



**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 to realize the evaluation and certification of the Textile, Cosmetics, plastic, paper, leather, wool, mohair, alpaca fiber and other applicable processing activities of an operator in private scopes. An operator having a certificate successfully by 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. concerning 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

- GOTS and TE (OCS, GRS & RCS, RAF Secondary Scope, RMS Primary Scope and RDS Secondary Scope)
  - 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)

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 relevant programs.

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 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;
- 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

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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 and 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:
  - 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;

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- 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 before 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 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, before 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, before 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, before 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.
- 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,

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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
    - 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

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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 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:

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- 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 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 accept the applicant 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 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 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.

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**Textile Exchange defines supply chain types as follows:**

**Trader:** A site which takes legal ownership but not physical possession of claimed material.

**Retailer:** An organization which sells products to individual consumers. Includes both physical stores and online sales, and may or may not also be the brand. The definition of retailer includes distribution centers which are controlled by the retailer.

**First Processor:** The certified organization that performs the first point of product transformation following the harvest or collection of the raw material.

- For GRS and RCS, this refers to the material recycler;
- For OCS, this refers to the earliest processing stage following the farm (the gin, for cotton);
- For RDS, this refers to the slaughter site; and
- For RWS, this refers to the earliest site processing wool after the farm (typically the scour).

**Brand:** An organization that controls the design, development, and purchase of final products for sale under their own name or private label. Brands may sell to wholesalers, retailers, or directly to consumers. This does not include organizations who sell a branded intermediate product for use in further processing steps.

**Distributor:** A site which takes physical possession of claimed material, but which is not a processor and does not transform products, including any (re)packaging which affects labeling or identification of materials (e.g. bagging of bulk down, or applying a logo to finished products).

NOTE: Distributors may include sites that provide warehousing for products that may or may not be owned by the distributor.

**Licensee Brand:** A company that is licensing the name of another brand for the purpose of putting this marketing on a finished good. In this case, the license brand does not assume ownership over the licensed brand name but does control the design and production process of the product. The licensee brand does not sell products to the company who owns the brand name. See also brand.

**Processor:** Entity engaged in construction or transformation of a product, including the addition of trims or application of logos. Also referred to as a “manufacturer”.

**Producer:** Entity responsible for the production of inputs into the manufacturing process. (1180-Textile Exchange)

**GOTS defines supply chain types as follows:**

**Operator:** Entity (processor, manufacturer, trader or retailer) applying for initial or continued GOTS certification respective chemical input approval to a Certification Body.

**Processor:** An entity in the processing chain (post-harvest handling up to finishing) of GOTS Goods.

**Manufacturer:** An entity in the manufacturing chain (sewing industry or so-called CMT (cut, make, trim) industry up to labelling and final packing) of GOTS Goods. (1180-GOTS)

**Trader and Retailer**

**Trader:** "Entity trading with (=buying and selling) GOTS Goods in the supply chain between the producer of the fibre and the retail merchant of the final product regardless of whether the goods are physically received or not (e.g. an import, export or wholesale trading entity). (Agents that do not become proprietors of the goods and retailers only selling to the end consumer are **not considered Traders.**") (GLOBAL ORGANIC TEXTILE STANDARD (GOTS) VERSION 7.0-7 DEFINITIONS) (1180-GOTS)

Business to Business (B2B) operators who buy and sell GOTS Goods, but do not alter the product or labelling in any manner are considered traders. B2B trade is made products within the supply chain (for yarns, fabrics, etc.), as well as for final packed products ready to be sold to end consumers. (Agents and buying offices that are only ‘facilitating’ the sale of goods are not considered traders.) Businesses that are exclusively selling to the end consumer are known as retailers. (http://global-standard.org/certification-and-labeling/who-needs-to-be-certified/trading)

**B2B and B2C:**

**B2B TRADE OF GOTS GOODS (PRE-RETAIL):** All organic raw materials and GOTS Goods is clearly labelled and identified as such along the entire stages of the supply chain. Transportation means and shipping documents is documented (GLOBAL ORGANIC TEXTILE STANDARD (GOTS) VERSION 7.0-26)

- An uncertified retailer may request TCs from its GOTS certified suppliers to ensure that the whole volume of shipment purchased is indeed GOTS certified. TC shall be issued by the Approved Certifier of the supplier.
- TCs can be issued to a (un)certified retailer as long as the products carry GOTS Signs. (Manual for the Implementation of GOTS Version 7.1 - GOTS Section 2.4)

Retailers may decide to make the issuance of TCs for the whole quantity of purchased GOTS Goods a (contractual) condition to each supplier they want to work with in this field. (Conditions for the use of GOTS Signs 3.1.6.3)

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- Labelling of final consumer-ready GOTS Goods to be sold in retail to an end-consumer is mandatory. Consumer-facing final products which are produced according to GOTS criteria but do not carry GOTS Signs cannot be referred to as GOTS Goods.
- Sellers of GOTS Goods are expected to ensure that they request TCs only for correctly labelled GOTS Goods via their respective Approved Certifiers.
- Labelling of GOTS Goods is made follow the latest version of 'Conditions for the Use of GOTS Signs'. (Manual for the Implementation of GOTS Version 7.1 - GOTS Section 2.7.8)

Only textile goods (finished or intermediate) produced in compliance with GOTS by a Certified Entity and certified by an Approved Certifier may be labelled, represented, advertised, or sold as GOTS Goods. (2.7 GOTS Signs and Labelling Conditions)

Transaction Certificates (TCs) are issued by an Approved Certification Body (CB) to verify one or more products as certified. (2.1 Issuance of Transaction Certificate)

As from 4th September 2023, According to GOTS's new provision; GOTS allows brands and retailers to obtain Transaction Certificates (TCs) for all finished GOTS Goods, even if the products themselves do not bear GOTS labelling.

According to the Section 2.7.8 in GOTS 7.0 "Labelling of GOTS Goods sold in retail is mandatory." This rule remains effective for any retail product that makes claims, is advertised or sold as GOTS. In the absence of GOTS signs on retail products, there shall be no claims to GOTS. As communicated herein by way of a provision, GOTS TCs may be issued for those retail goods which do not bear GOTS Signs. Provided that no claims or advertisements are made to GOTS in relation to their sale. (New Provision and Guidance Issuance of Transaction Certificate for Retail Goods 2023)

### GOTS Registered Traders

According to the GOTS Traders which is B2B and do not repack or relabel GOTS Goods with annual turnover from GOTS Goods less than € 20.000 per year do not have to become certified. However, they must register. ETKO signs a contract with these companies. And it is the responsibility of the Registered Trader to inform ETKO when annual turnover exceeds the threshold of €20.000. And the Registered Trader must apply to be certified immediately then. For this purpose, the "Annual Turnover" for the current calendar year is considered. ETKO assigns a Registration Number to the Registered Traders which is not confused with a GOTS License Number. The Registered Traders are not Certified Entities and are not listed in the Certified Suppliers Database on GOTS website. Accordingly, they must not make any certification claims anywhere. They are not allowed to use GOTS Logo. However, they may mention in text that they are a Registered Trader and have annual turnover of

GOTS Goods below €20.000.

Also, the Traders must report the turnover from GOTS Goods for the previous calendar quarter by the 10th of next month, which in turn will enable ETKO include the figure in its quarterly reporting to GOTS. Note: It is not mandatory to report the exact turnover, but it can be declared as below €20.000.

On completion of the application process, the Registered Traders receive a Registration Letter that include products description based on the Products Appendix of the supplier's SC. The validity of the Registration Letter would be and anniversary year or turnover exceeding the threshold, whichever is earlier.

ETKO report to GOS a list of Registered Traders which include details of registered traders, turnover from GOTS Goods for each registered trader for the previous quarter and contact details.

The Registered Traders must receive TCs for whole quantity of GOTS Goods purchased. For incoming TCs, Registration Number is mentioned instead of License Number.

