

Program Name: Carbon Asset Solutions - Soil Carbon Methodology

Organization: Carbon Asset Solutions Ltd

Assessment Type: Non-CORSIA Program Level Assessment

Date of Submission: 15 April 2026

Downloaded On: July 21, 2026

Status: In Review

Background

Must Read

Please acknowledge that you have reviewed the details provided in the "Background" section.

We have reviewed the Assessment Framework background materials.

Yes

Methodologies for Exclusion

Please list any methodologies (name and URL) that your programme would like to have excluded from Category-level assessment by the ICVCM team.

If none, please enter "None" or N/A.

None

A – Governance

1.1 Effective Governance – CORSIA

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.

Refer to CAS Corporate/Programme Overview (CORSIA), Material Summary, Section 3 Carbon Asset Solutions (CAS) Directors & Senior Leadership Team;

Ian Jones, Director and Chair
Hamish Macdonald, Managing Director
Sara Macdonald, Director & Chief Technical Officer Stephen Duke, Director of CAS Canada
Jehle Pretorius, Finance Manager
Emanuel Dumitru, Head of Program Management Fien Van Den Steen, Sustainability Strategy Manager

North America & Operations Team;

Emil De Kock, Operations Manager
Dr Rebecca D Clayton; PhD, Business Strategy and Development Manager Saman Saeidi, Program Manager & Radiation Safety Officer

Software Architecture and Registry Management Team;

Sara Macdonald, Director & Chief Technical Officer Dr. Nickolay Sargsyan, Software Development Lead
Harry Gill, Software Engineer
Nathan Cavalli, Software Engineer

Scientific Liaison – United States Department of Agriculture (USDA), National Soil Dynamics Laboratory (NSDL);

Dr Allen Torbert, Affiliate Professor, Research Leader, USDA-ARS, National Soil Dynamics Laboratory Dr Aleksandr Kavetskiy - Research Physical Scientist, National Soil Dynamics Laboratory
Dr Galena Yakubova - Research Soil Scientist, National Soil Dynamics Laboratory

CAS Advisory Board

Dr Allen Torbert – Soil Scientist & Laboratory Director, USDA Dr Galina Yakubova – Nuclear Physicist and Research Engineer
Dr Aleksandar Kavetskiy - Applied Radiation Chemistry and Applied Nuclear Physics, USDA Sharooz Ansari - Senior Director of Engineering, DoorDash
Ilona Millar - Partner in Gilbert + Tobin’s Banking + Projects group

Leadership URL:

www.carbonassetsolutions.com

Carbon Asset Solutions Ltd (CAS) is a climate technology and data company. CAS developed and is administrator of the Carbon Asset Solutions Soil Carbon Methodology v1.1 2024 (CAS-SCM), a global standard, methodology and registry, operating in accordance with ISO 14064-2:2019 and ISO 14064-3:2019 principles.

It is the world’s first precision, integrated digital Measurement, Reporting and Verification (MRV) supply chain for soil-based Carbon Credits. The CAS-SCM uses patented soil mapping technology developed by the US Department of Agriculture (USDA), precise greenhouse gas (GHG) emissions quantification via the Cool Farm Tool, data management in collaboration with Microsoft, and digital audit validation and verification with SGS to generate high quality credits that are stored in the blockchain CAS Registry.

The mission of CAS is to deliver a precise, cost-effective, and scalable measurement, reporting and verification platform for soil based Carbon Credits and to transition agriculture into a climate solution. The CAS MRV quantifies greenhouse gas changes resulting from regenerative agriculture practices,

packages that data into products which are certified to ISO and other standards and sold to markets.

CAS has global exclusive rights to patented, precision soil carbon mapping technology developed by the USDA called Mobile Inelastic Neutron Scattering (MINS). MINS technology is a quantum leap in ability to measure soil carbon with speed, accuracy, and certainty. The following accuracy statement has been endorsed by the USDA following extensive field and calibration trials under their supervision:

- The MINS soil carbon scanning process will deliver large field level measurement within 1.1 mg C/cm³ at the 95% confidence level, a significant improvement in accuracy compared to the gold standard traditional soil sampling approach.

CAS manages the measurement data in a transparent immutable data management platform developed in collaboration with Microsoft and a blockchain Registry. The CAS Registry has full transparency and chain of custody reporting for Carbon Credits and ESG data.

CAS stores project emission related data through an API with Cool Farm Tool. The Cool Farm Tool GHG metrics deliver Tier 3 certainty under IPCC 2019. A measure of soil carbon and project emissions establishes a baseline. A follow-up soil measurement at the end of crediting period (2-3 years avg) confirms soil carbon gain; this combined with a recollection of emissions data delivers net additionality for each project enrolled. A proprietary digital audit verification system is delivered under ISO standards with each project validated and verified by approve Validation & Verification Body.

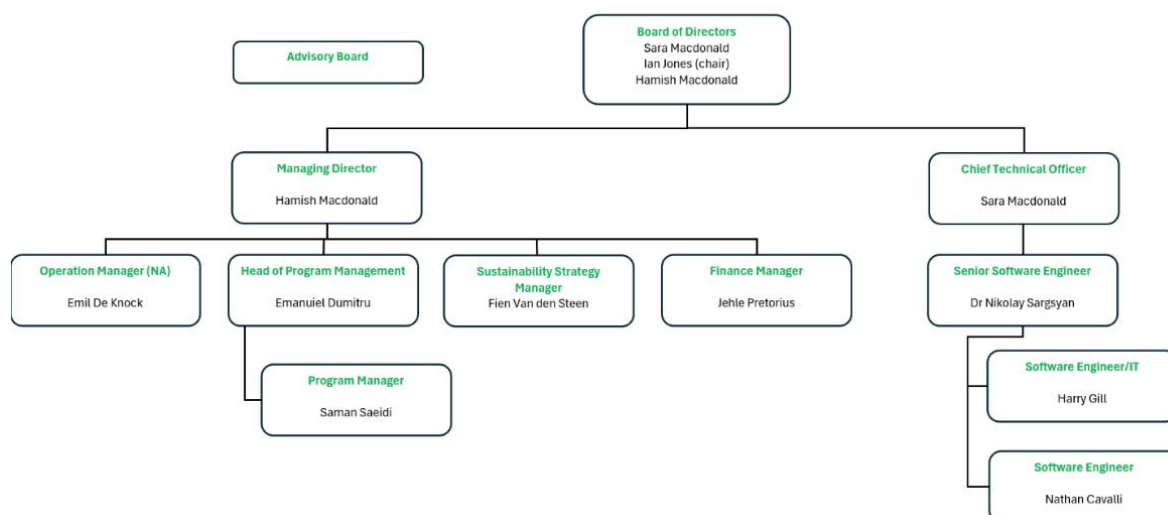
The CAS-SCM has operating procedures to ensure procedural compliance, data consistency and integrity through the project lifecycle and Carbon Credit creation process, as set out in detail in the CAS Soil Carbon Methodology v1.1 2024.

2) Provide an organizational chart that illustrates or otherwise describes the functional relationship a) among the individuals listed in 1; b) among those individuals and programme staff / employees; and c) the functions of each organizational unit and interlinkages with other units.

Organizational Chart URL:

<https://carbonassetsolutions.com/company/#team>

Org Chart - 2026



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

Programme Summary URL:

www.carbonassetsolutions.com

Refer to CAS Soil Carbon Methodology (SCM) Version 1.1, Section 1.3

Carbon Asset Solutions Ltd (CAS) is the administrator of the Carbon Asset Solutions - Soil Carbon Methodology (CAS-SCM), a new global standard, methodology operating pursuant to ISO 14064-2 and ISO 14064-3 and blockchain Registry. Its purpose is to accelerate the Carbon Credit life cycle, replace estimation methodologies for soil carbon stocks with precision measurement, significantly reduce transactional, validation, and verification costs, while enabling project data and information to be independently reviewed by interested parties and intended users. Together these deliver the CAS-SCM as a precision, efficient and transparent Measurement, Recording/Reporting and Verification (MRV) supply chain for soil-based Carbon Credits.

The CAS-SCM operates to deliver a reasonable level of assurance for all projects to a degree of uncertainty of 5% and a level of confidence of 95% or greater.

The aim of the CAS-SCM is for project owners to benefit from technical support and earn financial rewards for altering their farming and land management practices in ways that result in GHG emissions reductions and removals. The duration of a project participation agreement is open to allow project owners and participants to obtain maximum benefit. The baseline period for the CAS-SCM is minimum 3 years prior to the project commencement. Project participants receive 60% of the sale proceeds from the Carbon Credit sale.

The CAS-SCM employs an activity-based, globally applicable empirical model called the Cool Farm Tool (CFT) to quantify changes to net GHG emissions from farming practice changes. The CFT calculates the emissions of the three main GHGs associated with the production of agricultural crops: carbon dioxide (CO₂), methane (CH₄) and nitrous oxide (N₂O). Each of these GHGs are included in the scope of both the baseline and project scenarios used in the project. This includes CO₂ emissions and removals associated with:

- soil carbon stock change; changes to practices;
- changes to biomass;
- fuel and energy use; and
- synthetic fertiliser and pesticide.

It also includes CH₄ emissions from crop residue management and livestock via manure management and enteric fermentation. N₂O emissions from crop residue management, synthetic fertiliser use, and livestock via manure management are included.

The CAS-SCM connects three technology platforms to deliver a fully integrated digital Measurement, Recording/Reporting and Verification (MRV) based standard. The CAS-SCM establishes procedures to calculate the GHG emissions reductions and removals resulting from the adoption of improved agricultural land management and regenerative agriculture practices which increase soil carbon sequestration.

The Methodology is compatible with regenerative agriculture. The CAS-SCM supports the transition to sustainable agricultural practices with a significant climate action benefit as well as:

- increased farm yields and prosperity for food security
- reduced fossil fuel use and chemical inputs in agriculture greatly improved water utilisation and conservation
- increased farm income and economic empowerment for rural communities biodiversity
- economic and social prosperity for developing countries

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

Yes

Administrative oversight provisions URL:

<https://netorgft6138081.sharepoint.com/:f:/s/CarbonAssetSolutionsSoilCarbonMethodologyDocuments/IgCqgT7BymBFS6oU92yMUBO9AfDjFxoXcX9sEUy22nJuLN?e=ly2KG3>

Carbon Asset Solutions Ltd. is the administrator of the CAS-SCM. The CAS Board of Directors is responsible for overseeing global development, the immutable principles underlying the CAS-SCM, and the integrity of the Carbon Credits generated through the CAS MRV platform.

As per our company structure, procedures/policies, and the key function/role of team members set out on our company website.

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

Yes

Decision making process/policy URL:

<https://netorgft6138081.sharepoint.com/:f:/s/CarbonAssetSolutionsSoilCarbonMethodologyDocuments/IgCqgT7BymBFS6oU92yMUbO9AfDjFxoXcX9sEUy22nJuLNs?e=ly2KG3>

Carbon Asset Solutions change management policy applies to all permanent and contract employees, consultants, and third-party vendors engaged with the company. It covers all proposed, planned, and emergency changes that may impact the following areas:

- Business operations and workflows
- CAS-SCM program
- IT systems and infrastructure
- OHS and compliance procedures
- Financial controls and reporting
- HR systems and employment processes
- Sales strategies and client engagement tools
- MRV platform, including field operations using MINS technology

CAS Change management policy is made publicly available on our website.

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

Yes

Governance tenure URL:

<https://carbonassetsolutions.com/>

We confirm that CAS has been continuously operational from its incorporation in 2018 to the present day (seven years). A detailed filing history can be accessed on the Australian Securities and Investment Commission (ASIC) website. Since 2023 the filings have included lodgement of audited financial statements for the consolidated CAS entities (Australia, Canada, USA and UK) and the conduct of Annual General Meetings pursuant to Australian public company corporate law which applied when CAS became a public company in 2023.

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

Yes

Operational tenure URL:

<https://carbonassetsolutions.com/>

We confirm that CAS has been continuously operational from its incorporation in 2018 to the present day (seven years). A detailed filing history can be accessed on the Australian Securities and Investment Commission (ASIC) website. Since 2023 the filings have included lodgement of audited financial statements for the consolidated CAS entities (Australia, Canada, USA and UK) and the conduct of Annual General Meetings pursuant to Australian public company corporate law which applied when CAS became a public company in 2023.

Key Milestones:

CAS continuous operations and governance over the past 7 years has been:

- Carbon Asset Solutions (CAS) incorporated in Australia on 6 February 2018.
- CAS engages Jones Day as corporate legal advisors and BDO as accountants.
- Carbon Asset Solutions (USA) Ltd incorporated in Alabama on 14 October 2020.
- CAS granted global exclusive commercialisation license to precision MINS soil carbon measurement technology by US Department of Agriculture (USDA) on 1 July 2020. The license requires regular corporate and financial reporting.
- CAS closes seed capital round raising A\$1.2m in January 2021 at a A\$12.7m valuation.
- Carbon Asset Solutions Ltd incorporated in the UK on 3 February 2021.
- Carbon Asset Solutions Ltd incorporated in Canada on 10 June 2021.
- CAS engages management and operational teams in Canada and USA across 2021.
- MINS technology undergoes engineering development and rigorous testing to progress from TRL4 to TRL9 at Olds College Smart Farm, Canada during 2021 (Olds College is Canada's most advanced agricultural research centre) and at the USDA's Agricultural Research Service in Alabama.
- In April 2021 CAS and the US Department of Agriculture sign a 4 year co-operative research development agreement to further advance the scanning technology. The agreement was extended in 2024, and 3 new co-owned patents developed.
- CAS awarded C\$458,000 grant from Agrifood Canada (Federal Government) and C\$350,000 grant from Alberta Government Innovate Program to conduct technology improvements and automation of the scanning technology in a series of projects from 2021 to 2024.
- By mid-2022 CAS had constructed and deployed 5 MINS scanning units, 4 in North America and one in Australia.
- In November 2022 one of Canada's largest energy companies signs a US\$100,000 forward purchase agreement for CAS Carbon Credits to be delivered in 2026. Discussions for ongoing purchases from 2026 are underway.
- CAS closes its second capital round end 2022 raising A\$3.9m at a valuation of A\$25m.
- The US Department of Defense contracted CAS to conduct a 2,000 hectare trial scanning project of the Ford Riley base in March 2023. In September 2023 the DoD and CAS signed a contract for ongoing scanning of defense bases.
- In March 2023 CAS engaged SGS to conduct a gap analysis and validation audit of the Carbon Asset Solutions Soil Carbon Methodology. The Carbon Asset Solutions Soil Carbon Methodology 2023 v1.0 (CAS-SCM) was approved as a new global standard and methodology operating pursuant to ISO 14064-2:2019 and ISO 14064-3:2019 on 30 June 2023.

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

Yes

Long-term administration provisions URL:

<https://netorgft6138081.sharepoint.com/:f:/s/CarbonAssetSolutionsSoilCarbonMethodologyDocuments/IgCqgT7BymBFS6oU92yMUBO9AfDjFxoXcX9sEUy22nJuLNs?e=ly2KG3>

In May 2023 Carbon Asset Solutions become a public unlisted company and has a shareholder register of around 100 shareholders.

CAS serves as the operational entity in support of the CAS-SCM's long term operations. In the unlikely event that the CAS-SCM is discontinued in its current form, CAS is legally responsible for the administration of any ongoing program elements or the appointment of a comparable qualified organization to do so. This includes the management of the Buffer Programs established in support.

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

Dissolution plan approach URL:

<https://netorgft6138081.sharepoint.com/:f:/s/CarbonAssetSolutionsSoilCarbonMethodologyDocuments/IgCqgT7BymBFS6oU92yMUBO9AfDjFxoXcX9sEUy22nJuLNs?e=ly2KG3>

CAS covers winding up process in our company Constitution for key shareholders, Section 15.

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

Fiduciary conflict of interest provisions and policy URL:

<https://netorgft6138081.sharepoint.com/:f:/s/CarbonAssetSolutionsSoilCarbonMethodologyDocuments/IgCqgT7BymBFS6oU92yMUbO9AfDjFxoXcX9sEUy22nJuLNs?e=ly2KG3>

All Directors, employees and contractors of CAS and the CAS-SCM are required to adhere to the following Corporate Policies and Procedures.

