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I. PURPOSE

This document describes the different steps taken by a Cosmécert client in the certification process.

II. DEFINITIONS

The terms used in this document are defined in Appendix I.

III. APPLICABLE CERTIFICATION SCHEME

The COSMOS-standard is a harmonised standard set up by the international association COSMOS-standard AISBL. The five founder members include BDIH, Cosmébio, Ecocert, ICEA and Soil Association. It is a private scheme that was developed to harmonise the different private European standards for natural and/or organic cosmetics.

COSMECERT offers its services in France and abroad.

The COSMOS scheme is made up of the following documents:

- "The COSMOS-standard" (current version) defining organic and natural cosmetics, including the "Technical Guide", "Labelling Guide" and "Control Manual".
- This certification process
- Your certification agreement

These documents are available free of charge on request, and on the COSMOS website at: http://www.cosmos-standard.org/.

Certifiable products: organic and natural cosmetic products, PPAI (Physically processed agro-ingredients), CPAI (Chemically processed agro-ingredients) and approved ingredients.

IV. ACCESS TO CERTIFICATION

A. Scope of our service: In which circumstances should I apply for certification?

Beneficiaries	Obligation	No obligation
Distributor / Contracting party (brand owner)	You are a brand owner or in charge of releasing products on the market	- You are just a distributor and sell other brands' products, but you are not in charge of the release to market - You are the brand owner but not the company in charge of the release to market. This company is certified and manages the complete process (production, sale and communication related to certified products). - You are already certified by a COSMOS authorised certification body
Manufacturer / Subcontractor (of raw materials or finished products)	You are in charge of releasing products on the market that you manufacture	- You manufacture products for a contracting party that is currently applying for certification through COSMOS AISBL-approved certification body. **or** - If you have already appointed the services of another COSMOS AISBL-approved certification body to obtain certification **Operations in this field must nonetheless be inspected.**
Toll manufacturer (handler)	Toll manufacturers are not obliged to be certified. Activities of handlers must be audited to check conformity. Exemption accepted if no intervention occurs on the product (storage then re-dispatch of pallets for example). **Operations in this field must nonetheless be inspected.**	
Complex individual cases (corporate groups, supermarkets and hypermarkets…)	Please contact Cosmécert	

B. Restrictions

Cosmécert may refuse to accept a certification application or to sign a certification agreement with a company if there are fundamental or known reasons to do so, such as illegal activities, a repeated history of non-compliance with certification requirements, inappropriate behaviour, outstanding payments, etc.

V. THE CERTIFICATION PROCESS

A. Your certification application

1. Documents that make up your certification application file

We undertake to send you the following documents to give you all the information needed to carry out the certification process:

- A current version of the required standards
- The certification application form and other related forms where appropriate
- This certification process

This documents are also available on your Client area

We ask you to create an account and then complete a certification request so that we can gather all the information needed to conduct what is called the "application review". The application review is made up of two parts: the feasibility study and the phase defining the framework of your certification application file. The aim of this review is to:

- Ensure that you are acquainted with all the standard's requirements
- Check that all the information requested in the forms has been properly indicated
- Study the feasibility of certifying your products, based on the evidence of the information you have provided
- Except as noted below, all application will be quoted

2. Cases where applications cannot be accepted

Certification is not possible in the following specific cases:

- Proven non-compliance with statutory regulations in force regarding cosmetics
- A conflict of interest that may undermine the impartiality of our decisions
- A geographical location that makes certification technically impossible or too risky for those involved
- A lack of qualified staff with the suitable skills to address your specific requirements
- Another COSMOS certification body has withdrawn your certification

B. Formalising your contract with Cosmécert

1. Producing a quotation

Cosmécert draws up a customised quotation for the current calendar year, based on the information you have provided and on the estimated working time required, and taking into account your specific field of activity (manufacturer, subcontractor, contracting party, toll manufacturer or other). This quotation covers:

- the document review
- the on-site inspection(s)
- the audit report review
- managing certification

Any audits, sampling or analysis that are not included in the initial audit plan are not included in this initial quotation.

2. Which documents are included in your service contract with Cosmécert?

Your certification contract is made up of the current versions of the following documents:

- This certification process
- The COSMOS-standard, including the "Technical Guide", "Labelling Guide" and "Control Manual"
- Your certification application
- The quotation
- Your certification contrat

3. Formalising your commitment

Your certification contract is concluded and available on your client area upon return of the signed quotation.

By signing this quotation, you agree to the requirements described in this process, including compliance with the requirements set out in the COSMOS-standard.