The Registered Trader must apply for TCs. Their details are included as the Seller and the Registration Number is mentioned.

They cannot apply for labelling release of GOTS Goods, but may ask their suppliers to share a copy of their form, Labelling Release for GOTS Goods. Registration Number cannot replace License Number on the GOTS Label.

### 2. Application for certification and Contract

Before the audit, applicants are required to send all necessary documents and information including application form and other documents requested by ETKO. Application form is required to be filled out especially by paying attention to the following points: Only the processes that are currently maintaining are stated in the application form and only the products and, product details which is possible to handle by the operator are stated in the application form. Means, the products and product details are stated in the application form, if the operator has a supplier list which includes applicable suppliers for the specific product or if the operator has processes to produce the specific product.

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

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

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form and submit the original copy to ETKO

ETKO prepares 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 determines the schedule, after reviewing the documents available, for the activities to be followed.

The date for the initial inspection is determined mutually by ETKO and the operator. The periods and dates for the surveillance visits is determined by ETKO to ensure the compliance of the system and the maintenance of the certificate. The visit dates are informed to the operator before the inspection by ETKO.

### 2.1 Ginning steps for operators/applicants to follow:

Step 1: New/ initial applications and all pertinent documents shall be shared by CBs with GOTS.

Step 2: GOTS will analyze and communicate the feedback, whether positive or negative.

Step 3: Subsequently, CBs shall proceed with the approval or rejection of gin's initial application.

ETKO proceeds with the processing of the initial application only after receiving feedback from GOTS. ETKO is responsible for accepting or rejecting an application from ginners. If the application is accepted after receiving negative feedback from GOTS, ETKO reports all relevant audit documents and notify GOTS within 24 hours of any TCs issued to that operator. In such cases, an additional high-risk assessment plan is implemented to review and accept the operator in the GOTS system.

In order to ensure proper implementation of the requirement, step 1 must precede step 2, and so forth.

### 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 that 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 grounds 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.

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. The aim of this review is to determine the present status of the operator's system; and 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 that is called the Client Information Checklist is prepared by ETKO following the review and is sent to the operator prior to the on-site inspection to inform them and to take corrective measures if there is a deficiency, prior to the on-site inspection.

Also, the Application package Review form is sent to the client before the audit to inform them regarding whether the audit can be conducted.

The application process is completed with the above-mentioned information and documents supplied to ETKO.

### 3.1-COSMOS Application procedures Information for operators

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- 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 originate 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.

**3.2.1 RAF Primary Scope Application Procedures for Certification of the Operators**

Farms are mentioned in the application process they want to be certified according to which type of the following certifications:

- Individual Farm Certification,
- Farm *Group* Certification, or

c) Communal Farmer Group Certification.

- Individual Farm Certification: Individual Farm Certification applies to farms wishing to become certified independently, or when the qualifications for Farm Group Certification are not met.
  - Any farm may apply for Individual Farm Certification.
  - Individual Farm Certification requires annual on-site audits of the farm.
  - Individual Farm Certification also includes additional confirmation visits by ETKO without notice.
  - Individually certified farms submit annual Farm Questions by filling out the third tab of ETKO Checklist to ETKO.
- Farm *Group* Certification: Farm Group Certification and Communal Farmer Group Certification applies for groups with a defined internal control system (ICS) in place for the group. The farm group must meet the Farm and Communal Farmer Group Certification requirements of the Standard.
  - Farm Group Certification and Communal Farmer Group Certification requires annual on-site audits of the ICS and sample audits of farm group members according to the risk assessment of ETKO.
  - Farm Group Certification Communal Farmer Group Certification may also include additional confirmation visits of farm group members by ETKO without notice.

c. Communal Farmer Group Certification: A farm may be part of more than one scope certificate, including one Individual Farm Certification per Responsible Animal Fiber (RAF) standard and one or more Farm Group Certifications. The group certifications may be to the same or to different RAF standards. Communal Farmer Group Certification is for those farmers who are unable to meet the requirements for certification as an individual farm or a Farm Group. A farm, farmer, or herder may be part of one Communal Farmer Group per RAF standard, and is not allowed to be part of any other scope certificates.

Slaughter sites may apply to be certified for RWS/RMS/RAS Primary Scope. They must provide ETKO full access to all sites and inform ETKO of any

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biosecurity measures prior to the audit. Slaughter sites are audited annually.

**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 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 any other sources

- Operator shall have the relevant handling system plan in place including records and documents mentioned above for onsite inspection.
- 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:**

When necessary arrangements are completed, a detailed inspection plan is sent to the operator before the audit to verify the plan and prepare his operation for evaluation. Inspection detailed plan specifying the essential requirements of the Inspection is prepared according to the overview of the company’s operations. Task and time allocation also is specified in the resulting plan. Time to be spent for each area of inspection is to be determined according to the standard to ensure adequate time is given in each area of the Inspection according to the scope of production. Task share is to be done among the inspectors according to the qualification and skill required for inspection.

The documented plan ensures the company is made fully aware of the Inspection methodology and a thorough Inspection of the production and handling system of the client to the specified requirements of the relevant standard, within the agreed time frame.

The following points are to be taken into consideration in the planning of onsite Inspection, as appropriate. At the discretion of the Inspection team, the site where there

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are no organic products or productions may be visited to secure the quality of the operations.

- Company structure and organization. To ensure elements planned for Inspections are representative of the company’s scope of production and handling processes.
- Client Information Checklist, or documents within application package review.
- Number and complexity of the products produced
- Allocation of time: Adequate time is determined according to the standard for each area of the Inspection and to ensure all the elements of the standard have been planned for the inspection.
- Special conditions to gauge compliance at the time of the Inspection regarding standards or requirements in force that is relevant to the company seeking Inspection.
- Number of nonconformities raised during the previous Inspection
- Frequency of the nonconformities and/or complaints received.
- Parallel production

The audit duration is needed a minimum of three hours per scope certificate, not including confirmation visits and evaluation of non-conformities after the closing meeting (where applicable). However, because of the minimum audit duration will not be sufficient for the vast majority of audits, ETKO plans the audit durations to enough for appropriate audit and taking into account the additional requirements listed below: ASR-101 D4.4.5

- **Additional Requirements for CCS:** CCS-102 D2.5 The following minimum time is spent on-site to conduct each audit except the audits which is conducted for material recyclers, collectors/concentrators, OCS first processors, and all GRS sites except traders. This does not include auditor travel or reporting time and is specified per site.
  - Material recycler, collector/concentrator, OCS first processor, and/or all GRS site (except traders):
  - Trader (no physical possession): 1 hour
  - Distributor (physical possession with no processing): 2 hours
  - Processor: 3 hours
  - Associated Subcontractor: One hour less than the time specified above for the site type
  - Sites that can be designated to multiple site types: Longest specified audit duration per the time periods outlined in this section

For a scope certificate which is limited to one trader site, the minimum audit duration is two hours. This is an exception to the rule indicated above.

If two or more standards are being evaluated during a joint audit, the minimum audit time is the longest applicable time for one standard plus one hour per additional standard.

If a site fits into multiple categories, the minimum audit time is the longest specified time at options above.

Audits of sites without physical possession of claimed materials are performed in accordance with the risk assessment too. If the site is not the main location, evaluation may be limited to tasks directly performed by the site.

ETKO maintains a system to ensure that the auditor was present at the site for each on-site audit for at least the minimum required audit time (e.g. photos with time and GPS location recorded) and to maintain records that this was done.

The initial audit is conducted as a remote audit if the organization holds certification to another Textile Exchange standard with ETKO. To conduct a remote audit for the initial audit, the following conditions apply:

- The site is not adding GRS certification.
- The anniversary date is the same date (month and day) as the other certification (i.e. the initial scope certificate shall be issued in less than a year), and
- The organization has been identified as medium or low risk according to the risk assessment result.