- Carbon Asset Solutions – Conflict of Interest Policy and Procedures
- Carbon Asset Solutions – Conflict of Interest Disclosure

The CAS Board is supported by the following Committees (currently being established and will include independent parties):

- Finance and Governance Committee
- Risk Committee
- Sustainability Committee

11) Confirm your programme has policies and robust procedures in place to ensure that, conflicts arising from programme staff, board members, and management having financial, commercial or fiduciary conflicts of interest, are appropriately declared, and addressed and isolated

Yes

Procedures to address identified fiduciary conflicts of interest URL:

<https://netorgft6138081.sharepoint.com/:f:/s/CarbonAssetSolutionsSoilCarbonMethodologyDocuments/IgCqgT7BymBFS6oU92yMUbO9AfDjFxoXcX9sEUy22nJuLNs?e=ly2KG3>

All Directors, employees and contractors of CAS and the CAS-SCM are required to adhere to the following Corporate Policies and Procedures which can be viewed [here](#):

- Carbon Asset Solutions – Conflict of Interest Policy and Procedures
- Carbon Asset Solutions – Conflict of Interest Disclosure

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

Procedures to address registry services conflicts of interests URL:

<https://netorgft6138081.sharepoint.com/:f:/s/CarbonAssetSolutionsSoilCarbonMethodologyDocuments/IgCqgT7BymBFS6oU92yMUbO9AfDjFxoXcX9sEUy22nJuLNs?e=ly2KG3>

All Directors, employees and contractors of CAS and including registry team are required to adhere to the following Corporate Policies and Procedures which can be viewed [here](#):

- Carbon Asset Solutions – Conflict of Interest Policy and Procedures
- Carbon Asset Solutions – Conflict of Interest Disclosure

CAS owns and manages its own registry.

13) Confirm your programme has policies and robust procedures in place to ensure that, where conflicts arising from programme registry administrators from having financial, commercial or fiduciary interests in the governance or provision of registry services arise, they are appropriately declared, and addressed and isolated

Yes

Procedures to address identified registry conflicts of interest URL:

<https://netorgft6138081.sharepoint.com/:f:/s/CarbonAssetSolutionsSoilCarbonMethodologyDocuments/IgCqgT7BymBFS6oU92yMUbO9AfDjFxoXcX9sEUy22nJuLNs?e=ly2KG3>

As per CAS Conflict of Interest Policy and Procedures, section 4.26.

Board and Committee member conflicts of interests are managed in accordance with the process outlined in the Constitutions or Articles of the company. Managing this type of conflict includes declaring the interest, and the Chair or Committee deciding whether the member should be excused from discussions on that matter.

4.27. All other types of conflicts of interests are managed by implementing a management strategy. This strategy should be determined between the member and supervisor and approved by the relevant Senior Officer on the Conflict of Interest Disclosure Form. The four recommended responses are:

- i. avoid
- ii. accept and reduce
- iii. share, or
- iv. retain.

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

Professional liability insurance policy URL:

<https://netorgft6138081.sharepoint.com/:f:/s/CarbonAssetSolutionsSoilCarbonMethodologyDocuments/IgCqgT7BymBFS6oU92yMUbO9AfDjFxoXcX9sEUy22nJuLNs?e=ly2KG3>

Refer to our Public liability insurance certificate.

1.1 Effective Governance

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

Board members URL:

<https://carbonassetsolutions.com/company/#team>

Refer to CAS By-laws and Constitution

Carbon Asset Solutions Ltd is a public, unlisted company operating under the Corporations Act (Australia). It is required to provide quarterly reports to shareholders (it has 98 shareholders as of October 2024) and submits audited accounts and a Directors' report to an Annual General Meeting of members.

The CAS Board is supported by the following Committees

- Risk Committee
- Sustainability Committee

The CAS-SCM and the CAS Board are serviced by a Technical Advisory Board.

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

Annual report URL:

<https://netorgft6138081.sharepoint.com/sites/CarbonAssetSolutionsSoilCarbonMethodologyDocuments/Shared%20Documents/Forms/AllItems.aspx?id=%2Fsites%2FCarbonAssetSolutionsSoilCarbonMethodologyDocuments%2FShared%20Documents%2FCAS%2DSCM%20Program%20and%20Technical%20Documents%2F2025&viewid=f5ef111>

Carbon Asset Solutions Ltd is a public, unlisted company operating under the Corporations Act (Australia). It is required to provide quarterly reports to shareholders (it has 98 shareholders as of October 2024) and submits audited accounts and a Directors' report to an Annual General Meeting of members.

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

Yes

Social and Environmental policy(ies) URL:

<https://netorgft6138081.sharepoint.com/:f:/s/CarbonAssetSolutionsSoilCarbonMethodologyDocuments/IgCqgT7BymBFS6oU92yMUbO9AfDjFxoXcX9sEUy22nJuLNs?e=JjEplV>

Refer to our CAS Sustainability and Environmental policy, also published on our website.

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

Yes

Anti-money laundering policy/process URL:

<https://netorgft6138081.sharepoint.com/:f:/s/CarbonAssetSolutionsSoilCarbonMethodologyDocuments/IgCqgT7BymBFS6oU92yMUbO9AfDjFxoXcX9sEUy22nJuLNs?e=JjEplV>

The CAS-SCM delivers robust anti-money laundering policies by requiring all parties that wish to establish a CAS Registry account to complete a standard KYC/KYB assessment. This is set out in the [CAS KYB/KYC/AML Procedure](#)

The Registry accounts are linked directly to the projects where the credits are created. Thus, the application for inclusion in the CAS Registry forms part of the consolidated MRV delivery. Compliance and audit on each account takes place as part of the project certification process.

The immutable blockchain structure of the CAS Registry inherently ensures data integrity. Full detail on project qualification, screening and compliance is outlined in Question 3.1.

The CAS Registry uses a KYC/AML/KYB solution through an API integration.

The KYC solution verifies the name and identity of a customer. Verification documents are formal documents obtained for this purpose. Customers are required to provide proof of name, address, and in some cases, income.

This is a mandatory process that takes place to identify and verify the customer's identity at the time of onboarding. These checks confirm the customer is who they say they are and eliminates the

potential risk of fraud, money laundering, or other financial crime.

A KYB check enables CAS to confirm a business exists and that it is active and trading. Furthermore, the KYB procedure also confirms the business nature, principal activities, jurisdiction of operations and customer profile. This information is then used to determine the level of financial risk by considering the type of product the business is buying and how it will use that product. The solution also uses AI and machine learning, which enables efficient and accurate processing of identity documents from over 190 countries.

To perform a KYB check, CAS collects information about the other business entity. This includes the business name, registration number, address, and contact details.

Once the initial check has been conducted at the time of onboarding, the business profile will be monitored. This includes monitoring transactions, updated information, and periodic or perpetual reviews.

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

Yes

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

<https://netorgft6138081.sharepoint.com/:f:/s/CarbonAssetSolutionsSoilCarbonMethodologyDocuments/IgCqgT7BymBFS6oU92yMUbO9AfDjFxoXcX9sEUy22nJuLNs?e=JjEpIV>

CAS has a robust anti-bribery and corruption policy.

Company's zero-tolerance stance on bribery and corruption. It underscores the expectation that all business should be conducted legally and ethically, regardless of geographic location. It's designed to align with international anti-corruption standards while supporting Carbon Asset Solutions' commitment to sustainability and credibility within the carbon markets.

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

Stakeholder disclosure process/policy URL:

<https://netorgft6138081.sharepoint.com/:f:/s/CarbonAssetSolutionsSoilCarbonMethodologyDocuments/IgCqgT7BymBFS6oU92yMUbO9AU57KC9aGC6zngPZRSEbgAk?e=0rTvJo>

Refer to CAS Soil Carbon Methodology (SCM) Version 1.1, Section 2.0

Full information on the breadth and depth of information required to become part of the CAS SCM program is provided through the ongoing process for each project, and available for viewing in the CAS Registry once a project is validated or verified. These data requirements are laid out in multiple agreements and are available for consideration.

All data derived from the application of this Methodology are securely managed in the CAS Portal using the Azure Database, the Azure Confidential Ledger and the blockchain based CAS Registry. Standard Operating Procedures and Governance and Policies are viewable in the CAS Portal. Data and reports are hyperlinked within the Portal to create an end to end digital chain of custody which is visible to interested parties and intended users.

Data viewable in the CAS Portal includes the Project Interest Note, the Project Participation Agreement, the Project Design and Review Plan, Validation Report, Project Review Report, Project

Execution Document, and the Verification Report. These are recorded in the Microsoft Azure Database. The MINS soil measurement data are in the Azure Confidential Ledger.

The data for each project discloses all sources of information, calculations, types of data and assumptions for the project's GHG emission reduction calculations. All data and the logs and records are readily accessible by interested parties and intended users (such as Carbon Credit buyers, reviewers, auditors, regulators and other parties) at any time in the project life cycle to make the review and audit process highly transparent, efficient, and cost-effective.

Agreements identify individual contacts' information of project's stakeholders including, as appropriate: project owner; project proponent; property owner; project manager; intended users; stakeholders; staff; and regulators. This data entered and maintained in the CAS Azure database.

CAS notes that the CAS-SCM has provision for individual project consultation if applicable. However in most cases it is unlikely that consultation will be required as implementing practice change on individual projects will have minimal or no impact on other parties.

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

Yes

Disclosure of stakeholder consultation requirements URL:

<https://carbonassetsolutions.com/company/#governance>

CAS has developed a Public commentary & consultation policy which is made available on our website. Ensuring that our soil-carbon methodologies remain robust, credible, and responsive to real-world needs requires more than internal review—it demands genuine dialogue with the people and organization's we serve and depend upon. By inviting open commentary on draft methodologies and guidance, Carbon Asset Solutions reinforces its commitment to:

- **Stakeholder Empowerment:** Giving farmer cooperatives, industry experts, certification bodies, NGOs, and end-users a meaningful voice in shaping the technical and social dimensions of our Soil Carbon Methodology (CAS-SCM).
- **Technical Rigor & Practicality:** Surface practical insights—field experiences, local challenges, and innovative ideas—that strengthen the scientific foundations and operational feasibility of our approach.
- **Transparency & Trust:** Demonstrate to markets, regulators, and communities that our methodology evolves in an open forum, with every substantive comment acknowledged, considered, and addressed in a public consultation report.
- **Continuous Improvement:** Establish a repeatable feedback loop that not only refines today's methodology but also informs future enhancements, keeping us ahead of emerging science, regulatory shifts, and farmer needs.
- **Alignment with Mission & ESG Goals:** Reinforce Carbon Asset Solutions broader mission—bringing accuracy, transparency, and integrity to the carbon market—and our ESG commitment to climate action, sustainable agriculture practices, and social co-benefits in rural communities.

In short, the purpose of this policy is to transform commentary into constructive action, ensuring that every iteration of CAS-SCM learns from and reflects the collective wisdom of our global stakeholder network.

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

Yes

Disclosure of public comment provisions and considerations URL:

<https://carbonassetsolutions.com/company/#governance>

CAS has developed a Public commentary & consultation policy which is made available on our website. Section 5.

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

Yes

Public comment engagement on methodology development process/policy URL:

<https://carbonassetsolutions.com/company/#governance>

As per Q1, CAS has developed a Public commentary & consultation policy which is made available on our website. Section 3.

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

Yes

Public comment engagement on activities process/policy URL:

<https://carbonassetsolutions.com/company/#governance>

As per Q1, CAS has developed a Public commentary & consultation policy which is made available on our website. Section 3.

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

Yes

Public comment engagement on operational activities process/policy URL:

<https://carbonassetsolutions.com/company/#governance>

CAS has provisions for **Primary Methodology Documents** - Any new or revised versions of the Carbon Asset Solutions Soil Carbon Methodology (CAS-SCM), including baseline-setting, measurement protocols, and verification requirements and including ongoing stakeholder feedback

CAS Exclusions, CAS Exclusions, Internal drafts or confidential R&D not approved for release. Post-approval operational changes (e.g., purely administrative updates) which follow a streamlined internal notification process rather than full public consultation.

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

Yes

Public comment engagement on programme procedures process/policy URL:

<https://carbonassetsolutions.com/company/#governance>

As per Q1, CAS has developed a Public commentary & consultation policy which is made available on our website. Section 3.

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 available to the public.

Summary of programme activities URL:

<https://netorgft6138081.sharepoint.com/:f:/s/CarbonAssetSolutionsSoilCarbonMethodologyDocuments/IgCqgT7BymBFS6oU92yMUbO9AU57KC9aGC6znqPZRSEbgAk?e=0rTvJo>

Section 4. Requirements for CAS-SCM GHG Projects.

CAS delivers project level soil-based carbon credits based upon measured change in project (farm/ranch/land) emissions and additional carbon as stored in soil which occur through the implementation of new (additional) practice changes by the project owner.

Each farm/ranch/land is a unique project and subject to its own practice changes, eligibility assessment, GHG quantification, validation, monitoring, review and verification pursuant to the CAS-SCM, ISO 14064-2:2019 and ISO 14064-3:2019.

The CAS-SCM enables small, medium, or large agricultural or land management project activities that improve soil carbon net CO₂e removals/emission reductions (project activities), to be registered into its system with the Carbon Credits allocated to be sold to intended users (i.e. investors, buyers, governments, etc.), once validated and/or verified.

The CAS-SCM hosts single carbon soil projects or cluster projects, from one or multiple regions, different or common biomes and jurisdictions.

The CAS-SCM is also implementing good ESG/SDG practices, while establishing high technology registry and IT systems, including tokenized Carbon Credits, to ensure unique identification to each Carbon Credit generated.

A project is deemed to be feasible if it meets the eligibility criteria, is implementing one or more project activities that are known to deliver positive emissions reductions and removals outcomes and has adequate risk management procedures identified.

For each project, the CAS-SCM will assess the potential to implement practice changes that meet program criteria to sequester additional CO₂ relative to current baseline practice. Globally, these changes of practice have been described as “regenerative agriculture”. There is no universally agreed definition of regenerative agricultural practices. The CAS-SCM accepts practice changes from the following activities:

- Reduce fertiliser (organic or inorganic) application; Improve water management/irrigation;
- Reduce tillage;
- Improve residue management;
- Improve crop implementation and harvesting (eg crop rotations, cover crops);
- Improve grazing practices (eg changing stocking rates, duration or intensity of grazing);
- Organic amendments/nutrient management;
- Other regenerative agriculture techniques or technologies which prove positive balance of carbon fixation with the implementation of the project(s) activity's degraded area, by human activity or by natural disasters.

The intention of the CAS-SCM is to support the global transition to regenerative agricultural practices.

Regenerative agriculture differentiates itself from other sustainable agriculture practices. In addition to reducing the negative impacts of farming practices, regenerative agriculture aims to ensure that agriculture has a net positive effect on other environmental pressures, ranging from mitigating climate change to improved soil health, biodiversity, and rural economic resilience. It is outcomes based - the changes of practice require implementation as well as measured assessment of net farm emissions (CO₂e) and removals to confirm the benefits on a project basis. The effect is that agriculture becomes a net contributor to mitigate climate change and address other environmental/social factors.

The CAS-SCM identifies, measures, and verifies both the emissions/removals and the co-benefits via ESG data.

The CAS-SCM is a fully integrated digital suite of technologies which means the 3 functions of the MRV engine are connected in one digital system and managed under a single set of measurement standards, data management and security protocols, rules, procedures and audit standards for every

project.

The level of certainty for each process in the MRV is at least 95% (the MINS measurement, the data capture and security, the GHG emissions factors and the audit level of assurance). Hence a Carbon Credit created under the CAS-SCM has an equal level of integrity and governance (95%+) no matter where on the planet it comes from or whether it has been developed under an inset or offset program.

For buyers, regulators and stakeholders there is absolute transparency along the entire Carbon Credit lifecycle and certainty that what they are buying or creating and reporting has been verified as meeting the ISO standard for greenhouse gas programs to a reasonable (95%+) level of assurance.

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.

Public comment engagement on eligibility criteria for types of offset activity approach URL:

<https://netorgft6138081.sharepoint.com/:f:/s/CarbonAssetSolutionsSoilCarbonMethodologyDocuments/IgCqgT7BymBFS6oU92yMUbO9AU57KC9aGC6znqPZRSEbgAk?e=0rTvJo>

The CAS-SCM ensures its consistency with this requirement by confirming the following:

CAS does not restrict the geography where soil based Carbon Credits are created. The intention of the CAS-SCM is to deploy on a global basis to support the transition of agriculture to sustainability, reduce greenhouse gas emissions from agriculture and remove atmospheric CO₂ at scale through soil carbon sequestration.

