	<p>GP01 FSC CoC</p> <p>DESCRIPTION OF FSC COC CERTIFICATION PROCESS</p>	
--	---	--

Table of contents

1. General presentation of the FSC Certification system ----- 3

 1.1 Presentation of the Forest Stewardship Council ----- 3

 1.2 FSC COC system requirements ----- 3

2 Certification Proposition----- 3

 2.1 Certification process description ----- 3

 2.2 Useful definition ----- 4

3 Certification application ----- 4

 3.1 Documentation list for application ----- 4

 3.1.1 For a single site application -----4

 3.1.2 For a group or multisite certification scheme -----4

 3.2 Request and Offer of service preliminary examination ----- 5

 3.2.1 Quotation preparation -----5

 3.2.2 Particular cases -----5

 3.2.3 General and specific condition for certification services -----7

 3.3 Contract ----- 7

4 Audit preparation ----- 8

 4.1 Bureau Veritas Certification FSC CoC Auditors----- 8

 4.1.1 Auditor's qualification -----8

 4.1.2 Audit team composition -----8

5 Pre-Audit ----- 8

 5.1 Pre-audit interest and realization ----- 8

 5.2 Opportunity for Improvement ----- 9

6 Main Audit ----- 9

 6.1 Certification Audit Plan----- 9

 6.2 Main audit realization----- 9

 6.2.1 Opening meeting-----9

 6.2.2 Audit course -----9

 6.2.3 Closing meeting-----9

 6.3 Nonconformities and Corrective Actions -----10

 6.3.1 Nonconformities ----- 10

 6.3.2 Corrective Actions timeframes and upgrading----- 10

7 Certification----- 11

 7.1 Certification Decision ----- 11

 7.2 Certificate Issuance----- 11

8 Specific process: Evaluation of FSC Controlled Wood according to FSC-STD-40-003 ----- 11

 8.1 Off site evaluation----- 11

 8.2 On site evaluation----- 11

9	<i>Certification process synthesis</i>	12
10	<i>Certification Maintenance</i>	13
10.1	<i>Surveillance Audits</i>	13
10.2	<i>Re-certification Audit</i>	13
10.3	<i>Certificate Scope modification</i>	13
11	<i>Trademark use management system</i>	13
12	<i>Certification Costs</i>	13
12.1	<i>Certification process cost</i>	13
13	<i>Certificate: Suspension/Withdrawal, Scope modification</i>	14
14	<i>Complaints and Appeals process</i>	14
14.1	<i>Complaints</i>	14
14.2	<i>Appeals:</i>	14
15	<i>Applicable Standards</i>	16
15.1	<i>FSC-STD-40-004</i>	16
15.2	<i>FSC-STD-40-005</i>	16
15.3	<i>FSC-STD-40-003</i>	16
15.4	<i>FSC-STD-40-007</i>	16
16	<i>Confidentiality</i>	16
17	<i>Observer's participation to audit</i>	16
18	<i>Management of change</i>	17

1. General presentation of the FSC Certification system

1.1 Presentation of the Forest Stewardship Council

The Forest Stewardship Council (FSC) is a global, not-for-profit organization dedicated to the promotion of responsible forest management worldwide. It was established in 1993 as a solution to respond to concerns over deforestation at a global scale. FSC is regarded as one of the most important initiatives to promote responsible forest management worldwide.

FSC is a certification system that provides internationally recognized standard-setting and trademark assurance to companies, organizations, and communities interested in responsible forestry.

The FSC system is different from other certification schemes on two main points. The FSC Forest Management (FM) international standard shall be adapted locally and this adaptation process, and later on the field audit, shall use inputs from local stakeholders, or groups with an interest in forest management.

FSC certification system general purpose is to certify “responsible” forest management (FM Certification) and afterward to certify the products generated from these certified forests all along the processing chain till the final consumer. That transfer is only possible if all the links in the chain of custody (from the forest down to the retailer) are certified, each link in the chain being defined by a transfer of property. It is the certification process called Chain of Custody certification.

The FSC label provides a credible link between responsible production and consumption of forest products, enabling consumers and businesses to make purchasing decisions that benefit people and the environment as well as providing ongoing business value.