- **Additional Requirements for GRS:** GRS-102 D2.5.1 The following minimum time is spent on-site to conduct each audit. This does not include auditor travel or reporting time and is specified per site.
  - A set minimum time per site, based on the type of operation:
    - Collector or concentrator (GRS certified): 2 hours
    - Material recycler (mechanical recycling and/or biological recycling): 4 hours
    - Material recycler (chemical recycling): 5 hours

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- Supply chain site conducting one of the following processes: Dyeing, extrusion, finishing, non-woven, pre-treatment, preparatory, printing, pulp making, tanning, washing, or laundering: 4 hours
- All other supply chain sites: 3 hours
- Subcontractors: As above, based on the type of activity
- A minimum time for worker interviews related to GRS Section B (Social Requirements) based on the following table. This is required for all sites except for traders in addition to the time specified in a.

Number of Workers	Minimum Audit Duration
1-100	1-100
2 hours	2 hours
101-500	101-500
Each additional 1000 workers or part thereof	Add 1 hour

- **Additional Requirements for OCS:** OCS-102 D2.5 The following minimum time is spent on-site to conduct each audit. This does not include auditor travel or reporting time and is specified per site.
  - Cotton gins: 5 hours
  - All other first processor sites: 4 hours
- **Additional Requirements for RCS:** RCS-102 D2.4 The following minimum time is spent on-site to conduct each audit. This does not include auditor travel or reporting time and is specified per site.
  - Collector or concentrator (RCS certified): 2 hours
  - Material recycler (mechanical recycling, chemical recycling, and/or biological recycling): 3 hours

• **Additional RMS Primary Scope Requirements**  
 “Animal Welfare Criteria”, “Land Management Criteria”, “Social Welfare Criteria”, and “Chain of Custody” requirements of RMS are evaluated during the farm audit. Farms are not allowed to carry both certified and non-certified angora goats.  
 ETKO ensures that the farm provides us full access to all sites by cross checking between documents provided by the client and what the auditor see on the site visit.

ETKO verifies whether the farm informs us of any biosecurity measures prior to the audit. ETKO ensures that all biosecurity measures shall be followed to ensure the auditor is allowed to enter the farm without risk of spreading disease.

The following minimum time is spent on-site to conduct each audit. This does not include auditor travel or reporting time.

- a. Individual farm: 3 hours
- b. Farm group or communal farmer group ICS evaluation: 4 hours
- c. Farm group member farm: 2 hours, and should be a minimum of 3 hours if the ICS does not conduct internal inspections
- d. Communal farmer group member: 1 hour
- e. Confirmation visits to a farm: 1 hour
- f. Slaughter site: 2 hours
- g. Storage facility, when section G2 of the Standard does not apply: 0.5 hours
- h. Supply chain site: See CCS-102 CCS Certification Procedures.

**Organization of Applicant for Inspection**

Prior to the scheduled inspection, the applicant is expected to have organized all of the records, which documents that, the products and/or processes under review are certifiable according to Applicable Standards. The applicant’s cooperation in completing all of the forms, providing thorough and proper documentation (certified product flow documents, incoming and outgoing invoices, packing lists, transaction certificates, input-output, annual volume reconciliation for both certified and non-certified materials, processing sheets, recipes, safety data sheets, wastewater descriptions, staff lists, working contracts, calculations for organic ingredients % in cosmetic products, etc.), and being prepared, will greatly contribute to timely and cost-effective completion of the entire certification process.

**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.

**Acceptance of Prior Certification and Cooperation with the Other CBs & Omission of Activities from Inspection**

ETKO accepts the certificates issued under the related standards GOTS, TE scopes, and COSMOS where the products in the supply chain are certified by other CBs which are GOTS, TE scopes, and COSMOS. The certificates

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and residue analysis reports issued by other CBs and laboratories are also accepted on the grounds that they are following the related provisions.

For all programs, in case a certification decision is needed for a product coming from another source certified by another CB, relevant documents are validated by ETKO, before acceptance of the product. Information to be validated are at least the following:

- Certifier has a valid accreditation
- Operator has a valid scope certificate
- A valid Transaction Certificate of the product is available (if required by the relevant standard)

If ETKO relies on certifications it has already granted to the client or has already granted to other clients, to omit any activities, then ETKO will reference the existing certification(s) in its records. If requested by the client, ETKO provides justification for the omission of activities with its inspection reports. 7.4.5

**Inspection:**

An initial on-site inspection is conducted within a reasonable time following a determination that the applicant appears to comply or may be able to comply with the relevant standard requirements. Initial inspection may be delayed for up to 6 months in order to comply with the requirement that the inspection is conducted when the site, facilities, and activities that demonstrate compliance or capacity to comply can be observed.

All on-site inspections are conducted when an authorized representative of the operation who is knowledgeable about the operation is present and at a time when site, facilities, and activities that demonstrate the operation's compliance with or capability to comply with the production and handling requirements can be observed. This requirement does not apply to unannounced and semi-announced on-site inspections.

Inspection starts with the opening meeting in which the management team of the client attends and during that the scope of the certification (products, processes, standards, legal requirements...) is reviewed, information about the inspection method, inspection plan and reporting is provided.

The inspection involves recording observations of the entire operation, both in writing and/or on photo. During the inspection, the inspector verifies the effectiveness and compliance of the operations, effecting the certification, to the certification requirements utilizing the

relevant forms and questions as per relevant documents of ETKO:

- The operation's compliance or capability to comply with the appropriate relevant Standards
- That the information, accurately reflects the practices used or to be used by the applicant or by the certified operation; and
- That prohibited substances and/or methods have not been and are not being applied to the operation through means by which ETKO has the right to collect samples of certified raw and processed products and test them.
- Additionally, ETKO evaluates the basis for assessment of chemical, and biological inputs used to produce of the final products of cosmetics, cleaning material and textile, is the corresponding material safety data sheet (SDS). ETKO, where appropriate and felt necessary, includes further sources of information (s.a. additional toxicological and environmental data on specific components of the chemical, biological inputs, test reports and independent lab analyses) in the evaluation procedure.

For on-site inspections of processing facilities, the inspector evaluates the process flow. This is accomplished by observing the equipment being used, critical process control points, all ingredients added to the processed product, and all materials used in the maintenance and/or cleaning of the process equipment; and disposal of waste and other production process by-products.

**Risk Assessment Process  
For TE Scopes**

- Prior to each audit and before a site is added to SC, ETKO conducts a risk assessment both for Associated subcontractors and sites and assigns a risk level for each site and each subcontractor. In case the operations of a site or operations of an associated subcontractor fall outside of the scenarios covered by risk assessment format, ETKO contacts Textile Exchange by sending an email to Assurance@TextileExchange.org. CCS-102 D2.2.3 & D2.2.4 & D2.2.5  
If ETKO believes a higher risk level is justified ETKO Certification Department may decide to apply the higher risk level. ETKO informs the organization of the identified risk level(s) for the organization's sites and associated subcontractors. CCS-102 D2.2.3 & D2.2.4 & D2.2.5 & D2.2.6
- ETKO use (TI 48) its risk assessment to determine the frequency and intensity of audits if the following conditions apply:

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- a. The audit is an initial audit carried out by ETKO conducting the assessment;
  - b. There was no period of non-certification between the preceding CB and ETKO. In the case of a lapse in certification, ETKO conducts a new risk assessment; or
  - c. If a site moves from a lower risk level to a higher risk level as a result of the risk assessment, ETKO treats the risk level and frequency as if it were an initial audit.
- c) Risk-based audits of the following facility types are conducted according to the audit frequency and intensity levels:
- a. Processor sites or farms,
  - b. Supply chain distributors,
  - c. Brands where the brand's main site takes physical possession of claimed material,
  - d. Brands where the brand's main site does not take physical possession of claimed material,
  - e. Trader sites that are required to be certified, and
  - f. Brand retailers that are selling direct to consumers only.

**For RAF Primary Scope**

Prior to each audit, ETKO conducts a risk assessment and assigns a risk level for each scope certificate as explained above section.

