



Information for ETKO Certification Services
COSMOS, GOTS, OCS, GRS & RCS, RAF, RDS

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1. General

This document describes the procedure to be followed by ETKO and the activities to be realized by operator in order to realize the evaluation and certification of the Textile, Cosmetics and other applicable processing activities of the operator. Operator having a certificate successfully in accordance with this procedure is approved for its production operations and is permitted to make use of relevant ETKO logo in its business.

Accessibility: ETKO services equally accessible without discrimination to any interested operation whose activities fall within ETKO’s field of operation. ETKO works according to non-discriminatory policies and procedures, ensuring that no undue financial (e.g. with regard to the fee structure) or other conditions (such as size of applicant or membership of any association) are applied. ETKO accepts inspection assignments regardless whether they are for the entire processing chain, parts thereof or single operators.

Reference Standards to ETKO certification programs are following: 4.6.a

- ETKO Sustainable Textile program GOTS and TE (OCS, GRS & RCS, RAF and RDS)
- ETKO Sustainable Cosmetic program COSMOS and other private standards when applied.
- Applicants can download these regulations and/or standards from ETKO website section standards www.etko.com.tr Textile standards are available in Textile Section and Cosmetic is available in Cosmetic section.

When there are changes to the certification requirements affecting the certification system operators may be informed by the program owner or via ETKO. Any important changes for ETKO’s inspection notified to operators through ETKO website under section news. Additionally operators in question will be informed by email correspondence. Eventually ETKO verifies adapting system changes by the operators during the inspections. When explanations or interpretations of certification standards required it is prepared by the technical experts within the ETKO employees, advisory committee members or hired independent experts related to the scheme in question. ETKO makes sure that this information will be formulated by relevant and impartial persons possessing the necessary technical competence such as textile experts for textile programs, cosmetic experts for cosmetic programs, agricultural experts for agriculture.

Operator shall comply with the requirements stated in this procedure and other ETKO documents as well as relevant legal and statutory documents, and shall maintain all the records related with the production and processes in a satisfactory condition in order to receive and maintain the Certificate.

The scope of ETKO certification process is limited only to products and processes, which are directly controlled by the operator. Certification process does not cover the systems in which the products are not produced by the operator’s own system and the processes not managed and controlled by operator’s own system.

ETKO operators shall:

- Comply with applicable standards and requirements.
- Establish, implement, and update annually an organic compliance plan;
- Permit on-site inspections with complete access to the production or handling operation, including no certified production and handling areas, structures, and offices;
- make all necessary arrangements for the conduct of the evaluation, including provision for examining documentation and access to all areas, records (including internal audit reports) and personnel for the purposes of evaluation (e.g. testing, inspection, assessment, surveillance, reassessment) and resolution of complaints;
- make claims regarding certification only in respect of the scope for which certification has been granted;
- not use the product certification in such a manner as to bring ETKO into disrepute and does not make any statement regarding its product certification which ETKO may consider misleading or unauthorized;
- Maintain all records applicable to the organic operation for not less than 5 years beyond their creation and allow authorized representatives of the Secretary, the applicable State official, Standard owner, and ETKO inspector access to such records during normal business hours for review and copying to determine compliance with the regulations;
- upon suspension or cancellation of certification, stop its use of all advertising matter that contains any reference thereto and returns any certification documents as required by ETKO ;
- use certification only to indicate that products are certified as being in conformity with specified standards;
- endeavor to ensure that no certificate or report nor any part thereof is used in a misleading manner in making reference to its product certification in

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communication media such as documents, brochures or advertising, complies with the requirements of ETKO

- Submit the applicable fees charged on time
- Immediately notify ETKO concerning any:
 - Application, including drift, of a prohibited substance to any production unit, site, facility, livestock or product that is part of an operation; and
 - Change in a certified operation or any portion of a certified operation that may affect its compliance with the regulations.

All applicants, upon request for certification, shall receive an application package, which includes fee structures, a copy of the applicable standard(s), required documentation and other information deemed pertinent to certification-

2. Application for certification and contract

The offer/cost estimate to submit to the operator is prepared based on the information submitted by the operator with the use of the certification program specific application forms. The operator shall duly complete this form and submit the original copy to ETKO

ETKO shall prepare the offer/cost estimate in accordance with the information gathered from the application file and include all the required details related to the services to be provided, including the quotation.

In case the offer/cost estimate is accepted by the operator, the operator's authorized contact personnel shall sign necessary pages of the offer/cost estimate submit the offer/cost estimate back to ETKO office. The operator shall also submit an official document proving that the authorization of the personnel is valid. This offer/cost estimate, signed by the authorized personnel of the operator shall be valid as a contract between ETKO and its operator, and is accepted as an instruction to commence the certification process.

ETKO shall determine the schedule, after reviewing the documents available, for the activities to be followed.

The date for the initial inspection shall be determined mutually by ETKO and operator. The periods and dates for the surveillance visits shall be determined by ETKO to ensure the compliance of the system and the maintenance of the certificate. The visit dates shall be informed to operator at least two weeks before the inspection by ETKO.

2.1 Verify supplier certificates of conformity

ETKO certified operators shall verify the documentary evidence "Certificate of Conformity" of their suppliers appropriately to ensure that the document is genuine and issued by the certifier of the supplier. It is important to verify it before trade arrangements done.

