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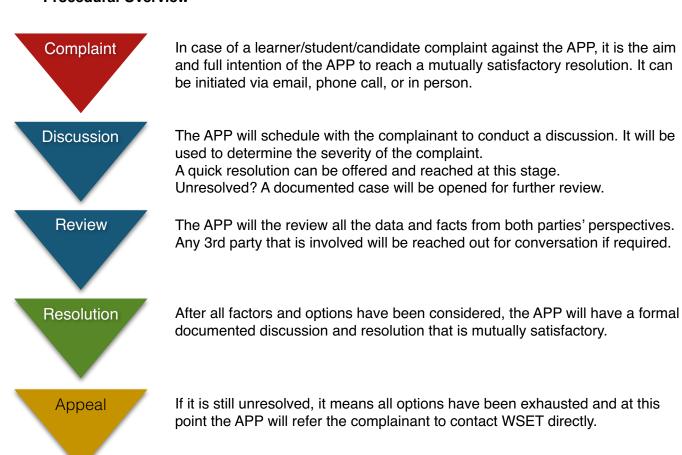


VinoZen Canada Inc. Governing Policy

This document contains policy statements which VinoZen Canada Inc. (The Company) and subsequently VinoZen Wine Academy (the APP) will use as operational guidelines including being a WSET Approved Program Provider. It is our aim to offer effective, fair, and considerate service to our patrons/students/learners while maintain the high standard of The Company and WSET Awards.

1. Complaints and Appeals

Procedural Overview





1.1 Mutual Understanding

VinoZen Canada Inc. aims to preemptively reach and officially document mutual understandings on both parties from the very beginning. This involves discussions and agreements on all expectations on services to be rendered by us to the students. Ample opportunities will also be given during and after all interactions between both parties to set expectations, provide feedback and reach a resolution in a timely and low-key manner. We believe this is the most effective way to minimize complaints. In incidents where we are unable to capture the exceptions, We iare very open to opportunities to improve through active listening, sincere acknowledgement, proactive alignment, and constructive assurance. We strongly believe that we can only grow and improve through feedback, both positive and negative.

1.2 Complaints

This policy provides clear and structured process that highlights who, can make a complaint (the complainant), how to make a complain and what The Company will do to reach a mutually satisfactory resolution.

We are here to ensure that:

- 1. Fully implement an open-door policy to make the process as easy as possible.
- 2. A thorough understanding of the situation is properly conducted and documented.
- 3. An appropriate response is provided where applicable. (An explanation, apology, or action taken)
- 4. All official complaints are properly documented and reviewed so it can be used to implement a more well-rounded policy and to improve services going forward.

1.2.1 Definition

A complaint is an expression of dissatisfaction about the standard of service, actions, or lack of action by all representatives of The Company. Dissatisfaction may be related to any discrepancies between the expectations and the actual learning experience the individual receives from us. It may be associated with our professional misconduct or the complainant's out-of-scope expectations.



1.2.2 Equality Disclaimer

The APP is committed to ensure a public facing version of the policy is accessible by all individuals. All complaints are treated equally and fairly with no personal prejudice on the complainant. Full confidentiality will be ensured and exercised unless the complainant waived the right. It should also be understood that while the complainant's personal information will not be released in any manner, the circumstances of the complaint could potentially make them identifiable to other parties involved in the investigation.

1.2.3 Complainant

Complaints can be made by an individual that have been directly affected by, have witnessed the cause of dissatisfaction, or someone acting on the behalf of the affected individual (third parties). Third parties filing a complaint on behalf of the complainant may only do so with written expressed permission to represent the complainant and their interests. This must be presented to and accepted by the APP. WSET Awards should only be reached after the APP has exhausted all available options following the complaints procedure. Complaints can be made and accepted in person, by telephone, or via email.

1.2.3 Informal Complaint

We understand that most individual who are dissatisfied will want to reach a resolution as quickly as possible. The informal approach aims to resolve the concern quickly, keep matters low key and enable mediation between the complainant and the individual to whom the complaint has been directed.

Therefore the complainant should contact the APP to schedule an informal discussion where it is our full intention to resolve the concern by providing an explanation, apology, or another desirable outcome.

A formal documented complaint procedure should and will be followed if the matter is not resolved after the informal discussion. At this point, an investigation consent by the complainant will be requested where additional information may be required in order to conduct a full documented investigation and provide a comprehensive response and resolution.



1.2.4 Formal process

Official Documented Complaint

Formal complaints are submitted in writing directly to the APP, which consists of the following:

- Full name and contact information
- Full details of the complaint including the cause, parties involved, and circumstances of the dissatisfaction.
- All supporting information including any relevant documentations, dates, locations, any witnesses.
- Expected resolution by the complainant.

