



POLICY · VERSION 1.0 · 28 SEPTEMBER 2026

Portfolio and credit-quality policy

Which carbon credits Coffset sells, how they are chosen and retired, how risks such as reversals are handled, and how the mix will evolve.

Version

1.0, adopted 28
September 2026

Owner

Coffset OÜ management

Supplier

CNaught, "Impact"
portfolio

Review

Annually, and on any
material change

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What this policy commits Coffset to. Only credits from recognised registries, with a serial number for every retirement. No project above 35% and no country above 40% of volume in any quarter. Vintage and the removal share disclosed every quarter in a transparency report. Credible allegations assessed within 10 working days. Records kept for 7 years. The removal share is raised as supply and prices allow, and every change to the mix is announced first.

Document control

Policy	Portfolio and credit-quality policy
Version and status	1.0, adopted by the management board
Date	28 September 2026
Owner	Coffset OÜ (registry code 17306246), management board
Applies to	All carbon credits sold by Coffset to individuals and businesses
Review	At least once a year, and whenever the supplier, the registries or the target mix change
Related documents	Project factsheets; methodology whitepaper v1.0; claims guide; terms of use

Changelog

VERSION	DATE	CHANGES
1.0	28 Sep 2026	First written policy. Formalises current practice (CNaught Impact portfolio, Oxford-aligned mix, public retirement records) and sets quality criteria, concentration limits, and reporting and review commitments.

Purpose and principles

Coffset sells carbon credits so that people and companies can fund climate projects for the emissions they cannot avoid yet. This policy sets the quality bar for those credits.



Reduction first

Credits complement emission reductions and never replace them. Coffset does not describe a purchase as making anyone carbon neutral.



Only verified, retired credits

Every credit is issued by a recognised independent standard and permanently retired on a public registry.



Diversified by design

Credits are spread across project types, countries and registries, following the Oxford Principles for Net Zero Aligned Carbon Offsetting (revised 2024).



Traceable to the tonne

Every order can be traced from the customer's certificate to the retirement serial numbers.



Honest about risk

Known risks such as reversal and over-crediting are disclosed, monitored and managed, not hidden.

How credits are sourced and retired

Coffset does not hold an inventory of credits. It buys and retires them through CNaught, a carbon-credit marketplace that curates a diversified portfolio.

#	STEP	WHAT HAPPENS
1	Customer pays	Checkout through Stripe for a quantity in kilograms or tonnes of CO ₂ e.
2	Order to CNaught	Coffset places an order for the same quantity from CNaught's "Impact" portfolio, in the customer's name (or the company's registry sub-account for business customers).
3	Allocation	The order is split across the portfolio's projects in their current proportions.
4	Retirement	Credits are retired on each project's registry. Registries count whole tonnes, so credits are retired in blocks and each order is allocated its share; the order records the block's serial range.
5	Certificate	Coffset issues a public certificate that links to the CNaught order, which lists every project, share, registry and serial.

Roles

CNaught

Sources credits from verified projects, performs project due diligence, manages the portfolio allocation and executes retirements on the registries.

Coffset

Chooses the portfolio it offers, applies the criteria in this policy, reviews the supplier, publishes project data and retirement records, and answers customers.

Eligibility criteria

Every credit Coffset sells must meet all of the following requirements.

REQUIREMENT	WHAT IT MEANS
Recognised standard	Issued under Verra (VCS), Gold Standard, Climate Action Reserve or Puro.earth. Other standards (for example Isometric) only after a documented review and approval.
Independent verification	Validated and verified by an accredited third-party body under the standard's rules.
Additionality	Demonstrated under the standard's methodology: the project would not happen without carbon finance.
Unique and retired	Unique serial numbers on a public registry; retired on behalf of the customer so the credit can never be resold or claimed twice.
Permanence safeguards	For nature-based projects, a buffer or equivalent mechanism under the standard to replace credits if stored carbon is lost.
Safeguards and co-benefits	No unresolved, credible allegations of serious social or environmental harm. Community and biodiversity labels (for example CCB) are preferred for nature-based projects.
Disclosed vintage	The vintage of every retirement is shown on the order, and the transparency report shows the vintage mix and the average age of credits retired. Coffset asks its supplier for recent vintages where the portfolio allows.
Integrity labels	Where a methodology is approved under the ICVCM Core Carbon Principles, credits carrying the CCP label are preferred.