Verifying certification of the suppliers is possible from their certifier's website. Certifiers disclose their list of certified operators including type or range of products as well as the period of validity. In case any doubt remains operator to inform certifier of supplier and/or ETKO to follow up, if satisfactory answer not received eventually, ETKO will communicate to the certifier of the supplier and / or the competent authorities.

2.2 Private Standards:

ETKO accepts the certificates issued in accordance with the COSMOS, GOTS and/or TE (OCS, GRS & RCS & RAF & RDS) where the products in the production chain are certified by other CBs which are COSMOS, GOTS and/or TE (OCS, GRS, RCS, RAF-Responsible Animal Fibers and RDS Responsible Down Standards) approved. The certificates and residue analyses reports issued by other CBs and laboratories are also accepted on the ground that they are in accordance with the COSMOS, GOTS and/or TE (OCS, GRS, RCS, and RAF-Responsible Animal Fibers and RDS Responsible Down Standards) provisions. The certificates which are obviously not in accordance with the above mentioned standards are not accepted by ETKO Inspection assignments are accepted regardless of whether they are for the entire processing chain or only parts thereof.

3. Documents required by ETKO for Application Package Review:

Following the contracting, the operator shall prepare an "Application Package" for the production systems and processes and submit it to ETKO within appropriate time period. (in two weeks)

Unless these documents and the original copy of the contract are submitted to ETKO office, it is not possible to start with the inspection planning.

Application package review covers the information submitted in Application Form and other documents sent by operator will be reviewed. The aim of this review is to determine the present status of the operator's system; its compliance level to the requirements and to estimate if the on-site inspections will result in a certification at this phase.

At this phase ETKO may request additional information for missing points or for clarification of the data already submitted by the operator. A report shall be prepared by

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ETKO following the review and be sent to the operator prior to the on-site inspection. The operator is expected to take corrective measures, prior to the on-site inspection, if any.

The application process is completed with the above mentioned information and documents supplied to the certification body

3.1-COSMOS Application procedures
Information for operators

- The users of the COSMOS Standard to comply with all relevant legislation, including the EU legislation for Cosmetic Products, EC directive 76/768/EEC & the EU REACH regulation and its amendments & other local or national laws where appropriate.
- ETKO will provide to operators an up-to-date description of the procedures to be applied for conducting certification. ETKO will inform operators about:
 - contractual conditions, including fees and possible contractual penalties;
 - the operator’s rights and duties, including the appeals procedure;
 - the current version of COSMOS-standard (and/or other harmonized standard) and corresponding relevant documents released by the COSMOS-standard AISBL;
 - program changes, including regular updates of procedures and standards;
 - the evaluation and inspection procedures applied by ETKO in the course of certification; and
 - Documentation to be maintained by the operator to enable verification of compliance with the COSMOS-standard by ETKO.

3.2-For textile processing facilities:

Regardless of whether they are originating from a specific farming operation or they are independent production processing, storage or handling facilities such as ginneries, spinners, weavers are also required to undergo inspection and certification. This package includes:

- chain of custody documentation to verify inputs as being organically grown,
- details on the mechanics of the processing operation,
- details on process management controls, including contamination prevention, pest management and sanitation’s controls,
- textile auxiliary agents and dyes,
- approvals by accredited certification bodies.

3.3-For textile input producers

Application form and MSDS of the products to be approved for GOTS or COSMOS

4-Application review consists of the following:

- A review to ensure that the application is complete as per ETKO procedures and other legal or statutory requirement.
- A determination of whether the applicant complies with the relevant applicable requirements of the production and handling standards;
- Verification that an applicant who previously applied to another certifying agent and received a notification of noncompliance or denial of certification has submitted documentation to support the correction of any noncompliance’s identified in the notification of noncompliance or denial of certification; and
- The scheduling of an on-site Inspection of the operation to determine whether the applicant qualifies for certification if the review of application materials demonstrates that the production or handling operations are in compliance with the applicable requirements.
- A review of the application materials received and communication of the findings to the applicant.

5-Contract

Upon the acceptance of the application package CONTRACT is signed and site visit is planned. Contract is signed after application package review procedure is finalized and offer/cost estimate must be confirmed. It is essential that applicant fulfill the requirement of the application and complete the operation file with all components for Inspection. When application package is completed, a contract signed between ETKO and the applicant, clarifying the processes, producers, products, addresses and fee structure.

6-Preparation by Operator:

- Prior to the scheduled Inspection, the applicant is expected to have organized all of the records, which documents that, the commodities and / or processes under review are certifiable as organic. The applicant’s co-operation in completing all of the forms, providing thorough and proper documentation, and being prepared, train the personnel involved for production of the requirements of the regulation, will greatly contribute to the timely and cost effective completion of the entire certification process. Applicant must have a complaint handling procedure in place related to complaints received from the customers, officials and from any other sources
- Operator shall have the relevant handling system plan in place including records and documents mentioned above for onsite inspection.

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- Provide sufficient information to inspectors, proving that production processes comply with the relevant requirements.
- Ensure the access to the facilities, records; personnel enabling the inspectors satisfactorily verify that organic production systems and processes are maintained.
- Results of own quality assurance program
- Cooperate to resolve the nonconformity and initiating the corrective action.
- For all scopes falls under the ETKO Private Standard certification, application responsible(s) for each scopes ensures that applicant is provided necessary standards, guides and procedures to ensure that a proper preparation could be realised.