Review and Investigation

The APP will acknowledge receipt of the formal complaint in writing no later than 3 business days from the submission. A thorough review and investigation will be conducted where all involving parties may be contacted and all discussions will be documented. While the complainants' names will not be disclosed, it may potentially become identifiable by any parties involved due to the circumstances of the investigation.

A response, including explanation and resolution will be provided no later than 20 working days of the submission of the complaint. The circumstances and the resolution will be used to implement and improve a better policy.

Appeal

Should the complaint remains unresolved, the APP will reach out to WSET Awards for support and recommendations on course of action. Only when all options have been exhausted would the complainant be referred to contact WSET Awards directly at qa@wsetglobal.com directly.



2. Conflict of Interest

As a WSET Approved Programme Provider and a company seeking to uphold the highest standard of excellence, we are committed to identify, monitor, and manage actual, potential and perceived conflicts of interest. This is strictly followed to safeguard the integrity, quality standard, and its relationship with WSET Awards, and promote confidence in the services offered by the APP and in WSET Awards and its qualifications.

2.1 Identification and Management

A Conflict of Interest exists where an individual has interests or loyalties that could adversely influence their judgement, objectivity or loyalty to the APP when conducting activities associated with VinoZen Canada Inc. It is the aim of the APP to identify, report, and resolve all actual, potential, and perceived Conflicts of Interest prior to any engagement of service activities. Head of Quality and Compliance (HOQC) at WSET will immediately be notified in the event where there is a Conflict of Interest. APP will follow the directions from the HOQC to apply additional measures to mitigate effects of the Conflicts of Interest.



3. Privacy Policy

VinoZen Canada Inc. is not in the business profiting from the sales of student data. All of individual's personal data are collected for the sole purpose of delivering WSET qualifications as well as other services and events offered by VinoZen Canada Inc. We are committed to protecting your privacy and we are at full disclosure of what and how we use your personal data with your expressed consent. As a WSET Approved Programmed Provider, we are required and committed to maintain a secured and up-to-date data of our students and destroy securely where needed. We employ sufficient technical measure and data usage guidelines to ensure your data is protected from loss, misuse, unauthorized access and disclosure. We collect your data:

- To maintain an ongoing relationship with you as a candidate to WSET Awards, other qualifications, classes, and events offered by VinoZen Canada Inc, and future potential collaboration opportunities. We send you these informations only with your full expressed consent.
- 2. To get a better understanding of your likes and dislikes, any relevant health conditions for course delivery and examination considerations.
- **3.** We are required by WSET Awards to collect your data for registration for WSET Qualifications courses and examinations.
- **4.** To administer and conduct your examination, including making arrangements for reasonable adjustments and/or special considerations.
- **5.** To communicate on your behalf with WSET Awards regarding the results and issue certificates where appropriate.
- 6. To process sales of products and services you have purchased from us.
- 7. To record feedback and complaints to improve our future services.

We utilize a secure online portal offered by SquareSpace and Stripe for all of our payment transactions and data collection. We will not have access to your payment information and your personal data will be shared with WSET Awards only for registration and administration purposes. They will be maintained as required by WSET Awards and legal requirements. We employ the best-in-class encryption and security online storage service called iCloud Drive offered by Apple to collect and manage your data. It can only be accessible by a specifically made account owned by VinoZen Canada Inc. protected by a Two-Factor-Authentication method.

You have the right to request erasure of your personal data. We will do so once we have cleared such request with WSET Awards and any related ongoing investigations with regulating bodies.



4. Diversity and Equality

VinoZen Canada Inc. is committed to treat all individuals fairly and equally at all times. We recognize and respect diversity and equality in all areas of our work. We strongly believe that by

- We aim to ensure that the format and content of course and service materials do not discriminate unlawfully against anyone on the grounds of disability, age, marriage and civil partnership, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation (having regard to the legal minimum age for the retail purchase of alcohol and assessment competence standards).
- Unless applicable for administrative purposes to properly conduct our business activities, we do not collect personal data that may be attributed and perceived as potential discrimination (ie. age, gender, orientation, ethnicity, disability..etc). We are also committed to fully disclose reasons for collecting any personal data and will only collect and maintain such information with your full expressed consent.
- We allow equal access to all of our qualification courses, services, and events.
- We provide equal opportunity for all of our hiring decisions and training activities.
- We provide open avenue for all stakeholders of VinoZen Canada Inc. to voice concerns should they believe that they have been unfairly discriminated against.

