



**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 the operator in order to realize the evaluation and certification of the Textile, Cosmetics, and other applicable processing activities of an operator in private scopes. An operator having a certificate successfully in accordance with this procedure is approved for their production operations and is permitted to make use of the relevant logos in their business.

**Accessibility:** ETKO services are 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 the size of the applicant or membership of any association) are applied.

ETKO accepts inspection assignments regardless of whether they are for the entire processing chain, parts thereof, or single operators.

Reference Standards to ETKO certification programs are the 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 the ETKO website section standards [www.etko.com.tr](http://www.etko.com.tr) Textile standards are available in Textile Section and Cosmetic is available in the 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 are notified to operators through the ETKO website under the section news. Additionally, the operators in question are informed by email correspondence. Eventually, ETKO verifies adapting system changes by the operators during the inspections.

When explanations or interpretations of certification standards are 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 is formulated by relevant and impartial persons possessing the necessary technical competence such as textile experts for textile programs, cosmetic

experts for cosmetic programs, and agricultural experts for agriculture.

The 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 to the production and processes in a satisfactory condition in order to receive and maintain the Certificate.

TC(s) issued by ETKO may not be changed by parties other than ETKO.

Documents issued/alterd by persons who are not authorized to issue documents are fake documents.

Documents that show the value of the goods or services less or more than the real value and whose buyer, seller, date and serial number, etc. are falsified are considered fake documents. Actions required by the standard regarding fake/misleading documents are taken.

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

ETKO operators that want to be certified for TE scopes shall:

- Comply with applicable standards and requirements.
- Permit on-site inspections with complete access to the production or handling operation, including no certified production and handling areas, structures, and offices. In case the organization includes multiple sites in the scope of SC, permits to make audit all sites on-site annually, unless;
  - The site is a trader or a distributor, where a remote audit may be allowed;
  - The organization is managing a supply chain group certification, in which case CCS-106 Policy for Supply Chain Group Certification shall apply; or
  - The organization is being audited on a sampling basis; in which case the CCS-107 Policy for Multi-Site Certification with Sampling of Sites shall apply.
- 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;

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- not use the product certification in such a manner as to bring ETKO into disrepute and 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, the Standard owner, and the 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 communication media such as documents, brochures, or advertising, complies with the requirements of ETKO
- Submit the applicable fees charged on the 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.
  - Also, ETKO operators who request to become certified shall:
    - operate a management system that ensures that all applicable criteria of the Standard are fully implemented.
    - establish, implement, and maintain documented procedures and/or work instructions covering all applicable criteria of the CCS.
    - maintain a documented management plan that describes processes, including the points of risk as well as a material and process flow diagram.
    - appoint a management representative to be responsible for the overall conformity with the CCS.
    - provide ETKO with access to complete, up-to-date, and accurate information, along with access to their operations to demonstrate conformity with the CCS. Access shall at a minimum include the following:
      - Access to all parts of the physical site;
      - Access to all documents and records related to conformity with the CCS and the standard upon which claims are made, which may include financial records;
- Access for auditors to interview personnel without restriction and without observation by management representatives; and
- Equivalent access to all sites and associated subcontractors included in SC.
- demonstrate that it is a registered legal entity with legal permission to operate and shall maintain a listing of the name, location, and processes performed at each site, along with documentation of legal permission to operate for all processing sites.
- conduct a regular (at least annual) internal inspection process to evaluate their own conformity with the CCS. The internal inspection shall be documented along with any non-conformities identified.
- maintain and communicate clearly defined roles and responsibilities for all responsible personnel that may have an impact on the implementation of the Standard.
- give proper and regular training to the staff responsible for each procedure impacted by the Standard with regard to the implementation of the Standard and documented training records shall be maintained.
- not sell more products as certified than they were able to produce given their available CCS inputs.
- maintain a system that controls and quantifies volumes of claimed input and output materials at all times.
- maintain complete and up-to-date records of the description, quantities, origins, and/or destinations of all claimed materials purchased, sold, received, or delivered;
- maintain Volume reconciliations performed conduct an ongoing volume reconciliation per lot or batch production to balance the quantities of each claimed material purchased, in stock, and sold. The volume reconciliation calculation shall be conducted based on the standardized weight of the materials, except when final products are the inputs. Where the final products are the input, the number of items is permitted. The volume reconciliation calculation shall take into account inventory levels, waste, rejected goods, and claimed materials sold without certification claims.
- specify the equations used for the volume reconciliation and content claims, including an example of the equations being applied.
- define the expected waste factors for each processing step. Where waste factors vary, separate waste factors shall be defined to cover all products and processing steps listed on SC. The organization shall specify the basis for determining waste factors.
- review the volume reconciliation at least annually to ensure that information is correct. This shall include:

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- Taking a physical inventory of any claimed materials in stock, including inputs, materials in the production process, and outputs;
- Comparing the actual waste factors to the expected waste factors. Deviations of more than five percent from the expected waste factors shall be investigated;
- Consideration of claimed material sold without certification claims;
- Comparing the production of claimed and non-claimed material to the site's production capacity; and
- Maintaining a record of the reviewed volumes.
- keep complete traceability of product from raw material purchase to final product sales.
- maintain complete, up-to-date, easily auditable, and understood records to demonstrate conformity with all criteria of the CCS.
- retain all records used in the implementation and/or verification of the CCS for a minimum of five years.
- maintain full responsibility for conformity with the Standard for outsourced materials in case the organization outsources the handling and processing of claimed materials to subcontractors. Subcontractors shall not have common ownership with the contracting organization.
- classify each subcontractor as either:
  - An associated subcontractor who is not independently certified to the Standard, and who is audited as needed under the organization's SC; or
  - An independently certified subcontractor, who holds an SC to the Standard independent from the organization.
- maintain a list of all subcontractors who may be used to store or process claimed materials, including the subcontractor's name, address, contact details, and outsourced processing steps. For independently certified subcontractors, the list shall also include the subcontractor's certification body, license number, and scope certificate expiry date.
- receive approval from ETKO and an updated SC prior to outsourcing to a new subcontractor.
- have a valid contract with each associated subcontractor which identifies the work to be outsourced and specifies that the subcontractor shall:
  - Meet all applicable certification criteria of the Standard;
  - Maintain physical separation of the claimed material from all other materials present at the subcontractor's site;
  - Agree to allow ETKO to conduct audits of the subcontractor in accordance with the Standard;
  - Not make any claims related to the Standard, including claims of the subcontractor being certified to the Standard or any use of the Standard's logo; and
  - Not further outsource any processing or storage of the claimed material.
- have a valid contract with each independently certified subcontractor which identifies the work to be outsourced and specifies that the subcontractor shall:
  - Meet all applicable certification criteria of the Standard under their own certified system;
  - Within seven calendar days, inform the organization of any change in their certification status, including suspension, withdrawal, expiry, or recertification; and
  - Provide the organization with an updated SC upon recertification.
- ensure that a current and valid SC is on file for the subcontractor, prior to sending each shipment of claimed material for outsourcing to an independently certified subcontractor;
- inform the certification body of the outsourcing and follow the certification body's instructions regarding transaction certificates for outsourcing, prior to sending each shipment of claimed material for outsourcing to an independently certified subcontractor;
- ensure that sufficient transport records are used to track the movement of outsourced claimed materials, both when materials are sent to the subcontractor and when they are returned to the organization, prior to sending each shipment of claimed material for outsourcing to an independently certified subcontractor;
- notify ETKO of the arrangement and shall ensure that all criteria in the contract with the contracting organization are met in case the organization is acting as a subcontractor for another contracting organization that is certified to the Standard.
- handles CCS inputs and products such that the integrity of the claimed material is maintained.
- hold a valid SC whenever claimed materials are labeled with assured claims, shipped, or sold. Blending, mixing, and processing may occur between an audit and the time an SC is issued with ETKO's prior approval. Otherwise, the materials do not be considered certified.