For Farm Group Certification and Communal Farmer Group Certification, ETKO can decide to divide the farms into multiple subgroups in coordination with the ICS for the purposes of risk assessment and sampling. Criteria which reference the "scope certificate" are considered at the scope certificate level.

No risk assessment is done for initial audits of individual farms.

Within each risk assessment, the risk level is assigned as follows:

- a. A risk level of low risk is assigned if all low-risk core criteria are met along with at least two low-risk additional criteria.
- b. A risk level of medium risk is assigned if the criteria for low risk (D2.4.2.a) are not met and no high-risk criteria apply.
- c. A risk level of high risk is assigned if any of the high-risk criteria are met.
- d. ETKO decides to increase the risk level above the minimum specified level if we identify another relevant risk indicator which justifies the increase

according to ETKO Certification Department's decision.

Before determining the risk level, ETKO also conducts a background check on the organization using ETKO Applicant Evaluation Checklist and considers any other feedback (solicited or unsolicited) which has been received about the organization or the farms including checking information about legal compliance history (e.g. past prosecutions for animal welfare issues) of the applicable farms when determining the risk level.

Audits are conducted annually for each certified organization.

Audit Duration is determined according to the standard.

Recertification audits for TE scopes are tried to complete no later than 60 days prior to the expiry of a scope certificate. In case, it could not be realized. ASR-101 D4.4.20

Recertification audits for GOTS should be completed within 30 days from the expiry of a scope certificate. GOTS SC Policy.

In addition, for each organization, ETKO does not audit additional sites with physical possession of claimed material in excess of the sampling method mentioned below:

Maximum number of audits for sites with physical possession of claimed materials

Number of physical sites	Maximum number of annual audits
1 to 100	5
101 to 500	10
501 to 1000	15
>1001	Square root of the total number of TCs

The following criteria apply:

- If major or critical non-conformities are found at a site that would indicate further sites are likely to be operating out of conformity, ETKO performs an additional audit until no such non-conformities are found; and
- ETKO gives the site the opportunity to correct the nonconformities prior to performing these additional audits and choosing the site location.

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- d) An organization or a site may be included in multiple scope certificates for claims based on different standards provided that applicable scope certificates should be issued by ETKO only unless there is another requirement mentioned in the certification procedures. When multiple sites (excluding independently certified subcontractors) are included in a scope certificate, each site is evaluated during each audit unless an alternative is specifically defined in the Standard (e.g. group certification). D4.4.21
- e) Audits of groups meets the requirements of Appendix E. D4.4.22

**Auditing of Multi-Site and Group Organizations**

During an initial or recertification audit of a multi-site scope certificate, all site audits are conducted over a maximum of 60 calendar days. CCS-102 D3.2.3 (NOTE: ACP 2.1, D4.6.8 requires that certification decisions be completed within 60 days of the audit. The 60-day timeline begins with the closing meeting of the audit following the completion of all auditing activities (e.g. all site visits). Delaying the closing meeting after other audit activities are complete in order to extend this timeline is not permitted.)

Also, when auditing multi-site and group organizations ETKO ensures to meet the criteria of CCS-106 or CCS-107 for applicable audits and SCs. Otherwise, all sites are audited annually. ETKO only approve the addition of a new site to the SC if: CCS-102 D3.2.1. & D3.2.2

- The organization has demonstrated that the site is eligible to be included in SC
- ETKO has either;
  - conducted an audit of the site as required for an initial audit;
  - confirmed that the applicable criteria of CCS-106 or CCS-107 have been met for SCs which fall under those policies; or
  - confirmed that the site does not take physical possession of claimed materials and is only conducting administrative functions (e.g. invoicing) which have been fully evaluated by ETKO
- All critical and major non-conformities for the site have been closed; and
- ETKO is able to conduct the certification decision and approve the site joining the SC within 60 calendar days of the audit ETKO conducted of the site. (if applicable)

**Auditing of Multiple Sites (Multiple Certification)**

When multiple sites (excluding independently certified subcontractors) are included in a scope certificate for TE scopes, each site is evaluated during each audit. ASR-101 D4.4.21

An organization or a site may be included in multiple scope certificates for claims based on different standards. All applicable scope certificates are issued by ETKO. CCS-102 D2.4.1

If an organization is certified to another standard (including both Textile Exchange and non-Textile Exchange standards) where there is a risk of overclaiming material volume, ETKO includes all standards which recognize similar content (e.g. organic cotton for OCS) in its review of the volume reconciliation, and evaluates the claims made regarding the other standard and any other necessary records to ensure that volumes are not being overclaimed. CCS-102 D2.4.2

A site does not be included as a main or subsequent site in more than one SC to the same Standard unless the site has a primary scope and multiple certifications are permitted by the Standard or its certification procedures. CCS-102 D2.4.3 (Note: This rule refers to sites only. A facility may be included as a subcontractor in multiple SCs.)

ETKO may conduct the initial audit as a remote audit if the organization holds certification to another Textile Exchange standard with ETKO. To conduct a remote audit for the initial audit, the following conditions apply: CCS-102 D2.4.4

- The site is not adding GRS certification;
- The anniversary date is the same date (month and day) as the other certification (i.e. the initial scope certificate is issued for less than a year); and
- The organization has been identified as medium or low risk according to the risk analysis result.

Sites which are under common ownership may be certified separately. When sites under common ownership are in the same country, they should be certified by the same certification body. (See “6.1 Application Procedure” section of this procedure) CCS-102 D2.4.5 (Note: Transaction certificates are required for sales of material between sites which are certified under separate scope certificates, even when those sites are under common ownership.)

**Auditing of Associated Subcontractors**

When outsourcing to subcontractors is included in the certificate scope, ETKO audits all subcontractors on-site unless the subcontractor is certified to the Standard independently. In all cases, data regarding outsourced activities are reviewed during the audit. ASR-101 D4.4.23 & 24

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ETKO conducts audits of the associated subcontractors according to the audit frequency and intensity levels. Risk-based audits of subcontractors added to the scope certificate outside of an initial or recertification audit is conducted according to the audit frequency and intensity levels.

**Management of Independently Certified Subcontractors**

- ETKO does not conduct any additional audits of the independently certified subcontractor unless the subcontracted product and/or its relevant process are not listed on the independently certified subcontractor’s scope certificate. ETKO informs the subcontractor’s responsible certification body to add the product and required process to avoid a duplicative audit.
- When an independently certified subcontractor is included in an organization’s scope, ETKO obtains the volume of certified material that is being processed for other entities by doing the following:
  - In case the organization and the subcontractor are certified with ETKO, ETKO ensures that outsourcing volumes from the organization are noted for the subcontractor’s audit; or
  - In case the subcontractor is certified by another CB, ETKO notifies the subcontractor’s certification body of the outsourcing activity and volumes and communicates about the activity and volumes when requested to do so by the other CB.

NOTE: The intention of that is to ensure that the independently certified subcontractor’s certification body and auditor are aware of materials that have been handled by the subcontractor since there are no transaction certificates for this work. This allows the auditor to ensure that the volume control and volume reconciliation systems include all applicable volumes.

- When ETKO has concerns that a subcontractor which is independently certified by another certification body is not meeting the criteria of the Standard, ETKO submits a complaint about the subcontractor to the subcontractor’s certification body or to Textile Exchange if there is no satisfactory resolution with the subcontractor’s certification body.
- When auditing an organization that acts as an independently certified subcontractor for other organizations, ETKO includes all certified

products processed by the organization in its evaluation, even if the auditee does not own the product.

- If a subcontractor is independently certified to the GRS, that subcontractor may be used as an independently certified subcontractor for RCS provided that the subcontractor is independently certified to the same Standard to qualify as an independently certified subcontractor.
- A subcontractor facility does not be listed on the scope certificate or audited as an associated subcontractor if they are independently certified to the same Textile Exchange standard since they hold an independent scope certificate.

