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FOR LIFE

Certification Protocol

CONTENTS

INTRODUCTION

The For Life Standard applies to companies and organisations wishing to demonstrate their commitment to sustainable production and social responsibility by means of third-party certification.

The For Life Scheme leads to a certification of systems. It ensures that social and environmental responsibilities are respected at the company's or organisation's level through one method of control: certification.

As an option, the certified company or organisation can ask, in addition to the certification of systems, for a product certification *('product certification option')*. In this case, the For Life Scheme ensures that:

- Social and environmental responsibilities are respected by all operations involved in the supply-chain;
- Raw materials and products are fully traceable from the producers to the final operation.

This is ensured through two main methods of control along the supply-chain: registration and certification.

The rights on the For Life Program are owned by Ecocert Environnement SAS (hereinafter refered to as 'Scheme Owner'), who is in charge of managing the governance of the Program, i.e. the evolution of the standard, the certification protocol, policies etc..

In order to ensure the compliance with the For Life criteria at the level of certified and registered operations, the Scheme Owner relies on Conformity Assessment Bodies (CAB). This may include the service of carrying out audits and preparing the audit report, performing documentary evaluations, performing evaluation of corrective actions, and/or issuing certification decisions.

This document presents the guiding principles of the For Life Control System to any party that wants to understand the process of the program, including consumers, NGOs, retailers etc.
It describes the process to become or remain a FL certified or registered company/organisation. It defines the framework for the process to be followed independent of which approved CAB is performing the audit and certification process.

This version is immediately applicable after publication. It supersedes all previous versions.
The original version and the reference version for this document is the English version.

This document and additional relevant documents are available on the Fair for Life & For Life website. These include:

- Documents concerning the development and governance of the programme (Fair for Life and For Life Revision Procedure)
- The For Life Standard and its annexes
- The For Life Graphic Guidelines
- Additional policies
- List of approved Certification Bodies (CBs)

Abbreviations

CAB	Conformity Assessment Body
CB	Certification Body
FL	For Life

1 GENERAL POINTS

Control of companies/organisations is based on an evaluation of conformity with the latest version of the For Life Certification Standard, the For Life Certification Protocol (this document), and related documents (such as the FL Policy on prohibited chemicals, etc.), which are available on the Fair for Life & For Life Website (www.fairforlife.org).

Applicants may chose freely between the approved Certification Bodies. A list of approved CBs is made available by the Scheme Owner.
For clarifications regarding the Standard interpretation or certification process, the applicant or certified/registered company/organisation may contact the approved CB of its choice.

A company/organisation may not hold For Life certificates from different CBs simultaneously.

1.1 Control Modalities

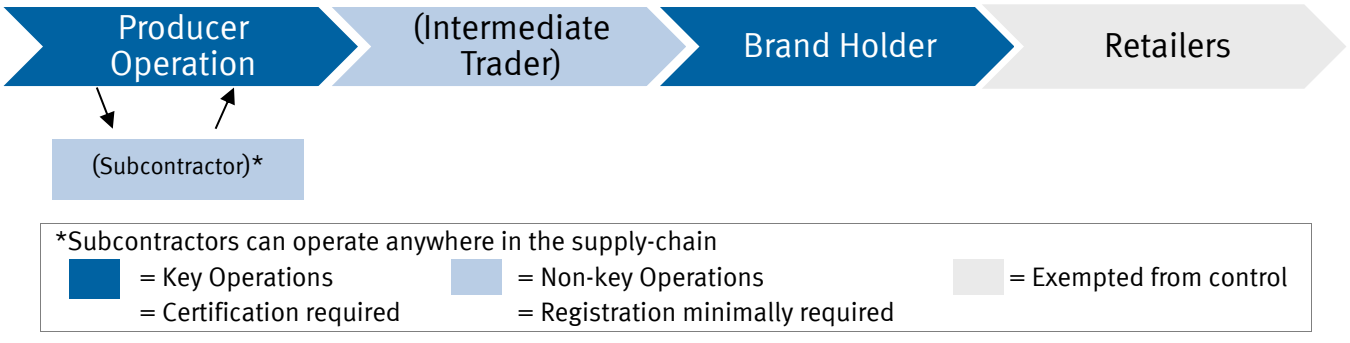
Companies and organisations applying for a certification of systems must be certified.