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- maintain a complete list of suppliers of claimed materials, including each supplier's license number.
- inspect the documents accompanying the inputs to confirm that the description, quantity, quality, blend, mix percentage, and a source described in the document match the products received if the organization receives qualified claimed materials as inputs.
- ensure that all claimed materials entering the supply chain which are not yet certified to the Standard, there is verification or certification documentation that confirms the identity of the claimed material as an accepted input according to the Standard. This documentation shall at a minimum include:
  - The name and address of the supplier;
  - The quantity, quality, and description of the product(s);
  - Reference to claims being made about the material(s);
  - Shipping document(s);
  - Financial record(s) of the purchase; and
  - Transaction certificate(s), where the material is already certified to a non-Textile Exchange standard which allows for transaction certificates.
- ensure that there are corresponding records that reference the initially claimed materials, the quantity, quality, blend, and mix percentage, and description of the claimed materials being received, sufficient to identify the corresponding incoming transaction certificate when claimed materials move from one site to another within the same organization (i.e. covered under the same scope certificate)
- ensure that the processing of the claimed material does not begin until conformity is demonstrated when there are any doubts about the validity of the incoming claimed materials
  - If received products are suspected of not conforming with the criteria of the Standard, the consignee of any claimed material shall inspect the related documentation (e.g. invoice, bill of lading, transaction certificate) to verify the origin and nature of the certified products upon receipt of the product.
  - When an organization suspects that any input or product is not in conformity with this Standard, they shall withdraw references to the claimed material content of the related product until they can confirm the valid certification of the product and shall inform ETKO within seven calendar days. If the product has already been sold, they shall inform ETKO and their customer within seven calendar days.
- has a system in place to manage the chain of custody of physical materials, based on segregation and controlled blending of those materials.
- demonstrate control over the flow, segregation, and identification of claimed materials within the site, including recipes used, material composition, material quality, and stock quantities.
- clearly identify the claimed materials as they move through production at all times. This may include, but is not limited to, direct labeling of claimed material, machines, storage vessels, or storage areas.
- Make machinery free of non-claimed material prior to use for claimed material if not doing so may result in contamination that affects the deviation of the volume reconciliation.
- Manage the storage of claimed material in order to identify and segregate claimed material from non-claimed material. Procedures shall be in place to prevent the commingling or substitution of the claimed material with other materials or products.
- Take extra precautions where claimed materials are being shipped, stored, or processed alongside non-claimed materials of the same type to ensure that no accidental commingling or substitution occurs.
- separate the claimed material from non-claimed material at all times, except as allowed by the following:
  - Blending and mixing of claimed materials with non-claimed materials are allowed and should be managed at a batch level.
  - When blending and mixing claimed materials with non-claimed materials, or different claimed materials with different percentages of certified content, the organization should prepare composition calculations which include the following:
    - Documentation of all input materials to the product or specified component resulting from the blending or mixing, including their material, material composition, the weight of product used, and claim percentage;
    - Calculation of the percentage of claimed content and content per raw material based on the weight and claim percentage of each input along with a material composition test report;
    - Consideration of loss factors per input material and product; and

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- Demonstration that the final calculated content is representative of the actually claimed material present following processing.
  - Composition calculations may be made per batch or per article included within the batch.
  - Trims may be excluded from composition calculations of textile products and footwear when they are not the claimed material and when the total trims do not account for more than ten percent of the total product weight.
- ensure that the products containing claimed material are transported to other units, including wholesalers and retailers, only in appropriate packaging, containers, or vehicles that are closed/sealed in such a way that substitution and contamination of the content are not possible without manipulation or damage to the container.
- label all shipments of claimed materials with identification that clearly links them to the relevant invoices or shipping documents. Alternatively, this information may be presented on an accompanying document, as long as such documents can be undeniably linked with the packaging, container, or transport vehicle of the claimed material.

Also, ETKO operators who are a brand that wants to be certified for TE scopes shall:

- maintains the integrity of certified products up to the point of sale.
- maintain a complete list of suppliers of claimed materials, including each supplier's license number.
- obtain TCs for all claimed materials purchased, including all products which carry the Standard's logo or any other product-related assured claim.
- have a system to ensure that claimed materials received match the description, quantity, quality, blend percentage, and source specified on the transaction certificate. This should include a physical inspection of products where possible.
- contact ETKO for guidance and shall follow the guidance provided by ETKO or by Textile Exchange in case there are any doubts about the validity of the claims associated with the claimed materials
- ensure that any consumer-facing assured claims meet the criteria of the GP 11 Use of Logo Licensees Mark of Conformity, regardless of who conducts the final sale of the product. This includes communications made by non-certified retailers who are selling the brand's products.
- maintain a list of all sites which take physical possession of claimed materials while they are owned

- by the brand, excluding retail sites. This includes the brand's own distribution sites and the brand's distribution or warehousing subcontractors.
- ensure that ETKO may access the brand's own and subcontracted distribution facilities to verify product storage and tracking, including for physical site visits.
- establish and maintain product identification which allows the brand to identify and link final products, as sold to the consumer, back to a specific incoming TC.
- maintain a tracking system for all outgoing products which are labeled or identified as certified and shall maintain documentation to demonstrate the link to incoming purchasing documentation and TCs.
- include the following information on each invoice or on a supplementary sales document that accompanies the invoice, in case the brand is selling certified products to another business (i.e. not a consumer):
  - The brand's license code;
  - The acronym of the Standard placed to allow clear identification of which products are and are not certified; and
  - If the brand's customer is prior to the final retailer (i.e. a wholesaler), the information shall be included on a supplementary sales document that is intended to be passed along to the retailer and which specifies this information.