**Auditing of Brands**

- ETKO conducts audits for licensee brands according to the following:
  - The licensee brand falls under the definition of a brand even if they do not assume ownership over the brand entity (i.e. the licensee brand controls the design and production of the product even if they don’t own the trademarks for the name).
  - The licensee brand needs to be certified to make product-related claims.
  - Brands that are licensing their name to other companies need to be certified only for products where they control the design and development; and.
  - Certification for both a licensee brand and a brand which is licensing their name to other companies are limited to the products within that brand’s ownership.

Note: Multi-site or group certification may apply to brands once CCS-106 and CCS-107 are published.

- ETKO audit the brand’s applicable sections as mentioned in the “9.1.E.1.1” section of this procedure and in accordance with TI 48. The audit type is determined according to their risk level.
- ETKO does not conduct routine annual audits for brand facilities that only have the “PR0031 Warehousing/distribution” process category if:
  - The storage facility does not store claimed materials other than final products which are clearly identifiable

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- (e.g. finished garments/products that are ready for individual consumers);
- ETKO reviews the on-product use of claims and logos by other means (e.g. photographic evidence).
- Even though ETKO audits a distribution or warehouse facility when doing so is relevant for the investigation of a complaint or other concern with the traceability of products at the site. Such audits are conducted as hybrid or on-site audits.
- If the brand has products with on-product claims available for retail sale (directly or through other retailers, including online retail) at the time of the audit or during the validity of the previous SC, ETKO conducts sampling according to TI 104.
  - Identifies a sample of a product with on-product claims for review by purchasing the product at retail (e.g. in-store, online order available to consumers) or by photographing the product in-store;
  - Does not allow to be chosen of the sample by the brand;
  - Provides either the sampled product or images of the product (e.g. photos of hang-tags and sew-in labels) to the brand;
  - Requests that the brand demonstrate their tracking system or records that link the product back to the incoming purchasing documentation and TC;
  - Requests that the brand demonstrate that an appropriate claims approval is in place; and
  - Conducts this check a minimum of once per brand audit.

(EXAMPLE: A brand sells products to a wholesaler who sells the products to various retailers. The certification body visits a retailer who sells the brand's products and takes photos in the store of the on-product claims as well as other identifying information (such as sew-in labels). The photos are provided to the brand for review during the audit.)

NOTE: Sampling at retail is not mandatory and may be replaced with audits of distribution facilities. ETKO may choose to do additional sampling at retail in addition to what is done to meet the criteria.

- Brand distribution facilities, including both brand-owned/operated sites as well as subcontractors are not required to be listed on the scope certificate. ETKO conducts audits for these sites according to the TI 104.

- The following is included as sites in the scope of a brand's certification. All brand functions may be audited remotely, and auditing is conducted to fully evaluate the brand's functions. A site does not need to be audited directly if that site's functions are evaluated by ETKO during the audit of another site.
  - The site acting as the brand's main site for the purpose of certification;
  - Any site named as the buyer on incoming transaction certificates;
  - Any site purchasing products on behalf of the brand, unless the site is acting as a non-certified trader (see CCS 3.1, B1.2); and
  - Any site which takes responsibility for claims approvals.

NOTE: When a parent company owns multiple brands which function as independent entities, the parent company may hold a scope certificate for their brands, or the brands may be individually certified.

- If a brand is conducting any processing which is considered to be minor in nature (see CCS-201-V3.1 CCS User Manual, B1.5) and no other processing, the brand does not be treated as a processor for the purpose of auditing. Process codes for auditing which is minor in nature does not be listed on the scope certificate.

#### Management of Non-Certified Traders

When a certified organization notifies ETKO that they intend to sell products to a trader who is not required to be certified, ETKO:

- Ensures that the trader meets the CCS Supply Chain conditions mentioned on page 6 of this procedure otherwise ETKO rejects the request regarding selling products to a trader who is not required to be certified
- Takes responsibility for issuing TC listing the certified organization (i.e. the trader's supplier) as the seller and the trader's customer as the buyer, including review of financial records and other documentation for both sales of the product; and
- Ensures that the trader is named on TC as described in ASR-104.
- Rejects the request under CCS-102 D3.13.1 if the criteria of CCS-102 B1.2 are not met;

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- Ensures that documentation is sufficient to document the sales through to the trader's customer is provided;
- Ensures that there is no fraudulent activity otherwise ETKO files a complaint with Textile Exchange as per ASR-110 Complaints and Feedback Policy

**Auditing of Distribution Sites**

When auditing a distribution site, ETKO includes sampling of products to compare physical inventory to recorded inventory. Where claimed materials are not available, non-claimed products are checked to verify the functioning of the system.

**Audit Types for TE Scopes**

**On-Site Audits**

When an on-site audit is conducted, the entire audit team is physically present at the facility being audited. An on-site audit may replace a hybrid or remote audit.

**RAF Primary Scope Specific for On-Site Audits**

On-site audits are conducted in a way which allows the auditor to observe a representative sample of the animals, which is not less than 10% of each class of stock. If problems with animal welfare are identified, this sample size is increased.

ETKO can conduct the document review portion of a farm audit as a remote audit, provided that it occurs no more than seven calendar days before or after the site visit.

**Hybrid Audits**

When a hybrid audit is conducted, the audit team includes at least one person who is physically present at the facility being audited and at least one person who is participating remotely.

A hybrid audit may replace a remote audit.

The hybrid audit is conducted jointly by a qualified lead auditor who is auditing remotely, and by an on-site representative of ETKO.

ETKO conducts an advance review with the organization to ensure that there is sufficient internet connectivity available to conduct a hybrid audit, that necessary technologies are able to work, and that no other barriers to a hybrid audit are present.

ETKO ensures that the on-site representative:

- is a qualified auditor with ETKO (for any standard) or an auditor trainee for the standard being audited;
- is independent of the organization being audited;

If necessary the on-site representative:

- acts as a language interpreter for the lead auditor;
- conducts auditing tasks under the lead auditor's supervision, if appropriate to their qualifications.

The lead auditor is present remotely for the entire audit and maintains responsibility for conformity to hybrid audit requirements.

The on-site representative ensures that the audit procedure is followed under the lead auditor's direction (e.g. areas of the facility are not missed on the site tour, and management representatives are not present for worker interviews).

A live video, including a full video tour of the site, is used throughout the hybrid audit (i.e. video calling or similar technology), where the on-site representative is responsible for managing the video device.

**Remote Audits**

When a remote audit is conducted, the audit team is participating in the audit remotely rather than being present on-site.

For processing facilities, the remote audit is conducted by an auditor who has visited the site in the past, where possible. Where this is not possible, the auditor is briefed in advance by an auditor who has visited the site in the past.

ETKO conducts an advance review with the organization to ensure that there is sufficient internet connectivity available to conduct a remote audit, that necessary technologies are able to work, and that there are no other barriers to conducting a remote audit are present.

For facilities with physical possession of claimed material, a live video, including a tour of the site, is used throughout the remote audit (i.e. video calling or similar technology).

Audits of sites without physical possession of claimed materials are conducted as remote audits. If the site is not the main location, evaluation is limited to tasks directly performed by the site.

**Semi-Announced and Unannounced Audits**

ETKO conducts semi-announced audits and unannounced audits for at least 2% of sites with physical possession of claimed materials on an annual basis in accordance with the following:

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- The 2% is calculated for all sites which are evaluated to the CCS.
- Unannounced audits for at least 1% of sites designated as high risk from the risk assessment.
- Semi-announced audits for at least 1% of sites designated as medium or low risk from the risk assessment.

Unannounced audits occur during a period where there is the greatest risk to the integrity of assurance (e.g. peak production period).

Semi-announced and unannounced audits are conducted in addition to initial and recertification audits and are not used in place of the annual recertification audit of a site.

Priority to unannounced audits is given where the first processor, recycler, social, and chemical criteria apply to the site.

For unannounced audits, the site does not receive any advance notice of the auditor’s arrival at the site.