Each project owner or project proponent is required to develop a full series of documents that meet the project for compliance with the CAS-SCM and ISO 14064-2:2019 requirements. These documents require the collection of farm related data that prove land title ownership, that CAS is the sole crediting body for that land area, confirm current and future emissions tied to the project, allow the measurement of soil-based carbon over the project lifetime and commit to specific changes of practice (additional) that will reduce GHG emissions and store carbon in soil (regenerative agriculture).

The CAS Program Project Participation Agreement

The Carbon Asset Solutions Soil Carbon Methodology 2024 V1.1 Project Interest Note

Project Design and Review Plan Project Review Report Validation Report Verification Report

Standard Operating Procedures

To be eligible a project must meet the criteria established in the CAS -SCM, from project application, eligibility, GHG quantification, design, monitoring, reporting, validation, verification, issuance, purchase, and ultimately extinguishment. Crucial control and inherent risk mitigating factors are part of a strong data quality management system.

A project is deemed to be feasible if it meets the eligibility criteria in the CAS-SCM, is implementing one or more project activities that are known to deliver positive emissions reductions and removals outcomes and has adequate risk management procedures identified.

CAS assesses each project to ensure they meet program criteria to sequester additional CO₂ relative to baseline activities. These practices are described as "regenerative agriculture". Each project proponent must submit an application that confirms a new change of practice will be employed, and broadly described as the following:

- Reduce fertiliser (organic or inorganic) application; Improve water management/irrigation;
- Reduce tillage;
- Improve residue management;
- Improve crop implementation and harvesting (eg crop rotations, cover crops);
- Improve grazing practices (eg changing stocking rates, duration or intensity of grazing);
- Organic amendments/nutrient management;

Other regenerative agriculture techniques or technologies which prove positive balance of carbon fixation with the implementation of the project(s) activity's degraded area, by human activity or by natural disasters.

The CAS-SCM identifies, measures, and verifies both the emissions/removals and the co-benefits quantified separately through the Cool Farm Tool (CFT).

1.2 Public Engagement, Consultation and Grievances

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

Stakeholder consultation policy/controls URL:

<https://netorgft6138081.sharepoint.com/:f:/s/CarbonAssetSolutionsSoilCarbonMethodologyDocuments/IgCqgT7BymBFS6oU92yMUbO9AU57KC9aGC6znqPZRSEbgAk?e=0rTvJo>

CAS has developed a Public commentary & consultation policy which is made available on our website. Ensuring that our soil-carbon methodologies remain robust, credible, and responsive to real-world needs requires more than internal review—it demands genuine dialogue with the people and organization's we serve and depend upon. By inviting open commentary on draft methodologies and guide.

- **Stakeholder Empowerment:** Giving farmer cooperatives, industry experts, certification bodies, NGOs, and end-users a meaningful voice in shaping the technical and social dimensions of our Soil Carbon Methodology (CAS-SCM).
- **Technical Rigor & Practicality:** Surface practical insights—field experiences, local challenges, and innovative ideas—that strengthen the scientific foundations and operational feasibility of our approach.
- **Transparency & Trust:** Demonstrate to markets, regulators, and communities that our methodology evolves in an open forum, with every substantive comment acknowledged, considered, and addressed in a public consultation report.
- **Continuous Improvement:** Establish a repeatable feedback loop that not only refines today's methodology but also informs future enhancements, keeping us ahead of emerging science, regulatory shifts, and farmer needs.
- **Alignment with Mission & ESG Goals:** Reinforce Carbon Asset Solutions broader mission—bringing accuracy, transparency, and integrity to the carbon market—and our ESG commitment to climate action, sustainable agriculture practices, and social co-benefits in rural communities.

In short, the purpose of this policy is to transform commentary into constructive action, ensuring that every iteration of CAS-SCM learns from and reflects the collective wisdom of our global stakeholder network.

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

Stakeholder grievances policy/controls URL:

<https://netorgft6138081.sharepoint.com/:f:/s/CarbonAssetSolutionsSoilCarbonMethodologyDocuments/IgCqgT7BymBFS6oU92yMUbO9AU57KC9aGC6znqPZRSEbgAk?e=0rTvJo>

YES. The CAS Program has a Complaints and Grievance and Complaints Procedures Statement that is

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

Definition of underlying attributes policy/provisions URL:

<https://netorgft6138081.sharepoint.com/:f:/s/CarbonAssetSolutionsSoilCarbonMethodologyDocuments/IgCqgT7BymBFS6oU92yMUbO9AU57KC9aGC6znqPZRSEbgAk?e=0rTvJo>

Refer to CAS Soil Carbon Methodology (SCM) Version 1.1, Definitions

CAS Carbon Credit: a financial services instrument that represents one metric tonne of CO₂e and may be a Future Carbon Removal Unit (FCRU), a Verified Carbon Removal Unit (VCRU) or an emissions reduction Carbon Credit.

CAS-SCM ICVCM-CCP eligible carbon credits will only be applicable to VCRUs and not FCRUs.

CAS does not restrict the geography where soil-based Carbon Credits are created. The intention of the CAS-SCM is to deploy on a global basis to support the transition of agriculture to sustainability, reduce greenhouse gas emissions from agriculture and remove atmospheric CO₂ at scale through soil carbon sequestration.

The CAS-SCM identifies, measures, and verifies both the emissions/removals and the co-benefits quantified separately through the Cool Farm Tool (CFT).

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

Yes

Definition of underlying property aspects policy/provisions URL:

<https://netorgft6138081.sharepoint.com/:f:/s/CarbonAssetSolutionsSoilCarbonMethodologyDocuments/IgCqgT7BymBFS6oU92yMUbO9AU57KC9aGC6znqPZRSEbgAk?e=0rTvJo>

Refer to CAS Soil Carbon Methodology (SCM) Version 1.1, Definitions

CAS Carbon Credit: a financial services instrument that represents one metric tonne of CO₂e and may be a Future Carbon Removal Unit (FCRU), a Verified Carbon Removal Unit (VCRU) or an emissions reduction Carbon Credit.

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The CAS-SCM identifies, measures, and verifies both the emissions/removals and the co-benefits quantified separately through the Cool Farm Tool (CFT).

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

Yes

Programme registry URL:

<https://registry.casmrv.com/>

The CAS-SCM ensures its consistency with this requirement by confirming that CAS has established and maintains a blockchain based registry, the CAS Registry.

The CAS Registry draws data from the secure Azure Database and the Azure Confidential Ledgers where the data for each project and the lifecycle of the Carbon Credit is held and hyperlinked to provide a seamless review system for interested parties.

The CAS Registry can be accessed online by intended users and interested parties who complete standard KYC/AML/KYB requirements. link to the Registry.

Each tokenised Carbon Credit in the CAS Registry includes project meta data to allow intended users and interested parties to review the project details, location, status, and history of each Carbon Credit. The tokenised Carbon Credit is hyperlinked to the files within the CAS Portal.

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

CCP-identification of emissions units policy/procedures URL:

<https://netorgft6138081.sharepoint.com/:f:/s/CarbonAssetSolutionsSoilCarbonMethodologyDocuments/IgCqgT7BymBFS6oU92yMUbO9AU57KC9aGC6znqPZRSEbgAk?e=0rTvJo>

The CAS-SCM ensures its consistency with this requirement by confirming the following:

When a project is approved on CAS platform, it then is listed on the CAS Registry with a unique identifier.

CAS applies multiple layers of encryption to the raw data gathered from each project. The encryption keys for this data are stored in Azure Key Vault while the hashes of project data and computation results are stored in Azure confidential ledger, a technology in Azure confidential computing that provides a decentralized digital ledger and tamper-resistant storage for highly confidential data. Hence, the alteration of the original data can be detected.

The forecast Carbon Credits (in a validation report) or verified (in a verification report) are shown in the CAS Registry as either Future Carbon Removal Units (FCRUs) or Verified Carbon Removal Units (VCRUs).

FCRUs allow buyers and interested parties to review potential supply of verified Carbon Credits from a project. Once verified at the end of the reporting period the FCRUs change to VRCUs in the blockchain and when purchased can be retired by the holder. The process is fully transparent, automated and completely eliminates any potential double counting or double sale.

CAS-SCM ICVCM-CCP eligible carbon credits will only be applicable to VCRUs and not FCRUs.

Carbon Credits on the CAS Registry is stored as a token in a blockchain ledger. All transactions and settlement process on the CAS Registry will be managed by smart contracts.

The dual Azure Confidential Ledger and blockchain Registry gives the best data handling efficiency and ensures the data is managed securely and in compliance with ISO and financial market standards.

The CAS Registry:

1. Registers carbon credit claims data for the CAS projects.
2. Assigns unique identifier information to track each credit bundle.
3. Authorizes independent validation and verification bodies to audit / verify credits that will be issued according to the CAS SCM standard.
4. Maintains a registration of forward, uncertified, certified, unsold, and sold credits (and other data linked to the project/credit).
5. Tracks ownership and status of each credit bundle.

6. Links to carbon market exchanges as appropriate.

Token metadata

The CAS tokenized credit process Each token has a unique id number, and has capability to identify, and facilitate tracking and transfer of, unit ownership/holding from issuance to cancellation or retirement. Each token has its status, including retirement or cancellation, and issuance status. identify in serialization, or designate on a public platform, each unique credit's country and sector of origin, vintage, and original project registration date as it is linked to the original project.

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

Tracking of units policy/procedures URL:

<https://netorgft6138081.sharepoint.com/:f:/s/CarbonAssetSolutionsSoilCarbonMethodologyDocuments/IgCqgT7BymBFS6oU92yMUbO9AU57KC9aGC6znqPZRSEbgAk?e=0rTvJo>

Refer to CAS Registry Technical Document.

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

Emissions units status identification procedures URL:

<https://netorgft6138081.sharepoint.com/:f:/s/CarbonAssetSolutionsSoilCarbonMethodologyDocuments/IgCqgT7BymBFS6oU92yMUbO9AU57KC9aGC6znqPZRSEbgAk?e=0rTvJo>

The forecast Carbon Credits (in a validation report) or verified (in a verification report) are shown in the CAS Registry as either Future Carbon Removal Units (FCRUs) or Verified Carbon Removal Units (VCRUs).

FCRUs allow buyers and interested parties to review potential supply of verified Carbon Credits from a project. Once verified at the end of the reporting period the FCRUs change to VCRUs in the blockchain and when purchased can be retired by the holder. The process is fully transparent, automated and completely eliminates any potential double counting or double sale.

CAS-SCM ICVCM-CCP eligible carbon credits will only be applicable to VCRUs and not FCRUs.

Carbon Credits on the CAS Registry is stored as a token in a blockchain ledger. All transactions and settlement process on the CAS Registry will be managed by smart contracts.

The dual Azure Confidential Ledger and blockchain Registry gives the best data handling efficiency and ensures the data is managed securely and in compliance with ISO and financial market standards.

Each CAS Carbon Credit token has a unique id number, and has the capability to identify, and facilitate tracking and transfer ownership/holding from issuance to cancellation or retirement. Each token has its status, including retirement or cancellation, and issuance status. identify in serialization, or designate on a public platform, each unique credit's country and sector of origin, vintage, and original project registration date as it is linked to the original project.

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

Assigning unique serial number to issued emission units procedures URL:

<https://netorgft6138081.sharepoint.com/:f:/s/CarbonAssetSolutionsSoilCarbonMethodologyDocuments/IgCqgT7BymBFS6oU92yMUbO9AU57KC9aGC6zngPZRSEbgAk?e=0rTvJo>

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Carbon Credits on the CAS Registry is stored as a token in a blockchain ledger. All transactions and settlement process on the CAS Registry will be managed by smart contracts.

The dual Azure Confidential Ledger and blockchain Registry gives the best data handling efficiency and ensures the data is managed securely and in compliance with ISO and financial market standards. Each CAS Carbon Credit token has a unique id number, and has the capability to identify, and facilitate tracking and transfer ownership/holding from issuance to cancellation or retirement. Each token has its status, including retirement or cancellation, and issuance status. identify in serialization, or designate on a public platform, each unique credit's country and sector of origin, vintage, and original project registration date as it is linked to the original project.

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**Identification of emission unit origin, vintage, and project registration date procedures URL:**

<https://netorgft6138081.sharepoint.com/:f:/s/CarbonAssetSolutionsSoilCarbonMethodologyDocuments/IgCqgT7BymBFS6oU92yMUbO9AU57KC9aGC6zngPZRSEbgAk?e=0rTvJo>

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CAS-SCM ICVCM-CCP eligible carbon credits will only be applicable to VCRUs and not FCRUs.

Carbon Credits on the CAS Registry is stored as a token in a blockchain ledger. All transactions and settlement process on the CAS Registry will be managed by smart contracts.

The dual Azure Confidential Ledger and blockchain Registry gives the best data handling efficiency and ensures the data is managed securely and in compliance with ISO and financial market standards. Each CAS Carbon Credit token has a unique id number, and has the capability to identify, and facilitate tracking and transfer ownership/holding from issuance to cancellation or retirement. Each token has its status, including retirement or cancellation, and issuance status. identify in serialization, or designate on a public platform, each unique credit's country and sector of origin, vintage, and original project registration date as it is linked to the original project.

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

Registry security policy/procedures URL:

<https://netorgft6138081.sharepoint.com/:f:/s/CarbonAssetSolutionsSoilCarbonMethodologyDocuments/IgCqgT7BymBFS6oU92yMUbO9AU57KC9aGC6znqPZRSEbgAk?e=0rTvJo>

The CAS-SCM system uses Azure CosmosDB, Azure Blob storage to store project-critical data and soil measurement data. The storage is configured to apply Azure's immutability policies to the project and measurement data ensuring the data cannot be modified or deleted once the policies are in place. The Azure immutability meets the relevant storage requirements of CFTC Rule 1.31(c)-(d), FINRA Rule 4511, and SEC Rule 17a-4(f).

FCRU/VCRU tokens are implemented on Kaleido, a fully managed blockchain. Registry is implemented on Azure and relies on CosmosDB, PostgreSQL, and Immutable Blob storages. The token is unique and transferable. These qualities are met by the ERC721 (aka NFT) standard in the Ethereum protocol. Kaleido is fully compatible with this format.

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

Yes

International data exchange standards URL:

<https://netorgft6138081.sharepoint.com/:f:/s/CarbonAssetSolutionsSoilCarbonMethodologyDocuments/IgCqgT7BymBFS6oU92yMUbO9AU57KC9aGC6znqPZRSEbgAk?e=0rTvJo>

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The CAS Registry is a standalone blockchain registry and secure digital ledger. It does not link to external registries but can connect to exchange or platforms such as the Microsoft Environmental Credit Services platform where it has an API connection to the Microsoft beta version.

The Programme ensures its consistency with this requirement by confirming it meets the following ISO 14064-2:2019 and ISO 14064-3 2019 standards.

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

Yes

New registry account screening policy/procedures URL:

<https://netorgft6138081.sharepoint.com/:f:/s/CarbonAssetSolutionsSoilCarbonMethodologyDocuments/IgCqgT7BymBFS6oU92yMUbO9AU57KC9aGC6znqPZRSEbgAk?e=0rTvJo>

The CAS-SCM ensures its consistency by requiring all parties that wish to establish a CAS Registry account to complete a standard KYB/KYC/AML assessment.

The Registry accounts are linked directly to the projects where the credits are created. Thus, the application for inclusion in the CAS Registry forms part of the consolidated MRV delivery. Compliance and audit on each account takes place as part of the project certification process.

The immutable blockchain structure of the CAS Registry inherently ensures data integrity. The CAS Registry uses a KYB/KYC/AML solution through an API integration.

The KYC solution verifies the name and identity of a customer. verification documents are formal documents obtained for this purpose. Customers will have to provide proof of name, address, and in some cases, income.

This is a mandatory process that takes place to identify and verify the customer's identity at the time of onboarding. These checks confirm the customer is who they say they are and eliminate the potential risk of fraud, money laundering, or other financial crime.

A KYB Check enables CAS to confirm a business exists and that they are active and trading. Furthermore, the KYB procedure also confirms the business nature, principal activities, jurisdiction of operations and customer profile. This information is then used to determine the level of financial risk by considering the type of product the business is buying and how they say they will use that product. The solution also uses AI and machine learning, which enables efficient and accurate processing of identity documents from over 190 countries.

To perform a KYB check, CAS collects information about the other business entity. This includes the business name, registration number, address, and contact details.

Once the initial check has been conducted at the time of onboarding, the business profile will be monitored. This includes monitoring transactions, updated information, and periodic or perpetual reviews.

The CAS Registry User Guide sets out the procedures for an application for a Registry account including KYB/KYC/AML procedures and requirements. The CAS Registry Terms of Use must be accepted before an account holder can access the Register. These set out the process for nominated authority to operate the account.