For companies and organisation asking, additionally, for a *products certification*, the For Life supply-chain must be certified. It is based on two modalities of control:

- The aim of **certification** is to ensure the compliance of the certified operation toward all principles defined in the Standard and translated into specific requirements, as applicable to their activity and typology.

- The aim of **registration** is to ensure the traceability of the FL product and that the principles defined in the FL Standard for social and environmental responsibilities are known to the all operations involved in the supply-chain and incorporated in their daily practices. Beyond this, registration does not aim to ensure the compliance of the registered operation toward the requirements of the standard.

The requirements concerning certification and registration depend on the applicant's role and position in the supply-chain. As shown in the below diagram, the Scheme defines key operations, non-key operations, and exempted operations.



As a rule, key operations must be certified; non-key operations must, at least, be registered; and exempted operations are exempted of control. The CB defines the applicable control modality in line with the objectives defined above.
Where considered relevant based on the potential influence of a supply-chain actor on the effective implementation of fair trade principles within the supply-chain, the CB may require a certification of *a priori* non-key operations.

For specific sectors, additional requirements apply:

Sector	Requirements
Textile and Leather	As a general rule, non-key operations must be certified For Life. The respective obligatory baseline certifications apply (OEKO-TEX 100 or OEKO-TEX Leather Standard). The requirement for FL certification can be waived if: ▪ The operation is not involved in any processing activities; OR ▪ one of the following certificates is available for the concerned FL products: - GOTS - ERTS Level 2 - Naturtextil IVN Best - Naturleder IVN - GRS in combination with OEKO-TEX 100 / OEKO-TEX Leather (at least class ii) In these cases, a regular registration process is deemed sufficient, unless specified otherwise in the control modality defined by the CB.

1.2 Ownership of the Certificate

Each key operation must own its certificate and must be directly contracted with an approved CB.

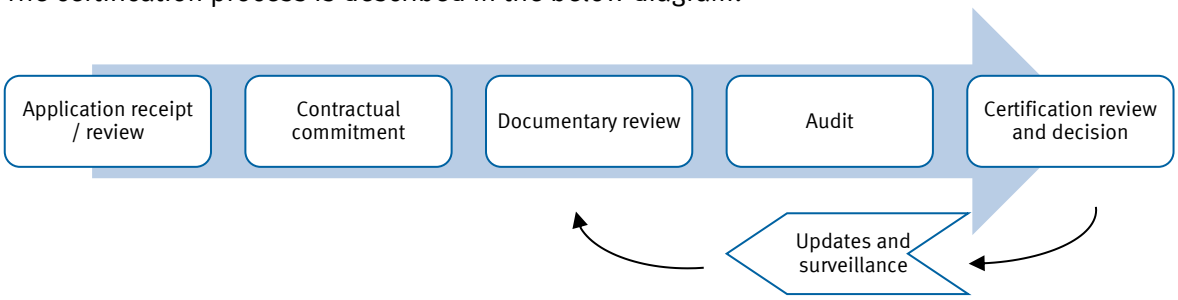
However, for Producer Operations, additional entities can be included in the certification scope (e.g. producers that are a member of a cooperative) as per the rules defined by the CB.
For particular cases beyond this, the CB may develop a specific policy which must be validated by the scheme owner.

Additional non-key operations can be included in the certification scope at any level.

For *product certification option:*
Registered operations are normally directly contracted with an approved CB. To simplify the commitment of the supply-chain, for certain cases the possibility of formalizing the contract with an already contracted entity is introduced: the contract for registration may be formalized with a company's FL certified partner instead, as long as that contracted entity is the only operation commercially involved with the non-contracted (registered) entity for certified products.

