Version_1.1.pdf

Note on "validated design documents" throughout Criterion 7: The ICVCM's requirement that proponents confirm safeguard adherence in "validated design documents" is drawn from programmes that use a formal project design document validated by a third-party auditor prior to registration. The BERS Program's equivalent is the combination of: (a) the Data Quality & Safeguard Attestation Form, a legally binding declaration completed by the Building Representative at registration and reconfirmed annually; and (b) the Project Description Report, generated by Ontoly and published on the Ontoly Registry for every project that has achieved Validated status (BERS Standard Section 5.3.6). Together, these documents serve the same purpose: they confirm safeguard compliance in a documented, verifiable form prior to or at the point of project listing.

2) assess associated risks of negative environmental and social impacts with regard to the safeguards contained in criteria 7.2 to 7.8 (inclusive), taking into account the scope and scale of the mitigation activity.

Yes.

The Safeguard Attestation Form requires Building Representatives to assess risks of negative environmental and social impacts across all safeguard categories defined in BERS Standard Section 13.2.1(b) — which map directly to Criteria 7.2–7.8. This assessment is required at registration and annually throughout the crediting period. The assessment is proportionate to the scope and scale of the activity: building retrofit projects on private property carry substantially lower risk profiles than land-use, forestry, or industrial activity types.

Risk assessment URL: *BERS Standard v1.2, Sections 13.2.1 and 13.3.1:* https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6ab857e27bb0574e400851_BERS_Standard_Version_1.1.pdf

3) ensures FPIC processes for IPs and LCs, where applicable; and conduct stakeholder consultations, including local stakeholders as part of project design and implementation in a manner that is

inclusive, culturally appropriate, and respectful of local knowledge, take these consultations into account and respond to local stakeholders' views.

Yes.

Where a building retrofit project directly or indirectly impacts Indigenous Peoples and Local Communities, the Safeguard Attestation Form requires the Building Representative to confirm that the project has, where relevant to circumstances, applied the Free, Prior and Informed Consent process; has identified rights-holders possibly affected, including customary rights holders; and has not forced eviction or displacement of IPs & LCs (BERS Standard Section 13.2.1 — IPs & LCs safeguard). The "where relevant to circumstances" qualifier is proportionate: the vast majority of BERS projects — energy retrofits within existing buildings on private property in urban and suburban settings — do not impact Indigenous territories or local community resources.

FPIC and stakeholder consultation URL: *BERS Standard v1.2, Section 13.2.1:* https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6ab857e27bb0574e400851_BERS_Standard_Version_1.1.pdf

b) Where, pursuant to 7.1 a) 2), the mitigation activity proponents have assessed that the mitigation activity poses risks of negative environmental and/or social impacts with regard to any of criteria 7.2 - 7.8 (inclusive) confirm your organisation requires the mitigation activity proponents to:

1) include measures, commensurate with the identified risks, to minimise and address such negative environmental and/or social impacts, in validated design documents prior to registration.

Yes.

Where the Building Representative's safeguard assessment identifies material risks, the Safeguard Attestation Form requires disclosure of those risks and the measures implemented to address them commensurate with severity, as part of project registration (BERS Standard Section 13.3.1). The Project Description Report, published on the Ontoly Registry for every project that has achieved Validated status, includes a safeguard summary drawn from the attestation, providing a public record of identified risks and mitigation measures (Section 5.3.6(h)).

Mitigation measures URL: *BERS Standard v1.2, Sections 5.3.6(h) and 13.3.1:* https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6ab857e27bb0574e400851_BERS_Standard_Version_1.1.pdf

2) include information on the measures implemented pursuant to 1), commensurate with the identified risks in the monitoring report.

Yes.

Where material risks were identified at registration, the Building Representative must include information on the measures implemented to address those risks, commensurate with their severity, in each subsequent Annual Monitoring Report for the duration of the crediting period (BERS Standard

Section 13.2.1). The annual Safeguard Attestation reconfirms compliance with all safeguard categories and flags any new or changed risks. This ongoing monitoring obligation ensures that safeguard compliance is not a one-time assessment but a continuous requirement verified throughout the project's life.

Monitoring measures URL: *BERS Standard v1.2, Section 13.2.1:* https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6ab857e27bb0574e400851_BERS_Standard_Version_1.1.pdf

CRITERION 7.2: LABOUR RIGHTS AND WORKING CONDITIONS

a) Confirm your organisation requires mitigation activity proponents to ensure that the mitigation activity:

1) provides safe and healthy working conditions for employees.

Yes.

The mandatory Safeguard Attestation Form requires Building Representatives to confirm that the project provides safe and healthy working conditions for all employees involved in the retrofit activity, in compliance with applicable occupational health and safety laws (BERS Standard Section 13.2.1 — Labour Rights and Working Conditions safeguard, item (1)).

Health and safety URL: *BERS Standard v1.2, Section 13.2.1:* https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6ab857e27bb0574e400851_BERS_Standard_Version_1.1.pdf

2) provides fair treatment of all employees, avoiding discrimination and ensuring equal opportunities.

Yes.

The Safeguard Attestation Form requires Building Representatives to confirm that the project provides fair treatment of all employees, avoids discrimination, and ensures equal opportunities in the context of employment (BERS Standard Section 13.2.1 — Labour Rights and Working Conditions safeguard, item (2)).

Fair treatment URL: *BERS Standard v1.2, Section 13.2.1:* https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6ab857e27bb0574e400851_BERS_Standard_Version_1.1.pdf

3) prohibits the use of forced labour, child labour, or trafficked persons, and protects contracted workers employed by third parties.

Yes.

The Safeguard Attestation Form requires Building Representatives to confirm that the project prohibits the use of forced labour, child labour, or trafficked persons, and protects contracted workers employed by third parties engaged in the retrofit activity (BERS Standard Section 13.2.1 — Labour Rights and Working Conditions safeguard, item (3)).

Forced/child/trafficked labour URL: *BERS Standard v1.2, Section 13.2.1:* https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6ab857e27bb0574e400851_BERS_Standard_Version_1.1.pdf

b) Confirm your organisation requires that mitigation activity proponents confirm in validated design documents that the mitigation activity adheres to the above safeguards or that it has put in place the measures referred to in 7.1 b) 1).

Yes.

As established in Criterion 7.1, Ontoly's equivalent of a validated design document is the Safeguard Attestation Form combined with the Project Description Report. The Attestation Form is completed at registration — the design and listing stage — and includes confirmation of all three labour rights safeguard elements above as mandatory declarations. Where material labour rights risks are identified, the Building Representative must describe mitigation measures commensurate with the severity of those risks. The safeguard summary is publicly disclosed in the Project Description Report on the Ontoly Registry for every project that has achieved Validated status (BERS Standard Section 5.3.6(h)).