Portfolio construction

The portfolio follows the five-type taxonomy of the Oxford Principles, which sorts credits by whether they reduce or remove emissions and how durably carbon is stored.

OXFORD TYPE	WHAT IT DOES	SHARE NOW
● 1 • Reductions	Avoids or reduces emissions from fossil and waste sources (landfill gas, gas leaks).	60%
● 2 • Conservation	Protects carbon already stored in forests and peatlands.	29%
● 3 • Fossil capture	Captures fossil CO ₂ at industrial sources and stores it.	0%
● 4 • Nature removals	Removes CO ₂ and stores it in trees, mangroves and soils.	10%
● 5 • Durable removals	Removes CO ₂ and stores it for centuries or longer.	1%



Direction of travel

In line with the Oxford Principles, the share of removals, and within removals the share of durable storage, should grow over time. Today the mix is set by the CNaught portfolio at Coffset's contracted price: 11% removals, of which 1% durable. Removals cost more, so Coffset does not set a numeric removal target yet. Instead it commits to:

- **Report** the removal share (Types 4 and 5) and the durable share (Type 5) in every quarterly transparency report.
- **Review** the mix with CNaught at least once a year, including the cost of a higher removal share.
- **Increase** the removal share when supply and prices allow, and announce any change to the mix on coffset.org before it applies.

Concentration limits

In the September 2026 order, three projects supplied 89% of the volume (33%, 29% and 27%). Limits: no single project above 35% of volume in any quarter, and no single country above 40%. The September 2026 order met both (largest project 33%, largest country 33%).

Risk management

Carbon credits carry known risks. This section sets how Coffset watches for them and what it does when they materialise.

RISK	WHAT IT IS	HOW IT IS MANAGED
Reversal	Stored carbon in forests, peat and soils released by fire, drought or clearing.	Registry buffer pools (Verra's pooled buffer for nature-based projects); diversification; annual check of monitoring reports for Type 2 and 4 projects.
Over-crediting	Baselines that overstate avoided emissions, a known issue for some forest-protection projects.	Diversification across types; preference for updated or CCP-approved methodologies; review of public ratings and research.
Concentration	Too much volume in one project or country.	Limits in section 5; quarterly review of order data.
Vintage	Credits from reductions that happened many years ago.	Vintage disclosed on every order and in the quarterly transparency report (section 4).
Supplier dependency	Reliance on one marketplace (CNaught) for sourcing and retirement.	Annual supplier review; retirement data kept per order; documented plan for an alternative supplier.
Data mismatch	Public project pages that differ from the registry data.	Project pages take registry, ID and developer from order data; quarterly reconciliation.

Worked example: Katingan Mentaya and peatland fire

Katingan Mentaya (Indonesia, Oxford Type 2, Verra VCS 1477) supplied 29% of the September 2026 order. Tropical peatland stores very large amounts of carbon and is exposed to fire in dry years. How the policy applies:

- **Disclose:** the risk is described on the project factsheet and in Coffset's article on Katingan wildfire risk.
- **Rely on the standard:** Verra's pooled buffer replaces credits if stored carbon is lost and the loss is reported.
- **Monitor:** check the project's monitoring and non-permanence risk reports at least once a year.
- **Limit exposure:** keep the project under the concentration limit, and balance it with removals.

Transparency commitments

Trust comes from data anyone can check. Coffset commits to publishing the following.