Also, ETKO operators who include multiple sites in the scope of a scope certificate that wants to be certified for TE scopes shall:

- have sites under common ownership with the organization (multi-site certification); or
- manage a supply chain group certification, in which case CCS-106 Policy for Supply Chain Group Certification shall apply; or
- has an SC which has a primary scope, and the primary standard allows for sites without common ownership (e.g. farm groups)
- has individual sites which are not part of more than one scope certificate for a Standard, except for primary scopes where the primary standard allows for this.
- have an internal control system (ICS) in place.
- Provide training to the site and ICS personnel regarding the CCS which is sufficient to meet their responsibilities. And the training records should be maintained.
- acknowledge that ETKO audits all sites on-site annually, unless:
  - The site is a trader or a distributor, where a remote audit may be allowed;
  - The organization is managing a supply chain group certification, in which case CCS-106

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Policy for Supply Chain Group Certification shall apply; or

- The organization is being audited on a sampling basis, in which case the CCS-107 Policy for Multi-Site Certification with Sampling of Sites shall apply.
- Sites may only be added to SC upon approval by ETKO.
- appoint an ICS Manager who is responsible for the management of the ICS and for ensuring conformity to the Standard by all sites. The ICS shall:
  - ensure that ETKO is provided with access to all sites and shall assist with the coordination of information.
  - maintain documented procedures showing how certification criteria are met, including documented procedures for at least the following elements:
    - Adding and removing sites;
    - Maintaining records;
    - Training of site and ICS personnel;
    - Internal inspections of sites; and
    - Claims about the Standard for the multi-site or group certification
  - maintain the following records:
    - A documented management structure of the ICS, and
    - A complete list of sites, including the site's name, address, contact details, products, and processing steps.
  - ensure that:
    - All certification criteria are implemented for all sites. The ICS may manage some requirements directly, or may delegate this to sites;
    - All sites have access to a copy of the CCS, TE-301 Standards Claims Policy (if the site is making claims), and any documented procedures are maintained by the ICS; and
    - All sites understand the relevant certification criteria and are aware of the consequences of nonconformity.
  - ensure that ETKO is granted access to all sites for auditing purposes.
  - have the authority to remove sites from SC. If a site is removed, the ICS should notify both the site and ETKO of the removal in writing, including the reason for the removal (e.g. voluntary, non-payment, non-conformity).

Prior to any certification agreement being signed with the organization or certified company renewing certification, ETKO reviews using "GP 02 F 06 Applicants Evaluation Checklist TE & GOTS" whether the organization is eligible for certification, including whether they are prohibited from becoming certified in accordance with ASR-225 List of Banned Organizations, also including whether they are restricted under any of the laws of the United States, any products made in whole or in part by entities that are restricted by the United States, or any products that are restricted from entry based on the laws of the United States, including, but not limited to the following:

- The Department of Commerce's Bureau of Industry and Security Entity List (<https://www.bis.doc.gov/index.php/documents/regulations-docs/2326-supplement-no-4-to-part-744-entity-list-4/file>);
- The U.S. Department of the Treasury's Office of Foreign Assets Control (OFAC) List of Specially Designated Nationals and Blocked Persons (<https://www.treasury.gov/ofac/downloads/sdnlist.pdf>);
- The scope of a Withhold Release Order issued by U.S. Customs and Border Protection (<https://www.cbp.gov/trade/forced-labor/withhold-release-orders-and-findings>); and
- Section 307 of the Tariff Act of 1930 or any other list promulgated pursuant to Section 307 (19 U.S.C. § 1307) (<https://www.govinfo.gov/content/pkg/USCODE-2011-title19/pdf/USCODE-2011-title19-chap4-subtitleII-partI-sec1307.pdf>).

The decision to acceptance of the applicant is accepted as a client is made according to the evaluation result of whether the applicant is eligible.