Safeguard adherence URL: *BERS Standard v1.2, Sections 5.3.6(h) and 13.2.1:* https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6ab857e27bb0574e400851_BERS_Standard_Version_1.1.pdf

CRITERION 7.3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION

a) Your organisation requires mitigation activity proponents to ensure that the mitigation activity minimises:

1) pollutant emissions to air

2) pollutant discharges to water, noise and vibration

3) generation of waste and release of hazardous materials, chemical pesticides and fertilisers

Yes.

The Safeguard Attestation Form requires Building Representatives to confirm that the project minimises: (1) pollutant emissions to air; (2) pollutant discharges to water, noise, and vibration; and (3) generation of waste and release of hazardous materials and chemicals. Note: chemical pesticides and fertilisers are not applicable to building retrofit projects. The attestation covers the relevant elements — waste minimisation and hazardous material management during construction and equipment installation phases (BERS Standard Section 13.2.1).

Pollution and hazardous materials policy URL: *BERS Standard v1.2, Section 13.2.1:* https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6ab857e27bb0574e400851_BERS_Standard_Version_1.1.pdf

b) Confirm your organisation requires that mitigation activity proponents confirm in validated design documents:

1) whether the mitigation activity results in pollutant emissions to air, pollutant discharges to water, noise and vibration, the generation of waste, the release of hazardous materials, chemical pesticides and fertilisers.

2) where the mitigation activity results in any of the impacts listed in 1) above, that it has put in place the measures referred to in 7.1 b) 1).

Yes.

The Safeguard Attestation Form completed at registration requires confirmation of (1) whether pollution and resource efficiency risks exist and (2) where they do, that mitigation measures commensurate with the identified risks have been implemented (BERS Standard Section 13.3.1). As noted in Criterion 7.1, Ontoly's equivalent of a validated design document is the Safeguard Attestation Form combined with the Project Description Report. The safeguard summary is publicly disclosed in the Project Description Report on the Ontoly Registry for every project that has achieved Validated status (BERS Standard Section 5.3.6(h)).

Resource efficiency and pollution prevention URL: *BERS Standard v1.2, Sections 5.3.6(h), 13.2.1, and 13.3.1:* https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6ab857e27bb0574e400851_BERS_Standard_Version_1.1.pdf

CRITERION 7.4: LAND ACQUISITION AND INVOLUNTARY RESETTLEMENT

a) Confirm your organisation requires mitigation activity proponents to ensure that the mitigation activity avoids, or where this is not feasible, minimises forced physical and/or economic displacement.

Yes.

The Safeguard Attestation Form requires Building Representatives to confirm that the project avoids, or where not feasible minimises, forced physical and/or economic displacement (BERS Standard Section 13.2.1 — Land Acquisition and Involuntary Resettlement safeguard). In practice, building retrofit projects are carried out within the physical envelope of existing buildings on private property owned by the Building Owner and do not involve land acquisition, community displacement, or restriction of access to public resources. The risk of involuntary resettlement or economic displacement is structurally negligible for this activity type.

Avoidance of displacement URL: *BERS Standard v1.2, Section 13.2.1:* https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6ab857e27bb0574e400851_BERS_Standard_Version_1.1.pdf

b) Confirm your organisation requires that mitigation activity proponents confirm in validated design documents:

1) whether the mitigation activity results in forced physical and/or economic displacement.

2) where the mitigation activity results in the impacts listed in 1) above, that it has put in place the measures referred to in 7.1 b) 1).

Yes.

The Safeguard Attestation Form completed at registration requires confirmation of (1) whether the project results in any forced physical or economic displacement and (2) where it does, that mitigation measures have been put in place (BERS Standard Section 13.3.1). The safeguard summary is publicly disclosed in the Project Description Report on the Ontoly Registry for every project that has achieved Validated status (BERS Standard Section 5.3.6(h)).

Physical and economic displacement URL: *BERS Standard v1.2, Sections 5.3.6(h), 13.2.1, and 13.3.1:* https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6ab857e27bb0574e400851_BERS_Standard_Version_1.1.pdf

CRITERION 7.5: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES

a) Confirm your organisation requires mitigation activity proponents to ensure that the mitigation activity:

1) avoids, or where this is not feasible, minimises negative impacts on terrestrial and marine biodiversity and ecosystems.

Yes.

The Safeguard Attestation Form requires Building Representatives to confirm compliance with the Sustainable Management of Living Natural Resources safeguard. Building retrofits within existing buildings on private urban or suburban property do not involve land-use change, habitat disturbance, or engagement with natural ecosystems — terrestrial or marine biodiversity risks are structurally absent from this activity type. Attestation is proportionate to this near-zero risk profile (BERS Standard Section 13.2.1).

Biodiversity URL: *BERS Standard v1.2, Section 13.2.1:* https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6ab857e27bb0574e400851_BERS_Standard_Version_1.1.pdf

2) protects the habitats of rare, threatened, and endangered species, including areas needed for habitat connectivity.

Yes.

The Safeguard Attestation Form requires confirmation that the project has no adverse effect on cultural or heritage assets, and the broader safeguard framework covers impacts on living natural resources (BERS Standard Section 13.2.1). For building retrofit projects, threats to species habitats are not a foreseeable risk given the confined, built-environment scope of activities. Where an atypical project circumstance exists, the attestation-based risk identification mechanism would capture it.

Endangered species URL: *BERS Standard v1.2, Section 13.2.1:* https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6ab857e27bb0574e400851_BERS_Standard_Version_1.1.pdf

3) does not convert natural forests, grasslands, wetlands, or high conservation value habitats.

Yes.

BERS projects are by definition retrofits of existing buildings — no land conversion, deforestation, or habitat change is involved in or permitted by the programme. BERS Standard Section 4.1.1 limits eligible activities to retrofit projects in existing large buildings, and Section 2.1.4 of the Existing Building Methodology explicitly requires that the incumbent technology be retired — not that land be converted. Habitat conversion is structurally impossible under the BERS activity type.

Habitat conversion URL: *BERS Standard v1.2, Section 4.1.1:* https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6ab857e27bb0574e400851_BERS_Standard_Version_1.1.pdf

4) minimises soil degradation and soil erosion.

Yes.

Building retrofit projects are confined to the interior and building envelope of existing structures. No soil excavation, grading, or land disturbance is involved in or required by eligible BERS activities. Where any minor construction activity is associated with a specific project, the Safeguard Attestation Form's pollution prevention safeguard covers waste and hazardous material management. Soil degradation and erosion risks are structurally negligible for this activity type.

Soil degradation URL: *BERS Standard v1.2, Section 13.2.1:* https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6ab857e27bb0574e400851_BERS_Standard_Version_1.1.pdf

5) minimises water consumption and stress in the mitigation activity.

Yes.

The Safeguard Attestation Form requires Building Representatives to confirm that the project minimises water consumption and stress through the project activity (BERS Standard Section 13.2.1 — Sustainable Management of Living Natural Resources safeguard). Building energy retrofits frequently include water conservation measures as part of their scope and inherently reduce the overall resource burden on building systems.