1.2 FSC COC system requirements

FSC system requirements are defined by the FSCTM Chain of Custody (COC) standards. The FSC standards related to chain of custody are mainly coded as: "FSC-STD-40-XXX"

When Bureau Veritas Certification issues an FSC COC certificate to a company, it provides a guarantee that the company has demonstrated conformity with all the applicable FSC requirements at the time of Bureau Veritas' evaluation.

BUREAU VERITAS Certification overall performance; review of independence; used policies; certification decision process, implementation of complaint and appeal resolution are available on request.

2 Certification Proposition

2.1 Certification process description

This document presents Bureau Veritas Certification procedures concerning FSC Chain of Custody certification. These procedures are developed according to FSC certification requirements.

The FSC Chain of Custody certification standard is designed for application at the site level of Chain of Custody operations. In case of a number of site to be jointly included under the same certificate, verification system take place at the site level and then at the upper level (Central Office) and so on depending on the management organization of the applicant.

2.2 Useful definition

Applicant:

Bureau Veritas Certification considers as an applicant any legal entity applying for a certification and linked contractually with Bureau Veritas Certification.

Site:

Bureau Veritas Certification considers as a "site" any location of a legal entity where the chain of custody is completely or partly managed. A single legal entity can have several sites. Depending on the management implemented by the applicant, a multisite scheme can be required (i.e. Holding with different legal entities who have different sites).

Multi-Site certification:

Regarding FSC™ certification schemes, a multisite certification is designed for the certification of large enterprises that are linked by common ownership or legal/contractual agreements. Ownership means at least 51% of ownership interest over the sites.

Group certification:

Regarding FSC™ certification schemes, a group certification is specifically designed for the certification of independent small enterprises.

Outsourcing/subcontracting:

Outsourcing/subcontracting is the practice of contracting an internal business process under the Chain of Custody (i.e. activities or tasks that produce a specific service or product) to another organization rather than staffing it internally. Outsourced activities usually take place outside the organization's facilities; however, the organization may establish outsourcing agreements with other entities operating within its facilities when the organization has no control or supervision over the activities performed by the contractor.

3 Certification application

Any company interested in certification receives on request an Application Form (Request for Quotation), the present document (GP01) and the applicable Chain of Custody standard(s). The whole FSC policies, standards, procedures, directives and guidance are available on the FSC web site (<https://ic.fsc.org/>) in the Normative Framework.

3.1 Documentation list for application

3.1.1 For a single site application

The company shall provide the application form fulfilled with definition of the scope in terms of FSC product groups and sites to be evaluated, and the leaflet (or any similar document) describing its activity. If existing, the company provides its chain of custody monitoring procedure and FSC™ products planned to be sold and propose the scope of the certification to be audited.

3.1.2 For a group or multisite certification scheme

If the company applies for a multisite certification, it shall mention it on the application form precising the name, address, activities and number of employees of each sites concerned.

In order to have a precise overview of the multisite organization, a chart displaying any available documentation justifying hierarchy and schemes is required

The managerial chart, describing the hierarchy between the different sites must be transmitted with one application form questionnaire per site to be included within the scope of the certification.

Certification management procedure at the site level shall be transmitted as well.

Any document allowing to evaluate the dispositions specifically taken for certification, in particular concerning the Chain of Custody or monitoring of FSC™ products and the responsibilities taken at group level and at the level of each group member or of each site.

3.2 Request and Offer of service preliminary examination

3.2.1 Quotation preparation

On return of the application form duly filled in, Bureau Veritas Certification prepares a certification quotation based on the information given by the applicant.

Together with the offer, the general and specific terms of sale are sent.

Bureau Veritas shall reject applications for certification of management units or sites that are already covered by a valid or suspended FSC certification, except where a certification transfer process according to FSC-PRO-20-003 is ongoing.

3.2.2 Particular cases

3.2.2.1 Outsourcing:

Depending on its organization, the company may have to include its subcontractors in the certification scope. In this case, the company should mention the subcontractor names & address and the number of employees and the type of outsourcing to be included in the application form. The company has to inform Bureau Veritas Certification to any changes related to this list of subcontractors during the validity of its certificate.

Subcontractors risk review will be done in order to quote the auditing time needed to have a reliable overview of the complete Chain of Custody.