C. Initial audit

The initial audit involves checking all of the operations that fall within the scope of certification to ensure that they comply with the requirements set out in the standard.

1. Validating documents and preparing your on-site audit (inspection)

Forms, specific to your activity are available in your client area. These help to gather all the information needed to prepare for an on-site audit. Cosmécert reviews these forms once completed.

All ingredients, formulas, labelling, packaging, cleaning materials and communication materials that mention the COSMOS-standard must be validated before use. Your first on-site audit (accreditation audit) is authorised once your commitment has been confirmed.

Your assigned auditor will contact you to schedule an appropriate date, and also put forward an audit plan, outlining the documents you will need to have at your disposal. The nature of the audit plan and its related documents depends on your specific role in the development process (i.e. manufacturing or distributing products), as well that of any third parties involved in the above-mentioned process.

2. On-site audit

The aim of on-site audits is to check that products comply with the requirements set out in the standard. Audits are conducted on every site involved in processing the product concerned by certification: manufacturing, packaging etc.

The audit involves the following stages:

- Opening meeting: the auditor presents the aims and different compliance points to be checked, as well as confirm the areas to be inspected and the audit plan
- Documentation review
- Visiting the premises to inspect the equipment and facilities and interview the staff
- Closing meeting: the auditor gives a summary review of the findings from the on-site audit

If any analysis needs to be carried out, samples will be taken either in your presence or in the presence of the person representing you and signing the related documents. Cosmécert decides on the type of tests required, and appoints the laboratory. If necessary, Cosmécert may decide to leave one of the samples on your premises. This sample must only be used for duplicate analysis. In this case, you, Cosmécert or a bailiff must undertake to send the above-mentioned sample, in accordance with Cosmécert's instructions to the laboratory of its choice.

3. Audit report

During the audit, instances of non-compliance may be identified. If so, you will be notified in the summary review given during the closing meeting when the findings are presented, and in the written audit report.

These cases of non-compliance are classified into two categories: "major" or "minor" depending on their severity.

These cases of non-compliance require you to take measures (known as "corrective actions") to ensure that you are fully compliant. Each corrective action that you put forward for each case of non-compliance will be recorded in the written audit report.

4. Assessing the implementation of corrective actions

Cosmécert will review the corrections, identified causes and corrective actions submitted by the operator to determine if they are acceptable. These action proposals must be relevant and exhaustive. Otherwise, you will have to suggest new actions.
Evidence obtained to confirm resolution of nonconformities should be recorded.

Depending on the findings of the additional assessment tasks that are required to ensure that non-compliance has been cleared, Cosmécert may need to:

- conduct another on-site audit
- take new samples and perform new tests
- perform further documentation reviews

D. Non-compliance and remedial action plan

The audit may identify instances of non-compliance. These are classified into 2 categories:

1. "Minor" non-compliance

Minor non-compliance is non-compliance that does not alter the characteristics of the product to be certified. This means that it does not call into question the product's compliance with the standard's key requirements and overarching principles (see the introduction to the standard), and is not considered to be misleading for consumers.

2. "Major" non-compliance

Major non-compliance is non-compliance that alters, or may later alter, the characteristics of the product to be certified. This means that it calls into question the product's compliance with the standard's key requirements and overarching principles and/or can be considered to be misleading for consumers. Major non-compliance can be critical in case of deep impact.

3. Remedial action plan

The remedial action plan lists all cases of non-compliance, and classifies them according to their degree of severity ("minor" or "major"). It also identifies a remedial course of action for each case of non-compliance, suggesting appropriate measures to be taken, and procedural methods of application. The corrective actions and procedures are determined by the nature and severity of each case of non-compliance, but also its occurrence and risk of fraud.

Appropriate measures may include (see paragraph H for more details):

- Maintaining certification under conditions
- Reducing the scope of certification
- Suspending certification
- Withdrawing certification

E. Certification review and decision

Once Cosmécert is satisfied that all corrective actions have been successfully cleared on the basis of evidence provided (documentary evidence, or, if necessary, evidence collected on site), the audit report is sent to be reviewed by the certification manager, who is in charge of checking the relevance of the elements included. The certification manager will then send you the certification decision and the results of your analysis tests (where appropriate). His decision is based on all the different parts of your audit report and the documents related to your client file.

If the certification decision is positive, Cosmécert will issue you with your certification documents.
If the certification decision is negative, Cosmécert will inform you as such in writing, explaining the reasons. At this stage you may apply to begin a new certification process by going back to Step A.