7. Site Inspection

Inspector Assignment: A scope approved inspector is assigned by ETKO for inspection purpose. ETKO makes sure inspector assigned has sufficient experience and qualification for the type of production, and no conflict of interest issues.

Inspection plan: Prior to the site inspection, inspector in charge prepares an inspection plan which needs approval of the person in charge for inspector assignment. The responsible for assignment should verify the plan whether all critical elements of the inspection are included. Critical points might be scope specific therefore inspector and the responsible person for assignment work together checking previous issues or pending non-compliances, any risk areas exist.

Both inspector and the responsible person for assignment makes sure that any standard used for that specific inspection requirements will be covered during inspection and evaluation process. Those requirements could be but not limited to; inspection requirement of all production, processing and handling sites as well as inputs, processing / handling aids, sanitation system, tools and equipment used, traceability and record keeping, input-output reconciliation, product segregation packing material, labelling, marketing arrangements, product flow from the production sites to the final buyer. Organic regulations requires inspection of the non-certified part of the production, therefore plan should include when it is valid.

Objection for assigned inspector: In case the operator has objection any one of the inspectors in charge, it is requested to inform ETKO management officially, together with the valid and objective proof. In case ETKO management agrees, the personnel shall be replaced.

Evaluation Audit:

Inspection covers production, handling and processing

practices, transport, storage, packing, labelling, sampling, testing of the products, evaluation of the documentation and record keeping related to production and marketing of the certified products. 7.4.3, In general a regular audit covers opening, closing meetings and production practices evaluation including transport, storage.

Inspection shall be conducted according to ETKO procedures and covers following:

- An opening meeting with the authorized personnel or management of the operator. The scope shall be confirmed, reporting method and how to deal with nonconformities shall be discussed. Responsible personnel of operator shall be ready in opening meeting. After the meeting a site visit should be done to evaluate following.
- Assessment of the production / processing system by means of visits to production facilities and storage units which may also include visits to non-organic production and/or processing areas if there is reason for doing so;
- Review of records and accounts in order to verify flow of goods (input/output reconciliation and tracing back) and on and off product statements.
- Identification of areas of risk to organic integrity;
- Verification of the operator's risk assessment of contamination and residue testing policy potentially including sample drawing for residue testing either as random sampling or in case of suspicion of contamination or non-compliance.
- Verification that changes to the standards and to related requirements have been effectively implemented; and
- Verification that corrective actions have been taken. After the site visit
- All the nonconformity, observations shall be discussed with operator.
- All the findings shall be reported to operator in the closing meeting.
- The inspection report shall be prepared and submitted to operator.

7.1-GOTS Specific:

- Inspection of the chemical inputs (dyes and auxiliaries) and accessories used and assessment of their compliance with the applicable criteria of the applicable standards.
- Inspection of the waste water (pre-) treatment system of wet processors.
- Verification of adherence to the defined minimum social criteria (including confidential interviews of workers, if applicable).

7.2-CCS Specific

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The CCS applies to organizations that wish to demonstrate the validity and legality of the material content claim of the products they buy, sell and/or produce. It provides third party verification of the amount of a given material being claimed in a final product. It addresses the flow of goods within and between companies, and covers manufacturing, storage, handling, and shipping.

Chain of Custody: TE (OCS, GRS, RCS, RAF, RDS..): .

Certified Material content integrity is maintained through to the final **CCS** Product.

For each specific content such as organic, recycled material (plastic, leather, paper etc.) the requirements of the CCS is implemented. For application to the type of the content material, each reference of "CCS" in the Content Claim Standard shall be understood as "specific content such as organic, recycled material (plastic, leather, paper etc.)" – with the exception of some labeling requirements.

The CCS requires all Organizations to be certified beginning with the primary production such as for fiber spinning mill for yarn manufacturing, or processing of raw material (plastic, leather and paper) for recycled material, processing sites through to the seller in the final business-to-business transaction. Depending on the kind of Organic Material processed, the following examples are considered the first post-harvest processing stages that shall be OCS certified:

- Ginning for cotton
- Retting for bast fibers
- Boiling and washing cocoons for silk
- Scouring for wools and other animal fibers respective grading if this step is undertaken before scouring and not already covered by the organic farming certification)
- Processing pre/post-consumer wastes for recycling material

For organic cotton content; Gins shall not be certified to both GOTS and OCS. If a gin is certified to OCS and wants to be certified to GOTS, it shall contact ETKO to terminate its OCS Scope Certificate prior to the GOTS Scope Certificate issuance.

Non-gin Organizations certified to both the Global Organic Textile Standard and the OCS shall be certified by ETKO in order to properly reconcile organic volumes among both standards.

Any output of organic farms that have been certified by an accredited certification body to comply with the USDA

National Organic Program NOP, EC Regulation 834/2007, or any other) organic standard that is approved in the IFOAM Family of Standards.

7.3-Genetically Modified Organisms - GMOs

Testing for the presence of Genetically Modified Organisms GMOs in the Organic Material shall be carried out by ETKO based on a risk assessment. The risk assessment shall consider the type of organic crop and the prevalence of GMO varieties in the growing region.