A sample of the “high risk” subcontractors will be audited by Bureau Veritas. The number of subcontractors to be audited is given by the formula : $y = \sqrt{x}$ (rounded to the next whole number), with x the number of high-risk contractors.

For group and multisite certificates, the calculation of the contractor sample shall be conducted at the participating-site level.

Contractors that hold their own FSC Chain of Custody certificate for the outsourced process and contractors that did not provide outsourcing services to the organization since the last certification body's evaluation do not need to be evaluated and therefore do not need to be added to the number of contractors (x) in the formula above.

The risk level is considered as “high” if any of the following applies:

- The Organization outsources all or most of the manufacturing processes of a product;
- Contractor mixes different input materials (e.g. FSC 100% and Controlled Wood);
- Contractor applies the FSC label on the product;
- Contractor does not physically return the FSC-certified product to the contracting organization after outsourcing;
- Outsourcing across national borders to countries with Transparency International's Corruption Perception Index (CPI) lower than 50.

Even when one or more of the above high-risk indicators apply to the outsourced activity, the low risk categorization is accepted if a low risk of contamination can be demonstrated due to one of the following factors:

- The product is permanently labelled or marked in a way that the contractor cannot alter or exchange products (e.g. heat brand, printed materials); or
- The product is palletized or otherwise maintained as a secure unit that is not broken apart during outsourcing; or
- The contractor is employed for services that do not involve manufacture or transformation of certified products (e.g. warehousing, storage, distribution, logistics); or
- The contractor is an FSC-certified organization that includes documented procedures for outsourcing services within the scope of its certificate.

If the organization wants to include new high-risk contractors in its certificate scope in the period between evaluations, a physical inspection of a sample of the new contractors shall be conducted according to the sampling criteria.

3.2.2.2 Multi-site certification

Bureau Veritas Certification will evaluate a sample of sites to be audited in compliance with the FSC™ standard.

For each audit, the number of sites to be sampled is given by the formula:

$$Y = R_1\sqrt{X_1} + R_1\sqrt{X_2} + R_2\sqrt{X_3}$$

Y : Number of participating site to be audited (rounded to the next whole number)

R₁ et R₂ : Risk indexes

X₁ : Number of normal-risk participating sites

X₂ : Number of high-risk participating sites

X₃ : Number of new normal-risk or high-risk participating sites to be added to the certificate scope

A high-risk participating site is a participating site operating a controlled wood verification program or due diligence system according to FSC-STD-40-005, a supplier audit program for reclaimed materials according to FSC-STD-40-007, or high-risk outsourcing to a non-FSC-certified contractor.

A normal-risk participating site is a participating site that does not conduct any of the activities considered 'high risk' above.

The risk index is calculated each year and depends on the performance of Central Desk and following this matrix:

RISK FACTOR		Score	Score Given
Ownership	All participating sites have common ownership	0.1	
	Participating sites do not have common ownership	0.2	
Certificate size	0–20 participating sites	0.2	
	21–100 participating sites	0.3	
	101–250 participating sites	0.4	
	251–400 participating sites	0.5	
	> 400 participating sites	0.6	
Central office's performance	No CAR issued to the central office in the previous evaluation	0.1	
	Not applicable (there was no previous evaluation)	0.1	
	Only minor CARs in the previous evaluation	0.2	
	1–2 major CARs in the previous evaluation	0.3	
	3 or more major CARs in the previous evaluation	0.4	
Audit type	Annual surveillance evaluation	0.1	
	Re-evaluation	0.2	
	Main evaluation	0.3	
	Audit for inclusion of new participating sites in the certificate	0.3	
TOTAL (R = sum of the scores given)			Σ

If new participating sites are being added to the scope of a multisite or group certificate at the time of a surveillance evaluation or re-evaluation, they shall be considered as an independent set for the determination of the sample size. After inclusion of new participating sites in the certificate scope, the new participating sites shall be added to the existing ones to determine the sample size for future surveillance evaluations or re-evaluations.

An increase or decrease in the Participating Sites of a group certification is not considered a change of scope unless, in the opinion of Bureau Veritas Certification, the change requires significant changes to the group certification holder's management systems.

3.2.2.3 Field verifications

Depending on the activity of the Company, audits at the supplier level or at the forest level will have to be conducted by Bureau Veritas Certification.