For semi-announced audits, the site receives two business days’ notice of the auditor’s arrival at the site. Semi-announced audits are conducted whenever no social criteria apply to the site.

When selecting sites for semi-announced and unannounced audits, ETKO considers the following:

- The risk level assigned to sites, with priority to higher-risk sites;
- Obtaining a representative sample in terms of standard, geography, and processing categories; and
- Prioritizing sites where there have been complaints or where there are other concerns with conformity.

ETKO conducts semi-announced or unannounced audits of specific sites when asked to do so by Textile Exchange or by the accreditation body. These audits are counted toward the total number of required audits.

ETKO maintains a record of all semi-announced and unannounced audits and submits those records to Textile Exchange upon request.

During a semi-announced or unannounced audit, ETKO, at minimum, evaluates the following as applicable to the site:

- Volume reconciliation (CCS 3.0, C3);
- Purchasing documentation (CCS 3.0, D2.3, D2.4, and D2.5);
- Physical handling and inventory of claimed materials (inputs, processing, and outputs, including CCS 3.0, D3);
- Transport and sale (CCS 3.0, D5);

- On-product claims relating to the Standard which are present on-site, including when labeling is done on behalf of a customer;
- The following Standard-specific criteria:
  - For material recyclers, the physical possibility to produce input and output claimed materials, applicable government requirements, and the authenticity of reclaimed input material sources (e.g. GRS-212 / RCS-212 Reclaimed Material Declaration Form);
  - For GRS, social, chemical, and environmental criteria;
  - For OCS first processors, input product origin information, GMO testing criteria (see OCS-103 GMO Screening of Organic Cotton) for cotton, and traceability records back to the organic farm; and,
- Any areas where a non-conformity was issued during the previous full audit;
- Any areas where ETKO has identified additional risks for the specific site, including risks that have been identified through complaints or which have been noted to ETKO by Textile Exchange or the accreditation body; and
- ETKO checks financial records of certified input and output materials (D2.1.2 and E2.1.1)

**RAF Primary Scope Specific for Semi-Announced and Unannounced Audits**

Semi-announced audits, where one of the following options for notice are used, according to the risk assessment and ETKO Certification Department’s decision:

- The site receives up to 72 hours’ notice of the audit, to ensure that the site is open, and the correct people are available; or
- The site receives notice of a 2-month window during which the audit will be conducted but does not receive any additional notice prior to the auditor’s arrival.

Semi-announced confirmation visits, where the site receives notice as for a semi announced audit and the auditor limits the evaluation to a visual check for animal welfare, land management, and social welfare only.

Unannounced audits, where the farm receives less than one hour’s notice of the visit, and a full audit is conducted.

Unannounced confirmation visits, where the site receives less than one hour’s notice of the visit, and the auditor

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limits the evaluation to a visual check for animal welfare, land management, and social welfare only.

NOTE: A confirmation visit is not considered to be a full audit. The purpose of confirmation visits is to provide additional oversight of the conditions of the farm without requiring a full audit. Where unannounced confirmation visits are required, ETKO makes efforts to avoid the farm predicting when the confirmation visit will occur.

**Unannounced Audit For GOTS Scope**

In case ETKO contracted more than 10 GOTS Certified Entities conducts a minimum of 2% unannounced on-site inspections (or 1 inspection; whichever is greater) of certified facilities per year, chosen randomly and/or chosen taking into account the risk or threat to the organic integrity of the products and the risk for non-compliances related to GOTS Human Rights and Social Criteria in the facilities. GOTS Implementation Manual 2.2.2. Notice of no more than 48 hours may be given in advance of an unannounced inspection.

**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

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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 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, when necessary, samples are taken for relevant analyses when there is a suspicion that there are inadmissible raw materials, additives or chemicals use. Analyses are made according to parameters and the limits required by the applicable standard. Laboratory must be accredited for ISO 17025.

**Procedure for testing requirements for GOTS products**

When there is accessory use for any GOTS products testing reports or Oeko-tex / equivalent certification is required for certification according to GOTS 5.2.

To safeguard GOTS 5.2 Testing of Technical Quality Parameters and Residues; additionally assessment to be

done to random selected accessories lists, quantities, certifications etc.

In the case yarn manufacturers certification; test reports done for the fibers used to be available either provided by the supplier / certifier of the fiber or ETKO auditor takes the samples from the fiber.

In the case a ginnery is certified GOTS GMO Advisory to CBs to be followed for testing.

In the case of conventional vegetable and / or animal fibers use GMO test is required from the supplier or ETKO auditor takes samples from the operators (spinners..) warehouse.

ETKO accepts the TCs issued by other CBs for GOTS products, so no further additional tests may be required, based on the risk assessment.

**9 Evaluation and Reporting for Approval**

**GOTS Approval of Chemical Textile Inputs and COSMOS Approval of Inputs**

Textile Inputs such as dyes and auxiliaries must be approved by a GOTS-approved certification body and biological and chemical inputs for cosmetics according to COSMOS-approved prior to use.

Input approvals are to be kept as a document in licensee's administration to be inspected by ETKO when required. All characteristics of the inputs used are subject to the criteria explained in GOTS standards for textile and COSMOS for cosmetics must be complying the requirements of the relevant standard.

The approval of non-organic cosmetic ingredients consists of a documentary validation without on-site inspection. The approval delivered by ETKO is not a certification: it only states that a non-organic ingredient is acceptable for use under COSMOS Standard. 11.2

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. 11.2

It is forbidden to label or otherwise indicate that approved cosmetic ingredients are certified according to COSMOS Standard. However, there is provision for labelling in 10.5 and as further elaborated in the COSMOS Labelling Guide. 11.2

All other inputs that are used in different process and which are not mentioned in the standards must be approved by a relevant Standard approved certification

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body (GOTS for textile and COSMOS for cosmetics). The approval must be kept as a document in the licensee's administration for ETKO evaluation purposes. Licensee is obliged to deliver necessary information and documents for ETKO judgment. The information may be analyzing results of the tests carried out according to the testing methods that are described by the relevant standards, or the producer of the substance may provide it.

The verification of the compliance of the ingredients with no organic content is based on a review of all the necessary information and documents needed for the approval. These info and documents are request from the client during the approval phase.

ETKO makes random testing for textile: a swatch of fabric (the testing is done by a subcontracted laboratory). In this case, the licensee must provide to ETKO with swatches when required. The swatches are tested according to the methods explained in the GOTS regulation, on heavy metals content of the fabric, formaldehyde content and the presents of AZO dyes.

For textile and cosmetic products required analyses for parameters described by GOTS and COSMOS are done when required in an ISO 17025 accredited laboratory.

#### Assessment of Chemical Inputs for GOTS

Assessment of chemical inputs are realized according to GOTS clause 4.2 by ETKO assign or subcontract experts who has experience with SDS

"All chemical inputs (Substances and Preparations) intended to be used to process GOTS Goods are subject to approval by a GOTS Approved Certifier prior to their usage. Chemical inputs are evaluated and their trade names are registered on GOTS Positive List available on the GOTS website prior to their usage by ETKO for the specific accreditation scope:

- Scope 4: Approval of Dyes and Textile Auxiliary Agents (Chemical Inputs) on GOTS Positive List

The chemical producer or supplier applying for their products to be evaluated are asked to provide a Material Safety Data Sheet (SDS), for all chemical inputs prepared according to an applicable recognized norm or directive.

ETKO may request, where appropriate and felt necessary, to include further sources of information (such as additional toxicological and environmental data on specific components of the auxiliary agents, test reports, independent lab analysis and traceability checks of ingredients, no intentional use declarations, sources of data for hazard & toxicity, etc.) in the assessment.

Also on-site inspection may be such an appropriate measure (e.g. if traceability is required and conformity

cannot be verified through analyses (for example enzymes – GM derived or not)) but it is not prescribed and would not be the rule.

ETKO issues an approval letter to the applicant chemical producer or supplier of the preparations containing the trade names of applied preparations that have been found to be compliant with the criteria of GOTS standard.