GMO testing on cotton shall be carried out at an early stage of the processing chain ginning or spinning to ensure that sufficient DNA from the plant is available in the seed or fiber material. GMO Tests to be done according to the ISO IWA 32:2019. Sampling of the seed cotton to be done according to ISO 1130:1975 Standard.

- The OCS allows "in-conversion" Organic Material as inputs if the applicable farming standard permits such certification.
- All Organic Materials entering the supply chain shall have a Transaction Certificate (TC) issued by the Certification Body.
- The OCS may be used with any product that contains non-food Organic Material. The OCS may not be used to support claims on food products; food products are governed by national laws. Food products in this context refer to those that are "intended for consumption" as agricultural food crops may have other purposes than consumption e.g. cucumbers in shampoo).
- Any products being sold in the United States and making a reference to "organic" on the label shall have the organic materials certified to the USDA NOP standard as per USDA policy).
- Organic fiber certification according to the Japanese Agricultural Standard (JAS) is not possible as per the JAS definition).
- The CCS applies to products that contain 5% to 100% Certified Material.

- Buyers of the OCS product are responsible to set any requirements on the specific organic standards to which the input material should be certified. For example, companies selling into the United States should ensure that the input materials have been certified to the United States Department of Agriculture's National Organic Program standard, while for companies selling into Europe, there are no legal requirements for non-food organic products.

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In advance of each inspection, the organization must prepare and submit to ETKO CCS documentation that contains:

a full description of the production units including:

- name of each unit
- name and location of the site
- activity being performed
- a list of all the practical measures taken at the level of the unit to ensure compliance with the CCS standard
- a declaration that the organization is performing its operations in accordance with the CCS standard

The description, practical measures list, and statement of compliance with the Standard must be signed by a representative of the Organization.

This document will be verified by ETKO during the certification process. If deficiencies and non-compliances with the requirements of this Standard are found, ETKO will issue an inspection report to the organization. The organization must countersign this report and take necessary corrective measures. Certification will be given only after deficiencies or non-compliance issues have been corrected by the applying organization and confirmed by ETKO.

7.4-COSMOS Specific:

- Inspection of the ingredients, technology or process could pose a health or environmental risk, this will be checked thoroughly to avoid from non-allowed material and/or methods such as;
 - Nanomaterial
 - GMO s or derivatives of GMOs
 - Irradiation
 - Animal testing

7.4.1-COSMOS products under organic certification

The product:

- must be labelled with the signature „COSMOS ORGANIC“ in conjunction with the seal of the COSMOS-standard AISBL member organization as detailed in the Labelling Guide
- must indicate on the label the percentage of organic origin ingredients by weight in the total product, as “x% organic of total”
- Must indicate organic ingredients and those made from organic raw materials in the INCI list. This should be limited to the wording: “from organic agriculture” for physically processed agro-ingredients and “made using organic ingredients” for chemically processed agro-ingredients or similar expressions using the same typing as used for the INCI list
- May also indicate the percentage of organic origin ingredients by weight in the total product without

water and minerals (as defined in 6.2.1 and 6.2.2), as “y% organic of total minus water and minerals”.

7.4.2-COSMOS products under natural certification

The product:

- must be labelled with the signature „COSMOS NATURAL“ in conjunction with the seal of the COSMOS-standard AISBL member organization as detailed in the Labelling Guide
- Must indicate organic ingredients and those made from organic raw materials only in the INCI list. This must be limited to the wording: “from organic agriculture” for physically processed agro-ingredients and “made using organic ingredients” for chemically processed agro-ingredients or similar expressions using the same typing as used for the INCI list
- may indicate the percentage of organic origin ingredients by weight in the total product, as “x% organic of total”
- May indicate the percentage of organic origin ingredients by weight in the total product without water and minerals (as defined in 6.2.1 and 6.2.2), as “y% organic of total minus water and minerals”.

Any claim relating to organic is not permitted, either ingredients or percentages, on the front of the packaging.

7.4.3-COSMOS Approval of ingredients

For non-organic cosmetic ingredients to be approved as acceptable for use under COSMOS Standard, it is required to:

- supply all information and documents needed for the approval as requested by ETKO and
- Declare to ETKO any changes to the processing of that ingredient that may affect its approval.

It is forbidden to label or otherwise indicate that approved cosmetic ingredients are certified according to COSMOS Standard.

8-Laboratory Analysis

During the inspection the inspector may take samples to be sent to an ISO 17025 accredited laboratory for required analysis. The sampling method will be followed according to ETKO’s OP 03 Testing procedure and TI 05 Sampling Method. The inspector certainly will take a sample in case of suspicion of the product inspected. Also the operator must maintain GMO free records for the seeds or for each additive that he intends to use for organic production. The operator is responsible to show GMO Free documents to the ETKO inspector when asked upon. The ETKO inspector may take a sample from the organic seed to be analyzed for GMO.

9. Non-conformities & Corrective Actions

Nonconformity procedure is kept available for the access

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of the interested bodies.

Grading non-conformities

Non-conformities are graded as major and minor. While grading non-conformities the following conditions shall be considered:

9.1-Critical Nonconformity:

Critical non-conformities represent serious failures to meet the fundamental principles of the Standard.