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

Yes

New registry account screening policy/procedures URL:

<https://netorgft6138081.sharepoint.com/:f:/s/CarbonAssetSolutionsSoilCarbonMethodologyDocuments/IgCqgT7BymBFS6oU92yMUbO9AU57KC9aGC6znqPZRSEbgAk?e=0rTvJo>

The CAS Registry User Guide sets out the procedures for an application for a Registry account including KYB/KYC/AML procedures and requirements. The CAS Registry Terms of Use must be accepted before an account holder can access the Register. These set out the process for nominated authority to operate the account.

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

Yes

Registry compliance with security provisions approach/procedures URL:

<https://www.kaleido.io/security-and-compliance>

The CAS-SCM system uses Azure CosmosDB, Azure Blob storage to store project-critical data and soil measurement data. The storage is configured to apply Azure's immutability policies to the project and

measurement data ensuring the data cannot be modified or deleted once the policies are in place. The Azure immutability meets the relevant storage requirements of CFTC Rule 1.31(c)-(d), FINRA Rule 4511, and SEC Rule 17a-4(f).

FCRU/VCRU tokens are implemented on Kaleido, a fully managed blockchain. Registry is implemented on Azure and relies on CosmosDB, PostgreSQL, and Immutable Blob storages. The token is unique and transferable. These qualities are met by the ERC721 (aka NFT) standard in the Ethereum protocol. Kaleido is fully compatible with this format.

Our blockchain provider (Kaleido) is compliant to SOC 2 Type 2, ISO 27001, ISO 27017 & ISO 27018.

2.1 Effective Registries (Retirement and Addressing Erroneous Issuance)

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 entity identification policy/process URL:

<https://netorgft6138081.sharepoint.com/:f:/s/CarbonAssetSolutionsSoilCarbonMethodologyDocuments/IgCqgT7BymBFS6oU92yMUbO9AU57KC9aGC6zngPZRSEbgAk?e=0rTvJo>

Refer to CAS Soil Carbon Methodology (SCM) Version 1.1, Section 4

When a project is approved on the CAS platform, it then is listed on the CAS Registry with a unique identifier.

CAS applies multiple layers of encryption to the raw data gathered from each project. The encryption keys for this data are stored in Azure Key Vault while the hashes of project data and computation results are stored in Azure confidential ledger, a technology in Azure confidential computing that provides a decentralized digital ledger and tamper-resistant storage for highly confidential data. Hence, the alteration of the original data can be detected.

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CAS-SCM ICVCM-CCP eligible carbon credits will only be applicable to VCRUs and not FCRUs.

Carbon Credits on the CAS Registry are stored as a token in a blockchain ledger. All transactions and settlement process on the CAS Registry is managed by smart contracts.

The dual Azure Confidential Ledger and blockchain Registry gives the best data handling efficiency and ensures the data is managed securely and in compliance with ISO and financial market standards.

The CAS Registry:

1. Registers carbon credit claims data for the CAS projects.
2. Assigns unique identifier information to track each credit bundle.
3. Authorizes independent validation and verification bodies to audit / verify credits that will be issued according to the CAS SCM standard.
4. Maintains a registration of forward, uncertified, certified, unsold, and sold credits (and other data linked to the project/credit).
5. Tracks ownership and status of each credit bundle.
6. Links to carbon market exchanges as appropriate.

Token metadata

Each token has a unique id number, and has capability to identify, and facilitate tracking and transfer of, unit ownership/holding from issuance to cancellation or retirement. Each token has its status,

including retirement or cancellation, and issuance status. identify in serialization, or designate on a public platform, each unique credit's country and sector of origin, vintage, and original project registration date as it is linked to the original project.

2) requires the identification of the purpose of retirement

Yes

Retirement purpose identification policy/process URL:

<https://netorgft6138081.sharepoint.com/:f:/s/CarbonAssetSolutionsSoilCarbonMethodologyDocuments/IgCqgT7BymBFS6oU92yMUbO9AU57KC9aGC6znqPZRSEbgAk?e=0rTvJo>

The CAS Registry requires a buyer to attest if the VCRU is being purchased under a reportable Nationally Determined Contributions programs such as CORSIA. This triggers an automated notification of the host country's NDC compliance authority. The procedures are set out in the CAS Nationally Determined Contributions and Article 6 Procedures.

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

Erroneous issuance policy/process URL:

<https://netorgft6138081.sharepoint.com/:f:/s/CarbonAssetSolutionsSoilCarbonMethodologyDocuments/IgCqgT7BymBFS6oU92yMUbO9AU57KC9aGC6znqPZRSEbgAk?e=0rTvJo>

Refer to CAS Program Rules, CAS Soil Carbon Methodology (SCM) Version 1.1, Section 3 & 4

The CAS-SCM manages reversal risk through:

- 1) Ongoing project monitoring and contact with the project owner and/or project proponent. The monitoring report assists in identifying potential reversal risk and allow the CAS Program Manager to take action to address the risk with the project owner.
- 2) Regular measurement and re-mapping of the contracted lands. The CAS-SCM benchmark measurement period is every 2 — 3 years. The precision MINS measurement technology can detect incremental changes in soil carbon stocks and hence detect potential reversal trends early.
- 3) The CAS-SCM provides the project owner with a soil carbon distribution map of the project area which is a valuable tool to enable project owners to refine and focus activities on areas that may yield better sequestration outcomes.
- 4) A dual permanence buffer system comprising:
 - a. Volume Buffer — 5% of all FCRUs and VCRUs are held in the blockchain Registry as a volume buffer against potential loss. These credits are not sold.
 - b. Revenue Buffer — Upon sale of the remaining 95% of credits, 10% of the cash proceeds are transferred into a cash risk buffer. If the volume buffer is insufficient to cover permanence loss for a crediting period funds from the revenue buffer are used, initially, to purchase VCRUs from other projects.

CAS-SCM ICVCM-CCP eligible carbon credits will only be applicable to VCRUs and not FCRUs.

In the event of a project owner leaving the CAS Program, CAS may withhold an additional retention buffer or seek repayment of payments made to manage the risk of reversal associated with the withdrawal of the project and exit from the CAS Program.

If a project owner withdraws from the CAS Program, subject to any repayment or withheld retention buffers, CAS may set a Permanence Period under which a project owner shall provide data and access to allow monitoring of permanence obligations. Permanence Periods, if any, will be a minimum of 10 years. A project owner is required to notify CAS during this period if a project owner becomes aware of an actual or threatened permanence reversal.

3.1 Information - CORSIA

Please respond to each question below.

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

Public disclosure of validation and verification results policy/procedures URL:

<https://netorgft6138081.sharepoint.com/:f:/s/CarbonAssetSolutionsSoilCarbonMethodologyDocuments/IgCqgT7BymBFS6oU92yMUbO9AU57KC9aGC6zngPZRSEbgAk?e=0rTvJo>

All project data and documents can be viewed on the CAS Registry : [Registry](#)

CAS Validation & Verification Body Requirements Guidance Documents. Section 4.

All Validation Bodies (VBs) and Verification Bodies (VVBs) engaged by Carbon Asset Solutions must hold **recognized third-party accreditation** and be formally approved under the CAS-SCM program. Acceptable credentials include:

- **ISO/IEC 17029** and/or **ISO 14065** accreditation by a nationally recognized Accreditation Body (AB)
- **Forest Stewardship Council (FSC)** Certification Body status under ASI
- **UNFCCC-CDM** accreditation as a Designated Operational Entity (DOE)
- Formal inclusion on Carbon Asset Solutions public registry of approved VBs/VVBs, with clearly defined scopes of work

In addition to the above each body must also demonstrate:

- **Organizational independence** from project proponents
- A documented **Conflict-of-Interest Policy**
- A robust **Quality Management System** (QMS) covering document control, recordkeeping, complaints handling, and internal audits.

3.1 Information

Please respond to each question below.

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

Information disclosure policy/process URL:

<https://carbonassetsolutions.com/company/#governance>

All project data is publicly viewable on the CAS Registry

All CAS-CSM Program documentation is viewable on the CAS website

- 2) **a mitigation activity design document that includes:**
- a) a non-technical summary.
 - b) detailed information on the mitigation activity, including its location and proponents.
 - c) a description of the technology or practices applied.
 - d) the environmental and social impacts.
 - e) the methodology used.
 - f) 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.

Yes

Mitigation activity design document provisions URL:

<https://netorgft6138081.sharepoint.com/:f:/s/CarbonAssetSolutionsSoilCarbonMethodologyDocuments/IgCqgT7BymBFS6oU92yMUbO9AU57KC9aGC6znqPZRSEbgAk?e=0rTvJo>

All project data is publicly viewable on the CAS Registry

Project PDRP and/or PED are available on our public registry section, the downloadable documents include but is not limited to each of the requirements set above.

- 3) **For Categories listed in 9.1 b) 1, information relating to the monitoring and compensation period. URL:**

<https://netorgft6138081.sharepoint.com/:f:/s/CarbonAssetSolutionsSoilCarbonMethodologyDocuments/IgCqgT7BymBFS6oU92yMUbO9AU57KC9aGC6znqPZRSEbgAk?e=0rTvJo>

Each project is available for review through the CAS Registry: All project data is publicly viewable on the CAS Registry. Please refer to the Project Design and Review Document and the Validation Report.

- 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

Information request policy/process URL:

<https://netorgft6138081.sharepoint.com/:f:/s/CarbonAssetSolutionsSoilCarbonMethodologyDocuments/IgCqgT7BymBFS6oU92yMUbO9AU57KC9aGC6znqPZRSEbgAk?e=0rTvJo>

As above, Each project is available for review through the CAS Registry: All project data is publicly viewable on the CAS Registry. Please refer to the Project Design and Review Document and the Validation Report.

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

Validation of activities policy/procedures URL:

<https://netorgft6138081.sharepoint.com/:f:/s/CarbonAssetSolutionsSoilCarbonMethodologyDocuments/IgCqgT7BymBFS6oU92yMUbO9AU57KC9aGC6znqPZRSEbgAk?e=0rTvJo>

As per, CAS Validation & Verification Body Requirements Guidance Documents, section 5.1.

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

Yes

Verification of emission reductions policy/procedures URL:

<https://netorgft6138081.sharepoint.com/:f:/s/CarbonAssetSolutionsSoilCarbonMethodologyDocuments/IgCqgT7BymBFS6oU92yMUbO9AU57KC9aGC6znqPZRSEbgAk?e=0rTvJo>

As per, CAS Validation & Verification Body Requirements Guidance Documents, section 5.2

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

Yes

Accreditation of validators policy/procedures URL

<https://netorgft6138081.sharepoint.com/:f:/s/CarbonAssetSolutionsSoilCarbonMethodologyDocuments/IgCqgT7BymBFS6oU92yMUbO9AU57KC9aGC6znqPZRSEbgAk?e=0rTvJo>

CAS Validation & Verification Body Requirements Guidance Documents. Section 4.

All Validation Bodies (VBs) and Verification Bodies (VVBs) engaged by Carbon Asset Solutions must hold **recognized third-party accreditation** and be formally approved under the CAS-SCM program. Acceptable credentials include:

- **ISO/IEC 17029** and/or **ISO 14065** accreditation by a nationally recognized Accreditation Body (AB)
- **Forest Stewardship Council (FSC)** Certification Body status under ASI
- **UNFCCC-CDM** accreditation as a Designated Operational Entity (DOE)
- Formal inclusion on Carbon Asset Solutions public registry of approved VBs/VVBs, with clearly defined scopes of work.

In addition to the above each body must also demonstrate:

- **Organizational independence** from project proponents
- A documented **Conflict-of-Interest Policy**
- A robust **Quality Management System** (QMS) covering document control, recordkeeping, complaints handling, and internal audits.

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

Yes

Accreditation of verifiers policy/procedures URL:

<https://netorgft6138081.sharepoint.com/:f:/s/CarbonAssetSolutionsSoilCarbonMethodologyDocuments/IgCqgT7BymBFS6oU92yMUbO9AU57KC9aGC6znqPZRSEbgAk?e=0rTvJo>

CAS Validation & Verification Body Requirements Guidance Documents. Section 7

To ensure consistent quality, impartiality, and adherence to the Carbon Asset Solutions Soil Carbon Methodology (CAS-SCM), all approved Validation and Verification Bodies (VVBs) are subject to ongoing oversight by CAS. This oversight process is designed not only to identify and address performance issues but also to support continuous improvement, uphold credibility, and maintain alignment with international best practices and accreditation standards (e.g., ISO 14065, ISO 17029).

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

Yes

Validation timing policy/procedures URL:

<https://netorgft6138081.sharepoint.com/:f:/s/CarbonAssetSolutionsSoilCarbonMethodologyDocuments/IgCqgT7BymBFS6oU92yMUbO9AU57KC9aGC6znqPZRSEbgAk?e=0rTvJo>

CAS Validation & Verification Body Requirements Guidance Documents. Section 5

Projects registered under the Carbon Asset Solutions Soil Carbon Methodology (CAS-SCM) undergo a rigorous, two-stage Validation & Verification (V&V) lifecycle to confirm both the integrity of their design and the accuracy of their reported removals. All activities comply with ISO 14064-3 (verification) and ISO 14065 (accreditation) and are guided by Carbon Asset Solutions GHG accounting principles: relevance, completeness, consistency, accuracy, transparency, and conservativeness.

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

Measurement and verification requirements using independent third-party entities URL:

<https://netorgft6138081.sharepoint.com/:f:/s/CarbonAssetSolutionsSoilCarbonMethodologyDocuments/IgCqgT7BymBFS6oU92yMUbO9AU57KC9aGC6znqPZRSEbgAk?e=0rTvJo>

CAS Validation & Verification Body Requirements Guidance Documents. Section 5.

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

Verification and issuance of emission units policy/procedures URL

<https://netorgft6138081.sharepoint.com/:f:/s/CarbonAssetSolutionsSoilCarbonMethodologyDocuments/IgCqgT7BymBFS6oU92yMUbO9AU57KC9aGC6znqPZRSEbgAk?e=0rTvJo>

Projects registered under the Carbon Asset Solutions Soil Carbon Methodology (CAS-SCM) undergo a rigorous, two-stage Validation & Verification (V&V) lifecycle to confirm both the integrity of their design and the accuracy of their reported removals. All activities comply with ISO 14064-3 (verification) and ISO 14065 (accreditation) and are guided by Carbon Asset Solutions GHG accounting principles: relevance, completeness, consistency, accuracy, transparency, and conservativeness.

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

Third-party verification entity conflict of interest policy/procedures URL:

<https://netorgft6138081.sharepoint.com/:f:/s/CarbonAssetSolutionsSoilCarbonMethodologyDocuments/IgCqgT7BymBFS6oU92yMUbO9AU57KC9aGC6znqPZRSEbgAk?e=0rTvJo>

CAS Validation & Verification Body Requirements Guidance Documents. Section 6.

Maintaining strict independence and impartiality is critical to the credibility of Carbon Asset Solutions Validation & Verification (V&V) framework. To preserve the impartiality and credibility of every

validation and verification engagement under CAS-SCM:

- All Validation Bodies (VBs), Verification Bodies (VVBs), and their personnel must be free of any financial, familial, or commercial ties to the project proponent that could influence—or be perceived to influence—their work.
- Prior to each assignment, organizations and individuals must affirm their independence in writing; any actual, potential, or perceived conflict must be disclosed and managed in accordance with Carbon Asset Solutions Code of Conduct.
- Failure to declare or resolve a conflict to Carbon Asset Solutions satisfaction may result in suspension or removal from the approved VB/VVB registry.

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

Fiduciary disclosure for verifiers policy/procedures URL:

<https://netorgft6138081.sharepoint.com/:f:/s/CarbonAssetSolutionsSoilCarbonMethodologyDocuments/IgCqgT7BymBFS6oU92yMUbO9AU57KC9aGC6znqPZRSEbgAk?e=0rTvJo>

CAS Validation & Verification Body Requirements Guidance Documents. Section 6.

Maintaining strict independence and impartiality is critical to the credibility of Carbon Asset Solutions Validation & Verification (V&V) framework. To preserve the impartiality and credibility of every validation and verification engagement under CAS-SCM:

- All Validation Bodies (VBs), Verification Bodies (VVBs), and their personnel must be free of any financial, familial, or commercial ties to the project proponent that could influence—or be perceived to influence—their work.
- Prior to each assignment, organizations and individuals must affirm their independence in writing; any actual, potential, or perceived conflict must be disclosed and managed in accordance with Carbon Asset Solutions Code of Conduct.
- Failure to declare or resolve a conflict to Carbon Asset Solutions satisfaction may result in suspension or removal from the approved VB/VVB registry.