ETKO prepares the list of the approved inputs to inform GOTS regularly.

ETKO makes the list of approved chemical inputs available to all Approved Certifiers. The lists are taken as applicable tool for input assessment in the GOTS certification scheme by ETKO. In case of conflicting decisions (product approved by ETKO that is declined by another certifier or vice versa), ETKO participates to achieve consistent assessment by sharing its proofs of assessment. If this fails in last instance GOTS is informed accordingly for further evaluation.

Inputs specifically marked as approved on confidential basis for an applicant (e.g. input developed for a specific processing operator and only applied in this context) are not disclosed by ETKO to the other GOTS approved Certification Bodies and their clients.

#### Evaluation Process

As other programs ETKO starts with application procedure as receiving the application form and related SDS directly from the operator. Responsible person for SDS receives the application and communicate with the applicant directly. No other persons to be involved with such as intermediary, consultants, or ETKO staff members from other countries. Applications are accepted directly from the operator responsible. Responsible person in ETKO head office for textile inputs checks the application package and prepare the form designed for this. GP 02 F 05 App Pack Review Textile Input. He/she evaluates the SDS and other related documents for approval before sending out to the expert's evaluation to the laboratory. For renewal or additional product SDSs evaluation ETKO staff members assigned for the application pays specific attention whether the products are the same or the content was changed.

ETKO may demand other information, documents, samples etc to make sure application is made appropriately. SDSs must be prepared according to GOTS requirements indicated section 4.2. Products must be applicable for textile, operator contract must be signed and company related documents are available with ETKO.

Scope 4 responsible personnel reviews the SDS including documentary evidences demanded against the GOTS

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Criteria for Input and Accessory evaluations fully. There are 2 person in the process of review. First expert assesses the SDSs and prepare the results for final approval. The second person reviews the file before approval decision.

Following points to be checked carefully for a proper evaluation;

- Verify if the applied inputs have already Letter of Approval by other CBs in case of suspicion
- Verify if the documents provided are original, no draft versions are accepted
- Ask test reports instead of declarations especially for GMO related evidences.
- Pay more attention to specific products applications such as washing agents containing prohibited substances e.g. phosphates,
- Enzymes for the risk of GMOs,
- Chemical and biocidal preservatives used in chemical formulations.
- Use of natural dyes, pigments and auxiliaries that are derived from a threatened species listed on the Red List of the IUCN: <https://www.iucnredlist.org/>
- Evaluate GOTS Q&A section from the GOTS website in case needed for specific questions answered for Scope 4 topics.
- Use "Policy and Template for Issuing Letters of Approval for GOTS Colourants & Textile Auxiliaries and the Accessories for guidance each time a new product or applicant is received.
- Use only one option to indicate validity of the LoA such as "either a date, or valid until the new version of the standard". Both options cannot be used at the same time.
- Cancel unnecessary explanatory notes in the footer of the LoA Template.
- Publish only finalized version and share with client. Do not share DRAFT version of the certificate. Keep in the clients file in the ECERT only finalized one as valid version.
- Categories for utilization to be selected appropriately to the approved inputs. Verify the terminology used from the GOTS Database.
- Traders cannot have subcontracting relationships with chemical formulators. A trader or distributor may only apply for GOTS approval with their own unique trade names if the original formulator holds a valid GOTS Letter of Approval for those products.

Scope 4 responsible person complete the assessment of the SDSs and forward the file to file review person. The file is checked by the second person before submitting to approval decision.

ETKO may subcontracts evaluation process to independent external experts or institutes who has sufficient qualification for Textile Inputs and / or industry

experience. ETKO checks qualification of the personnel involved with the evaluation and guarantees their qualification. ETKO provides latest news and versions of the GOTS Standard to assigned experts. ETKO textile responsible explains the updates of the ETKO procedure.

After receiving evaluation results from the experts ETKO reviews the results internally before issuing the approval letter. This review to be done by the textile department experts for inputs who has the knowledge of chemistry and SDS and communicate with the textile department responsible and the management for the results. Certificate is signed by the Managing Director.

**Process to Verify Chemicals and Wastewater During Inspection**

- The inspector evaluates the chemical and wastewater during the audit according to TI 95 and sends the documents belonging to the chemical to the ETKO Chemical Department to get verification.
- When there is not sufficient evidence to evaluate the chemical and/or wastewater the inspector mentions that in the NCR.
- Also, the ETKO Chemical Department can issue an NC even if it was not determined by the inspector when the ETKO Chemical Department cannot verify the chemical/wastewater during the certification process.
- An NC for chemical/wastewater is issued as a major NC as mentioned in the ETKO Catalogue of Measures.

**Interpretation**

"Applicable recognized norms or directives" according to which a SDS of a chemical input (substance or preparation) has to be prepared in this context are:

- ANSI Z400.1-2004
- ISO 11014-1
- EC 1907/2006 (Reach)
- EC 2001/58
- GHS (Global Harmonized System)
- JIS Z 7250:2005, Part 1

In specific, valid reasons for inclusion of further sources of information in the assessment include:

- The SDS does not represent a legally binding basis in the country/region where the input is marketed
- The input potentially contains restricted or prohibited substances for which a declaration in the SDS is not binding (e.g. AOX, endocrine disruptors, GMO (derived) material or enzyme, nano-particles) the SDS does not

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contain certain ecological or toxicological information required to assess compliance with related GOTS criteria

- Tests / methods used to determine certain ecological or toxicological values are not specified or do not correspond to those listed in the GOTS criteria
- Spot checking on the accuracy of certain ecological or toxicological information provided on the SDS
- Surveillance of impurities

-ETKO provides certified inputs lists available to all Approved Certifiers. In case of any conflicting decisions ETKO shares its proofs of assessment with other certifiers for a consistent assessment.

-Basic chemicals such as salt, alkali, acid etc used do not need to be released on Letter of Approval.

-ETKO makes sure that all valid approval decisions are made on the basis of valid SDS, based on knowledge of all relevant endpoints for each constituent of formulations. Relevant endpoints are, for example, values used for the formulation of H-phrases and / or their GHS equivalents, for their individual constituent.

**Product Stewardship of Chemical Inputs**

ETKO verifies whether the chemical formulator and Chemical Subcontractors (if any) are implemented appropriate and effective product stewardship practices. ETKO verifies during the on-site audit whether an adequate system for product testing and quality assurance is in place.

ETKO verifies whether the Chemical Formulator designated suitably trained and authorized personnel for Product Stewardship responsibilities and provides relevant updates and education to the concerned personnel regularly.

Product Stewardship practices may include, but not limited to:

- Control on raw materials for consistent quality and hazardous substances.
- Process control during formulation for consistent quality and hazardous substances. Quality Assurance practices in formulation of preparations.
- Testing plan for raw materials, preparations and intermediate products, if any. Staff training for risk assessment.
- Adequate evaluation of preparations for release of hazardous substances during intended use.

**Environment, Health and Safety for Chemical Suppliers**

Chemical formulators and Chemical Subcontractors (if any) undergo an on-site audit for environmental management system and safety audit of their premises. On-site inspection is performed as part of the chemical

Input assessment for granting and/or renewing a Letter of Approval that is valid for up to 3 years or until a new Standard version comes into effect, whichever is earlier.

Following GOTS criteria is included in the audit of the Chemical Formulators and Chemical Subcontractors (if any) and is applicable to the entire Site during the validity of the certification:

- Environmental Management Policy
- Wastewater Treatment
- Occupational Health and Safety

4.2.5.4 At all stages through the chemical manufacturing and distribution, it is ensured that adequate precautions are taken by the operator for Separation and Identification. It is ensured that GOTS Approved inputs and other chemicals are not commingled nor contaminated by contact with prohibited Substances.