Suppliers of reclaimed materials

If Company has a supplier audit program in compliance with the requirements of FSC-STD-40-007, Bureau Veritas Certification shall carry out annual on-site verification audits of the supplier sites, unless the organization's supplier audits were out by another FSC accredited certification body.

For each audit, the number of suppliers to be sampled is given by the formula:

$$y = 0.8 * \sqrt{x} \text{ (rounded to the next whole number)}$$

With x : number of suppliers audited by the participating site in the current evaluation period

For group and multisite certificates, the calculation of the supplier audit sample shall be conducted at the participating-site level

Forest evaluation

Bureau Veritas Certification may have to conduct forest audits in order to evaluate the relevance, effectiveness and adequacy of DDS conducted by companies applying the FSC-STD-40-005.

The number of supply units to be sampled will be given each year by Bureau Veritas Certification depending on the risk level to be evaluated.

Suppliers or sub-suppliers of non-certified materials

Bureau Veritas Certification may have to conduct audit of suppliers or sub-suppliers in order to evaluate the risk mitigation related to the mixing of material from non-eligible inputs for companies that apply the FSC-STD-40-005.

The number of suppliers or sub-suppliers to be sampled will be given each year by Bureau Veritas Certification.

3.2.2.4 Organizations concerned by FSC-SFD-40-005

Additional auditing time will be evaluated for:

- On site evaluation
- Stakeholders consultation

Stakeholders consultation has to be conducted by Bureau Veritas Certification for initial audit or renewal audit of companies applying the requirements of FSC-STD-40-005 and for surveillance audits when material is sourced from unassessed, specified or unspecified risk areas.

Additional time of audit will be evaluated for this process.

- Off site evaluation

3.2.3 General and specific condition for certification services

Together with the offer (SF01) are sent the General Conditions for Certification Services (SF05) and the Specific Condition for FSC Certification (SF05 part II). These conditions as the present GP01 document are part of the contractual agreement.

3.3 Contract

When Bureau Veritas Certification's proposal is sent back signed: the proposal becomes a contract between the company and Bureau Veritas Certification.

At this precise part of the certification process, the company is called the applicant for certification. The optional pre-audit realization shall be validated at this step.

4 Audit preparation

Bureau Veritas Certification and the applicant have to find an agreement on the audit team's timetable and composition to prepare the pre-audit (if applicable) and the initial audit. Also the audit scope shall be defined and proposed by the applicant to Bureau Veritas Certification. This scope will be validated during the auditing process.

The applicant can ask for a revision of the audit team composition to avoid any conflict of interest between the company and one or several audit team members. Bureau Veritas Certification reserves the audit team composition final choice.

The audit preparation is finalized and presented to the applicant. The documents that will have to be examined before the audit according to the audit scope are requested and shall be provided in a reasonably agreed timeframe.

4.1 Bureau Veritas Certification FSC CoC Auditors

4.1.1 Auditor's qualification

Bureau Veritas Certification works with Forest-Wood industry specialists, in order to honour the following points:

- Independence
- Mastering of the process and industrial techniques
- Industry knowledge

To be considered as a Bureau Veritas Certification auditor, these specialists shall:

- Prove a technical competence and a professional experience in the wood industry field;
- Have followed a specific training for the audit and FSC normative documents;
- Have validated that training by having achieved at least three audits.

For audits realization, specialist auditors are designated according to the 3 following criteria:

- Competence in the Company's field of activity;
- Nearness of the Company's offices;
- Availability on the certification dates wished by the Company.

Bureau Veritas Certification auditor cultivates a pragmatic and efficient approach. Priority is given to the evaluation of the FSC Chain of Custody system as a tool allowing the company to master its activities and to improve them.

4.1.2 Audit team composition

An audit team is formed of at least one Bureau Veritas Certification lead auditor, sometimes helped by other auditors or consultants.

The auditors shall sign a non-disclosure agreement to protect the applicant's details.

If particular competences field is needed, Bureau Veritas Certification may call on specialist consultants / experts who come with the adapted skills.

5 Pre-Audit

5.1 Pre-audit interest and realization

The pre-audit stage gives the opportunity to precise the scope of audit by identifying the industrial process implemented as well as the critical monitoring points, and to demonstrate how is managed the audit by our services. A gap analysis is realized between the monitoring/managerial system and the requirements of the FSC Chain of Custody standard. Consequently, the applicant can decide when to proceed to the next step.