9.2-Major Nonconformity:

- One of the requirements of standard or regulation related to the process or product are not complied
- Production process plan not applied
- Product is under risk

If any one of the above is observed on the system under inspection MAJOR non-conformity report shall be issued. Major non-conformities are usually clear-cut system deficiencies.

9.3 Minor non-conformity

- Failure to fully satisfy a requirement of a standard or regulation.
- Factors causing no risk on the condition of the product.

9.4 Point of Attention

Apart from the major and minor non compliances, the points to be improved and similar cases are mentioned in the inspection report as "Point of Attention". These have no direct effect on the certification decision.

All the nonconformity found and reported during the inspection shall be cleared (major NCR) or planned to be cleared (minor NCR) and the effectiveness of the action taken by the operator shall be verified by ETKO for issuing the Certificate.

There are three levels of corrective action to take by operator:

- Corrective actions taken during the site inspection. If this is the case the action taken is verified by the inspector and the non-conformity is reported to the certifier. Certifier evaluates and finds satisfactory evidences of the corrective actions; the non-compliance is closed and filed.
- CA related only with the documents. In this case operator shall send the relevant evidences of the action taken together with the duly filled nonconformity report. The NCR and the evidence for the action taken is reviewed by the certifier and if

found satisfactory NCR is closed and filed.

- In all other cases the inspector makes a follow up visit to the field again to verify the action taken and close the NCR (Major NCR) if the action is effective on date. In this case, the duration for this visit is charged to operator. Follow up visits are not included in the contract, and will be invoiced to the operator.

The maximum permissible period for taking and verification of corrective action for Major Non-Conformities is 30 days and should be verified by ETKO. For Minor Non-Conformities corrective action plans are sent to ETKO within 30 days. In case the corrective action plans are approved by ETKO, their implementation is verified on next inspection visit. In case allowed time periods for corrective actions are exceeded, the complete certification process shall be renewed. In case of renewal, the costs shall be charged on the inspection fees which are valid on that date.

9.5 Surveillance visit required for closing and implementation follow up NCs

To close major non-conformities a follow up inspection may be required within the target date described. In this case ETKO will assign an inspector to follow up the NCR issued to operator and corrective actions taken by the operator. Inspector will evaluate over all activities and implementation done including preventive actions with the responsible person(s). When applicable inspector takes samples, evidences by electronic means picture, video or documents for further evaluations incase needed.

The non-conformity report shall be closed in case of satisfying consequences are determined.

Resolutions for the minor non-conformities that are not critical for product integrity can be evaluated by a desk audit without site audit but still they are to be confirmed during the following inspection.

Non-conformities that are not closed on time shall result in further sanctions of suspension, revocation and cancellation of the contract as explained in GP 15.

Monitoring the implementation of the non-compliances resolved to be done as follows:

ETKO will register the NCs in its database and classify the risk levels of the operators in line with the risk assessment procedure. Unannounced inspections and sampling for analyses will be decided for which operators to be subjected. Selected operators will receive un-announced

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inspection particularly verifying the implementation of the previous NCs.

ETKO inspector(s) will take note in the review report before going on site inspection to emphasis the resolutions of the previous NCs with the inspection plan in order not to forget verification of the resolutions. Findings will be recorded with the Noncompliance Register.

All operators who received NCs during the previous inspection will be assessed carefully if implementation of the previous NCs were in place and effective since resolutions reported. Inspector will pay attention to the implementation date of the resolutions from the record keeping of the operator or interviewing the people involved.

Issues pending with the implementation of the NCs will be reported by the inspector and further sanctions will be implemented.

10. Use of Logo and Certificate 4.6.c

Certification decision could be taken by ETKO only when client passes inspection and review process successfully including financial obligations.

Certificate is valid through the issue date for a year, if none otherwise stated for specific programs.

ETKO Sustainable Textile program GOTS and TE (OCS, GRS, RCS, RAF , RDS), COSMOS, and other private standards require the validity of the certificate as one year.

The inspection realized for certification purposes does not preclude the operator from its legal responsibilities.

In case production practices are related to ETKO Textile, Cosmos and other private standard certification programs requires Private Standards Certification GP 24.

The operator has the right to demonstrate the certificate in his premises, in marketing or in any advertising media. The certificate shows the scope of the certification, the status of the products, identifying relevant statutory requirements.

A guiding document is provided for operator defining the rules to be followed in using the certificate and logo. The operator shall send its logo samples to ETKO for approval prior to use. ETKO shall control the use of logo and certificate at its discretion and during the surveillance visits.

In case of improper use of certificate and / or logo, nonconformity is raised and operator is requested to take corrective action. Such nonconformity may cause the

suspension or withdrawal of the certificate.

Operators using processing inputs as a part of their organic textile processing whose input must be approved by ETKO otherwise may not be used for organic textile processing. The inputs must be approved by an authority or by ETKO to be used for organic textile processing. In case of improper use of inputs, nonconformity is raised and operator is requested to take corrective action. Such nonconformity may cause the suspension or withdrawal of the certificate.

ETKO maintains a list demonstrating the certificated operators. The list is open for public information on the website www.etko.com.tr

11. Maintenance of Approval for Certification.

Maintenance of certificate depends on the operator's performance to comply with the relevant requirements of standards and statutory documents. ETKO shall ensure the compliance with planned surveillance visit.