If Cosmécert has any suspicion that you have put on the market, or may be planning to put on the market any product that is not compliant with the COSMOS-standard, yet which refers to COSMOS certification, it may call for the provisional suspension of your certification for the above-mentioned products. Before making any such decision, we will notify you of our suspicions and invite you to submit to us your comments on the issue.

F. Certification documents

Certification documents shall only be issued after or at the same time as:

- A positive decision to grant certification has been made
- The certification requirements have been fulfilled

These certification documents establish or clearly specify:

- Cosmécert's name and address
- Certification date of issue
- Your name and address
- Certification expiry date
- The list of certified products or raw materials classified by level of certification (COSMOS NATURAL, COSMOS ORGANIC or COSMOS CERTIFIED) / the different procedures inspected

Any costs incurred (e.g.: production costs, printing labels etc …) in anticipation of a certification decision that has not yet been made, are under your responsibility and cannot be covered by Cosmécert.

Only certificate holders may make reference to the certification on their products.

G. Follow-up and continuing the certification process

1. Periodic reviews

The certification process is automatically renewed on an annual basis, unless you give Cosmécert prior warning that you would like to end your certification agreement.

At the end of each renewal period, Cosmécert examines the information that you provide and/or that we are able to gather from audits and other investigations, and informs you of the cost of renewing your certification for another year.

For the purposes of monitoring certification, we implement the following follow-up plan:

- On-site follow-up audit(s) (any corrective actions put in place to address issues of non-compliance identified during the previous audit are checked at this point)
- Document validation: if changes have been made to documents assessed during the initial document validation procedure, or if there are new products to be certified
- Annual analysis plan, where appropriate

Cosmécert will then notify you of your certification status.

2. Establishing an on-site audit plan

The risk analysis defines the type and frequency of audits required, depending on your field of activity and other possible criteria.

All entities working in distribution, as opposed to production, are audited once a year. All entities working in production (excluding toll manufacturers) are audited twice in the first year (for the accreditation audit) and once or up to twice a year for all subsequent renewed years. The total number of audits required depends on the results of the risk analysis carried out for each entity. It is systematically made as part of monitoring and certification process continuation.

Each certification application is examined to identify the level of risk involved, and consequently determine the number of audits required each year, and the overall duration of the audit.

The following criteria are taken into account:

- Field of activity (raw materials producer, make-up manufacturer…)
- Number of products to be certified
- Number of ingredients used
- Degree of severity for any non-compliance identified in the previous year
- Quality assurance procedure currently in use in your company

Type of company (field of activity)	Accreditation	Renewal
Contracting party/Distributor	1 audit/year	1 follow-up audit/ year
Manufacturer/Subcontractor	2 audits/year	1 to 2 follow-up audits/ year depending on risk analysis
Toll manufacturer	1 audit/year	1 follow-up audit/ year