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

Yes

Resolution of fiduciary conflicts for verifiers policy/procedures URL:

<https://netorgft6138081.sharepoint.com/:f:/s/CarbonAssetSolutionsSoilCarbonMethodologyDocuments/IgCqgT7BymBFS6oU92yMUbO9AU57KC9aGC6znqPZRSEbgAk?e=0rTvJo>

CAS Validation & Verification Body Requirements Guidance Documents. Section 7.

To ensure consistent quality, impartiality, and adherence to the Carbon Asset Solutions Soil Carbon Methodology (CAS-SCM), all approved Validation and Verification Bodies (VVBs) are subject to ongoing oversight by CAS. This oversight process is designed not only to identify and address performance issues but also to support continuous improvement, uphold credibility, and maintain alignment with international best practices and accreditation standards (e.g., ISO 14065, ISO 17029).

Carbon Asset Solutions adopts a risk-based and collaborative approach to oversight, balancing regular monitoring with supportive engagement. Routine review cycles, project-specific concerns, or stakeholder feedback may trigger oversight activities. VVBs are expected to fully cooperate with all review activities and respond to findings in a timely and constructive manner.

Oversight mechanisms include, but are not limited to:

- **Desk Reviews:** Periodic examination of validation and verification reports, methodologies applied, and justification of assurance levels and materiality thresholds.
- **On-Site or Remote Office Visits:** Scheduled or unannounced inspections of the VVB's operating procedures, personnel records, and QMS documentation.
- **Witnessing of V&V Activities:** Observation of VVB teams during live project validations or verifications (in person or remotely) to assess adherence to standards and protocols.
- **Stakeholder Feedback Review:** Collection and assessment of feedback from project proponents or affected parties regarding a VVB's conduct, communication, or impartiality.
- **Performance Issue Response:** In cases of identified concerns (e.g., repeated non-conformances, delayed reporting, or procedural lapses), XYZ will notify the VVB and request a formal response, which may include a corrective action plan.

Carbon Asset Solutions reserves the right to:

- Suspend or revoke a VVB's approval for serious or persistent misconduct, non-compliance, or breach of impartiality.
- Notify the VVB's accreditation body or relevant third-party certifier if performance concerns are substantiated.
- Require the implementation of an improvement plan and/or further training for VVB personnel before reauthorisation.

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

Yes

Renewal of mitigation activities requirements/procedures URL:

<https://netorgft6138081.sharepoint.com/:f:/s/CarbonAssetSolutionsSoilCarbonMethodologyDocuments/IgCqgT7BymBFS6oU92yMUbO9AU57KC9aGC6zngPZRSEbgAk?e=0rTvJo>

CAS-SCM V1.1 (refer to section 3 and section 4.13)

The CAS-SCM meets these criteria through a full remeasurement of soil-based carbon at the end of each crediting period, described in detail below. The CAS-SCM uses a static baseline scenario to model business as usual GHG emissions during the first crediting period, benchmarked as approximately 2-3 years. The baseline scenario for the first crediting period assumes that GHG removals from business as usual is zero. The baseline scenario assumes pre-project agricultural management practices continue.

For each field in the project area, practices in the baseline scenario are established from a 3-year historical perspective to produce an annual schedule of activities (i.e. tillage, planting, harvest, fertilisation events) for each field within the project area. Baseline emissions are then modelled assuming continuation of baseline activities.

At the end of a crediting period soil carbon stock change is directly measured in the project area by the MINS technology and data on GHG emissions from project activities calculated using the CFT. The baseline is re-evaluated as required by the CAS-SCM and revised to incorporate the new data, and if required, practices. This becomes the new baseline for the subsequent crediting period against which the project is monitored and reported. The use of a dynamic baseline in the CAS-SCM creates a more realistic view of the GHG impact of the project.

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.

No

Verification of mitigation activities outside of the allowable number of years between verification events requirements/procedures URL:

<https://netorgft6138081.sharepoint.com/:f:/s/CarbonAssetSolutionsSoilCarbonMethodologyDocuments/IgCqgT7BymBFS6oU92yMUbO9AU57KC9aGC6zngPZRSEbgAk?e=0rTvJo>

All project owners must follow CAS-SCAM rules, Sections 2.2, 3.2 , 4.5. - The CAS-SCM minimises risk of misstatement of carbon and carbon gain through measurement. The MINS measurement process establishes a baseline carbon (organic and inorganic) level; subsequent re-measurements at regular intervals (every 2-3 years) confirm additional carbon present. When combined with confirmation of practice change and associated emissions, the net CO₂e removed from the atmosphere is determined.

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.

Yes

Ex-ante and ex-post credit identification procedures URL:

<https://netorgft6138081.sharepoint.com/:f:/s/CarbonAssetSolutionsSoilCarbonMethodologyDocuments/IgCqgT7BymBFS6oU92yMUbO9AU57KC9aGC6zngPZRSEbgAk?e=0rTvJo>

Refer to CAS Project Validation Report and Project Design and Review Plan

CAS supports both ex-ante and ex-post issuance of carbon credits and has established procedure to monitor and manage both.

The CAS-SCM issues both Forward Carbon Removal Units (FCRUs) based upon forecast rates of carbon gain at the beginning of a reporting period which have been validated but not yet verified, and Verified Carbon Removal Units (VCRUs) based upon measured, verified additionality at the end of the reporting period.

CAS recognizes that FCRUs do not qualify as CCP eligible. . Both FCRUs and VCRUs are clearly visible and distinguishable in the CAS Registry. Once a project is independently verified, the CAS Registry is updated to show that credits have been certified and may be sold or extinguished. When data are verified, the Registry is updated and FCRUs are extinguished and replaced by VCRUs.

4.1 Robust Independent Third-Party Validation and Verification

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

VVB accreditation requirements URL:

<https://netorgft6138081.sharepoint.com/:f:/s/CarbonAssetSolutionsSoilCarbonMethodologyDocuments/IgCqgT7BymBFS6oU92yMUbO9AU57KC9aGC6zngPZRSEbgAk?e=0rTvJo>

4. VALIDATION & VERIFICATION BODY QUALIFICATION REQUIREMENTS

All Validation Bodies (VBs) and Verification Bodies (VVBs) engaged by Carbon Asset Solutions must hold recognized third-party accreditation and be formally approved under the CAS-SCM program.

Acceptable credentials include:

- ISO/IEC 17029 and/or ISO 14065 accreditation by a nationally recognized Accreditation Body

(AB)

- Forest Stewardship Council (FSC) Certification Body status under ASI
- UNFCCC-CDM accreditation as a Designated Operational Entity (DOE)
- Formal inclusion on Carbon Asset Solutions public registry of approved VBs/VVBs, with clearly defined scopes of work

In addition to the above each body must also demonstrate:

- Organizational independence from project proponents
- A documented Conflict-of-Interest Policy
- A robust Quality Management System (QMS) covering document control, recordkeeping, complaints handling, and internal audits.

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

VVB management policy/process URL:

<https://netorgft6138081.sharepoint.com/:f:/s/CarbonAssetSolutionsSoilCarbonMethodologyDocuments/IgCqgT7BymBFS6oU92yMUbO9AU57KC9aGC6znqPZRSEbgAk?e=0rTvJo>

VVB Requirements Section 7.

To ensure consistent quality, impartiality, and adherence to the Carbon Asset Solutions Soil Carbon Methodology (CAS-SCM), all approved Validation and Verification Bodies (VVBs) are subject to ongoing oversight by CAS. This oversight process is designed not only to identify and address performance issues but also to support continuous improvement, uphold credibility, and maintain alignment with international best practices and accreditation standards (e.g., ISO 14065, ISO 17029).

Carbon Asset Solutions adopts a risk-based and collaborative approach to oversight, balancing regular monitoring with supportive engagement. Routine review cycles, project-specific concerns, or stakeholder feedback may trigger oversight activities. VVBs are expected to fully cooperate with all review activities and respond to findings in a timely and constructive manner.

B – Emissions Impact

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

Qualification, quantification, and protocol disclosure URL:

<https://netorgft6138081.sharepoint.com/:f:/s/CarbonAssetSolutionsSoilCarbonMethodologyDocuments/IgCqgT7BymBFS6oU92yMUbO9AU57KC9aGC6zngPZRSEBgAk?e=0rTvJo>

The Carbon Asset Solutions Soil Carbon Methodology (CAS-SCM) is a publicly available document on the CAS website.

In June 2023 the CAS-SCM was accredited by SGS as a new global standard, methodology and registry operating according to ISO 14064-2:2019 and ISO 14064-3:2019 principles. ISO 14064-2:2019 governs the process for determining baselines, monitoring, quantifying, and reporting greenhouse gas (GHG) emissions and removals under a project, and the basis for projects to be verified and validated. ISO 14064-3:2019 governs the verification and validation of the process under 14064-2 and enables the Carbon Credit buyer to determine the degree of confidence of the project's compliance with the methodology.

CAS-SCM Program Management documents and protocols are available for download on the CAS website.

Once a project is independently validated as eligible for inclusion in the CAS-SCM the project's details including the forecast Carbon Credits, or Future Carbon Removal Units (FCRUs) are visible in the CAS Registry.

At the end of a reporting/crediting period (approximately 3 years) and once the net GHG reductions and removals have been verified the FCRUs convert to Verified Carbon Removal Units (VCRUs) in the blockchain CAS Registry and are available for sale and retirement. Pre-purchased FCRUs are automatically retired when they convert to VCRUs.

All project details are stored in the CAS secure digital ledgers and can be viewed at any time by interested parties and intended users.

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

Summary of development of methodologies and protocols approach URL:

<https://netorgft6138081.sharepoint.com/:f:/s/CarbonAssetSolutionsSoilCarbonMethodologyDocuments/IgCqgT7BymBFS6oU92yMUbO9AU57KC9aGC6zngPZRSEBgAk?e=0rTvJo>

CAS-SCM V1.1 (refer to section 2).

In June 2023 the Carbon Asset Solutions Soil Carbon Methodology v1.0 2023 was accredited by SGS as a global standard, methodology and registry operating according to ISO 14064-2:2019 and ISO 14064-3:2019 principles. Version 1.1 was accredited in spring 2024.

Variations to the CAS-SCM will occur from time to time to accommodate and will be independently validated by SGS. These variations will update the SCM as required to stay relevant to changing certification demands (ISO 14064), emerging standards (eg ISO 14067 and ISO 14068), developments in science related to regenerative agriculture, changes of practices, and technology enhancements.

Any future variations will be subject to review by SGS, and updated versions released as required. These new versions will be published on the CAS website, the CAS Portal and through media channels.

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

Development of methodologies and protocols process URL:

<https://netorgft6138081.sharepoint.com/:f:/s/CarbonAssetSolutionsSoilCarbonMethodologyDocuments/IgCqgT7BymBFS6oU92yMUbO9AU57KC9aGC6znqPZRSEbgAk?e=0rTvJo>

The CAS-SCM ensures its consistency with this requirement by confirming the following: (refer to section 2).

- Variations to the CAS-SCM will occur from time to time to accommodate developments and will be independently validated by SGS. These variations will update the SCM as required to stay relevant to changing certification demands (ISO 14064), emerging standards (eg ISO 14067 and ISO 14068), developments in science related to regenerative agriculture, changes of practices, and technology enhancements.
- Any future variations will be subject to review by SGS, and updated versions released as required. These new versions will be published on the CAS website, the CAS Portal and through media channels.
- The CAS-SCM v1.0 was developed after public consultation and analysis of soil carbon sequestration methodologies revealed frustration amongst market participants at the costs, inefficiencies, and lack of precision and transparency within the current systems. This was a problem for intended users on both the supply side (agriculture, supply chains and landholders) and the buy side (corporates, supply chains and the capital markets).
- For supply side intended users comprising project owners including farmers, ranchers, landholders; advisors and services providers to project owners; and project aggregators and proponents, a market survey was conducted of farming and ranch operators in the USA and Canada in 2022 and direct consultations with advisors, aggregators and proponents across 2021 and 2022.
- Project owners such as farming operators were found to be motivated by a number of factors regarding a Carbon Credit program: upfront cost, application complexity, ongoing monitoring obligations, risk, return.

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

Yes

Emissions units based on accurate measurements and valid quantification methods/protocols URL:

<https://netorgft6138081.sharepoint.com/:f:/s/CarbonAssetSolutionsSoilCarbonMethodologyDocuments/IgCqgT7BymBFS6oU92yMUbO9AU57KC9aGC6znqPZRSEbgAk?e=0rTvJo>

Refer to CAS-SCM V1.1 section 4.

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

Procedures for monitoring, measuring, and reporting of both activities and the resulting mitigation URL:

<https://netorgft6138081.sharepoint.com/:f:/s/CarbonAssetSolutionsSoilCarbonMethodologyDocuments/IgCqgT7BymBFS6oU92yMUbO9AU57KC9aGC6znqPZRSEbgAk?e=0rTvJo>

CAS-SCM refer to section 4.13).

The benchmark crediting period (or project cycle) for the CAS-SCM is set at approximately 2 to 3 years. This may vary depending upon project activities, conditions, and other events that may include force majeure events.

Upon commencement of the project and at the commencement of every crediting period CAS produces a Measurement Plan for the project which meets the scientific criteria and operational procedures of the patented MINS soil carbon mapping technology. The Measurement Plan is set up in the MINS software and the project area is scanned by the MINS which follows the Measurement Plan specifications using path planning and auto steer software built into the MINS unit. The GPS coordinates, path planning and other key data during the mapping process are recorded to a digital log. Software compares the Measurement Plan and the operational log to audit compliance with the methodology.

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 and adopting updates to existing quantification methodologies.

Yes

Quantification methodology update policy/process URL:

<https://netorgft6138081.sharepoint.com/:f:/s/CarbonAssetSolutionsSoilCarbonMethodologyDocuments/IgCqgT7BymBFS6oU92yMUbO9AU57KC9aGC6zngPZRSEbgAk?e=0rTvJo>

CAS-SCM Section 2:

In June 2023 the Carbon Asset Solutions Soil Carbon Methodology v1.0 2023 was accredited by SGS as a new global standard, methodology and registry operating according to ISO 14064-2:2019 and ISO 14064-3:2019 principles. In May 2024 version 1.1 was approved.

Variations to the CAS-SCM will occur from time to time to accommodate technology or process updates and will be independently validated by SGS. These variations will update the SCM as required to stay relevant to changing certification demands (ISO 14064), emerging standards (eg ISO 14067 and ISO 14068), developments in science related to regenerative agriculture, changes of practices, and technology enhancements.

Any future variations will be subject to review by SGS or another VVB, and updated versions released as required. These new versions will be published on the CAS website, the CAS Portal and through media channels.

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 carbon crediting program provisions). 4) establishing the baseline scenario. 5) quantification of GHG emission reductions or removals. 6) monitoring practices.

Yes

Methodology provisions URL:

<https://netorgft6138081.sharepoint.com/:f:/s/CarbonAssetSolutionsSoilCarbonMethodologyDocuments/IgCqgT7BymBFS6oU92yMUbO9AU57KC9aGC6zngPZRSEbgAk?e=0rTvJo>

CAS-SCM Section 2 and Section 4 addresses the essential components listed above.

The CAS-SCM requires additionality to be demonstrated by the adoption, at the project start date, of one or more changes in pre-existing agricultural management practices. Practice changes must be additional to business as usual. A practice change constitutes adoption of one or more of the practices covered in the schedule of activities and the categories included in Chapter 4, cessation of a pre-existing practice (e.g. stop tillage or irrigation), adjustment to a pre-existing practice, or some combination thereof.

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

Methodology approval policy/process URL:

<https://netorgft6138081.sharepoint.com/:f:/s/CarbonAssetSolutionsSoilCarbonMethodologyDocuments/IgCqgT7BymBFS6oU92yMUbO9AU57KC9aGC6znqPZRSEbgAk?e=0rTvJo>

CAS is currently appointing Advisory Boards of independent experts to provide business, technical and scientific advice on the current and future program operations and versions CAS-SCM (see Section 2.12).

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

Methodology review/suspension policy/process URL:

<https://netorgft6138081.sharepoint.com/:f:/s/CarbonAssetSolutionsSoilCarbonMethodologyDocuments/IgCqgT7BymBFS6oU92yMUbO9AU57KC9aGC6znqPZRSEbgAk?e=0rTvJo>

Yes, although this is not relevant to the CAS Program as it uses the same procedures for measurement, data management and verification for all projects.
CAS-SCM section 1.4 refers.