Surveillance visit are planned during the initial inspection preferably and is informed to operator two weeks before it is conducted.

The periods for surveillance inspections are determined during the initial inspection.

The operator shall maintain compliance to relevant regulations requirements to ensure the maintenance of its certificate. NCR reported during the surveillance inspections will be evaluated after corrective actions.

12. Changes in the Operator's System

Operator shall inform ETKO in case of change in the production system and processes (such as changes in location, additional units, name, shareholders, scope...) in time, formally in writing. ETKO shall evaluate the effect of the changes on the certification and determine if a special surveillance inspection is required or not.

In case it is determined that a special surveillance visit is required, until the special inspection visit is conducted, ETKO logo or any other document cannot be used by the operator and none of the products can be labeled as organic. Operator will be informed by ETKO.

In case it is determined that a special surveillance visit is required the time planning will be done by ETKO inspection division, and charged to operator on the fee stated in the contract following the visit.

In case there are changes limited to production system

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and not effective on certification, or if there are changes in documentation, these shall be subject to review in next inspection visit by the inspector.

NOTE: All the changes in the production and documents shall be kept by the operator for the inspector to be a reference.

13. Suspension, Withdrawal and Cancellation of the Certificate.

ETKO reserves its right suspending, withdrawal, cancelling, or changing the scope of the certificate during the certification period.

Suspension, withdrawal, cancel is caused by the operator:

- If the corrective actions are not taken as planned for the nonconformity found and reported, in a timely manner as mutually agreed by ETKO and operator.
- Postponing the surveillance inspection
- Not complying with the requirements of relevant standards and statutory requirements.
- Misuse ETKO Logo and certificate
- Not complying to the contract between ETKO and operator
- Acting in a way harming ETKO's prestige in the sector or aiming to act so.
- Not paid fees in due time

In such cases ETKO shall raise nonconformity report to operator and request corrective action in an acceptable time period. If the operator does not take corrective action on time ETKO shall suspend or withdraw or cancel the certificate; the operator shall return the certificate back to ETKO as determined also by the contract.

ETKO makes public its decision about the operator suspending, withdrawal, or cancelling the certificate. See www.etko.com.tr

In cases the operator itself decides to stop the certification by any reason during the certification period ETKO shall cancel the certificate.

14. Appeals and Complaints ^{4.6.d}

In case operator wishes to raise objections to any decision of ETKO about certification, or in case of a dispute between the parties the appeal or corrective actions procedures shall be followed. The operator shall apply to ETKO management formally in writing. More information is available GP 05 Appeal, Complaints and Disputes Info Letter, or SP 06 Corrective & Preventive Actions. See www.etko.com.tr.

15. Confidentiality

Except where national law or accreditation bodies require, ETKO shall keep confidential and shall not disclose to third parties the information about the operator obtained during the contract and the certification process, unless the operator permits in writing not to do so.

The supplier shall be informed of the information provided when required by the law and that all other times that information not be disclosed without consent of the supplier.

Operator accepts the verification and inspection activities of the accreditation bodies by signing the contract with ETKO for certification services. No fee is charge for the inspection of accreditation bodies.

16. Postponing and Cancellation

In cases the field inspection is postponed before less than 2 weeks prior to the inspection date, ETKO charges %25 of total inspection fee to the operator. This amount shall not be excluded from the total sum of original inspection fee.

In case the contract is cancelled by the operator in any phase, ETKO shall charge to operator %25 of the fees of the services not realized yet plus all the expenses incurred already for the services provided.

17. Legal Aspects

The contract for certification services is valid under the legislation of TR. In case of dispute, the parties shall apply to Izmir courts

18. Handling of Appeals, Complaints and Disputes by Operator

The operator shall properly handle the appeals, complaints, and disputes received from its own operators. All the records related to such cases and relevant corrective actions shall be filed in an auditable manner and shall be kept open to the inspector during the inspections.

This file shall include the following:

- The statement of the nature of the received appeals, complaints, and disputes either by the operator or as recorded by the operator itself.
- The identity of the involved persons/groups that are in charge of the case solving and verifying.
- The statement of root cause of the problem
- The action taken or action plan to be taken
- Verification and documentation of the effectiveness of the initiated measures.

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When there is appeals, complaints and disputes situation received by ETKO, ETKO will act according to its Appeals, Complaints and Dispute procedures.

19. Extension and Renewal of Certification

The operators are regularly reevaluated in order to verify that they maintain their system in compliance with the standard and that the corrective actions are implemented effectively. For the extension of the certification the operator is required to renew the contract and start the application process.

Renewal of certification must be annual for all programs

Operators shall continue to be met for certification criteria and apply annually for continued certification. ETKO will evaluate the application documents eventually on-site inspection will follow. Each location of the operation will be verified.

Operators shall pay the certification fees deemed by ETKO When operator does not renew certification ETKO will formally notify the operator that certification is withdrawn, no longer valid.

For the reevaluation, a/m rules are applicable.

20. Exchange of Information

Where an operator is certified also by other Certification Bodies within the same scope, ETKO will seek information exchange with the other Certification Bodies involved misuse of certificates.

ETKO may, if necessary exchange information with other Certification Bodies and/or authorities including GOTS, TE and COSMOS-standard AISBL to verify the authenticity of the information.