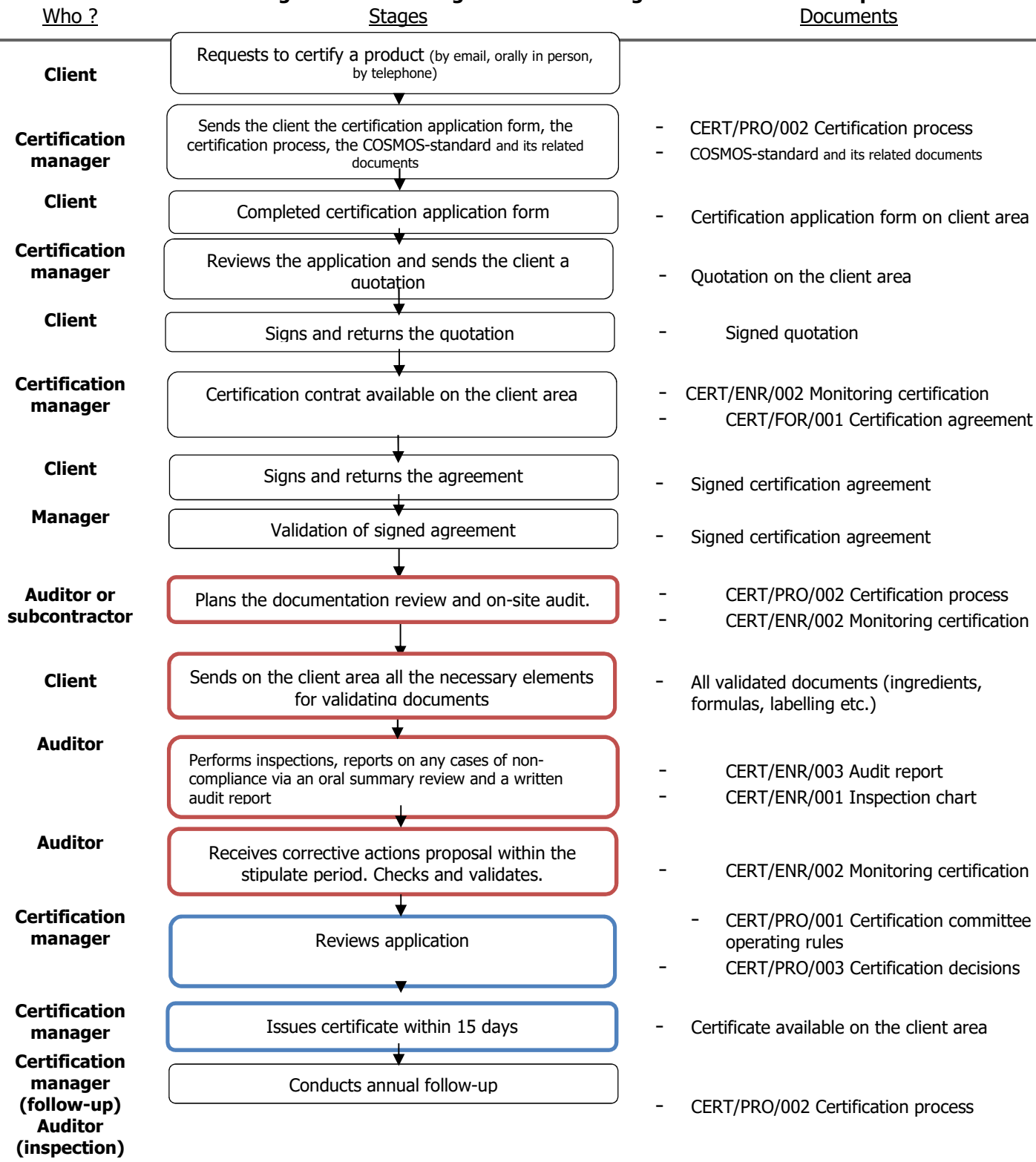
This risk analysis is applied for all clients, both in France or abroad, except for clients belonging exclusively to the category for approving non-organic ingredients. Complementary and additional audits may be added to this plan.

If an audit is not performed within the given time frame, Cosmécert reserves the right to suspend your certifications, even if the expiry date of the above-mentioned certificates postdates the final date by which the audits must be performed.

3. Follow-up on your operations

Follow-up (monitoring) is based on checking any changes made to certification requirements and/or to the range of products concerned by certification. For these purposes, you are required to inform Cosmécert promptly of any intention to make changes to your system (production, procedures, quality assurance systems etc) or to the range of products to be certified.

4. Diagram summarising the different stages in the certification process



H. Renewing certification

If no issues of non-compliance are identified during your follow-up audits, certification is maintained and the certification manager renews your certification documents.

If a case of non-compliance is identified either during your follow-up audits, or by any other means, Cosmécert must examine your case and take the appropriate measures.

1. Maintaining certification under conditions

Examples of the conditions required for maintaining certification may include:

- Increased monitoring through additional audits or analysis tests,
- A prescribed time period within which you are invited to correct all issues of non-compliance,
- etc.

If you fail to fulfil the conditions within the given time frame, Cosmécert will start the process of suspending or withdrawing your certification documents.

2. Suspending certification or pending certification

This involves interrupting certification for a specific time period, or until such time as the product has been made compliant. If the product in question has not yet been granted certification, we refer to what is called "pending certification". Suspension may be applied to one or several products and/or batches. To correct any such cases of non-compliance, you must provide the necessary elements within the allowed time period.

In any event, the product(s) concerned may no longer make any reference to the certification until such time as non-compliance has been cleared, and the above-mentioned products will be removed from your certification documents throughout the duration of the suspension period.

3. Reducing the scope of certification

This involves terminating certification of all or some products and/or batches on a definitive basis and to immediate effect. In this instance, products are considered to be part of the conventional (non-organic) market, and no longer have the right to make reference to the certification. Such a decision may be the result of non-compliance identified during an audit, or at your own request if you no longer wish to be certified for one or some of your products (relinquishment).

In any event, the names of the product(s) concerned are removed from the certificate without notice.