5.2 Requirements for Quantifying GHG Emission Reductions or Removals - CORSIA

Please respond to each question below.

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

Yes

URL:

<https://netorgft6138081.sharepoint.com/:f:/s/CarbonAssetSolutionsSoilCarbonMethodologyDocuments/IgCqgT7BymBFS6oU92yMUbO9AU57KC9aGC6znqPZRSEbgAk?e=0rTvJo>

CAS-SCM Section 2 - Principles.

The CAS-SCM collects, measures, or empirically models all GHG SSRs, data and processes relevant to

the baseline scenario, the project, monitoring, and reporting. These data are set out in detail in this Methodology document and the Annexes.

Project boundaries are identified as the physical boundaries of the project area, the GHG SSR boundaries that are controlled, affected and related to the project, and leakage. These are described in detail in the Project Design and Review Plan (Annex 6.3) and set out in Chapter 3 of this document. The project uses the activity-based, globally applicable empirical model Cool Farm Tool (CFT) to quantify changes to net GHG emissions from farming practice changes.

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

Yes

URL:

<https://registry.casmrv.com/>

CAS-SCM Section 2 – Principles.

Data in the Project Interest Note, the Project Participation Agreement, the Project Design and Review Plan, the Validation Report, Validation Statement, Project Review Report, Project Execution Document, the Verification Report, and the Verification Statement are recorded in the Microsoft Azure database. Baseline and subsequent soil scan data from the MINS are stored in the Azure Confidential Ledger. All projects are then posted as live on CAS registry for public viewing.

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

URL:

<https://netorgft6138081.sharepoint.com/:f:/s/CarbonAssetSolutionsSoilCarbonMethodologyDocuments/IgCqgT7BymBFS6oU92yMUbO9AU57KC9aGC6znqPZRSEbgAk?e=0rTvJo>

CAS-SCM section 2.2 - Principles

The CAS-SCM uses a static baseline scenario to model business as usual GHG emissions during the first crediting period, benchmarked as approximately 2-3 years. The baseline scenario for the first crediting period assumes that GHG removals from business as usual is zero. The baseline scenario assumes pre-project agricultural management practices continue.

For each field in the project area, practices in the baseline scenario are established from a 3-year historical perspective to produce an annual schedule of activities (i.e. tillage, planting, harvest, fertilisation events) for each field within the project area. Baseline emissions are then modelled assuming continuation of baseline activities.

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

URL:

<https://netorgft6138081.sharepoint.com/:f:/s/CarbonAssetSolutionsSoilCarbonMethodologyDocuments/IgCqgT7BymBFS6oU92yMUbO9AU57KC9aGC6znqPZRSEbgAk?e=0rTvJo>

CAS-SCM section 4.4. I)

When adding new activities or changes to an existing project the GHG baseline(s) and the project emissions and removals affected by the new activities or changes are assessed to ensure they are consistent with the Validation Report and incorporated into an updated Project Design and Review

Plan as appropriate. If the changes are not consistent with the validated GHG baseline, the project will be re-validated.

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

Yes

URL:

<https://netorgft6138081.sharepoint.com/:f:/s/CarbonAssetSolutionsSoilCarbonMethodologyDocuments/IgCqgT7BymBFS6oU92yMUbO9AU57KC9aGC6znqPZRSEbgAk?e=0rTvJo>

CAS-SCM Section 4.6.2 and equations 15-17

The CAS-SCM considers the three crediting period cycle as reasonable. Risks of leakage are low as sustainable farming practices in general lead to yield and efficiency increases. However in the interests of conservativeness leakage is monitored and, if required, accounted for in the overall net abatement for the project.

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

URL:

<https://netorgft6138081.sharepoint.com/:f:/s/CarbonAssetSolutionsSoilCarbonMethodologyDocuments/IgCqgT7BymBFS6oU92yMUbO9AU57KC9aGC6znqPZRSEbgAk?e=0rTvJo>

As stated above, CAS-SCM Section 2.15 4.6.2 and equations 15-17

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

URL:

<https://netorgft6138081.sharepoint.com/:f:/s/CarbonAssetSolutionsSoilCarbonMethodologyDocuments/IgCqgT7BymBFS6oU92yMUbO9AU57KC9aGC6znqPZRSEbgAk?e=0rTvJo>

CAS-SCM Section 2.15, 4.6.2 and equations 15-17

In the event that there is a productivity reduction across a minimum of three crediting periods (which under the CAS-SCM is a benchmark 6 — 9 year period) and this reduction cannot be explained by seasonal fluctuations or other variations (such as extreme weather, drought, or precipitation events) reasonably considered as not due to the project activity, the CAS-SCM will take the leakage into consideration.

For livestock, potential leakage due to displacement is considered a productivity reduction and hence is monitored and accounted for across the three crediting period cycle.

The CAS-SCM considers the three crediting period cycle as reasonable. Risks of leakage are low as sustainable farming practices in general lead to yield and efficiency increases. However in the interests of conservativeness leakage.

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

Yes

URL:

<https://netorgft6138081.sharepoint.com/:f:/s/CarbonAssetSolutionsSoilCarbonMethodologyDocuments/IgCqgT7BymBFS6oU92yMUbO9AU57KC9aGC6zngPZRSEbgAk?e=0rTvJo>

CAS-SCM Section 2.15

The CAS-SCM considers the three crediting period cycle as reasonable. Risks of leakage are low as sustainable farming practices in general lead to yield and efficiency increases. However in the interests of conservativeness leakage is monitored and, if required, accounted for in the overall net abatement for the project.

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

Yes

URL:

<https://netorgft6138081.sharepoint.com/:f:/s/CarbonAssetSolutionsSoilCarbonMethodologyDocuments/IgCqgT7BymBFS6oU92yMUbO9AU57KC9aGC6zngPZRSEbgAk?e=0rTvJo>

CAS-SCM Section 4.5, 4.6.2 and equations 15-17

The CAS-SCM assesses risk to implement proactive methods to identify and minimise potential loss, ameliorate potential impact, and minimise overall measurement risk. CAS minimises risk associated with identification of additional carbon sequestered through ongoing measurement using the MINS technology and project monitoring.

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

Carbon Credit definition URL:

<https://netorgft6138081.sharepoint.com/:f:/s/CarbonAssetSolutionsSoilCarbonMethodologyDocuments/IgCqgT7BymBFS6oU92yMUbO9AU57KC9aGC6zngPZRSEbgAk?e=0rTvJo>

Refer to CAS-SCM Definitions.

CAS Carbon Credit: a financial services instrument that represents one metric tonne of CO₂e and may be a Future Carbon Removal Unit (FCRU), a Verified Carbon Removal Unit (VCRU) or an emissions reduction Carbon Credit. AS noted elsewhere, CAS recognizes that Forward Carbon Removal Units are not permitted under several international crediting programmes.

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

Yes

GWP values used URL:

<https://netorgft6138081.sharepoint.com/:f:/s/CarbonAssetSolutionsSoilCarbonMethodologyDocuments/IgCqgT7BymBFS6oU92yMUbO9AU57KC9aGC6zngPZRSEbgAk?e=0rTvJo>

Indicate specific numbered sections/headings or rule text in the URL pertinent to this

criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

Refer to CAS-SCM Section 4 and Section 5.

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

Yes

Definition for length of crediting periods URL:

<https://netorgft6138081.sharepoint.com/:f:/s/CarbonAssetSolutionsSoilCarbonMethodologyDocuments/IgCqgT7BymBFS6oU92yMUbO9AU57KC9aGC6znqPZRSEbgAk?e=0rTvJo>

Refer to CAS-SCM Section 1 and Section 2.

Three-Year Length of Crediting Period

Core to generating a Carbon Credit is the tenet of additionality, or where a practice change results in more carbon being drawn from the atmosphere than "business as usual" farming methods. CAS creates a future stream of Carbon Credits by entering into a forward contract with farmers or rural landholders who then use regenerative agricultural practices to reduce greenhouse gas emissions and sequester carbon in the soil, which in turn are measured and certified for sale.

The reporting period (crediting period) which is the time between a baseline measurement and the next review period is on average 3 years under the CAS-SCM. Project monitoring is conducted annually. The contract period with the project owner is ongoing with no end date specified.

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.

Yes

Guidance on crediting period renewal URL:

<https://netorgft6138081.sharepoint.com/:f:/s/CarbonAssetSolutionsSoilCarbonMethodologyDocuments/IgCqgT7BymBFS6oU92yMUbO9AU57KC9aGC6znqPZRSEbgAk?e=0rTvJo>

Refer to CAS-SCM Section 2.2

Baseline Scenario

The CAS-SCM uses a static baseline scenario to model business as usual GHG emissions during the first crediting period, benchmarked as approximately 2-3 years. The baseline scenario for the first crediting period assumes that GHG removals from business as usual is zero. The baseline scenario assumes pre-project agricultural management practices continue.

For each field in the project area, practices in the baseline scenario are established from a 3-year historical perspective to produce an annual schedule of activities (i.e. tillage, planting, harvest, fertilisation events) for each field within the project area. Baseline emissions are then modelled assuming continuation of baseline activities.

At the end of a crediting period soil carbon stock change is directly measured in the project area by the MINS technology and data on GHG emissions from project activities calculated using the CFT. The baseline is re-evaluated as required by the CAS-SCM and revised to incorporate the new data, and if required, practices. This becomes the new baseline for the subsequent crediting period against which the project is monitored and reported. The use of a dynamic baseline in the CAS-SCM creates a more realistic view of the GHG impact of the project.

The use of dynamic baselines meets conservative requirements as GHG emissions reductions models which may be impacted by favourable or unfavourable periods will smooth out over time. The CAS methodology confirms if a project is a net emitter or a net (or equal) sequesterer of carbon.

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

Assessment of uncertainty URL:

<https://netorgft6138081.sharepoint.com/:f:/s/CarbonAssetSolutionsSoilCarbonMethodologyDocuments/IgCqgT7BymBFS6oU92yMUbO9AU57KC9aGC6znqPZRSEbgAk?e=0rTvJo>

Refer to CAS-SCM Section 2 - Principles and Section 4 – Quantification.

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

Yes

Conservativeness provisions/processes URL:

<https://netorgft6138081.sharepoint.com/:f:/s/CarbonAssetSolutionsSoilCarbonMethodologyDocuments/IgCqgT7BymBFS6oU92yMUbO9AU57KC9aGC6znqPZRSEbgAk?e=0rTvJo>

Refer to CAS-SCM Section 2 – Principles.

7) require in its program documents 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

Policy and legal provisions URL:

<https://netorgft6138081.sharepoint.com/:f:/s/CarbonAssetSolutionsSoilCarbonMethodologyDocuments/IgCqgT7BymBFS6oU92yMUbO9AU57KC9aGC6znqPZRSEbgAk?e=0rTvJo>

Refer to CAS-SCM Section 2 – Principles.

5.3 Ex-Post Determination of Emission Reductions or Removals

Please respond to each question below.

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.

Yes

Ex-ante and ex-post credit identification procedures URL:

<https://netorgft6138081.sharepoint.com/:f:/s/CarbonAssetSolutionsSoilCarbonMethodologyDocuments/IgCqgT7BymBFS6oU92yMUbO9AU57KC9aGC6znqPZRSEbgAk?e=0rTvJo>

The CAS-SCM meets this criterion through its program design and the provision to issue both Forward Carbon Removal Units (FCRUs) based upon forecast rates of carbon gain at the beginning of a reporting period which have been validated but not yet verified and Verified Carbon Removal Units (VCRUs) based upon measured, verified additionality at the end of the reporting period.

CAS recognizes that FCRUs are not qualified. Both FCRUs and VCRUs are clearly visible and distinguishable in the CAS Registry.

Once a project is independently verified, the CAS Registry is updated to show that credits have been certified and may be sold or extinguished. When data are verified, the Registry is updated and FCRUs are extinguished and replaced by VCRUs.

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; and

Yes

No double registration procedures URL:

<https://netorgft6138081.sharepoint.com/:f:/s/CarbonAssetSolutionsSoilCarbonMethodologyDocuments/IgCqgT7BymBFS6oU92yMUbO9AU57KC9aGC6znqPZRSEbgAk?e=0rTvJo>

CAS cover this requirement in the following documents;

CAS-SCM V1.1 - Section 4

CAS Project Participation Agreement - Clause 1.1 PDRP – Eligibility

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

No double issuance procedures URL:

<https://netorgft6138081.sharepoint.com/:f:/s/CarbonAssetSolutionsSoilCarbonMethodologyDocuments/IgCqgT7BymBFS6oU92yMUbO9AU57KC9aGC6znqPZRSEbgAk?e=0rTvJo>

CAS-SCM V1.1

CAS Project Participation Agreement PDRP -

The CAS-SCM ensures its consistency with this requirement as follows:

The CAS SCM has enacted measures to eliminate double counting in all of its forms including double issuance, double use and double claiming. CAS utilizes blockchain data management which is immutable and cannot be tampered with. It employs a tokenized carbon credit which ensures unique identification to each credit issued. This avoids double issuance (more than one credit issued for a single tonne as stored), double use (double selling of same credit) and double claiming (same credit counted by more than one company).

The legal documents registered to each project also ensures that the land base has not been enrolled in another carbon program and eliminates future potential of same

6.2 No Double Use

Please respond to each question below.

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

No Double Use provisions URL:

<https://netorgft6138081.sharepoint.com/:f:/s/CarbonAssetSolutionsSoilCarbonMethodologyDocuments/IgCqgT7BymBFS6oU92yMUbO9AU57KC9aGC6znqPZRSEbgAk?e=0rTvJo>

The CAS-SCM ensures its consistency with this requirement as follows:

The CAS SCM has enacted measures to eliminate double counting in all of its forms including double issuance, double use and double claiming. CAS utilizes blockchain data management which is immutable and cannot be tampered with. It employs a tokenized carbon credit which ensures unique identification to each credit issued. This avoids double issuance (more than one credit issued for a single tonne as stored), double use (double selling of same credit) and double claiming (same credit counted by more than one company).

The legal documents registered to each project also ensures that the land base has not been enrolled in another carbon program and eliminates future potential of same

C - Sustainable Development

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

URL:

<https://netorgft6138081.sharepoint.com/:f:/s/CarbonAssetSolutionsSoilCarbonMethodologyDocuments/IgCqgT7BymBFS6oU92yMUbO9AU57KC9aGC6znqPZRSEbgAk?e=0rTvJo>

The safeguards for CAS' operational environmental, social and governance (ESG) risks are outlined in the CAS Environmental, Social and Governance Sustainability Policy: Section 2.1. outlines the Scope of the ESG risks and requirements, which are addressed by the Sustainability Strategy Section 4.2. Materiality Assessment for CAS' operations and the Section 4.1 Scope SDGs and Section 8 SDGs refer to the CAS Co-Benefit Framework which is used to assess and address the ESG impact of client projects. In addition, the CAS Soil Carbon Methodology requires a mandatory Environmental Impact Assessment (PDRP SECTION 1.12) as part of the onboarding of carbon project suppliers, and a familiarization with the CAS Ethics Code of Conduct.

To make sure all risks are identified, assessed and effectively managed, CAS adheres to the Stakeholder Engagement Strategy and the Public Commentary and Consultation Policy.

2) Confirm that your program uses sustainable development criteria

Yes

URL:

<https://netorgft6138081.sharepoint.com/:f:/s/CarbonAssetSolutionsSoilCarbonMethodologyDocuments/IgCqgT7BymBFS6oU92yMUbO9AU57KC9aGC6znqPZRSEbgAk?e=0rTvJo>

Section 4.1. of the CAS ESG Sustainability Policy outlines that CAS carbon clients must demonstrate their current state and progress against the United Nations Sustainable Development Goals using the proprietary CAS Co-benefit Questionnaire and Matrix.

Section 8.1 and 8.2 of the CAS Sustainability Strategy outline the specific KPIs and actions CAS takes to ensure optimal alignment and progress of its clients against the outlined sustainable development criteria.

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

Yes

URL:

<https://netorgft6138081.sharepoint.com/:f:/s/CarbonAssetSolutionsSoilCarbonMethodologyDocuments/IgCqgT7BymBFS6oU92yMUbO9AU57KC9aGC6znqPZRSEbgAk?e=0rTvJo>

The CAS Co-Benefit Framework Section 6 outlines the procedures to monitor, report and verify these criteria by:

(1) using the CAS Co-benefit questionnaire, the (2) CAS Co-benefit matrix and (3) the CAS co-benefit scorecard. All Co-benefit assessments undergo an internal verification by CAS program managers, and

before these claims can be made public and added to the carbon credits, they must be verified by a third-party independent auditor.