Water conservation URL: *BERS Standard v1.2, Section 13.2.1:* https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6ab857e27bb0574e400851_BERS_Standard_Version_1.1.pdf

b) Confirm your organisation requires that mitigation activity proponents confirm in validated design documents:

1) whether the mitigation activity has negative impacts on terrestrial and marine biodiversity and ecosystems, on habitats of rare, threatened, and endangered species, on soil degradation and soil erosion, and on water consumption and water stress.

Yes.

The Safeguard Attestation Form requires Building Representatives to confirm compliance with the Sustainable Management of Living Natural Resources safeguard. Building retrofits within existing buildings on private urban or suburban property do not involve land-use change, habitat disturbance, or engagement with natural ecosystems — terrestrial or marine biodiversity risks are structurally absent from this activity type. Attestation is proportionate to this near-zero risk profile (BERS Standard Section 13.2.1).

Biodiversity URL: *BERS Standard v1.2, Section 13.2.1:* https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6ab857e27bb0574e400851_BERS_Standard_Version_1.1.pdf

2) where the mitigation activity results in any of the impacts listed in 1) above, that it has put in place the measures referred to in 7.1 b) 1).

Yes.

The Safeguard Attestation Form requires confirmation that the project has no adverse effect on cultural or heritage assets, and the broader safeguard framework covers impacts on living natural resources (BERS Standard Section 13.2.1). For building retrofit projects, threats to species habitats are not a foreseeable risk given the confined, built-environment scope of activities. Where an atypical project circumstance exists, the attestation-based risk identification mechanism would capture it.

Endangered species URL: *BERS Standard v1.2, Section 13.2.1:* https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6ab857e27bb0574e400851_BERS_Standard_Version_1.1.pdf

CRITERION 7.6: INDIGENOUS PEOPLES, LOCAL COMMUNITIES, AND CULTURAL HERITAGE

a) Where the mitigation activity directly or indirectly impacts IPs & LCs, including livelihoods, ancestral knowledge and cultural heritage, confirm your organisation requires mitigation activity proponents to ensure that the mitigation activity:

1) recognises, respects and promotes the protection of the rights of IPs & LCs in line with applicable international human rights law, and the United Nations Declaration on the Rights of Indigenous Peoples and ILO Convention 169 on Indigenous and Tribal Peoples.

Yes.

Where the project directly or indirectly impacts IPs & LCs, the Safeguard Attestation Form requires confirmation that the project recognises, respects, and promotes the protection of the rights of IPs & LCs in line with applicable international human rights law, the UN Declaration on the Rights of Indigenous Peoples, and ILO Convention 169 on Indigenous and Tribal Peoples (BERS Standard Section 13.2.1 — IPs & LCs safeguard, item (1)).

IPs & LCs rights URL: *BERS Standard v1.2, Section 13.2.1:* https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6ab857e27bb0574e400851_BERS_Standard_Version_1.1.pdf

2) identifies the rights-holders possibly affected by the mitigation activity (including customary rights of local rights holders).

Yes.

Where the project directly or indirectly impacts IPs & LCs, the Safeguard Attestation Form requires confirmation that the project has identified rights-holders possibly affected by the project, including customary rights of local rights holders (BERS Standard Section 13.2.1 — IPs & LCs safeguard, item (2)).

Rights-holder identification URL: *BERS Standard v1.2, Section 13.2.1:* https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6ab857e27bb0574e400851_BERS_Standard_Version_1.1.pdf

3) when relevant to circumstances, has applied the FPIC process.

[Y / N/A]

Where relevant to circumstances, the Safeguard Attestation Form requires confirmation that the FPIC process has been applied (BERS Standard Section 13.2.1 — IPs & LCs safeguard, item (3)). For the vast majority of BERS projects — energy retrofits within existing buildings on private property in urban and suburban settings — FPIC is not applicable because the projects do not affect Indigenous territories, ancestral knowledge, or community resources. Where FPIC is relevant, it is required.

FPIC URL: *BERS Standard v1.2, Section 13.2.1:* https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6ab857e27bb0574e400851_BERS_Standard_Version_1.1.pdf

4) does not force eviction or any physical or economic displacement of IPs & LCs, including through access restrictions to lands, territories, or resources, unless agreed upon with IPs & LCs during the FPIC process.

[Y/]

The Safeguard Attestation Form requires confirmation that the project does not force eviction or any physical or economic displacement of IPs & LCs, including through access restrictions to lands, territories, or resources, unless agreed upon with IPs & LCs during the FPIC process (BERS Standard Section 13.2.1 — IPs & LCs safeguard, item (4)).

Anti-eviction URL: *BERS Standard v1.2, Section 13.2.1:* https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6ab857e27bb0574e400851_BERS_Standard_Version_1.1.pdf

5) preserves and protects cultural heritage consistent with IPs & LCs protocols/rules/plans on the management of cultural heritage or UNESCO Cultural Heritage conventions.

Yes.

The Safeguard Attestation Form requires confirmation that the project preserves and protects cultural heritage consistent with IPs & LCs protocols, rules, and plans on the management of cultural heritage, or UNESCO Cultural Heritage conventions (BERS Standard Section 13.2.1 — IPs & LCs safeguard, item (5); Cultural Heritage Protection safeguard).

Cultural heritage URL: *BERS Standard v1.2, Section 13.2.1:* https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6ab857e27bb0574e400851_BERS_Standard_Version_1.1.pdf

b) Where the mitigation activity directly or indirectly impacts IPs & LCs, including livelihoods, ancestral knowledge and cultural heritage, confirm your organisation requires that mitigation activity proponents confirm in validated design documents that the mitigation activity adheres to the above safeguards or that it has put in place the measures referred to in 7.1 b) 1).

Yes.

The Safeguard Attestation Form completed at registration includes confirmation of all IPs & LCs safeguard elements where applicable. The safeguard summary is disclosed in the Project Description Report on the Ontoly Registry for every project that has achieved Validated status (BERS Standard Section 5.3.6(h)).

IPs & LCs design documents URL: *BERS Standard v1.2, Sections 5.3.6(h) and 13.2.1: https://cdn.prod.website-*https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6ab857e27bb0574e400851_BERS_Standard_Version_1.1.pdf

CRITERION 7.7: RESPECT FOR HUMAN RIGHTS, STAKEHOLDER ENGAGEMENT

a) Confirm your organisation requires mitigation activity proponents to ensure that the mitigation activity:
1) avoids discrimination and respects human rights.

Yes.

The Safeguard Attestation Form requires Building Representatives to confirm that the project avoids discrimination and respects human rights (BERS Standard Section 13.2.1 — Fair Treatment and Non-Discrimination safeguard, item (1)).

Human rights URL: *BERS Standard v1.2, Section 13.2.1:* https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6ab857e27bb0574e400851_BERS_Standard_Version_1.1.pdf

2) Abides by the International Bill of Human Rights and universal instruments ratified by the host country. Yes.