4. Withdrawing certification

This involves the immediate withdrawal of certification for all of your products. In this instance, you no longer have the right to make any reference to the certification on any of your products. This decision goes hand in hand with terminating your agreement with Cosmécert.

Any product without a certificate, or whose certificate has been suspended/withdrawn may not be put on the market if it makes any reference to the certification. This extends to apply for all related communication materials. Suspending or withdrawing compliance documents means that these documents are considered no longer valid with immediate effect. You must inform your clients that your products no longer comply with the COSMOS-standard, and in any event, you no longer have the right make use of you compliance documents.

I. Recognising other certification bodies

The COSMOS-standard is a Europe-wide partnership that was set up by two certification bodies (ECOCERT in France and ICEA in Italy) that joined forces with three professional associations (COSMÉBIO in France, BDIH in Germany, and SOIL ASSOCIATION in the UK).

Certification bodies share a common interest in harmonising standards, and therefore they must mutually recognise all certificates issued to the COSMOS-standard granted by other certification bodies, which they themselves have been approved by the COSMOS-standard AISBL's board of directors.

If different certification bodies are handling only one part / several part(s) of a client's processing chain, they may share information regarding the above-mentioned client (with due regard to confidentiality) in the interests of ensuring the compliance of the finished product.

Similarly, if a major issue of non-compliance is identified, Cosmécert must inform the other COSMOS AISBL-approved certification bodies of the final decision taken. If a case of non-compliance leads to certification being refused, or if a certification application is considered unacceptable, Cosmécert undertakes to transfer that information to the other COSMOS AISBL-approved certification bodies. In this instance, your certification application will not be considered acceptable by any other COSMOS AISBL-approved certification body.

J. Changes that may affect certification

1. Changes to the certification scheme (new or revised requirements)

Cosmécert undertakes to inform you via email of any changes made to the documents that make up the COSMOS scheme and to the implementation procedures, as well as provide you with the most up-to-date version of the scheme, available on the COSMOS website.

Depending on the circumstances, changes introduced will take immediate effect, or COSMOS AISBL will put into place a set of provisional measures during the transition period.

You are in charge of implementing such changes, and Cosmécert is in charge of checking that the changes have been applied.

If the changes are not implemented, Cosmécert may notify you of your non-compliance, which if left unresolved, may lead Cosmécert to reduce, suspend or even withdraw your certification (see paragraph H).

2. Change(s) to the company and the scope of your certification

If you wish to certify new products, you must send Cosmécert your completed certification application form (CERT.FOR.004 for products, CERT.FOR.010 for raw materials) indicating the products in question. In this case, Cosmécert may use the certification that you have already been granted to adapt its audit plan.

You are held responsible for informing Cosmécert promptly of any changes that may affect your ability to comply with the certification requirements. Examples of such changes include the following:

- Changes in company structure (change of ownership, or status…)
- Changes in management or procedures
- Changes made to the products or manufacturing processes
- A change of address or contact details
- etc.

These changes may lead your certification to be reconsidered (changes in scope, suspension, withdrawal …) and may mean that an additional audit is carried out as a result (in the case of new products/processes).

3. Deferring your certification

If you wish to suspend your business operations (stopping manufacturing, packaging and selling products that have been certified by Cosmécert), we offer you the possibility of deferral by suspending our certification services for six months to a year, yet all the while maintaining our certification agreement throughout that period. If you wish to defer your certification, you must inform Cosmécert as soon as possible.

Your certificates are no longer valid during this deferral period. You therefore lose the right to manufacture and sell products certified by Cosmécert. You also lose the right to make any reference to COSMOS and/or Cosmécert certification on any communication materials (labelling, website, communication documents…)

At the end of this deferral period, the certification process is restarted all over again, beginning at Step 1 with the application review, followed by the initial accreditation audit, exactly like for all other initial applications.

K. Terminating certification

1. Termination procedures and effects on certification

You may, at any given moment, ask to end the certification of some or all of your products. If you wish to terminate, you must follow the conditions set out in your certification agreement.

Terminating certification of some or all of your products and terminating your certification agreement, if appropriate, automatically means that your certification documents for the products in question are no longer valid.

Accordingly, as of the date on which certification is terminated (the same applying for the certification agreement, if appropriate), you no longer have the right to manufacture or sell the products in question which make any reference to COSMOS and/or Cosmécert certification. This does not affect products that have already been released on the market.

2. Exceptional cases: selling off and auditing stock

If you have a stock of compliant products that make reference to certification COSMOS and/or Cosmécert certification, and yet which need to be sold off at a time that postdates the expiry date of your certification and your agreement, we require you to give us an estimate of how long you think it would take to sell off the above-mentioned stock.