2 THE CERTIFICATION PROCESS STEP-BY-STEP

The certification process is described in the below diagram:



Annex 1 of this document gives a more detailed overview of the different steps.

2.1 Application

Upon initial contact with an approved CB, applicants will receive the documents necessary to understand the requirements and the process for becoming certified or registered.
Upon receipt, the CB reviews the application files.

2.2 Eligibility Review

The CB reviews the application and assesses the eligibility of the applicant's activity for certification. The initial confirmation of eligibility allows the CB to proceed with the formalization of the contract and to define the methodology and timeline for the continuous surveillance of the eligibility.

2.3 Formalization of the Contract

After confirmation of the control modality, the CB formalizes the contractual commitment.

2.4 Initial Evaluation

The CB provides the necessary documents and information on the applicable process.

Audit Preparation

The CB will provide the documents and information necessary to plan and carry out the audit. They need to be sent back by the operation within the defined timeframe.

Audit Modalities

The audit is carried out on-site with the operation's assistance and according to the process defined by the CB.

THE DIFFERENT STAGES OF THE ON-SITE AUDITS

1) **Opening meeting:** the auditor presents the objectives and the different points to check, confirms the scope and the audit plan.

2) **Conformity Assessment:** the auditor verifies the compliance with the applicable standard requirements through different means:
   Assessment of the management system based on a **documentary review;**
   On-site visit and interviews with personnel and/or producers (according to the number of visits and interviews defined by the CB); and
   Interviews with management staff.

3) **Closure meeting**: the auditor prepares a summary of the on-site audit and of any observed non-conformities. You will be asked to define corrective actions and sign it.

Note: During the audit, copies may be made of certain documents. If data privacy laws of the audit country prohibit copies of certain documents, the auditor and the CB respect these restrictions.

Product Sampling and Analysis

Based on a risk analysis, the CB or the auditor may require sampling analysis following the methodology defined by the CB.

Corrective Action Plan

During the audit, any non-conformities with the Standard requirements are identified. Following the progressive approach of the FL Programme, only non-conformities corresponding to certification requirements are obstructing (see section 1.2.8 for further details on certification requirements in the different years of certification). These obstructing non-conformities require actions (called "corrective actions") from the operation in order to become compliant.

During the closing meeting or within the following week, the operation must commit to a corrective action plan and provide it to the CB. This plan must:

- describe the corrective actions considered for the identified obstructing non-conformities,
- assign responsibilities for implementation, and
- set effective implementation dates for the corrective actions.

Audit Summary

The operation will receive an audit report, either during the closing meeting or after the audit. This report contains:

- basic information on the main verification methods used during the audit (interviews, visits, etc.),
- the scores obtained per requirement,
- the details of any non-conformity, completed by its corrective action plan, and
- a summary of the overall performance.

Evaluation of implemented Corrective Actions

According to the corrective action plan previously presented, the operation must submit within 4 months (6 months upon request, based on a case-by-case evaluation) after receiving the audit report the proofs of implementation of the corrective actions for each non-conformity corresponding to a certification requirement. In specific cases, where an operation can demonstrate an action plan, but more time is needed for implementation of the measures, the CB may extend the deadline beyond 6 months. In this case, an additional audit must be performed by the CB to confirm the implementation of the corrective actions before a positive certification decision can be issued.

Depending on the additional evaluation tasks needed to verify that the non-conformities have been cleared, the CB may, if necessary, proceed with:

- Additional documentary evaluations, and/or
- Additional on-site audits.

2.5 Review of the Evaluation Results and Certification Decision

Once the CB has checked the relevance and completeness of the operation's file, it will take a certification decision.

- If the certification decision is **positive**: the CB sends the certification documents.
- If the certification decision is **negative**: the CB informs the operation by letter and identifies the reasons. In this case, the operation can apply for a new certification process, beginning at step 1.2.1

2.6 Certification documents

Certification documents are issued by the CB after, or concurrent with the following:

- Certification requirements have been fulfilled,
- The decision to grant the certification has been made.