The Safeguard Attestation Form requires Building Representatives to confirm that the project abides by the International Bill of Human Rights and universal instruments ratified by the host country (BERS Standard Section 13.2.1 — Fair Treatment and Non-Discrimination safeguard, item (2)).

International Bill of Human Rights URL: *BERS Standard v1.2, Section 13.2.1:* https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6ab857e27bb0574e400851_BERS_Standard_Version_1.1.pdf

3) takes into account and responds to local stakeholders' views.

Yes.

The Safeguard Attestation Form requires Building Representatives to confirm that the project takes into account and responds to local stakeholders' views, and that where the project is reasonably expected to affect tenants, workers, or community stakeholders, their concerns have been appropriately considered (BERS Standard Section 13.2.1 — Fair Treatment and Non-Discrimination safeguard, item (3); Stakeholder Consideration safeguard).

Stakeholder engagement URL: *BERS Standard v1.2, Section 13.2.1:*https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6ab857e27bb0574e400851_BERS_Standard_Version_1.1.pdf

b) Confirm your organisation requires that mitigation activity proponents confirm in validated design documents that the mitigation activity adheres to the above safeguards, or that it has put in place the measures referred to in 7.1 b) 1) above.

Yes.

The Safeguard Attestation Form completed at registration includes confirmation of all human rights and stakeholder engagement safeguard elements. The safeguard summary is disclosed in the Project Description Report on the Ontoly Registry for every project that has achieved Validated status (BERS Standard Section 5.3.6(h)).

Design document measures URL: *BERS Standard v1.2, Sections 5.3.6(h) and 13.2.1:* https://cdn.prod.website-

files.com/6987d504fe9b9a604857ae67/6a6ab857e27bb0574e400851_BERS_Standard_Version_1.1.pdf

CRITERION 7.8: GENDER EQUALITY

a) Confirm your organisation requires mitigation activity proponents to ensure that the mitigation activity:

1) provides for equal opportunities in the context of gender.

2) protects against and appropriately responds to violence against women and girls.

3) provides equal pay for equal work.

Yes.

The Safeguard Attestation Form requires Building Representatives to confirm that the project: (1) provides for equal opportunities in the context of gender; (2) protects against and appropriately responds to violence against women and girls; and (3) provides equal pay for equal work (BERS Standard Section 13.2.1 — Gender Equality safeguard).

Gender equality URL: *BERS Standard v1.2, Section 13.2.1:* https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6ab857e27bb0574e400851_BERS_Standard_Version_1.1.pdf

b) Confirm your organisation requires that mitigation activity proponents confirm in validated design documents that the mitigation activity adheres to the above safeguards or that it has put in place the measures referred to in 7.1 b) 1).

Yes.

The Safeguard Attestation Form completed at registration includes confirmation of all three gender equality safeguard elements. The safeguard summary is disclosed in the Project Description Report on the Ontoly Registry for every project that has achieved Validated status (BERS Standard Section 5.3.6(h)).

Gender equality design documents URL: *BERS Standard v1.2, Sections 5.3.6(h) and 13.2.1:* https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6ab857e27bb0574e400851_BERS_Standard_Version_1.1.pdf

CRITERION 7.9: ROBUST BENEFIT-SHARING

a) If your organisation requires arrangements for benefit-sharing with IPs & LCs, confirm that you require that mitigation activity proponents:

1) include in validated design documents information on how benefit-sharing arrangements that are appropriate to the context and consistent with applicable national rules and regulations will be designed and implemented through a benefit-sharing plan.

[N/A]

The BERS Program does not require benefit-sharing arrangements with Indigenous Peoples and Local Communities. Under BERS Standard Version 1.0, benefit sharing is voluntary and a matter of private negotiation between the Building Owner and other relevant parties (BERS Standard Section 13.4.1). Accordingly, there is no requirement for proponents to include benefit-sharing plan information in design documents. This approach is appropriate and proportionate to the BERS activity type: building retrofits on private property do not extract natural resources from community lands or generate benefits from the use of communal or Indigenous resources, which are the primary contexts in which mandatory benefit-sharing arrangements are warranted.

Benefit-sharing URL: *BERS Standard v1.2, Section 13.4.1:* https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6ab857e27bb0574e400851_BERS_Standard_Version_1.1.pdf

2) confirm in validated design documents that the draft and final benefit-sharing plan have been shared with the affected IPs & LCs in a form, manner, and language understandable to them.

[N/A]

As benefit-sharing arrangements are not required under the BERS Program (BERS Standard Section 13.4.1), there is no requirement to confirm that a benefit-sharing plan has been shared with IPs & LCs in design documents.

Benefit-sharing dissemination URL: *BERS Standard v1.2, Section 13.4.1:* https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6ab857e27bb0574e400851_BERS_Standard_Version_1.1.pdf

3) make benefit-sharing outcomes that result from the benefit-sharing plan publicly available, subject to applicable legal restrictions.

[N/A]

As benefit-sharing arrangements are not required under the BERS Program (BERS Standard Section 13.4.1), there are no mandatory benefit-sharing outcomes to disclose. Where Building Representatives voluntarily disclose how monetary project benefits are shared with building tenants, this information may be included in Registry disclosures, but it is not a programme requirement.

Benefit-sharing results URL: *BERS Standard v1.2, Section 13.4.1:* https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6ab857e27bb0574e400851_BERS_Standard_Version_1.1.pdf

CRITERION 7.10: CANCUN SAFEGUARDS

a) Confirm your organisation requires for all REDD+ mitigation activities that the mitigation activity is consistent with all relevant Cancun Safeguards as set out in paragraph 71 of decision 1/CP.16 of the United Nations Framework Convention on Climate Change.

[N/A]

The BERS Program does not support any REDD+ mitigation activities. The programme is limited exclusively to operational GHG emission reductions from energy efficiency and fuel-switching retrofit projects in existing buildings in Canada and the United States (BERS Standard Section 4.1.1). REDD+ activities — which involve reducing emissions from deforestation and forest degradation — are entirely outside the scope and eligibility criteria of the BERS Program. The Cancun Safeguards established under paragraph 71 of decision 1/CP.16 are therefore not applicable.

Cancun Safeguards URL: *BERS Standard v1.2, Section 4.1.1:* https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6ab857e27bb0574e400851_BERS_Standard_Version_1.1.pdf

CRITERION 7.11: ENSURING POSITIVE SDG IMPACTS

a) Confirm your organisation requires that mitigation activity proponents, in validated design documents:

1) provide information on how the mitigation activity is consistent with the SDG objectives of the host country, where the SDG objectives are relevant, and such is feasible.

Yes.