Once Cosmécert has studied your case, it may then agree to extend your agreement and authorise you to sell off your stock of compliant products, on condition that an annual "distributor" audit is carried out and paid for at the appropriate rate.

The agreement and certificate will therefore remain in force up until the final date estimated as being sufficient for selling off the stock of certified products.

In any event, we recommend that you contact Cosmécert to get more information about the exact procedures involved in ending your certification agreement, depending on the precise nature of your company.

During this extension period to your certification agreement you are not authorised to manufacturer new products that make reference to COSMOS and/or Cosmécert certification.

VI. COMPLAINTS AND APPEALS

You may wish to make a complaint (claim) to Cosmécert regarding our level of service, or you may wish to appeal against decisions concerning you that have been made by Cosmécert.

Cosmécert commits to acknowledging receipt of all complaints and appeals, and to handling them within the prescribed time period outlined in our internal procedures.

A. Complaints

Any person may submit a complaint to Cosmécert in writing. Complaints may involve issues such as validation, another client, Cosmécert's services, etc.

The complainant receives acknowledgement of receipt within 8 days. A reply is then sent, having first been validated by a person who has no previous connection with the complaint.

The quality manager records all complaints received, as well as the measures taken in each case, and regular analysis is carried out on the quality assurance system to ensure that it meets your expectations as best as possible.

B. Appeal

You may appeal against a certification decision. For your appeal to be accepted for consideration, it must be:

- In writing (letter or email)
- Sent within 15 days from the date of receiving the certification decision
- Duly justified: any relevant elements that Cosmécert does not have in its possession must be provided

Appeals do not automatically lead to the suspension of the decisions they relate to. Decisions continue to apply until such time as a new decision is made, following consideration of the appeal.

C. Your obligations with respect to third-party complaints

You are responsible for managing third-party complaints that are addressed to you directly. You must keep a record of all complaints related to compliance with certification requirements and make these records available to Cosmécert at any given time. These records must keep track of the appropriate actions taken, and these actions must be documented.

VII. USE OF REFERENCES TO COSMOS CERTIFICATION, COSMÉCERT AND ASSOCIATED TRADEMARKS

The conditions for making to reference to COSMOS certification are defined in the COSMOS "Labelling Guide".

Misuse of the name and logo or incorrect reference to COSMOS certification on the part of a client may lead to the implementation of appropriate measures such as the reduction, suspension or withdrawal of certification. In this instance, Cosmécert must also inform the appropriate authorities.

Potential examples include:

- Reference to compliance, COSMOS certification or Cosmécert is displayed on products that do not comply with certification requirements.
- Reference to compliance, COSMOS certification or Cosmécert is displayed on products for which a certification application has not been submitted, or that are still in the process of being certified.
- Generally speaking, the rules for making reference to certification are not observed (please ensure that you are acquainted with these rules, which can be found in the relevant document, available on the internet and on request).

Appendix I: Definitions

Corrective action: Action (also referred to as a measure) to clear the cause of a case of non-compliance or any other undesirable situation noticed during an audit.

Appeal: Written request by a client to the certification body calling for reconsideration of a certification decision.

Certification: Issuance of a certification document (cf. definition).

Client: Person or organisation that has subscribed to a service provided by Cosmécert by signing a service agreement (also referred to as a certification agreement).

Certificate (also referred to as certification document): Document issued to the client attesting the compliance of products to the scheme.

Certification requirement: Specified requirement that must be fulfilled by the client as a condition of establishing or maintaining certification.

Non-compliance (also referred to as non-conformity): Non-fulfilment of a requirement.

Risk analysis: Description of the number and types of inspections needed in one complete audit cycle to ensure that a product complies with requirements, based on the type of clients.

Complaint: Expression of dissatisfaction, other than an appeal, made by a person or organisation to Cosmécert, concerning its operations, for which an answer is required.

Remedial action plan (also referred to as a correction plan): List of instances of non-compliance related to certification requirements and their impact on the certification decision. It may be completed by additional assessments required to clear such non-compliance.

Certification scheme: Set of requirements, rules and procedures defined by the scheme owner that must be implemented by Cosmécert.

Certification standard: Technical document defining the product requirements to be met, inspection methods and procedures for communication on certification.

Follow-up (also referred to as monitoring or surveillance): Repetition of the audit, review and certification decision, in compliance with the certification scheme as the basis for maintaining certification.