The certification documents convey the following information:

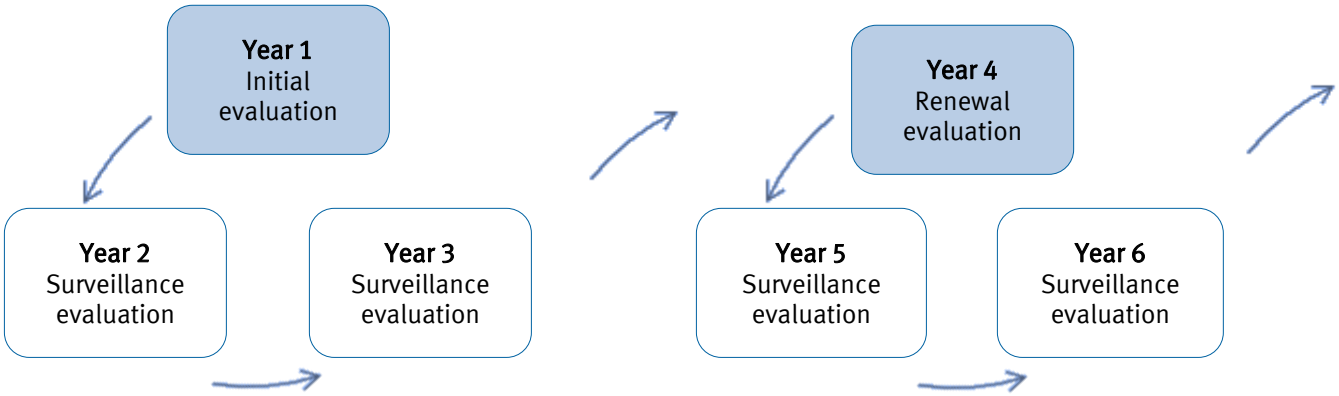
- The name and address of the CB,
- The operation's name and address,
- The date the certification is granted,
- The scope of certification,
- *For product certification option:* The list of the certified products, and
- The term of certification.
- If applicable, description of the increased surveillance defined by the CB.

The certificate includes a section on the overall performance of the operation.

Upon positive certification, the certified company's name, basic ratings, performance level and project information will be published on the Scheme website (www.fairforlife.org).
For this purpose, the CB shares the audit summary with the Scheme Owner. The company/organisation may present objections to the publication within 14 days after the receipt of certification documents.
For product certification option, the publication will be completed with the approved product categories.

2.7 Surveillance

Following the initial evaluation and initial Certification Decision, the certification process is renewed every year, unless the operation notifies the CB about the termination of its certification contract. The CB will contact the operation in a timely manner to start the surveillance process and provide the necessary documents and information.
Annual evaluation will be organized through a 3-year cycle, as shown in the diagram below:



Renewal evaluations are based on on-site audits. Exceptions can be defined by the CB only for low risk operations, following a risk assessment.

Surveillance evaluations are carried out at least once per year and based on on-site audits. Adaptations to the surveillance modalities can be defined by the CB, based on a risk assessment.

When non-conformities on certification requirements are identified as a result of surveillance or renewal evaluation, the operation must commit to a corrective action plan and provide it to the auditor within one week after the audit.

According to the corrective action plan previously presented, the operation must submit within 2 months after the sending of the audit report by the CB the proof of implementation of the corrective actions for each non-conformity corresponding to a certification requirement. Upon request and based on a case-by-case basis, more than 2 months can be granted. On the other hand, for especially critical aspects which will be identified during the closing meeting, the CB may grant only 1 month.

When non-conformities on certification requirements are identified by any other means than the surveillance or renewal evaluation, the operation must commit to a corrective action plan and provide it to the CB within 2 weeks after being notified on the non-conformity. According to the corrective action plan presented, the operation must submit within 1 month after the validation of the corrective action plan by the CB.

In specific cases, where the operation provides an action plan and can demonstrate concrete progress on the defined actions, the CB may consider this as sufficient for considering the non-conformity as managed and define an increased surveillance plan to monitor the implementation of the action plan.