This policy will be modified and amended as required. All relevant parties can request to review this policy and your feedback will be taken into consideration to improve our services.



5. Reasonable Adjustments

We recognize that patrons with disabilities and other learning difficulties that puts them at a substantial disadvantage in the learning and assessment situation. Reasonable adjustments are in place to reduce such disadvantage so they are assessed the similar manner for those who do not require such adjustments. These adjustments must not affect the reliability and validity of the assessment outcomes, give unfair advantage, and it will not be taken into consideration during assessment of the candidate's work.

These may involve:

- Changing standard assessment arrangements such as allowing extra time to complete the assessment for those who have reading disabilities and/or writing difficulties.
- Adapting assessment materials such as providing materials in large text format
- Reorganizing the assessment room those who may be overly distracted by external audio/visual stimuli.

Any adjustment requests must be submitted at least 5 weeks before the examination date. We also include the opportunity to make such request in the qualification enrolment form as part of the application process. These requests must be forwarded to WSET Awards to gain approval before they can be put in place. All reasonable adjustments will be officially documented.



6. Special Consideration

Special consideration is an action taken after an assessment to allow candidates who have been disadvantaged by temporary illness, injury, or adverse circumstances at the time of the assessment to demonstrate attainment.

Special consideration will not give unfair advantage over candidates for whom special consideration is not being applied or alter the assessment demands of the qualification as detailed in the applicable Specifications.

A candidate may be eligible for special consideration if:

- Performance in an assessment is affected by circumstances beyond the control of the candidate. This may include recent personal illness, accident, bereavement or examination room conditions
- Alternative assessment arrangements which were agreed in advance of the assessment proved inappropriate or inadequate
- The application of special consideration would not mislead the user of the certificate as to the candidate's attainment.

Please note that while special considerations may be in place, candidates still need to meet all assessment requirements as outlined in the applicable Specifications to earn the qualification.

We are required by WSET Awards to submit the Special Consideration Form within 7 working days of the assessment date. Please provide supporting documentations in order to be considered.



7. Malpractice and Maladministration

This is to ensure the highest of learning experience and to protect the interests of the students and safeguard the integrity of WSET qualifications.

Non-compliance can be categorized as follows:

- 1. Maladministration: Where non-compliance is accidental
- 2. Malpractice: Where non-compliance is intentional or due to negligence

VinoZen Canada Inc. aims to apply the highest level of standard when conducting any business activities such as courses, services and events. We use the following filters to minimize such occurrence and will report, record, and resolve any non-compliance and involve any relevant parties including WSET Awards of the incident.

1. Compliant

The goal of VinoZen Canada Inc. is to conduct its business in accordance to the company policies outlined in this document as well as WSET Award's Policy and Procedures.

2. Timely

VineZen Canada Inc. aims to administer all its procedures and to respond to all inquiries and feedback in an efficient and constructive manner.

3. Ethical

VinoZen Canada Inc. approaches all of its business dealings and operations with best of intentions by utilizing counsels from legal advisors and WSET Awards as well as exercising common sense.

4. Transparent

We aim to implement the highest level of transparency by promptly communicating to all parties involved with relevant and truthful information. All interactions are properly documented and maintained and can be made accessible when needed.

5. Sanction

Upon occurrence and confirmation of non-compliance, VinoZen Canada Inc. will file a full comprehensive report after thorough investigation. We will implement applicable sanction to individuals who are non-compliant including our representatives as well as our students. Applicable sanctions to the individuals range in severity from written documented coaching plan to suspension from practice. For students, it can potentially mean that they can be disqualified and barred from ever participating in any of the events and courses offered by VinoZen Canada as well as WSET Awards.



8. Registration Policy

To provide the highest standard of service and patron/student/client experience, we ask that all our registrations for our courses, events, and contracts for services to be rendered to be completed with full intentions from both The Company and our patrons/students/clients to commit to the agreement.

8.1 WSET Qualifications

All registrations require the full amount of tuition payable upon completion of registration. Cancellation and 100% refunds are allowed **3 weeks** prior to the course commencement date. After which point, tuitions become non-refundable.

Cancellations are allowed up to **2 weeks** prior to the commencement date with tuitions paid fully transferrable to future courses or another person to be used within the next 12 months. After which point, tuitions are considered forfeited.

Requests should be submitted by email. We do not refund missing classes.

Full refunds will also be given in the event of low registration.

9. Forward Looking

As The Company and its relationships with patrons/students/clients grow, this document will evolve to capture and regulate to the highest standard of excellence. We accept all applicable feedback to improve our services going forward.