Where the operator and/or the subcontractors of that operator are checked by ETKO and a different control body, ETKO will exchange the relevant information on the operations under its control. 889-92-1.

Where ETKO operators and/or their subcontractors change their control body; the change will be notified without delay to the competent authority by ETKO. ETKO will hand over the relevant elements of the control file of the operator concerned and the reports and non-conformities to the subsequent control body.

In case ETKO accepts a new operator coming with non-conformities; ETKO will ensure that non-conformities noted in the report of the previous control body have been or are being addressed by the operator.

Where the operator withdraws from the control system, ETKO will without delay, inform the related Standard organization.

Where ETKO finds irregularities or infringements affecting the certification status of products, ETKO will without delay inform the standard organization.

21. GRS "Global Recycled Standards"

The goal of the GRS is to increase use of Recycled materials in products and reduce/eliminate the harm caused by its production.

The objectives of the GRS are:

- Alignment of definitions across multiple applications.
- Track and trace Recycled input materials.
- Provide customers (both brands and consumers) with a tool to make informed decisions.
- Reduce harmful impact of production to people and the environment.
- Provide assurance that materials in the final product are actually Recycled and processed more sustainably.
- Drive innovation in addressing quality issues in the use of Recycled materials.

GRS "The Global Recycled Standard" is intended for use with any product that contains at least 20% Recycled Material. Each stage of production is required to be certified, beginning at the recycling stage and ending at the last seller in the final business-to-business transaction. Material Collection and Material Concentration sites are subject to self-declaration, document collection and on-site visits.

The GRS does not address quality or legal compliance.

22. "RCS" The Recycled Claim Standard is intended for use with any product that contains at least 5% Recycled Material. Each stage of production is required to be certified, beginning at the recycling stage and ending at the last seller in the final business-to-business transaction. Material Collection and Material Concentration sites are subject to self-declaration, document collection, and on-site visits.

The RCS does not address social or environmental aspects of processing and manufacturing, quality, or legal compliance.

23. Principles of GRS Certification

23.1 Scope

23.1a The Standard applies to products that contain 20% or more Recycled Content. Some exceptions may apply, see [Textile Exchange Accreditation and Certification Procedures](#) for the derogation process.

23.1b The Standard applies to any verified Recycled Material and may apply to any supply chain.

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23.2 Scope

23.2a The Standard provides verification of chain of custody for Recycled Material, in accordance with the Content Claim Standard.

23.2b The Standard includes consumer-facing labeling; only products that have been certified up to the seller in the last business-to-business transaction are eligible.

Only products with at least 50% Recycled Content qualify for product-specific GRS labeling. See GRS Logo Use and Claims Guide for labeling guidelines.

23.2c The Standard establishes criteria for social and environmental principles in processing GRS certified products.

23.2d The Standard restricts the use of hazardous chemicals in the processing of GRS products; it does not address the chemicals present in the Reclaimed Materials or what may be present in final GRS products.

24 – Recycled Material Requirements

- Reclaimed Material suppliers should submit below required documentation to their customers. Reclaimed Material suppliers may be subject to further inspection, as mentioned in the Reclaimed Material Supplier Agreement, Appendix B.
- Material Recycling: full GRS certification; transaction certificates
- Production and Trading: full GRS certification, with exceptions for subcontractors and low volume traders; transaction certificates.

24.1 Material Recycling

24.1a Entities involved in Material Recycling (as defined in A1) are subject to GRS certification. The GRS requires compliance with the requirements of the Content Claim Standard, whereby the 'Claimed Material' is replaced with 'Recycled Material' as defined in section A1.

24.1b In addition, entities involved in Material Recycling shall:

- Verify that all sources of Reclaimed Material have legal authorization to operate for the relevant function, and hold copies of the relevant documents.
- Hold valid Reclaimed Material Supplier Agreements (see Appendix B) for all suppliers of Reclaimed Material (entities involved in Material Collection and/or Material Concentration).
- Collect and retain completed Reclaimed Material

Declaration Forms (see Appendix C) from their suppliers for all Reclaimed Material inputs. The Reclaimed Material Declaration Forms shall be collected at least annually or if the Reclaimed Material source changes.

iv. Inspect all incoming shipments of Reclaimed Material to confirm that they are not virgin material; confirm the correct identification as Pre- or Post-Consumer. Retain records of inspections.

v. Request Transaction Certificates for all outgoing GRS certified products.

24.1c Material Recyclers who collect Reclaimed Material from their own processing shall retain the following records to verify their volume of recycling:

- Records of all materials entering the recycling process.
- Description of Reclaimed Material and the stage where the waste was collected.
- Any other relevant transfer notes.
- Reclaimed Material Declaration Forms may be used in lieu of the records listed above (see Appendix C).

25 – Supply Chain Requirements

25.1 Application of Production Requirements

Organizations involved in production and trade of GRS products are subject to GRS certification. The Global Recycled Standard requires compliance with the requirements of the Content Claim Standard, whereby the 'Claimed Material' is replaced with 'GRS Material'.

25.2 Production and Trade

In addition to the requirements of the CCS, all organizations involved in the production or trade of GRS products shall meet the following requirements:

25.2a All Recycled materials entering the supply chain shall have a valid Transaction Certificate (TC).