SDG reporting is mandatory for every project. BERS Standard v1.2, Section 13.4.1, requires every project to report its contribution to the UN Sustainable Development Goals: SDG 13 (Climate Action) applies to all projects by construction, with consistency with host-country climate objectives established at programme level; for all other SDGs, the Building Representative must either report the additional SDGs to which the project contributes or affirmatively state that no other SDGs apply, and must describe how each reported SDG is consistent with the SDG objectives and national sustainable development priorities of the host country. At methodology level, Section 13.5.1 additionally requires every new or revised BERS Methodology to include an assessment of the project's compatibility with the host country's net-zero objectives; the Existing Building Methodology satisfies this by requiring assessment of consistency with long-term decarbonisation pathways for the building sector in the applicable jurisdiction. These disclosures are included in the Project Description Report published on the Ontoly Registry for every project that has achieved Validated status.

SDG objectives URL: BERS Standard v1.2, Sections 13.4.1 and 13.5: https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6ab857e27bb0574e400851_BERS_Standard_Version_1.1.pdf

2) demonstrate, if applicable, through qualitative assessment how the mitigation activity delivers positive SDG impacts for certain SDGs (excluding SDG 13), if any.

Yes.

Under BERS Standard v1.2, Section 13.4.1, qualitative SDG reporting is a mandatory requirement for every project: the Building Representative must report contributions, or affirmatively state that no SDGs beyond SDG 13 apply, with host-country consistency described for each reported SDG. Qualitative SDG reporting is not independently verified. BERS Standard Section 15.4.3.4 identifies inherent sustainable development benefits of building energy retrofits — reduced energy consumption (SDG 7), improved occupant health and comfort (SDG 3), and climate action (SDG 13) — and a project may separately elect the CCP Attribute 3 pathway (Quantified Positive SDG Impacts), under which SDG impacts are quantified ex-post using a method, tool, or standard recognized by a CCP-eligible carbon-crediting program and verified by an accredited Verification Body (Section 15.4.5).

SDG impacts URL: BERS Standard v1.2, Sections 13.4.1 and 15.4.3.4: https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6ab857e27bb0574e400851_BERS_Standard_Version_1.1.pdf

3) provide information on any standardised tools and methods that were used to assess the SDG impacts.

Yes.

Where Building Representatives seek the optional CCP Attribute 3 (Quantified Positive SDG Impacts), the BERS Standard requires that SDG impacts be monitored and quantified ex-post using a method, tool, or standard recognized by a CCP-eligible carbon-crediting program, and that the quantification be verified by an accredited Verification Body (BERS Standard Section 15.4.5). Information on the method or tool used must be included in the relevant project documentation. For qualitative SDG disclosures under Section 13.4.1, no specific tool is prescribed.

SDG methods URL: *BERS Standard v1.2, Sections 13.4.1 and 15.4.5:* https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6ab857e27bb0574e400851_BERS_Standard_Version_1.1.pdf

D – CORSIA REQUIREMENTS RELATED TO ICVCM CATEGORY ASSESSMENT

8. ADDITIONALITY DEMONSTRATION – CORSIA

1) Confirm that your Program’s carbon credits represent greenhouse gas emissions reductions or carbon sequestration or removals that exceed any greenhouse gas reduction or removals required by law, regulation, or legally binding mandate.

Yes.

The BERS Program's regulatory surplus requirement is a mandatory first gate that every project must pass before any other additionality assessment is conducted. BERS Standard Section 10.1.1 states that a project activity shall be deemed additional only if, based on Ontoly's Regulatory Surplus Assessment, it is very unlikely that the specific GHG emission reductions the project generates are required by applicable local, provincial/state, or federal laws, regulations, or legally binding mandates in effect or enacted as of the assessment date.

Ontoly applies its Jurisdictional Regulatory Model — a continuously updated database of mandatory building codes, minimum efficiency standards, building performance standards, and climate regulation that directly impacts buildings across all eligible jurisdictions — to conduct a Regulatory Surplus Assessment for every project (**BERS Standard Section 10.1.3**). Where a consumer carbon tax applies to the utility inputs for a building, the tax is reflected in the price assumptions used for the Financial Additionality Assessment but does not independently negate regulatory surplus. This database is verified by the contracted third-party Verification Body. Where Ontoly's assessment identifies proposed, publicly consulted, or enacted-but-not-yet-effective regulations that may require the project's measures during the crediting period, Ontoly discloses this regulatory risk in the Project Description Report published on the Registry.

This fixed-period approach reflects the nature of building retrofit decisions as one-time capital investments made at a single point in time. Where material regulatory changes affecting a project's regulatory surplus status are enacted after the assessment date, these changes do not impact projected or issued BERUs that have already been assessed at the point of Preliminary Ex-Ante BERU Report assessment. This ensures buyer and stakeholder certainty for contractual outcomes. (**BERS Standard Section 10.1.4**).

Where BERUs are expressly recognized as an eligible and approved compliance mechanism under an applicable regulatory program or building performance standard, such use does not negate regulatory surplus, provided the project otherwise meets all BERS requirements. The relevant municipality or jurisdiction may set parameters and limits governing how BERUs may be used in conjunction with its regulatory framework, including percentage-based compliance limitations, geographic restrictions on buyer eligibility, and other conditions designed to preserve the effectiveness of the applicable regulation (**BERS Standard Section 10.1.2**).

Rationale for Ontoly's likelihood-based approach to regulatory surplus:
Ontoly's regulatory surplus assessment is ultimately a pass/fail gate — projects whose emission reductions are required by law are ineligible for BERU issuance. However, rather than treating regulatory surplus as a deterministic binary with absolute certainty, Ontoly attaches a likelihood qualification to its finding and pairs it with ongoing regulatory risk disclosure. This reflects the reality that the building regulatory landscape in Canada and North America is demonstrably dynamic, frequently reversed, and subject to political reprioritization. A bare pass/fail assessment against current law — without probability context or ongoing disclosure — would overstate the certainty of a regulatory determination that is inherently contingent on political and legislative conditions. Recent examples illustrate this volatility:

- **Ontario repealed Toronto's Green Roof Bylaw (2025):** In November 2025, Ontario's provincial government repealed Toronto's mandatory green roof bylaw — the first of its kind in North America — via order-in-council under the *Fighting Delays, Building Faster Act, 2025*. A regulation that had been legally binding for over 15 years was eliminated overnight to accelerate housing construction. Ontario further prohibited municipalities from imposing environmental building requirements that exceed the provincial building code.
- **BC Step Code in-stream exemptions (2024–2025):** British Columbia delayed key provisions of the 2024 BC Building Code — including earthquake-resilience and adaptable dwelling requirements — and granted in-stream exemptions for projects already underway, extending transition windows to March 2027. Municipalities that had adopted higher Step Code tiers faced pressure to defer enforcement in the interest of housing supply.
- **Federal housing-climate tension:** The federal government under Prime Minister Carney has explicitly prioritized building homes faster and at lower cost, committing to simplify the

National Building Code in consultation with provinces — signalling that climate-related building requirements may be subordinated to affordability and supply targets.

These examples demonstrate that building-sector climate regulation is routinely enacted, delayed, weakened, or repealed based on shifting political and economic priorities. A project that is clearly surplus to regulation at the time of investment may find itself subject to a new mandate years later — or conversely, a project that appears borderline may see the relevant regulation withdrawn entirely.