Following the review of the file, the CB confirms the validity of the previous certification decision or, where needed, takes a new certification decision.

Surveillance also includes the verification of any changes in the scope of the certification in between audits. For this reason, any change in the operation's system (manufacturing, process, quality, number of workers and facilities, etc.) and/or (in the case of *product certification option*) the range of the products to be certified must be informed by the operation to the CB without delay. In the event of modification of the certification scope, the CB may decide that an additional audit is necessary before the certification documents are amended.

Unsolved non-conformities

At any stage of the process in case of non-solved non-conformities, the CB takes a negative certification decision according to the conditions and the scope defined by the CB:

	Permanent impact	Temporary impact
Total impact (all activities and products)	▪ Withdrawal	▪ Suspension
Partial impact (part of the activities and/or products)	▪ Reduction	▪ Partial suspension

2.8 The Certification Requirements and Rating System

Categories of Criteria and their evaluation

The clarification of the categories of criteria (KO, Must and Bonus) and the description of the possible ratings are available in the Standard (Chapter "Introduction").

Certification Requirements

The For Life Programme follows a progressive improvement approach. In order to promote a continuous improvement, some criteria have to be fulfilled in the first year, while for others more time is given.

Those criteria that must be fulfilled (minimum rating = 2) in a given certification year, are called "Certification Requirements".

Current certification year	Certification Requirements
Year 1	All KO, Year 0 and Year 1 criteria
Year 2	All KO, Year 0, Year 1 and Year 2 criteria
Year 3	All KO, Year 0, Year 1, Year 2 and Year 3 criteria
Year 4 and over	All KO, Year 0, Year 1, Year 2, Year 3 and Year 4 criteria

If a non-conformity is detected on a certification requirement, a corrective action must be identified and implemented before certification or renewal of certification (see sections 1.2.4 and 1.2.7).

Specific case for KO requirements

At any stage of the certification process, if a non-conformity on a KO requirement is transmitted to the CB, it will be immediately reviewed by the CB (please note that during this step, further investigations can be done by the CB) and lead to a **refusal** or a **reduction/withdrawal** of your certificate.

Reminder: At any time, applicable local laws must be respected. If legal regulations are not respected for a given criterion, a non-conformity will be indicated.

Percentage of Performance

$$Overall\ performance\ percentage = \frac{Total\ number\ of\ points\ obtained\ (KO, Must\ \&\ Bonus\ criteria)}{Maximum\ possible\ points\ on\ KO\ \&\ Must\ criteria}$$

This percentage does not have a direct impact on your certification but reflects your overall performance. Depending on the percentage reached, you will be granted a certain level, displayed on your certificate:

	Less than 60% of overall performance
	Between 60% and 80% of overall performance
	More than 80 % of overall performance

3 REGISTRATION PROCESS STEP-BY-STEP (PRODUCT CERTIFICATION OPTION)

Annex 2 of this document gives a more detailed overview of the different steps.

3.1 Application

Upon initial contact with an approved CB, applicants will receive the documents necessary to understand the requirements and the process for becoming certified or registered.
Upon receipt, the CB reviews the application files.
The CB reviews the application and assesses the eligibility of the applicant's activity for registration.

3.2 Formalization of the contract

After confirmation of the control modality, the CB formalizes the contractual commitment.

3.3 Initial Evaluation

According to the control modality, the CB provides the necessary documents and information on the applicable process. They need to be sent back by the operation within the defined timeframe.

The CB will review the documents and, if applicable, the corrective actions provided and exchange information with the operation until the confirmation of registration can be issued. If deemed necessary by the CB, an on-site audit is organized.

3.4 Registration Documents

If the review is satisfactory, a confirmation of registration is sent by the CB.

Upon positive registration, the operation's name will be published on the Scheme website (www.fairforlife.org). For this purpose, the CB shares a summary of the registration results with the Scheme Owner. The operation may present objections to the publication within 14 days after the receipt of your registration documents.