Where verifiable results (audit reports) from the following internationally recognized compliance schemes are available for the inspected Chemical Formulator and Chemical Subcontractor, these are screened and considered to the widest extent possible for the GOTS verification procedures:

Eco Passport by Oeko-Tex®

Certificate of ZDHC Level 3 Product Conformance

Bluesign (chemical formulators or subcontractors are currently engaged in the bluesign® implementation process and are needed to provide to ETKO the bluesign® assessment or implementation progress report to verify full compliance with this section.)

**10. Non-conformities & Corrective Actions**

Please see Catalogue of Measure for nonconformity procedure.

**11. 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. Individual Farm, Farm Group, and Communal Farmer Group scope certificates for RAF Primary Scope is issued for a duration of three years.

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

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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)

## 12. Use of Logo and Certificate 4.6.c

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

## 13. 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 annually. For RAF Primary Certification two annual audits are conducted during the three-year duration of each scope certificate, unless an audit is waived as explained in ETKO Instruction for RAF. This does not include the recertification audit. One audit typically is conducted per calendar year.

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.

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.

### 13.1. 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

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being made.

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

**13.1.1 Verifying Transfers via eTrackit**

First, for the use of eTrackit instead of the TC publication method, the certified company correctly performs the registration process to Textile Genesis and enters the SC information, including its current processes, into TextileGenesis. This information is reviewed by ETKO and if it is correct, it is approved by ETKO, if not, the deficiencies/erroneous parts are reported back to the certified company via eTrackit. Default waste factors are automatically determined by TextileGenesis according to the processes specified by the certified company.

Then, the certified company approves the eTransaction that comes via eTrackit and will be used as input for the transaction it will apply to. If the waste factor it specifies at this stage differs from the waste factor automatically determined by TextileGenesis, it sends a waste factor update request to ETKO via the system along with supporting documents. ETKO examines these supporting documents and approves the waste factor update application or sends feedback.

Then, the certified company creates an eTransaction application by providing the necessary information to the system. And by attaching supporting documents, they send their transaction application to ETKO through the system. In this case, ETKO approves or sends feedback after reviewing the transaction application.

**14. 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.

**15. 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 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.

**16. 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

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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).

**17. 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.

**18. Postponing and Cancellation**

In cases where 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 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.

**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 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 re-evaluation, a/m rules are applicable.

**20. 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, once take a file request from a CB, should follow the situation to understand whether the customer still want to migrate and remind the customer to sign a migration declaration by ETKO if they still want to migrate.

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.

When necessary, ETKO exchanges or disclose information with or to other Certification Bodies, accreditation bodies and the Global Standard gGmbH for quality control, for aggregated data reporting, for impact measurements and to verify the authenticity of the information.

**21 Information to Authority**

ETKO provides the following information regularly to meet the related standards' requirements.

**21.1 GOTS Requirements**

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(Reference: Approval Procedure and Requirements for Certification Bodies. Item 5.4.4)

- a) ETKO keeps the GOTS public data base up-dated at least monthly period regarding the certified operators as it is required on GOTS web site (names, addresses, contact details, product specifications, field of operation and validity date of certificate).
- b) Annual report on the relevant activities including a complete list of the inspected and/or certified entities and their facilities as well as withdrawn entities and their facilities in the preceding calendar year is sent by end of January of each year to the Global Standard GmbH. The required lists are updated regularly by textile Department for reporting purposes and Follow up the operator's status.

ETKO submits upon request by the GOTS Technical Committee detailed procedural or individual documentation related to inspection, certification and chemical approval activities in order to permit the GOTS Technical Committee to supervise Certification Body's adherence to the GOTS, the Manual for Implementation and any procedural rules and interpretation advises issued by the GOTS Technical Committee. This information about operators is kept confidential by GOTS Technical Committee members

In case reasons for denial or withdrawal of, certification and/or reasons for denial or withdrawal or suspension of approval include fraudulent activities of the operator ETKO promptly notifies Global Standard GmbH who will circulate among all Approved Certification Bodies details of such operators. ETKO does not offer certification to those operators within a period specified by Global Standard gGmbH 5.3.3b&c

**21.2 COSMOS Requirements**

(Reference: COSMOS-standard AISBL Control Manual Item 7.4.3)

- a) ETKO keeps the COSMOS-standard AISBL up-dated about; Commercial names, brand name, company name, addresses, category, certification date and certification renewal (validity date of certificate) of the certified operators (if any) at least monthly period by sending e mail to COSMOS-standard AISBL by using standard spreadsheet provided by Cosmos.
- b) Annual report on the relevant activities in the preceding calendar year is sent by the end of January of

each year to COSMOS-standard AISBL according to COSMOS Certified Cosmetic Products Database Updating Guide for Certifiers

- c) ETKO notifies COSMOS within one working week of any Client where it has withdrawn certification because of violation of COSMOS requirements. COSMOS has the right to determine that ETKO will not offer certification services to that Client for a specified period. COSMOS Manual 8.3.8.c

**21.3 Textile Exchange Requirements**

ETKO reports the following information to Textile Exchange quarterly. Data is reported in a format specified by Textile Exchange (i.e. dTrackit requirements) or in an alternate format that has been approved by Textile Exchange:

A Non-Conformity Report which includes:

- o An anonymized list of non-conformities issued to certified organizations, or their related sites or subcontractors, based on the criteria of the CCS 3.0 and to farms and farm groups, divided into the categories: animal welfare, land management, social, and ICS non-conformities; and
- o A list of exemptions issued or applied to sites and farms by Textile Exchange or ETKO. This includes exemptions issued by Textile Exchange for a specific site or organization or farm/farm group, as well as exemptions issued more generally for sites or organizations and farms which meet particular conditions (e.g. which may be applied to all sites in a specific country).
- A set of Farm Questions for each certified farm (including each member in the case of Farm Group Certification and Communal Farmer Group Certification). ETKO ensures all questions are complete and accurate following the submission by each farm/group. These are submitted via the online survey form, using the custom link provided to ETKO (preferred option), or in another format specified by Textile Exchange.
- ETKO submits all data by identifying the country/area using the "Country/area code" and stating using the "State/province code", as specified in ASR-214 Geographic Classification which is required on SCs and TCs to Textile Exchange. Submissions are made directly into Textile Exchange's database ("dTrackit") on a frequency determined and communicated by

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Textile Exchange. Data that is not required on printed SCs also is included in data submissions if it is included in ASR-504 Certification Body Data Specifications.

- Exemptions issued by ETKO directly in cases where Textile Exchange has already approved an exemption that covers an organization’s situation (e.g. an exemption which applies to a country) are reported to Textile Exchange quarterly.
- Certified site information is submitted by ETKO after a completed certification or renewed certification.
- ETKO reports the following information to Textile Exchange quarterly. Data is reported in a format specified by Textile Exchange or in an alternate format that has been approved by Textile Exchange.
  - ETKO shares GMO test reports with Textile Exchange on request,
  - ETKO retains and collates data from GMO testing for other OCS sites and submits this information to Textile Exchange(Assurance@TextileExchange.org) using OCS-504 OCS GMO Policy Data Template until the 15th of the following month after test results are received.
  - In case of a positive GMO test result on seed/lint cotton, ETKO retain and collate data from GMO testing at the gin and submits this information to Textile Exchange(Assurance@TextileExchange.org) using OCS-504 OCS GMO Policy Data Template until the 15th of the following month after test results are received.
  - ETKO reports the findings of its investigation regarding the Positive Test Results for GMO Presence in OCS Certified Gins to Textile Exchange immediately by email to Assurance@TextileExchange.org, including the following information:
    - The identification of the gin;
    - The test report (under ISO IWA 32:2019 and GMO contamination test report, if available);
    - The identification and scope certificate number of the farm;

- The transaction certificate number from the farm to the gin;
- The conclusion of the investigation; and
- The sanctions or corrective measures taken.
- Aggregated report of non-conformities identified for each requirement, and
- Aggregated report of number of workers at certified sites.

**Abbreviations:**

**SC: Scope Certificate**

**TC: Transaction Certificate**

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