Ontoly's approach addresses this uncertainty as follows: where a building retrofit is assessed as very unlikely to be required by law, the project clears the regulatory surplus gate. Where regulation exists but takes the form of financial penalties rather than outright mandates — such as building performance standard fines or carbon taxes — Ontoly incorporates those costs directly into the Financial Additionality Assessment as negative cash flows in the project's NPV calculation. If the project's NPV remains below zero (i.e., carbon finance is still needed to make the investment viable even after accounting for regulatory fines and tax obligations), the project satisfies both regulatory surplus and financial additionality. This ensures that projects subject to soft regulatory signals — penalties, taxes, or partial mandates — are not automatically excluded, but are only creditable where carbon finance remains demonstrably necessary to drive the investment decision.

This approach is consistent with the ICVCM's intent that regulatory surplus prevent the crediting of emission reductions that would occur anyway due to legal requirements, while recognizing that the building sector operates in a regulatory environment where "required by law" is rarely a stable or binary condition.

Regulatory surplus URL: BERS Standard v1.2, Section 10.1: https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6ab857e27bb0574e400851_BERS_Standard_Version_1.1.pdf

2) Confirm that your Program's carbon credits exceed any greenhouse gas reductions or removals that would otherwise occur in a conservative, business-as-usual scenario.

Yes.

The BERS Program establishes the business-as-usual (BAU) scenario through a conservative, empirically grounded baseline derived from 12–36 months of actual, historical, metered utility data for the specific building, drawn from the period immediately preceding the retrofit (BERS Standard Section 3 Definitions — Baseline Scenario; Existing Building Methodology Section 5.1). This is the most direct and defensible BAU baseline possible — it is the building's own measured pre-retrofit performance, not a modelled or benchmarked estimate.

The BAU baseline is conservative by design: where adjustments are required due to occupancy changes or weather variability, standardised normalization procedures aligned with ASHRAE Guideline 14 and IPMVP Option C are applied with conservative assumptions (Existing Building Methodology Section 7.1). The electricity grid emission factor is fixed at the baseline value and does not update annually, preventing any credit for grid decarbonisation (BERS Standard Section 12.1.4). Only reductions in energy consumption attributable to the specific retrofit measures — measured through actual post-retrofit utility bills — are credited.

The Financial Additionality Test (NPV < 0 without carbon revenue) provides a further confirmation that the retrofit would not have occurred under BAU conditions, demonstrating that the emission reductions would not have happened in the absence of carbon finance (BERS Standard Section 10.2).

BAU scenario URL: *BERS Standard v1.2, Sections 3 and 10.2:* https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6ab857e27bb0574e400851_BERS_Standard_Version_1.1.pdf;

Existing Building Methodology v1.1, Section 5.1: https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6aa6bf6ef197dfbd03146e_Existing_Building_Methodology_v1.1.pdf

3) Confirm that additionality and baseline-setting is assessed by an accredited and independent validation/verification entity.

Yes.

Both additionality gates and the baseline are subject to independent third-party assessment. The Jurisdictional Regulatory Model and Financial Additionality Assessment calculations are reviewed by the ISO 14065-accredited Verification Body as part of the mandatory Program-Level Model and Parameter Verification conducted at least every two years (Verification Standard Section 12.2.1(b) and (c)). The Verification Body independently confirms the correct application of the Jurisdictional Regulatory Model, the accuracy of financial additionality inputs, and the appropriateness of baseline determinations.

Additionally, the sensitivity analysis results for every project that passes the NPV test are disclosed on the Ontoly Registry, providing public transparency over the robustness of each additionality determination (BERS Standard Section 10.3.9).

Additionality assessment URL: *BERS Validation and Verification Standard v1.1, Section 12.2.1:* https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6a9d8bc4ccee04bf71c84d_BERS_Verification_Standard_v1.pdf;

BERS Standard v1.2, Sections 10.1.3 and 10.3.5–10.3.9: https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6ab857e27bb0574e400851_BERS_Standard_Version_1.1.pdf

4) Confirm that your program reviews additionality and baseline-setting.

Yes.

Yes. The BERS Program reviews additionality and baseline-setting through several ongoing mechanisms. Additionality parameters — including the discount rate, energy price escalation rates, and sensitivity analysis ranges — are reviewed and verified annually by the contracted Verification Body (BERS Standard Section 10.3.5). The Verification Body also reviews the correct application of the Jurisdictional Regulatory Model and Financial Additionality Assessment calculations as part of the Program-Level Model and Parameter Verification (Verification Standard Section 12.2.1). The Methodology Development and Review Process requires periodic review of all approved methodologies at a minimum of every five years, including a reassessment of additionality procedures and baseline-setting approaches.

Additionality and baseline review URL: *BERS Standard v1.2, Section 10.3.5:* https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6ab857e27bb0574e400851_BERS_Standard_Version_1.1.pdf;

Methodology Development and Review Process v1.0, Section 8: https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6aa769c8f4eb46b52fd0aa_Ontoly_Methodology_Development_and_Review_Process_v1.0.pdf

5) Which of the following methods below are used to assess that credited mitigation activities are additional:

- Investment, cost, or other financial analysis
- Legal or regulatory additionality analysis

Yes.

The BERS Program uses two of the listed methods:

Investment, cost, or other financial analysis — YES. The NPV Financial Additionality Test is a mandatory binary test applied to every project, determining whether the project is financially viable without carbon credit revenue. A project passes (is deemed financially additional) where the NPV of the project without carbon revenue is less than zero (NPV < 0) (BERS Standard Section 10.2(A), 10.3.1–10.3.2). This test uses standardised, publicly disclosed parameters (discount rate, energy price escalation rates, equipment useful lives) published in the Public Parameter List.

Legal or regulatory additionality analysis — YES. For Regulatory Surplus, Ontoly screens federal, provincial/state, municipal, and equipment-level regulations to determine whether it is *very unlikely* that the project's specific emission reductions are required by laws in effect or enacted as of the assessment date — a binary pass/fail test anchored to that date. Any forward-looking regulations (proposed, consulted, or enacted-not-yet-effective) or material interpretive ambiguities identified during screening are flagged and disclosed on the Registry, with ongoing monitoring obligations that update the disclosure if material regulatory changes occur post-assessment — without retroactively affecting already-issued BERUs. (BERS Standard Section 10.1).

Barrier analysis — NO. Not used as a formal test under Version 1.0. Common practice / market penetration analysis — NO. Not included as a secondary test under Version 1.0, as standardised datasets by technology type, building type, and geography are not yet comparable across jurisdictions. Future versions of the BERS may introduce this assessment as data availability improves (BERS Standard Section 10.6.2). Performance standards / benchmarks — NO. Not used under Version 1.0.