3.5 Surveillance

The registration process is renewed based on the annual evaluation process defined by the CB, unless the operation notifies the CB about the termination of its registration contract. The CB will contact the operation in a timely manner to start the surveillance process and provide the necessary documents and information.

4 CHANGES AFFECTING CERTIFICATION OR REGISTRATION

4.1 Changes in the Programme

Changes to the Certification Standard are implemented following the process defined in the Fair for Life & For Life Revision Procedure.

Responsibilities of the Scheme:
The Scheme Owner undertakes to inform the CBs of changes to documents in the Standard and related documents and the modalities of implementation and to make available the most up-to-date version of the Standard and related documents on the corresponding website.

Responsibilities of the CB: The CB undertakes to inform the operation in writing of changes to documents in the Scheme, modalities of implementation and to make available the most up-to-date version of the Standard and related documents on the corresponding website.
According to the circumstances, the amended provisions will apply with immediate effect or transitional measures may be implemented by the CB in compliance with the modalities of implementation defined by the Scheme Owner. It is the responsibility of the CB to verify the implementation of the changes.

Certified operations' responsibilities: It is the certified operations responsibility to implement changes. If changes are not implemented, the CB can notify non-conformities which, if not resolved, can lead to a total or partial suspension, a reduction or even a withdrawal of the certification (see table in section 2.7).

4.2 Changes in the Certification or Registration Scope

It is the responsibility of the operation to inform the CB, without delay, of any changes that might affect the compliance to the certification requirements.

Examples of changes to be notified:

- Legal, commercial, organisation status or ownership;
- Organisation and management;
- Contact address and production sites;
- Addition of new producers;

In addition *for product certification option*:

- Modifications to the products, of the production method;
- Addition of new suppliers;
- Changes in the role in the supply chain;
- Etc.

These changes may have an impact on the certification (changes of the scope of the certificate, suspension, withdrawal etc.) and potentially could lead to an additional audit.

If the changes lead to a modification of the applicable requirements, the new MUST requirements will be applicable according to the first year of your certification and not according to the year of change.

4.3 Postponement of Certification

Should the operation plan to suspend its communication about the certification, the CB can suspend its service for up to 2 successive semesters, without cancelling the contract during this time, according to the process defined by the CB.
Additionally for product certification: A postponement is only possible if the company or organisation plans to suspend the activity concerned by the certification (halt manufacture, packaging or sale of the certified products).

At the end of the suspension period, the certification process is resumed at step 1.2.7 Surveillance. The surveillance plan (type of audit and year of certification) will be resumed without considering the period of suspension.

4.4 Voluntary end of Certification or Registration

An operation can ask to stop certification or registration for all or a part of the certification scope at any time in accordance with the terms defined in the contract it holds with the CB. Additional verifications may be required in the case of *product certification option* as defined by the CB, including, amongst others, product and label stock disposal and traceability.

4.5 Change of Certification Body

A certified or registered operation may choose to change its CB if it is not satisfied with the provided services or for any other reason, as long as there are no open non-conformities on certification requirements, on-going appeals or on-going investigations.

5 COMPLAINTS, APPEALS AND ALLEGATIONS

Depending on the type of complaint a stakeholder wants to submit, it can contact either the CB or the Scheme Owner:

Type of Complaint	Description	Responsible Party
Allegation	Violations of the For Life Standard requirements or misuse of the For Life logo by certified or registered operations	CB
Appeal	Request for reconsideration of a certification decision taken by an approved CB	CB
Complaint on CB service	Dissatisfaction with the service provided by an approved CB	CB
Complaint on the For Life Programme	Dissatisfaction with positions, policies, interactions of the FL Programme Request for changes in the FL Standard	Scheme Owner

Allegations

Any party may submit complaints about a certified operation to the CB or the Scheme Owner. Where an allegation is filed with The Scheme Owner, it will be transferred to the CB responsible for the certification of the alleged operation. The CB will address the allegation respecting the process defined in the FFL & FL Allegation Policy.