In case a previously certified component, product, shipment, or site is identified as restricted, and therefore ineligible for certification, ETKO:

- Immediately notify TE and withdraw the related SC of a such ineligible organization (entity);
- Cease all related certification activities within the prescribed timeline provided by TE;
- Notify CB of any buyer of the identified ineligibility and any resulting withdrawal if any related TC has been issued during the validity period of SC;
- Does not issue TC for products at the first processor that has become ineligible for certification immediately upon becoming ineligible. For products already certified prior to becoming ineligible, ETKO considers them to be certified unless specifically identified by TE to be considered ineligible immediately; and
- Does not issue TC for ineligible products after six months of becoming ineligible.

Note: This applies only to outputs of any process that is not

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the first processor.

Any OCS-certified first processor may accept cotton which is in conversion to organic status under any of the standards named in OCS-101-V3.0 Organic Content Standard, section C1.1, including where the farming standard does not allow for in-conversion claims. OCS-105 c1.1

All applicants are required to complete the initial application process. Applicants are required to provide sufficient additional information to substantiate the baseline history of their certified status; including previous certification information where available.

**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 the necessary pages of the offer/cost estimate and submit the offer/cost estimate back to the 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 the 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 the 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. 834.29.2 It is important to verify it before trade arrangements are done.

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

**2.2 Acceptance of Certificates Issued by Other CBs**

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 analysis 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 the appropriate time period. (in two weeks)

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

Application package review covers the information submitted in the Application Form and other documents sent by the operator is reviewed. The aim of this review is to determine the present status of the operator's system; its compliance level with the requirements and to estimate if the on-site inspections result in 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 ETKO following the review and be sent to the operator prior to the on-site inspection. The operator is expected

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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 Regulation on Cosmetic Products (EC No. 1223/2009) as amended, the EU REACH REGULATION (EC No. 1907/2006), the Commission Regulation on claims in cosmetic products (EU No. 655/2013), and/or other local or national laws concerning cosmetic products where appropriate.
- ETKO provides operators with an up-to-date description of the procedures to be applied for conducting certification. ETKO informs operators about:
  - contractual conditions, including fees and possible contractual penalties;
  - the operator's rights and duties, including the appeals procedure;
  - the current version of the 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-GOTS & TE Application Procedures for Certification of the Operators

Regardless of whether they are originating from a specific farming operation or are independent production processing, storage, or handling facilities such as ginneries, and 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 controls,
- textile auxiliary agents and dyes,
- approvals by accredited certification bodies.

### 3.3-GOTS Application Procedures for Approval of the Operators

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

#### 4-Application review consists of the following:

- A review to ensure that the application is complete as per ETKO procedures and another 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 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, the contract is signed, and a site visit is planned. The contract is signed after the application package review procedure is finalized and the offer/cost estimate must be confirmed. It is essential that the applicant fulfills the requirements of the application and completes the operation file with all components for Inspection. When the application package is completed, a contract is 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 cooperation in completing all of the forms, providing thorough and proper documentation, and being prepared, and training the personnel involved for the 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 access to the facilities, and 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 initiate the corrective action.
- For all scopes that fall under the ETKO Private Standard certification, the application responsible(s) for each scope ensures that the applicant is provided with necessary standards, guides, and procedures to ensure that proper preparation could be realized.

## 7. Site Inspection

**Inspector Assignment:** A scope-approved inspector is assigned by ETKO for inspection purposes. ETKO makes sure the 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, the inspector in charge prepares an inspection plan which needs the approval of the person in charge for inspector assignment. The responsible for the assignment should verify the plan and whether all critical elements of the inspection are included.

Critical points might be scope-specific therefore inspector and the responsible person for the assignment work together to check previous issues or pending non-compliances, and any risk areas that exist.

Both inspector and the responsible person for the assignment make sure that any standard used for that specific inspection requirements will be covered during the inspection and evaluation process. Those requirements could be but are not limited to; inspection requirements 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, labeling, marketing arrangements, product flow from the production sites to the final buyer. Organic regulations require inspection of the non-certified part of the production; therefore, the plan should include when it is valid.

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

management agrees, the personnel shall be replaced.

### Inspection:

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

The inspection shall be conducted according to ETKO procedures and cover the 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 the operator shall be ready in the opening meeting. After the meeting, a site visit should be done to evaluate the 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 a reason for doing so;
  - Review of records and accounts in order to verify the 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 the operator.
- All the findings shall be reported to the operator in the closing meeting.
- The inspection report shall be prepared and submitted to the 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 wastewater (pre-) treatment system of wet processors.
- Verification of adherence to the defined minimum social criteria (including confidential interviews of

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workers, if applicable).