Additionality methods URL: *BERS Standard v1.2, Sections 10.1–10.4:* https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6ab857e27bb0574e400851_BERS_Standard_Version_1.1.pdf;

Public Parameter List v1.1, Sections 4–5: https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a04baa18ad44dc2dec2b4b4_Ontoly_Public_Parameter_List_v1.1.pdf

6) If your program provides for the use of method(s) not listed above, please describe the alternative procedures and how you ensure that mitigation activities are additional:

[N/A]

The BERS Program does not employ additionality methods beyond those identified in Q5. The two-gate framework — Regulatory Surplus Assessment and NPV Financial Additionality Test — represents the complete additionality determination process under Version 1.0. No other alternative procedures are in use. The investment analysis is complemented by a mandatory sensitivity analysis testing three parameters (CAPEX −15%, energy savings +15%, discount rate −2pp), which confirms that the additionality determination remains robust even under varied assumptions.
No alternative methods URL: *BERS Standard v1.2, Section 10:* https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6ab857e27bb0574e400851_BERS_Standard_Version_1.1.pdf

7) Confirm whether your program designates certain mitigation activities as automatically additional (e.g., through a "positive list" of eligible project types).

[N]

The BERS Program does not designate any activity type or project category as automatically additional. Every project registered under the BERS Program must independently pass both additionality gates — the Regulatory Surplus Likelihood Assessment and the NPV Financial Additionality Test — regardless of technology type, building type, or location (BERS Standard Section 10.6.1). There is no positive list or categorical exemption from the additionality determination process under Version 1.0. This design ensures that every BERU is underpinned by a project-specific additionality determination.

No automatic additionality URL: *BERS Standard v1.2, Section 10.6.1:* https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6ab857e27bb0574e400851_BERS_Standard_Version_1.1.pdf

8) If your program designates certain mitigation activities as automatically additional, do you provide clear evidence on how the activity was determined to be additional?

[N/A]

As the BERS Program does not designate any activities as automatically additional (Q7), this question is not applicable.

9) Confirm how the procedures described under the above criteria related to additionality provide a reasonable assurance that the mitigation activities would not have occurred in the absence of the carbon crediting program:

Yes.

The BERS Program's two-gate additionality framework provides strong, quantitative assurance that credited emission reductions would not have occurred without carbon finance.

The Regulatory Surplus Assessment provides an assessment of the degree to which emission reductions beyond existing legal obligations — projects where existing regulations would likely achieve the same reductions independently are excluded at the first gate. The Regulatory Surplus Assessment screens applicable regulations to confirm it is very unlikely the project's reductions are required by law as of the assessment date — a binary pass/fail test. Identified regulatory risks are flagged and disclosed on the Registry. (BERS Standard Section 10.1).

The NPV Financial Additionality Test provides direct, project-specific financial evidence that the retrofit would not have been commercially viable without carbon revenue. A project passes only where its NPV without carbon credits is demonstrably negative (NPV < 0) — meaning the investment generates a net financial loss in the absence of BERU revenue. This is not a proxy or assumption-based test; it uses actual project-specific cost and savings data submitted by the Building Representative under attestation (BERS Standard Section 10.2).

The mandatory sensitivity analysis — testing CAPEX −15%, energy savings +15%, and discount rate −2pp — further confirms that the additionality determination remains robust even if the underlying assumptions are varied in the direction most favourable to project economics. A project must pass at least 2 of 3 sensitivity scenarios to retain a robust additionality determination (BERS Standard Section 10.3.8; Public Parameter List Section 5.4). Results are publicly disclosed on the Ontoly Registry (Section 10.3.9).

The Investment Analysis Rating (1–5 scale based on payback period) provides a transparent public signal of the degree of financial additionality, enabling buyers and market participants to assess the strength of the additionality case for each individual project (BERS Standard Section 10.4).
All additionality parameters are independently verified annually by the contracted Verification Body, and financial inputs are subject to third-party audit (BERS Standard Sections 10.3.5, 10.5.4).

Additionality assurance URL: *BERS Standard v1.2, Sections 10.1–10.4:* https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6ab857e27bb0574e400851_BERS_Standard_Version_1.1.pdf;

Public Parameter List v1.1, Section 5: https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a04baa18ad44dc2dec2b4b4_Ontoly_Public_Parameter_List_v1.1.pdf

9. PERMANENCE – CORSIA

Preliminary note applicable to Q1–9: The BERS Program certifies exclusively GHG emission reductions from building retrofit activities. Carbon removals are explicitly excluded from Version 1.0 (BERS Standard Section 11.1.1). Because the BERS Program does not certify removals, sequestration, or avoidance credits in sectors with reversal risk — such as forestry, land use, or soil carbon — the permanence framework established under the CORSIA requirements was designed primarily for activity types that are not present in the BERS Program.

1) List all emissions sectors (if possible, activity types) supported by your program that present a potential risk of reversal of emissions reductions, avoidance, or carbon sequestration:

[N/A]

The BERS Program supports a single activity type: energy efficiency and fuel-switching retrofits in existing buildings (Sectoral Scope 03). Under Version 1.0, only GHG emission reductions are certified — carbon removals and sequestration are entirely excluded (BERS Standard Section 11.1.1). The risk of non-permanence does not apply to emission reductions: a reduction in energy consumption that has already occurred and been verified is a historical fact, not a stock of stored carbon that can be released. No activity types with reversal risk in the carbon sequestration sense are supported.

Permanence URL: *BERS Standard v1.2, Section 11.1.1: https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6ab857e27bb0574e400851_BERS_Standard_Version_1.1.pdf*

2) Confirm what the minimum scale of reversal (i.e. threshold of materiality) is for which your program provisions or measures require a response. (Quantify if possible)

[N/A]

As no activity types with reversal risk are supported under the BERS Program (Q1), a materiality threshold for reversals is not applicable. However, in relation to the physical reversal of installed retrofit measures — a distinct concept from carbon sequestration reversal — the BERS Program's response threshold is effectively zero: reversals are prohibited under the BERS Standard (Section 11.1.2), and any reversal would be automatically detected through the annual metered utility data monitoring framework (Section 11.1.3).

Reversal provisions URL: *BERS Standard v1.2, Sections 11.1.2–11.1.3:* https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6ab857e27bb0574e400851_BERS_Standard_Version_1.1.pdf

3) For those sectors/activity types identified in CORSIA requirement 9.1 in this section, confirm that procedures and measures are in place to require and support these activities to undertake a risk assessment that accounts for, inter alia, any potential causes, relative scale, and relative likelihood of reversals.

[N/A]

As no activity types with reversal risk were identified in Q1, this requirement is not applicable to the BERS Program.

4) For those sectors/activity types identified in CORSIA requirement 9.1 in this section, confirm that procedures and measures are in place to require and support these activities to monitor identified risks of reversals.

[N/A]

As no activity types with reversal risk were identified in Q1, this requirement is not applicable. In relation to the physical reversal of retrofit measures, annual metered utility data monitoring inherently detects any reversal: if installed energy-efficiency equipment is removed or replaced with higher-emitting alternatives, this change would be immediately reflected in the building's utility consumption data, reducing quantified emission reductions for the affected period (BERS Standard Section 11.1.3).