Certified operations are responsible for managing third-party claims that are addressed to them directly. They must keep a record of all complaints relating to compliance with certification requirements and make these records available to the CB. These records must keep track of the appropriate actions taken and these actions must be documented.

Appeals and complaints concerning the service provided by a CB

Complaints concerning the CB and appeals against certification decisions shall be submitted directly to the CB, following the complaint/appeal procedure defined by the CB. If a complaint concerning a CB or an appeal is filed with the Scheme Owner, it will be forwarded to the respective CB.

The CB commits first to acknowledge receipt of the complaint or the appeal and to deal with it in a timely manner and according to the relevant internal procedures.
When the operation does not agree with the way the CB has managed its complaint or appeal, it may address its concern to the scheme owner. The received complaint will be considered and followed up by the scheme owner as part of the oversight mechanism for the CBs.

Complaints concerning the FL Programme

Any complaints concerning the FL Programme may be submitted through the contact form on the Fair for Life & For Life website or through an email to info@fairforlife.org. The Scheme Owner will acknowledge the receipt of the complaint and to deal with it in a timely manner.

6 USE OF THE FOR LIFE LOGO AND REFERENCE TO THE SCHEME AND CB

Conditions of references to the certification and associated trademarks are defined in the following documents:

- The Annex III of the For Life Certification Standard
- The For Life Graphic Guidelines
- *For product certification option*, the Annex II of the For Life Certification Standard

For product certification option: Additionally to the mandatory For Life mention, certified and registered operations may use the mention of their approved CB on the certified products, according to the rules defined by the CB.

Example: Social Responsibility certified according to the For Life Standard by ‹‹Name of CB››

Misuse of the trademark or incorrect reference to the certification by an operation may lead to the implementation of appropriate measures such as reduction, suspension or withdrawal of certification. The CB is also required to inform the Scheme Owner.

Example of misuse of the trademark or incorrect reference to the certification:

- *For product certification option*: the logo seal or reference to the certification is made on products which are not (yet) certified,
- In general, the communication / labelling rules are not fulfilled (complete rules available in the Certification Standard and accompanying documents).

TERMS AND DEFINITIONS

Allegation – Claim by any person or organisation to the Scheme Owner or an approved Certification Body that FL Standard requirements are not or not fully being complied with by a certified operation

Appeal – Written request by a controlled operation to the Certification Body for reconsideration of a certification decision the Certification Body has made.

Certification – Issuance of a certification document.

Certification Body – Third-party conformity assessment body operating certification schemes, responsible for assuring the compliance of certified actors with the Certification Programme and taking a certification decision as a result of the performed evaluations.

Certification Programme – A system consisting of standard, process and governance requirements, defined in order to reach specific objectives and achieve defined impacts.

Certification Requirement – Standard requirement that must be fulfilled before a positive certification decision can be taken.

Complaint – Expression of dissatisfaction, other than appeal, by any person or organisation to the Certification Body, related to the activity of the Scheme Owner or an approved Certification Body, where a response is expected.

Conformity Assessment Body – The organisation responsible for assuring the compliance of certified actors with the Certification Programme.

Corrective Action Plan – List of non-conformities related to certification requirements and their impact on the certification decision. It can be completed by additional evaluation needed to clear non-conformities

Desk-based audit – Audit which is based on the analysis of documentation and telephone discussions but does not include the on-site visit of the audited operation.

Evaluation - Planning, preparation and completion of activities such as inspection, audit, documentary verification, analysis, etc., in order to give information regarding the requirement relating to the products.