### 7.2-CCS Specific

CCS certification applies to all supply chain sites that own or take physical possession of the claimed material up to and including the brand of the final product, except as indicated below:

- Traders, who do not take physical possession of products, are not required to be certified if all of the following conditions are met:
  - The trader is not a brand;
  - The trader's supplier(s) for claimed materials is/are certified to the Standard;
  - The trader is identified on TC;
  - Records are provided to the certification body of the trader's supplier sufficient to track the sale of the certified material to the trader's customer;
  - There is no change in the certified or total volume; and
  - The certified material is shipped directly from the trader's supplier to the trader's customer (i.e. no outsourcing is done by the trader).
- Traders, who request to become certified. In this case, all audits are audited in accordance with the risk assessment at all times.
- Distributors are not certified in case they are handling final products on behalf of a brand (including brand-owned and outsourced locations) if all the following conditions are met. Even though site audits may be required as part of the brand's certification.
  - If the brand maintains a list of all sites which includes the brand's own distribution sites and the brand's distribution or warehousing subcontractors and which take physical possession of claimed materials while they are owned by the brand, excluding retail sites.
  - Also, ETKO may access the brand's own and subcontracted distribution facilities to verify product storage and tracking, including for physical site visits.
- Retailers are not certified unless they are brands or are conducting processing that is not minor in nature.
- The Standard is applied to materials and products of any type and globally. However, ETKO may certification activities for textiles, textile inputs, cosmetic products, paper, plastic, and leather in the country which are mentioned on the ETKO website. In case the certification request is for a country and/or material and/or product of type in which ETKO has not been approved by the accreditation body after, you apply to ETKO, ETKO applies to the accreditation body to be approved and when ETKO approved is continue the certification process.

- A site may process and handle both claimed and non-claimed material. Claimed material should have one or more attributes that form the basis of the claim.

Note: If the organization uses a continuous production method where batch-level segregation of products is not possible, volume reconciliation may be implemented on an alternative basis. (See CCS-105 Alternative Volume Reconciliation (VR2).)

### 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 are 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 any GOTS certified sites that wish to add OCS certification until June 30, 2023, the following applies:

- If ETKO issued the GOTS scope certificate for the operator, ETKO shall issue the OCS scope certificate.
- Audits are not required for GOTS certified sites with active scope certificates,
- The OCS scope certificate issued will have the same validity date as the GOTS scope certificate and maintain the same anniversary date,

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- Full OCS audits will be completed as required per existing OCS standard criteria throughout the validity of the scope certificate including at renewal. OCS and GOTS audits will be performed at the same time and ETKO will not charge fee to the operator.

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) the 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 are to be done according to the ISO IWA 32:2019. A sampling of the seed cotton is 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 is 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.

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

#### 7.4-COSMOS Specific:

Audit by on-site/remote visit is carried out in order to verify information and compliance with certification requirements applicable to the client. In case the audit is conducted remotely, it is needed to ensure that the audit is conducted in compliance with the circumstances specified in COSMOS internal procedures. Audits follow a set protocol to facilitate non-discriminatory and objective audits. And the audit protocol includes at the very minimum:

- Checking all COSMOS criteria listed in the COSMOS-standard scheme documents
- Assessment of the processing system by means of visits to facilities and if necessary, storage units (according to the risk and information availability). It may also include visits to non-organic areas if there is reason for doing so
- At least one traceability check or mass balance conformity assessment for each audit. A risk

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analysis has to be realized by ETKO for each client to reinforce this conformity assessment if necessary. A traceability check consists of ensuring the compliance of upstream and downstream flows of a production batch. A mass balance conformity assessment assesses incoming and outgoing quantities of raw material or a product during a specific time period. The risk analysis criteria and the applicable modalities are defined by ETKO.

- Verification of any complaints received as well as of the actions taken.

Inspection of the ingredients, technology, or process could pose a health or environmental risk, this is checked thoroughly to avoid from non-allowed material and/or methods such as;

- Nanomaterial
- Primary raw materials or ingredients that are GMOs or derivatives of GMOs
- Irradiation
- Animal testing

### 8-Laboratory Analysis

During the inspection, the inspector may take samples to be sent to an ISO 17025 accredited laboratory that is listed on the ETKO Approved Laboratory List on the ETKO web page for the required analysis. The inspector certainly takes a sample in case of suspicion of the product being 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

Please see Catalogue of Measure for nonconformity procedure.