WHAT	WHERE	HOW OFTEN
Certificate per order, linked to the CNaught order and registry serials	coffset.org/certificate/...	Every order
Project factsheets with registry and ID	coffset.org/impact-portfolio	On every change
Portfolio mix, with the date of the last update	coffset.org/impact-portfolio	On every change
Transparency report: tonnes retired by project, type, registry and vintage	coffset.org	Quarterly
This policy and its changelog	coffset.org	Annually

Governance and review

- **Approval.** This policy and any change to the target mix, the approved standards or the limits are approved by Coffset's management board.
- **Quarterly review.** Order data is reconciled with the project pages, concentration and vintage are checked against the limits, and the transparency report is prepared.
- **Annual review.** Supplier review of CNaught (selection method, due diligence, retirement practice), review of this policy, and review of the removal share in section 5.
- **Mix changes.** When the portfolio mix changes, the impact portfolio page shows the new mix and the date of the change.
- **Records.** Order and retirement data are kept for at least 7 years, in line with purchase record retention.

If a project faces credible allegations

1. Assess the allegation with CNaught within 10 working days.
2. If it is credible, ask CNaught to pause new allocations to the project until it is resolved.
3. Inform business customers whose orders used the project, and update the factsheet.
4. Publish the outcome in the next transparency report.

Current portfolio, September 2026

The projects in the portfolio as of 28 September 2026. Two projects used in the September 2026 order are not yet listed on coffset.org.

PROJECT	COUNTRY	TYPE	REGISTRY AND ID	STATUS
Fuzhou Hongmiaoling Landfill Gas	China	● 1	VCS, ID to add	As published
Gaziantep Landfill Gas	Turkey	● 1	VCS, ID to add	As published
Istanbul Landfill Gas to Electricity	Turkey	● 1	GS 707	Confirmed
Liling Landfill Gas	China	● 1	VCS, ID to add	As published
Oeste de Caucaia Landfill	Brazil	● 1	VCS, ID to add	As published
Titas Gas Leak Repair	Bangladesh	● 1	VCS 2478	Confirmed
Bottomland Forests of the Louisiana Plains	USA	● 2	VCS + CCBS, ID to add	As published
Katingan Mentaya Project	Indonesia	● 2	VCS 1477	Confirmed
Manoa REDD+ Project	Brazil	● 2	VCS + CCBS, ID to add	As published
Delta Blue Carbon Project	Pakistan	● 4	VCS 2250	As published
Ejido La Libertad	Mexico	● 4	VCS + CCBS, ID to add	As published
Ejido Sierra de Agua	Mexico	● 4	VCS + CCBS, ID to add	As published
Ejido X-Hazil	Mexico	● 4	VCS, ID to add	As published
Karnataka Regenerative Farming	India	● 4	VCS 3115	Not on site yet
Kuamut Rainforest Conservation	Malaysia	● 4	VCS + CCBS, ID to add	As published
Predio Las Piedras	Veracruz, Mexico	● 4	VCS + CCBS, ID to add	As published
TIST Program in Uganda	Uganda	● 4	VCS, ID to add	As published
Yarra Yarra Biodiversity	Australia	● 4	GS 3039	Not on site yet
Charm Industrial Bio Oil	USA	● 5	Isometric Protocol, ID to add	As published
Farm Gai Kaisa	Namibia	● 5	VCS, ID to add	As published
Frontier Carbon Removal Portfolio	California, USA	● 5	Frontier Framework, ID to add	As published
Gevo Carbon Capture	USA	● 5	PUR 353054 (Gevo North Dakota)	Confirmed

September 2026 order, by project

PROJECT	REGISTRY	KG	SHARE	VINTAGE
● Istanbul Landfill Gas to Electricity	Gold Standard GS 707	165	33%	2014
● Katingan Mentaya Conservation	Verra VCS 1477	145	29%	Nov 2015 – Dec 2016
● Titas Gas Leak Repair	Verra VCS 2478	135	27%	Jan 2017 – Dec 2018
● Karnataka Regenerative Farming	Verra VCS 3115	25.5	5.1%	2019
● Yarra Yarra Biodiversity	Gold Standard GS 3039	24.5	4.9%	2019
● Gevo Carbon Capture	Puro.earth PUR 353054	5	1%	2025