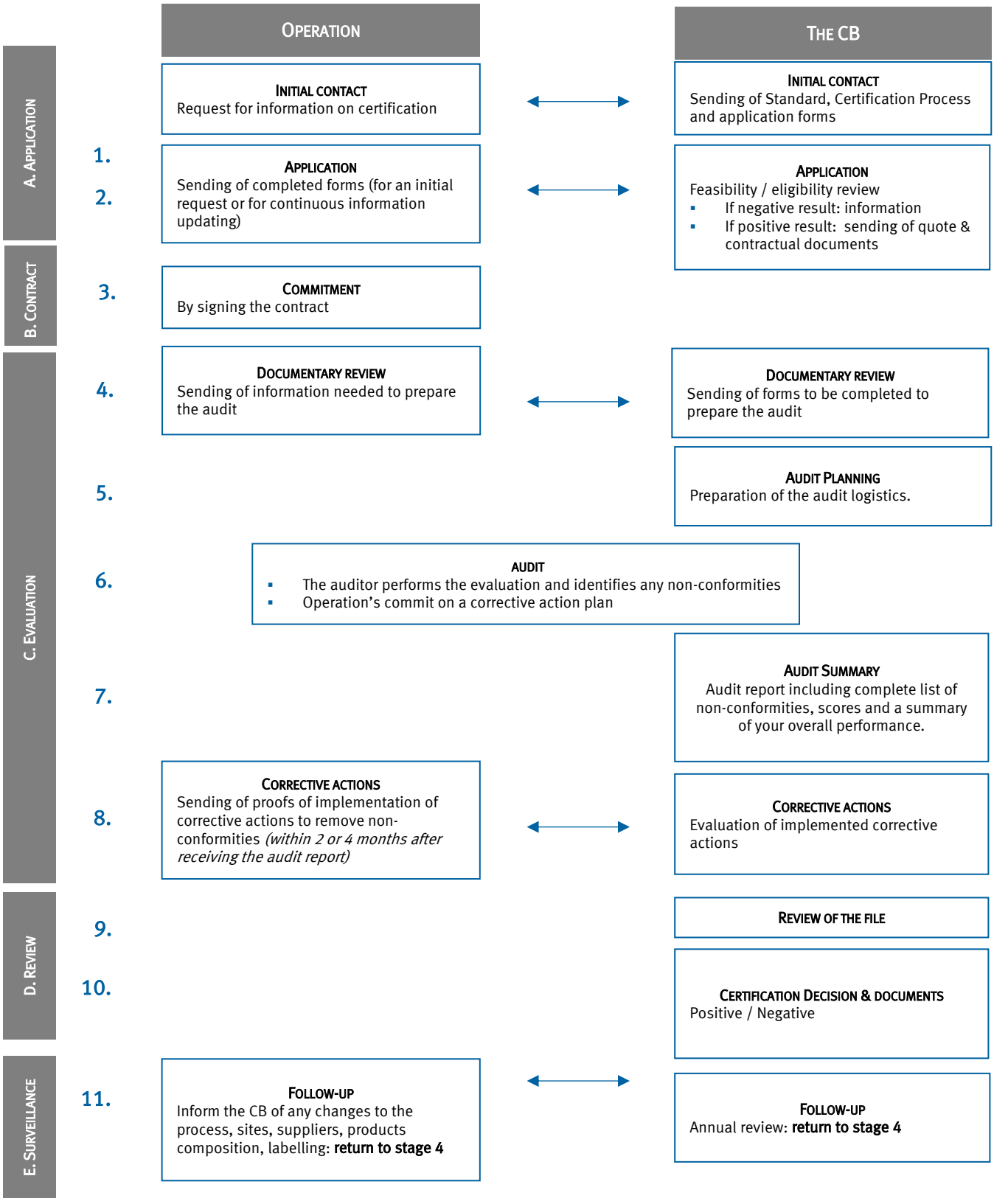
Non-conformity – Non-fulfilment of a standard requirement.

Registration – The issuance of a conformity document to handle certified ingredients or products within a certified supply chain.

Scheme Owner – The organisation responsible for the development and governance of a Certification Programme.

Surveillance - Repetition of the assessment, review, certification decision, according to the certification scheme, as the basis of the maintenance of certification.

ANNEX I: CERTIFICATION PROCESS OVERVIEW



ANNEX II: REGISTRATION PROCESS OVERVIEW