### 10. Certification Decision

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

The 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.

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

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

ETKO maintains a list demonstrating the certified/approved operators. The list is accessible on the website [www.etko.com.tr](http://www.etko.com.tr)

### 11. Use of Logo and Certificate <sup>4.6.c</sup>

A guiding document is provided for the operator defining the rules to be followed in using the certificate and logo. All assured claims should be submitted for approval by ETKO. This includes hangtags, printed labels, sewn labels, and online claims. The operator should send its logo samples to ETKO for approval prior to use. See GP 11 Use of Logo Licensees Mark of Conformity

### 12. Surveillance

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

Surveillance visits are planned during the initial inspection preferably and are informed to the operator sufficient time before it is conducted.

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

For COSMOS, re-assessment of non-organic raw materials is made at least every 3 years (or as soon as any change) in order to confirm any change in process and/or origin of accepted raw materials.

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

### 12.1. Specific for GOTS & TE Scopes

The organization shall maintain TCs for any incoming claimed materials. For claimed materials already certified for TE scopes, a CCS TC should accompany the claimed materials, confirming they were produced by an organization certified to the Standard. The organization should provide copies of all incoming TCs to ETKO. The organization should apply for a TC from ETKO for all products sold by the organization to another business that references the Standard on sales or shipping documentation, which carries the Standard's logo, or which is identified as certified to the Standard in marketing materials.

For finished GOTS goods that will be sold in retail as of September 4, 2023, and have been dispatched and received up to 3 months before this date (September 4, 2023) TC may be issued for the Brands and Retailers, even if the items themselves do not bear GOTS labeling.

The TC application should include documented proof of the claimed material's sale which includes but is not limited to:

- Invoices, purchase orders, financial records, third-party product quality test reports (input and output), and shipping documents (e.g. government transportation documents) that show outgoing products have been sold to the named buyer of the products;
- The identity of the claimed materials, quality, and quantities;
- Invoices, shipping documents (e.g. government transportation documents), financial records, and incoming transaction certificates to validate the purchase of the certified inputs;
- Composition calculations;
- A balanced volume reconciliation;
- The identity of any subcontractors who handled the material while it was owned by the organization; and
- Any Standard-specific documentation

Only products that are issued a valid TC from the responsible certification body may be considered certified, regardless of whether or not assured claims are being made.

The scope certificate and all outgoing transaction certificates for an organization shall be issued by the same certification body.

### 13. Changes in the Operator's System

The operator shall inform ETKO in case of change in the production system and processes (such as changes in location, additional units, name, shareholders, and 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, the ETKO logo or any other document cannot be used by the operator and none of the products can be labeled as organic. The operator is informed by ETKO.

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

In case there are changes limited to the production system and not effective on certification, or if there are changes in documentation, these shall be subject to review in the 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.

### 14. Suspension, Withdrawal, and Cancellation of the Certificate.

ETKO reserves its right to suspend, withdraw, cancel, or change 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 with the contract between ETKO and the 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 a nonconformity report to the 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

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certificate back to ETKO as determined also by the contract.

ETKO makes public its decision about the operator suspending, withdrawing, or canceling the certificate. See [www.etko.com.tr](http://www.etko.com.tr)

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

#### 15. Appeals and Complaints <sup>4,6,d</sup>

In case the 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 in GP 05 Appeal, Complaints and Disputes Info Letter, or SP 06 Corrective & Preventive Actions. See [www.etko.com.tr](http://www.etko.com.tr).

#### 16. 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 at all other times that information not be disclosed without the consent of the supplier.

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

#### 17. Postponing and Cancellation

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

In case the contract is canceled 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.

#### 18. 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 evaluates the application documents eventually on-site inspection follows. Each location of the operation is verified.

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

For the reevaluation, a/m rules are applicable.

#### 19. Exchange of Information

Where an operator is certified also by other Certification Bodies within the same scope, ETKO seeks 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 ETKO operators and/or their subcontractors change their control body; the change is notified without delay to the competent authority by ETKO.

ETKO hands 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 ensures 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 without delay, informs the related Standard organization.

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

#### Abbreviations:

**SC: Scope Certificate**

**TC: Transaction Certificate**

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