25.2b Pre-Consumer and Post-Consumer Material Content percentage shall be recorded separately for each batch at every certified site and recorded on the transaction certificate.

25.2c Traders with an annual turnover of less than \$10,000 of GRS products, and retailers selling to end consumers only, are exempt from the certification obligation; provided that they do not (re-) pack or (re-) label GRS products. Exempted traders with less than

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\$10,000 annual turnover of GRS products shall register with ETKO and shall inform ETKO immediately once their annual turnover exceeds \$10,000, or once they plan to (re-) pack or (re-) label GRS products.

25.2d In cases where there is the possibility of differential rates of production loss between Recycled and virgin inputs, Certified Organizations shall address this through their mass balance formula for each material to show that calculations were done to account for the differences.

26. Section B – Social Requirements: Verification of adherence to the defined minimum social criteria (including confidential interviews of workers, if applicable).

27.1 – Environmental Management System

27.1.1 Environmental Management System: Inspection of the waste water (pre-) treatment system of wet processors.

Certified Organizations shall have an environmental management system (EMS) in place. The environmental management system shall include the following:

27.1.1a EMS Manual

27.1.1b A designated EMS staff person (from the management level) responsible for its implementation; it is not required that an entire position be dedicated to managing the environmental management system at the facility, but instead that someone has been assigned the role as part of their job responsibilities.

27.1.1c A mechanism to remain up-to-date with applicable local legal requirements.

27.1.1d Basic management controls in place: a system to document, measure, and track the relevant environmental indicators

27.1.1e Annual plan to target and reach meaningful environmental improvements across all indicators.

27.1.2 Chemical Management System

The Certified Organization shall have a Chemical Management System (CMS) in place which includes the following:

27.1.2a Mechanism to monitor and meet all relevant legal requirements related to chemical management.

27.1.2b A dedicated and competent staff person responsible for managing the Certified Organization's use of chemicals; it is not required that an entire position shall be dedicated to managing the chemical use at the facility, but instead that someone has been assigned the role as part of their job responsibilities.

27.1.2c Procedures and records for training of relevant staff in chemical management, and where necessary, training to properly manage the CMS.

27.1.2d Complete information on all input suppliers, including address and key contacts.

27.1.21e Accurate lists of all chemical inputs used in all products; each input shall have a complete Safety Data Sheet (SDS) available in the language(s) used by workers in the facility and in English. Information shall be available for a minimum of 5 years. The SDS shall meet the guidelines found in D1.2a. The chemical supplier should be responsible for the English translations of the SDS.

27.1.3 Record Keeping

27.3.1a Certified Organization shall submit a signed document that confirms their commitment to comply with the GRS Environmental Requirements outlined in Section C2.

27.3.1b Certified Organization shall submit all relevant policy documents and training records referencing the procedures in place to ensure environmental management.

28.1 – GRS Chemical Management

Inspection of the chemical inputs (dyes and auxiliaries) used and assessment of their compliance with the applicable criteria of the GRS standards.

28.1.1 GRS Product Chemical Management

In addition to the Chemical Management System (CMS) (see Section C1.2), the Certified Organization shall maintain:

28.1.1a Accurate lists of all chemical inputs used in GRS products;

28.1.1b Documentation for each input that demonstrates they are accepted for use in GRS products (see details in D3.1).

28.1.1c A process to assess all chemicals used in GRS products against hazard criteria in Section D2.

28.1.2 Record Keeping

28.1.2a Certified Organizations shall maintain Safety Data Sheets (SDS) for each substance (or mixture) used

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in the production of GRS Products. The SDS shall be less than three years old and shall meet at least one of the following criteria:

1-ANSI Z400.1-2004, which identifies information that shall be included to comply with the U.S. OSHA Hazard Communication Standard

2-Regulation (EC) No 1907/2006 (REACH), as adapted to take into account the rules for safety data sheets of the Globally Harmonised System of Classification and Labelling of Chemicals (GHS) and the implementation of other elements of the GHS into EU legislation that were introduced by Regulation (EC) No 1272/2008 (CLP)⁹

3-Globally Harmonised System of Classification and Labelling of Chemicals (GHS).¹⁰

28.1.2b Certified Organizations shall maintain records of assessments conducted to verify conformance with the ZDHC MRSL Conformance Guidance document.

28.2 – Restricted Chemical Substances in GRS

GRS criteria for the use of chemicals that may be used in the production of GRS products are based on the following main requirements:

- 1.Exclusion of inherently problematic substances that are classified as dangerous to human health and/or to the environment by REACH.
- 2.Exclusion of substances and mixtures classified with particular hazard codes or risk phrases.
- 3.Exclusion of substances that do not comply with ZDHC’s Manufacturer’s Restricted Substance List.

28.2.1 Inherently problematic substances

Any chemicals used in processing of GRS Products shall not contain Substances of Very High Concern (SVHC) as referred to in Article 57 of European Regulation (EC) No 1907/2006 concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH), and included in Annex XIV of the Regulation.

28.2.2 Exclusion of substances and mixtures classified with particular hazard codes or risk phrases

No use is allowed of substances or mixtures that are assigned (or may be assigned by the time of the application) any of the hazard statement codes and/or risk phrases (or a combination of them) listed in Table A.

UPDATES TABLE

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