7.1 Assessment and Management of Environmental and Social Risks

Please respond to each question below.

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

1) abide by national and local laws, objectives, programs and regulations and where relevant, international conventions and agreements.

- https://www.un.org/development/desa/indigenouspeoples/wp-content/uploads/sites/19/2018/11/UNDRIP_E_web.pdf
- <https://www.ohchr.org/en/what-are-human-rights/international-bill-human-rights>

Yes

Provisions to abide by national and local laws URL:

<https://netorgft6138081.sharepoint.com/:f:/s/CarbonAssetSolutionsSoilCarbonMethodologyDocuments/IgCqgT7BymBFS6oU92yMUbO9AU57KC9aGC6zngPZRSEBgAk?e=0rTvJo>

CAS-SCM Section 4.4 h) -The project owner and/or project proponent are required to guarantee that all information provided is true and reliable and meets municipal, state, and federal laws and regulations relevant to the project.

PDRP Section 1.11. 4.

Further to our CAS-SCM requirements, Section 3.2 of the CAS Sustainability Strategy list all the environmental legislation and regulations at the global and national level for all geographic areas where CAS operates. Section 4.3. of the CAS Sustainability Policy outlines CAS' commitment to adhere to these legal requirements as the minimum.

Section 6.4. of the CAS Stakeholder Engagement Strategy specifies the commitment to adhere to the principle of FPIC to ensure the United Nations Declaration on the Rights of Indigenous Peoples are respected.

Compliance to the Human Rights Charter is guaranteed by adhering to the

- Prohibition of Forced Labour Policy
- Ethics Code of Conduct Policy
- Equity Policy

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

Assessment of negative environmental and social impacts policy/processes URL:

<https://netorgft6138081.sharepoint.com/:f:/s/CarbonAssetSolutionsSoilCarbonMethodologyDocuments/IgCqgT7BymBFS6oU92yMUbO9AU57KC9aGC6zngPZRSEBgAk?e=0rTvJo>

CAS defines potential negative environmental impact through its leakage criteria, as the acceptable COPS do not include negative environmental impact on the project itself. Leakage is defined as an increase in GHG emissions outside the project area as a result of project activities.

Further to CAS-SCM, mandatory assessment of the Co-benefits as outlined in the CAS Co-Benefit Framework ensures that project clients cause no environmental harm to the minimum and generate

additional co-benefits beyond carbon; which include social and environmental impacts.

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

FPIC IPs and LCs provisions URL:

<https://netorgft6138081.sharepoint.com/:f:/s/CarbonAssetSolutionsSoilCarbonMethodologyDocuments/IgCqgT7BymBFS6oU92yMUbO9AU57KC9aGC6znqPZRSEbgAk?e=0rTvJo>

The Sustainability Policy Section 3.3. outlines the importance and procedures of CAS effective stakeholder consultations:

- **Internal stakeholder engagement** – The [Sustainability Strategy](#)
- **External stakeholder engagement** – The [Stakeholder Engagement strategy](#)
- **Engagement of First Nations People** – The [Stakeholder Engagement Strategy Section 6.4](#)
- **Policy consultation, especially related to carbon methodology and projects** – The [Public Commentary and Consultation Policy](#)

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

Assessment of mitigation requirements URL:

<https://netorgft6138081.sharepoint.com/:f:/s/CarbonAssetSolutionsSoilCarbonMethodologyDocuments/IgCqgT7BymBFS6oU92yMUbO9AU57KC9aGC6znqPZRSEbgAk?e=0rTvJo>

As part of the Onboarding of the CAS project owners must disclose any information on the environmental impact assessment and mitigation strategies in the [PIN](#) (or any other document that would have this section. If risks are identified, CAS records "risk mitigation measures" in PDRP section 2. Project Risk Assessment.

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

Yes

Measures implemented commensurate with identified risks URL:

<https://netorgft6138081.sharepoint.com/:f:/s/CarbonAssetSolutionsSoilCarbonMethodologyDocuments/IgCqgT7BymBFS6oU92yMUbO9AU57KC9aGC6znqPZRSEbgAk?e=0rTvJo>

CAS project owners must disclose any information on the environmental impact assessment and mitigation strategies in the [PIN](#) (or any other document that would have this section. Ongoing monitoring is conducted by CAS inline with our CAS-SCM section 2.17.

7.2 Labour Rights and Working Conditions

Please respond to each question below.

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

1) provides safe and healthy working conditions for employees.

Yes

Health & safety policy URL:

<https://netorgft6138081.sharepoint.com/:f:/s/CarbonAssetSolutionsSoilCarbonMethodologyDocuments/IgCqgT7BBymBFS6oU92yMUbO9AU57KC9aGC6zngPZRSEbgAk?e=0rTvJo>

CAS identifies safe and healthy working conditions for its employees as one of the material sustainability topics as outlined in the Sustainability Strategy section 4.2. It therefore includes its commitments to a safe and healthy work environment in the Sustainability Policy Section 4.2, and is address by the CAS Occupational Health and Safety Policy.

Project Clients and CAS employees, contractors and partners must adhere to the CAS Ethics Code of Conduct, and CAS Prohibition of Forced Labour Policy. CAS Project Clients are assessed against the provision of Decent Work (SDG8) through the CAS Co-Benefit Framework.

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

Yes

Fair treatment policy URL:

<https://netorgft6138081.sharepoint.com/:f:/s/CarbonAssetSolutionsSoilCarbonMethodologyDocuments/IgCqgT7BBymBFS6oU92yMUbO9AU57KC9aGC6zngPZRSEbgAk?e=0rTvJo>

CAS is dedicated to uphold an equitable, inclusive, fair and safe environment as outlined it is Equity policy. The Whistleblower Policy and Complaints and Grievance Procedures are put in place to ensure prompt exposure and resolution of breaches to this commitment.

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

Yes

Measured to protect against forced/child/trafficked labour URL:

<https://netorgft6138081.sharepoint.com/:f:/s/CarbonAssetSolutionsSoilCarbonMethodologyDocuments/IgCqgT7BBymBFS6oU92yMUbO9AU57KC9aGC6zngPZRSEbgAk?e=0rTvJo>

The CAS Prohibition of Forced Labor Policy defines Forced Labor and CAS commitment to strictly prohibit the use of forced labor, child labor or trafficked persons in any part of the business or supply chain.

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

Adherence to safeguards provisions URL:

<https://netorgft6138081.sharepoint.com/:f:/s/CarbonAssetSolutionsSoilCarbonMethodologyDocuments/IgCqgT7BymBFS6oU92yMUbO9AU57KC9aGC6znqPZRSEbgAk?e=0rTvJo>

As outlined in above, Project Clients are required to disclose the results concerning each element of social and environmental risks, impacts and opportunities. They must detail the approaches used to address potential risks, including those associated with labor rights and employment conditions where applicable. If such risks do not pertain to the project, this must be explained within the.

7.3 Resource Efficiency and Pollution Prevention

Please respond to each question below.

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

- pollutant emissions to air
- pollutant discharges to water, noise and vibration
- generation of waste and release of hazardous materials, chemical pesticides and fertilisers

Yes

Pollution and hazardous materials policy URL:

<https://netorgft6138081.sharepoint.com/:f:/s/CarbonAssetSolutionsSoilCarbonMethodologyDocuments/IgCqgT7BymBFS6oU92yMUbO9AU57KC9aGC6znqPZRSEbgAk?e=0rTvJo>

Refer to CAS Sustainability policy - Section 4.1

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

- 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.
- 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

Resource Efficiency and Pollution Prevention policy URL:

<https://netorgft6138081.sharepoint.com/:f:/s/CarbonAssetSolutionsSoilCarbonMethodologyDocuments/IgCqgT7BymBFS6oU92yMUbO9AU57KC9aGC6znqPZRSEbgAk?e=0rTvJo>

Refer to CAS Sustainability policy - Section 4.1.

7.4 Land Acquisition and Involuntary Resettlement

Please respond to each question below.

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

Avoidance of forced physical and/or economic displacement policy URL:

<https://netorgft6138081.sharepoint.com/:f:/s/CarbonAssetSolutionsSoilCarbonMethodologyDocuments/IgCqgT7BymBFS6oU92yMUbO9AU57KC9aGC6znqPZRSEbgAk?e=0rTvJo>

[qgT7BymBFS6oU92yMUbO9AU57KC9aGC6zngPZRSEbgAk?e=0rTvJo](https://netorgft6138081.sharepoint.com/:f:/s/CarbonAssetSolutionsSoilCarbonMethodologyDocuments/IgCqgT7BymBFS6oU92yMUbO9AU57KC9aGC6zngPZRSEbgAk?e=0rTvJo)

Refer to CAS-SCM Section 4 for GHG quantification.

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

- whether the mitigation activity results in forced physical and/or economic displacement.;
- 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

Physical and Economic Displacement policy URL:

<https://netorgft6138081.sharepoint.com/:f:/s/CarbonAssetSolutionsSoilCarbonMethodologyDocuments/IgCqgT7BymBFS6oU92yMUbO9AU57KC9aGC6zngPZRSEbgAk?e=0rTvJo>

Refer to CAS-SCM Section 4.

7.5 Biodiversity Conservation

Please respond to each question below.

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

Terrestrial and marine biodiversity mitigation policy URL:

<https://netorgft6138081.sharepoint.com/:f:/s/CarbonAssetSolutionsSoilCarbonMethodologyDocuments/IgCqgT7BymBFS6oU92yMUbO9AU57KC9aGC6zngPZRSEbgAk?e=0rTvJo>

The impact management on terrestrial and marine biodiversity and ecosystems of client projects must be assessed in the Environmental Impact Assessment PDRP section 1.12 and disclosed and managed before any project can be validated and credits can be issued, as specified in the CAS Sustainability Policy Section 4.1.

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

Yes

Endangered species policy URL:

<https://netorgft6138081.sharepoint.com/:f:/s/CarbonAssetSolutionsSoilCarbonMethodologyDocuments/IgCqgT7BymBFS6oU92yMUbO9AU57KC9aGC6zngPZRSEbgAk?e=0rTvJo>

The potential risk to physical and/or economic displacement must be identified and disclosed during the initial Environmental Impact Assessment (PDRP Section 1.11 & 1.12), however considering CAS only operates with agricultural practice changes it is high-unlikely that this would form a risk as CAS Project owners already have converted and cultivated their land and poses no to limited risk to habitats of rare, threatened, and endangered species, including areas needed for habitat connectivity.

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

Yes

Preservation of high conservation value habitats policy URL:

<https://netorgft6138081.sharepoint.com/:f:/s/CarbonAssetSolutionsSoilCarbonMethodologyDocuments/IgCqgT7BymBFS6oU92yMUbO9AU57KC9aGC6znqPZRSEbgAk?e=0rTvJo>

Further to above, Section 1.11 of PDRP confirms project area was not or intends to convert natural forests, grasslands, wetlands, or high conservation value habitats. Considering CAS only operates with agricultural practice changes it is high-unlikely that this would form a risk as CAS Project owners already have converted and cultivated their land.

4) minimises soil degradation and soil erosion.

Yes

Soil degradation and soil erosion policy URL:

<https://netorgft6138081.sharepoint.com/:f:/s/CarbonAssetSolutionsSoilCarbonMethodologyDocuments/IgCqgT7BymBFS6oU92yMUbO9AU57KC9aGC6znqPZRSEbgAk?e=0rTvJo>

CAS SCM is the adoption of regenerative agriculture practices. CAS requires that program participants commit to an agricultural Change of Practice (COP) that will sequester net additional carbon in soil. These regenerative agriculture COPS deliver multiple environmental benefits.

CAS considers this impact unlikely yet high valuable because CAS' projects are soil carbon projects that aim to increase soil carbon through the implementation of regenerative agricultural practices that enhance soil health and reduce soil erosion. Moreover, soil erosion has specific criteria that are assessed against the CAS Co-benefit Framework that every Project Client mandatory completes during onboarding (SDG15 Life on Land).

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

Yes

Water conservation policy URL:

<https://netorgft6138081.sharepoint.com/:f:/s/CarbonAssetSolutionsSoilCarbonMethodologyDocuments/IgCqgT7BymBFS6oU92yMUbO9AU57KC9aGC6znqPZRSEbgAk?e=0rTvJo>

CAS-SCM section 4.3. Assessment of project Feasibility encourages minimizing water consumption/improvements.

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

- 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.
- 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

Biodiversity conservation and sustainable management of living natural resources policy URL:

<https://netorgft6138081.sharepoint.com/:f:/s/CarbonAssetSolutionsSoilCarbonMethodologyDocuments/IgCqgT7BymBFS6oU92yMUbO9AU57KC9aGC6znqPZRSEbgAk?e=0rTvJo>

As stated in Q2, The potential risk to physical and/or economic displacement must be identified and disclosed during the initial Environmental Impact Assessment (PDRP Section 1.11 & 1.12), however considering CAS only operates with agricultural practice changes it is high-unlikely that this would form a risk as CAS Project owners already have converted and cultivated their land and poses no to limited risk to habitats of rare, threatened, and endangered species, including areas needed for habitat connectivity.

7.6 Indigenous Peoples, Local Communities and Cultural Heritage

Please respond to each question below.

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

Protection of rights of IPs & LCs URL:

<https://netorgft6138081.sharepoint.com/:f:/s/CarbonAssetSolutionsSoilCarbonMethodologyDocuments/IgCqgT7BymBFS6oU92yMubO9AU57KC9aGC6znqPZRSEbgAk?e=0rTvJo>

Section 6.4. of the CAS Stakeholder Engagement Strategy specifies the commitment to adhere to the principle of FPIC to ensure the United Nations Declaration on the Rights of Indigenous Peoples are respected.

The CAS Prohibition of Forced Labor Policy defines Forced Labor and CAS commitment to strictly prohibit the use of forced labor, child labor or trafficked persons in any part of the business or supply chain.

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

Yes

Identification of rights-holders provisions URL:

<https://netorgft6138081.sharepoint.com/:f:/s/CarbonAssetSolutionsSoilCarbonMethodologyDocuments/IgCqgT7BymBFS6oU92yMubO9AU57KC9aGC6znqPZRSEbgAk?e=0rTvJo>

The Sustainability Policy Section 3.3. outlines the procedures to engage all parties that could be affected by the Client Project through effective stakeholder consultations:

- **Internal stakeholder engagement** – The Sustainability Strategy
- **External stakeholder engagement** – The Stakeholder Engagement strategy
- **Engagement of First Nations People** – The Stakeholder Engagement Strategy Section 6.4
- **Policy consultation, especially related to carbon methodology and projects** – The Public Commentary and Consultation Policy

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

N/A

FPIC process/policy URL:

<https://netorgft6138081.sharepoint.com/:f:/s/CarbonAssetSolutionsSoilCarbonMethodologyDocuments/IgCqgT7BymBFS6oU92yMubO9AU57KC9aGC6znqPZRSEbgAk?e=0rTvJo>

The Stakeholder Engagement Strategy Section 6.4 outlines the commitment and the procedures of the FPIC process when client projects could potentially impact First Nations Peoples.

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.

Yes

Prevention of eviction or economic displacement provisions URL:

<https://netorgft6138081.sharepoint.com/:f:/s/CarbonAssetSolutionsSoilCarbonMethodologyDocuments/IgCqgT7BymBFS6oU92yMUbO9AU57KC9aGC6znqPZRSEbgAk?e=0rTvJo>

The CAS program operates on agricultural land and the project owner/landholder (if different) warrant that they have the rights or consent to operate on the land.

However, considering CAS only operates with agricultural practice changes it is high-unlikely that this would form a risk as CAS Project Owners already have converted and cultivated their land and no additional land conversion is expected.

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

No

Preservation of culture heritage provisions URL:

<https://netorgft6138081.sharepoint.com/:f:/s/CarbonAssetSolutionsSoilCarbonMethodologyDocuments/IgCqgT7BymBFS6oU92yMUbO9AU57KC9aGC6znqPZRSEbgAk?e=0rTvJo>

Considering CAS only operates with agricultural practice changes it is high-unlikely that this would form a risk as CAS Project Clients already have converted and cultivated their land and no additional land conversion is expected.

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).

No

IPs & LCs provisions in design documents URL:

N/A

Considering CAS only operates with agricultural practice changes it is high-unlikely that this would form a risk as CAS Project Clients already have converted and cultivated their land and no additional land conversion is expected.

7.7 Respect for Human Rights, Stakeholder Engagement

Please respond to each question below.