Monitoring URL: *BERS Standard v1.2, Section 11.1.3:* https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6ab857e27bb0574e400851_BERS_Standard_Version_1.1.pdf

5) For those sectors/activity types identified in CORSIA requirement 9.1 in this section, confirm that procedures and measures are in place to require and support these activities to mitigate identified risks of reversals?

[N/A]

As no activity types with reversal risk were identified in Q1, this requirement is not applicable. Physical reversals of retrofit measures are prohibited under the BERS Standard (Section 11.1.2) and must be attested against annually by Building Representatives (Section 7.4.1 — Permanence of Measures attestation). This prohibition, combined with the annual monitoring framework, constitutes the programme's mitigation mechanism for physical reversal risk.

Reversal mitigation URL: *BERS Standard v1.2, Sections 7.4.1 and 11.1.2: https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6ab857e27bb0574e400851_BERS_Standard_Version_1.1.pdf*

6) For those sectors/activity types identified in CORSIA requirement 9.1 in this section, confirm that procedures and measures are in place to require and support these activities to ensure full compensation for material reversals of mitigation issued as emissions units and used toward offsetting obligations under the CORSIA?

[N/A]

As the BERS Program does not certify removals or sequestration, no compensation mechanism for carbon stock reversals is required. In the event that BERUs are subsequently determined to have been issued on the basis of materially inaccurate or fraudulent data — including concealed physical reversals of retrofit measures — Ontoly reserves the right to cancel those BERUs regardless of whether they have been sold, transferred, or reserved, and all legal and financial consequences rest solely with the Building Representative (BERS Standard Section 16.3.1; Corrective Actions Policy Section 12.1).

Erroneous issuance URL: *BERS Standard v1.2, Section 16.3.1:* https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6ab857e27bb0574e400851_BERS_Standard_Version_1.1.pdf

7) Confirm that provisions are in place that confer liability on the activity proponent to monitor, mitigate, and respond to reversals in a manner mandated in the program procedures?

Yes.

Although the BERS Program does not certify removals, Building Representatives bear legal obligations in relation to the physical permanence of retrofit measures throughout the crediting period. The mandatory Permanence of Measures attestation, submitted with each Annual Monitoring Report, requires Building Representatives to confirm that all installed GHG-reducing equipment remains installed and operational and has not been reversed or replaced with higher-emitting alternatives (BERS Standard Section 7.4.1). Failure to comply with this attestation constitutes a breach of BERS Program requirements, potentially resulting in corrective action — including denial of BERU issuance and cancellation of previously issued BERUs (Section 16, 17.1.1).

Proponent liability URL: *BERS Standard v1.2, Sections 7.4.1 and 17.1.1:*https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6ab857e27bb0574e400851_BERS_Standard_Version_1.1.pdf

8) Confirm that provisions are in place that require activity proponents, upon being made aware of a material reversal event, to notify the program within a specified number of days.

Yes.

Building Representatives are required to notify Ontoly of any material change in building circumstances — including change of ownership or operational change — within ninety (90) days (BERS Standard Section 7.6.1). The mandatory annual Permanence of Measures attestation (Section 7.4.1) and the leakage prevention attestation (Section 7.4.1) further require Building Representatives to disclose any reversal of installed measures at the time of each Annual Monitoring Report submission, with the reporting deadline of March 31 following each monitoring year (Section 5.5.1).

Reversal notification URL: *BERS Standard v1.2, Sections 7.4.1 and 7.6.1:* https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6ab857e27bb0574e400851_BERS_Standard_Version_1.1.pdf

9) Confirm that provisions are in place that confer responsibility to the program to, upon such notification, ensure and confirm that such material reversals are fully compensated in a manner mandated in the program procedures.

Yes.

Upon notification or detection of a material reversal, Ontoly is responsible for initiating the appropriate corrective action response under the Corrective Actions Policy. For a material reversal of a physical retrofit measure — which would constitute a Major or Critical non-conformance — Ontoly issues a Corrective Action Notice, holds BERU issuance in abeyance, and may cancel previously issued BERUs for the affected period (Corrective Actions Policy Sections 6.2–6.3; BERS Standard Section 16.3.1). Where the reversal results in erroneous issuance, Ontoly cancels the affected BERUs and adjusts the programme's BERU registry accordingly.

Programme responsibility URL: *BERS Standard v1.2, Section 16.3.1:* https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6ab857e27bb0574e400851_BERS_Standard_Version_1.1.pdf*f;*
Corrective Actions Policy, Sections 6.2–6.3 and 12.1: https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/69b128024012a92a93eaed00_Ontoly_Corrective_Actions_Policy.pdf

12. SUSTAINABLE DEVELOPMENT BENEFITS AND SAFEGUARDS – CORSIA

1) Confirm that your program has procedures in place to ensure that mitigation activities do not violate local, state/provincial, national or international regulations or obligations.

Yes.

The mandatory Safeguard Attestation Form requires Building Representatives to declare at registration — and reconfirm annually — that the project complies with all applicable local, provincial/state, national, and international laws and conventions (BERS Standard Section 13.2.1(a)). Non-compliance with applicable laws constitutes a breach of BERS Program requirements subject to corrective action under the Corrective Actions Policy, up to and including project suspension, BERU cancellation, and permanent project termination (Corrective Actions Policy Sections 4.3, 6.2–6.3).

Legal compliance URL: *BERS Standard v1.2, Section 13.2.1(a):* https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6ab857e27bb0574e400851_BERS_Standard_Version_1.1.pdf

2) Confirm that your program demonstrates it complies with social and environmental safeguards.

Yes.

The institutions, processes, and procedures governing safeguard implementation, monitoring, and enforcement are publicly disclosed across several programme documents. The safeguard requirements applicable to Building Representatives are set out in BERS Standard Section 13. The monitoring process — including the annual Safeguard Attestation Form, evidence requirements, and consequence of non-compliance — is defined in BERS Standard Sections 7.4.1 and 13.2.1–13.3.1. The verification of safeguard attestations by the independent Verification Body is established in the BERS Validation and Verification Standard Section 9.2. The corrective action framework for safeguard breaches is published in the Corrective Actions Policy. All documents are publicly available on the Ontoly website.

Public disclosure URL: *BERS Standard v1.2, Sections 7.4.1, 13.2.1–13.3.1:* https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6ab857e27bb0574e400851_BERS_Standard_Version_1.1.pdf;

BERS Validation and Verification Standard v1.1, Section 9.2: https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/6a6a9d8bc4ccee04bf71c84d_BERS_Verification_Standard_v1.pdf;

Corrective Actions Policy: https://cdn.prod.website-files.com/6987d504fe9b9a604857ae67/69b128024012a92a93eaed00_Ontoly_Corrective_Actions_Policy.pdf