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

1) avoids discrimination and respects human rights.

Yes

Discrimination & human rights policy/provisions URL:

<https://netorgft6138081.sharepoint.com/:f:/s/CarbonAssetSolutionsSoilCarbonMethodologyDocuments/IgCqgT7BymBFS6oU92yMUbO9AU57KC9aGC6znqPZRSEbgAk?e=0rTvJo>

CAS Sustainability Strategy section 4.2. outlines CAS' commitment to adherence to Human Rights by its Client Projects and own operations. As part of the initial Environmental Impact Assessment, Client Projects must disclose whether and how they could impact Human Rights and how they will mitigate and manage potential breaches.

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

Yes

International Bill of Human Rights and host country provisions policy URL:

<https://netorgft6138081.sharepoint.com/:f:/s/CarbonAssetSolutionsSoilCarbonMethodologyDocuments/IgCqgT7BymBFS6oU92yMUbO9AU57KC9aGC6znqPZRSEbgAk?e=0rTvJo>

The Sustainability Policy section 4.2. outlines CAS' commitment to adherence to Human Rights by its Client Projects and own operations. As part of the **project enrollment**, Projects Owners are provided a copy of CAS Sustainability Policy and must agree. If CAS identify or notified of any breaches, CAS reserves the right is deactivate project.

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

Yes

Engagement and response to stakeholders approach URL:

<https://netorgft6138081.sharepoint.com/:f:/s/CarbonAssetSolutionsSoilCarbonMethodologyDocuments/IgCqgT7BymBFS6oU92yMUbO9AU57KC9aGC6znqPZRSEbgAk?e=0rTvJo>

The Sustainability Policy Section 3.3. outlines the procedures to engage all parties that could be affected by the Client Project through effective stakeholder consultations:

- **Internal stakeholder engagement** – The Sustainability Strategy
- **External stakeholder engagement** – The Stakeholder Engagement strategy
- **Engagement of First Nations People** – The Stakeholder Engagement Strategy Section 6.4
- **Policy consultation, especially related to carbon methodology and projects** – The Public Commentary and Consultation Policy

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

Design document measures URL:

<https://netorgft6138081.sharepoint.com/:f:/s/CarbonAssetSolutionsSoilCarbonMethodologyDocuments/IgCqgT7BymBFS6oU92yMUbO9AU57KC9aGC6znqPZRSEbgAk?e=0rTvJo>

As outlined in the Sustainability Policy Section 4.3 Stakeholder Engagement is considered critical to identify all potential social and environmental risks created by the project and include and respect local views. This is further specified in the Stakeholder Engagement Policy.

7.8 Gender Equality

Please respond to each question below.

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

- provides for equal opportunities in the context of gender
- protects against and appropriately responds to violence against women and girls
- provides equal pay for equal work

Yes

URL:

<https://netorgft6138081.sharepoint.com/:f:/s/CarbonAssetSolutionsSoilCarbonMethodologyDocuments/IgCqgT7BymBFS6oU92yMUbO9AU57KC9aGC6zngPZRSEbgAk?e=0rTvJo>

Pursuant to CAS Ethics Code of Conduct and the Equity Policy and re-iterated in the Sustainability Policy Section 4.2, Project Owners are obligated to promote a safe and supportive workplace, uphold equitable treatment, and guarantee equal access to opportunities for all personnel, irrespective of gender, sexual orientation, gender identity, or other distinguishing attributes. In evaluating the project's impact, Project Clients are expected to identify and assess any risks to affected individuals, including potential threats of gender-based violence, particularly against women and girls, and implement suitable measures to mitigate such risks where identified.

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

Gender Equality policy/provisions URL:

<https://netorgft6138081.sharepoint.com/:f:/s/CarbonAssetSolutionsSoilCarbonMethodologyDocuments/IgCqgT7BymBFS6oU92yMUbO9AU57KC9aGC6zngPZRSEbgAk?e=0rTvJo>

Per program requirement, all Project Owners are obliged to disclose the findings, information and mitigation strategies following the initial Environmental Risk Assessment.

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.

Yes

Benefit sharing proponent requirements URL:

<https://netorgft6138081.sharepoint.com/:f:/s/CarbonAssetSolutionsSoilCarbonMethodologyDocuments/IgCqgT7BymBFS6oU92yMUbO9AU57KC9aGC6zngPZRSEbgAk?e=0rTvJo>

The Stakeholder Engagement Strategy Section 6.6 includes CAS' commitment on benefit-sharing where applicable. Due to Carbon Asset Solutions' nature of carbon credit projects (agricultural practice changes on existing agricultural land) projects typically do not have the same impacts on IPs and LCs as

traditional carbon offset projects, such as those related to forestry. Therefore, Carbon Asset Solutions does not mandate benefit-sharing arrangements with Indigenous Peoples (IPs) and Local Communities (LCs), unless it is disclosed during the project onboarding that IPs or LCs are potentially affected. In those scenarios, these communities should be consulted specifically on benefit-sharing according to the Stakeholder Engagement Policy FPIC Section.

In any other case, project clients are not required to present detailed plans in a prescribed format within design documents. Where co-benefits do arise as assessed with the CAS Co-benefit framework that affected IPs and LCs, these would be communicated during stakeholder engagement and reflected in the relevant sections of the PDRP.

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.

Yes

Benefit sharing dissemination requirements URL:

<https://netorgft6138081.sharepoint.com/:f:/s/CarbonAssetSolutionsSoilCarbonMethodologyDocuments/IgCqgT7BymBFS6oU92yMUbO9AU57KC9aGC6znqPZRSEbgAk?e=0rTvJo>

As above (Q1).

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

Yes

Benefit-Sharing results policy/provisions URL:

<https://netorgft6138081.sharepoint.com/:f:/s/CarbonAssetSolutionsSoilCarbonMethodologyDocuments/IgCqgT7BymBFS6oU92yMUbO9AU57KC9aGC6znqPZRSEbgAk?e=0rTvJo>

As above (Q1).

7.10 Cancun Safeguards

Please respond to each question below.

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](#).

No

Cancun Safeguards policy/provisions URL:

<https://netorgft6138081.sharepoint.com/:f:/s/CarbonAssetSolutionsSoilCarbonMethodologyDocuments/IgCqgT7BymBFS6oU92yMUbO9AU57KC9aGC6znqPZRSEbgAk?e=0rTvJo>

REDD+ activities are not included in the scope of CAS-SCM, because CAS carbon projects are exclusively soil carbon projects of existing agricultural entities.

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

Proponent SDG objectives policy/provisions URL:

<https://netorgft6138081.sharepoint.com/:f:/s/CarbonAssetSolutionsSoilCarbonMethodologyDocuments/IgCqgT7BymBFS6oU92yMUbO9AU57KC9aGC6znqPZRSEbgAk?e=0rTvJo>

Every CAS Project completes the CAS proprietary Co-benefit Assessment which assesses the project's current state and monitor its progress to make an impact beyond carbon against the SDGs. These procedures are outlined in the CAS Co-Benefit Framework.

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

Yes

Requirement of proponent demonstration of positive SDGs provisions URL:

<https://netorgft6138081.sharepoint.com/:f:/s/CarbonAssetSolutionsSoilCarbonMethodologyDocuments/IgCqgT7BymBFS6oU92yMUbO9AU57KC9aGC6znqPZRSEbgAk?e=0rTvJo>

Every CAS Project Client completes the CAS proprietary Co-benefit Assessment which assesses the project's current state and monitor its progress to make an impact beyond carbon against the SDGs. These procedures are outlined in the CAS Co-Benefit Framework.

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

Yes

Requirement of proponent methods provision URL:

<https://netorgft6138081.sharepoint.com/:f:/s/CarbonAssetSolutionsSoilCarbonMethodologyDocuments/IgCqgT7BymBFS6oU92yMUbO9AU57KC9aGC6znqPZRSEbgAk?e=0rTvJo>

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

Every CAS Project completes the CAS proprietary Co-benefit Assessment which assesses the project's current state and monitor its progress to make an impact beyond carbon against the SDGs. To this end, CAS has developed a Questionnaire and Matrix which ensure repeatability and transparency of the SDG impact measurements. These procedures are outlined in the CAS Co-Benefit Framework.

D – CORSIA Requirements Related to ICVCM Category Assessment

8. Additionality Demonstration – CORSIA

Please respond to all questions below.

- 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

URL:

<https://netorgft6138081.sharepoint.com/:f:/s/CarbonAssetSolutionsSoilCarbonMethodologyDocuments/IgCqgT7BymBFS6oU92yMUbO9AU57KC9aGC6znqPZRSEbgAk?e=0rTvJo>

Refer to PDRP Section 2 – Principles

- 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

URL:

<https://netorgft6138081.sharepoint.com/:f:/s/CarbonAssetSolutionsSoilCarbonMethodologyDocuments/IgCqgT7BymBFS6oU92yMUbO9AU57KC9aGC6znqPZRSEbgAk?e=0rTvJo>

Refer to PDRP Section 2 – Principles

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

Yes

URL:

<https://netorgft6138081.sharepoint.com/:f:/s/CarbonAssetSolutionsSoilCarbonMethodologyDocuments/IgCqgT7BymBFS6oU92yMUbO9AU57KC9aGC6znqPZRSEbgAk?e=0rTvJo>

Refer to PDRP Section 2 – Principles

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

Yes

URL:

<https://netorgft6138081.sharepoint.com/:f:/s/CarbonAssetSolutionsSoilCarbonMethodologyDocuments/IgCqgT7BymBFS6oU92yMUbO9AU57KC9aGC6znqPZRSEbgAk?e=0rTvJo>

Refer to PDRP section 2 - Principles and Section 4

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

Possible Selections: Barrier analysis; Common practice / market penetration analysis; Investment, cost, or other financial analysis; Performance standards / benchmarks; Legal

or regulatory additionality analysis; Other (please explain below)

Selections Made:

- **Barrier analysis**
- **Common practice / market penetration analysis**
- **Performance standards / benchmarks**
- **Legal or regulatory additionality analysis**
- **Other (please explain below)**

URL:

<https://netorgft6138081.sharepoint.com/sites/https://netorgft6138081.sharepoint.com/:f:/s/CarbonAssetSolutionsSoilCarbonMethodologyDocuments/IgCqgT7BymBFS6oU92yMUbO9AU57KC9aGC6e=0rTvJo>

Refer to PDRP Section 4

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:

No

URL:

N/A

Not Applicable, CAs does not allow the use of other methods outside of CAS-SCM. All Project owners MUST comply with CAS-CSM.

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

No

URL:

N/A

Not Applicable, all practice changes nominated by project owners are reviewed and assessed to ensure all additional and not BAU. CAS does not have automatic additional list or type of practice changes.

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?

No

URL:

N/A

As above response, Not Applicable, all practice changes nominated by project owners are reviewed and assessed to ensure all additional and not BAU. CAS does not have automatic additional list or type of practice changes.

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:

No

URL:

N/A

As above response, Not Applicable, all practice changes nominated by project owners are reviewed and assessed to ensure all additional and not BAU. CAS does not have automatic additional list or type of practice changes.

9. Permanence – CORSIA

Please respond to all questions below.

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:

Yes

URL:

<https://netorgft6138081.sharepoint.com/:f:/s/CarbonAssetSolutionsSoilCarbonMethodologyDocuments/IgCqgT7BymBFS6oU92yMUbO9AU57KC9aGC6znqPZRSEbgAk?e=0rTvJo>

Refer to PDRP Section 4.5

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)

Yes

URL:

<https://netorgft6138081.sharepoint.com/:f:/s/CarbonAssetSolutionsSoilCarbonMethodologyDocuments/IgCqgT7BymBFS6oU92yMUbO9AU57KC9aGC6znqPZRSEbgAk?e=0rTvJo>

Reversals are measured on a crediting period cycle (approximately every 3 years). Reversals due to cyclical conditions (eg drought) can be addressed by the CAS dual buffer system which is described in the Program Rules (section 6) below.

Management of reversals is described in the CAS-SCM section 4.5 below.

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.

Yes

URL:

<https://netorgft6138081.sharepoint.com/:f:/s/CarbonAssetSolutionsSoilCarbonMethodologyDocuments/IgCqgT7BymBFS6oU92yMUbO9AU57KC9aGC6znqPZRSEbgAk?e=0rTvJo>

Reversals are measured on a crediting period cycle (approximately every 3 years). Reversals due to cyclical conditions (eg drought) can be addressed by the CAS dual buffer system which is described in the Program Rules (section 6) below.

Management of reversals is described in the CAS-SCM section 4.5 below.

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.

Yes

URL:

<https://netorgft6138081.sharepoint.com/:f:/s/CarbonAssetSolutionsSoilCarbonMethodologyDocuments/IgCqgT7BymBFS6oU92yMUbO9AU57KC9aGC6znqPZRSEbgAk?e=0rTvJo>

Management of reversals is described in the CAS-SCM section 4.5 below and PDRP Section 4.5.

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?

Yes

URL:

<https://netorgft6138081.sharepoint.com/:f:/s/CarbonAssetSolutionsSoilCarbonMethodologyDocuments/IgCqgT7BymBFS6oU92yMUbO9AU57KC9aGC6znqPZRSEbgAk?e=0rTvJo>

Reversals are measured on a crediting period cycle (approximately every 3 years). Reversals due to cyclical conditions (eg drought) can be addressed by the CAS dual buffer system which is described in the Program Rules (section 6) below.

Management of reversals is described in the CAS-SCM section 4.5 below.

CAS Program Rules - section 6 PDRP - Section 4.5.

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?

Yes

URL:

<https://netorgft6138081.sharepoint.com/:f:/s/CarbonAssetSolutionsSoilCarbonMethodologyDocuments/IgCqgT7BymBFS6oU92yMUbO9AU57KC9aGC6znqPZRSEbgAk?e=0rTvJo>

Reversals are measured on a crediting period cycle (approximately every 3 years). Reversals due to cyclical conditions (eg drought) can be addressed by the CAS dual buffer system which is described in the Program Rules (section 6,) below. Project owner obligations are in sections 7 and 8.

Management of reversals is described in the CAS-SCM section 4.5 below CAS Program Rules - section 6 PDRP - Section 4.5.

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

URL:

<https://netorgft6138081.sharepoint.com/:f:/s/CarbonAssetSolutionsSoilCarbonMethodologyDocuments/IgCqgT7BymBFS6oU92yMUbO9AU57KC9aGC6znqPZRSEbgAk?e=0rTvJo>

Covered in, CAS Project Participation Agreement Program Rules - section 7 & 8.

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

URL:

<https://netorgft6138081.sharepoint.com/:f:/s/CarbonAssetSolutionsSoilCarbonMethodologyDocuments/IgCqgT7BymBFS6oU92yMUbO9AU57KC9aGC6znqPZRSEbgAk?e=0rTvJo>

Covered in, CAS Project Participation Agreement Program Rules - section 7 & 8.

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

URL:

<https://netorgft6138081.sharepoint.com/:f:/s/CarbonAssetSolutionsSoilCarbonMethodologyDocuments/IgCqgT7BymBFS6oU92yMUbO9AU57KC9aGC6znqPZRSEbgAk?e=0rTvJo>

Covered in, CAS Project Participation Agreement Program Rules - section 7 & 8.

12. Sustainable Development Benefits And Safeguards – CORSIA

Please respond to each question below.

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

URL:

<https://netorgft6138081.sharepoint.com/:f:/s/CarbonAssetSolutionsSoilCarbonMethodologyDocuments/IgCqgT7BymBFS6oU92yMUbO9AU57KC9aGC6znqPZRSEbgAk?e=0rTvJo>

Refer to PDRP section 1 eligibility.

2) **Confirm that your program demonstrates it complies with social and environmental safeguards.**

Yes

URL:

<https://netorgft6138081.sharepoint.com/:f:/s/CarbonAssetSolutionsSoilCarbonMethodologyDocuments/IgCqgT7BymBFS6oU92yMUbO9AU57KC9aGC6znqPZRSEbgAk?e=0rTvJo>

Refer to CAS Sustainability and Environmental Policy.

3) **Confirm that your program publicly discloses the institutions, processes, and procedures that are used to implement, monitor and enforce safeguards to identity, assess and manage environmental and social risks.**

Yes

URL:

<https://netorgft6138081.sharepoint.com/:f:/s/CarbonAssetSolutionsSoilCarbonMethodologyDocuments/IgCqgT7BymBFS6oU92yMUbO9AU57KC9aGC6znqPZRSEbgAk?e=0rTvJo>

Refer to CAS Sustainability and Environmental Policy Section 2.3.

End Copy of Application