That step is not compulsory in the certification process; nevertheless it becomes necessary when the industrial process is complex or when the company to be evaluated is important. The pre-audit is mostly carried out by the auditor who will be the future main audit manager.

A pre-audit report is given to the applicant; it specifies the opportunities for improvement which can be implemented before the initial audit. The time limit to carry out these actions between the pre-audit and the initial main audit shall not exceed one year.

5.2 Opportunity for Improvement

On the pre-audit report basis, the applicant for certification sets up updating actions in order to find a solution to dysfunctional points identified during pre-audit.

The applicant then notifies Bureau Veritas Certification by mail that the updating actions have been carried out and Bureau Veritas Certification appoints an audit team to prepare the main audit. A period of about 3 weeks is necessary for that stage.

6 Main Audit

6.1 Certification Audit Plan

In reasonable timelines, Bureau Veritas Certification sends to the Company a looking forward intervention program which specifies the schedule and the scope of the evaluation.

6.2 Main audit realization

6.2.1 Opening meeting

At the beginning of the audit an opening meeting is organized by the lead auditor to:

- Confirm the certification scope (definition of the Chain of custody managed by the applicant and precise listing of the product groups and species into the CoC.)
- Present the team and audit programme
- Confirm the audit plan and logistic according to the latest changes that the Company may have done.

The presence of the Company's managers and heads of departments is necessary during that meeting so that they can clearly perceive the way in which the audit will take place and thus be able to inform their staff.

Company managers are invited to have a clear view of the audit course and schedule. Therefore they can inform their colleagues and help in the audit course fluency.

6.2.2 Audit course

First the audit team checks company's documents, then inspect the applicant's office and production site. The audit team will assess respectively the managerial process and the operational monitoring implemented by the applicant against the FSC™ standard applicable within the audit scope. Employee interviews are held in accordance with the audit scope. If necessary outside participants may be interviewed (suppliers, subcontractors...).

Audit team will also check the coherence between the products and the audit scope and a coherence checking between input and output as well.

Ongoing problems within the CoC and proposition of corrective actions can be discussed with the auditor who will not give solutions but just inform the applicant if the corrective actions are pertinent.

6.2.3 Closing meeting

The Lead Auditor organizes a closing meeting at the end of the audit. It gathers, as far as possible, the same people as those who were present at the opening meeting.

That meeting enables to present the audit results and its conclusions, as well as handing in the nonconformity reports and to have the audit conclusions signed.

Despite the audit will present the Non-Conformities (NC) during the closing meeting, the final wording and grading of all NC will be submitted by Bureau Veritas Certification offices together with the finalized audit report resulting from the certification decision.

Then, the lead auditor gives to the applicant a copy of the nonconformity reports signed.

At that stage, the initial audit results only expose the noted situation and facts, they do not allow a certificate allocation decision.

The audit team produces a temporary initial audit report and submits it to the Bureau Veritas Certification technical manager concerned. The audit report is reviewed by Bureau Veritas Certification, then this revised report is transmitted to the applicant.

6.3 Nonconformities and Corrective Actions

6.3.1 Nonconformities

It's the dysfunctions part of the process which are not compliant with the requirements of the applicable standard(s) that are formalized on a nonconformity report (SF02).

Nonconformities shall always meet the following 3 criteria:

- Being objective and argued based on the relevant standard requirement;
- Being based on facts and evidences. No presumptions, wishes or discriminatory argue is acceptable; Being understood and accepted by the Company.

According to their importance, nonconformities are balanced as:

Minor nonconformity: It's an unusual and non-systematic failure regarding the applicable requirements. It's not to result in a fundamental failure to achieve the objective of the chain of custody requirement. If the minor nonconformity is not corrected in the proper timelines, it shall be upgraded to a Major non conformity level. Also, a number of recurrent minor non-conformity against a requirement can be considered as a permanent breakdown of the chain of custody system and thus be considered as a Major non conformity.

The entity can be certified but it must put itself in conformity with the requirements in question within the year following the initial audit.

Major nonconformity: It's a repeated or systematic failure generating a fundamental failure to achieve the objective of the relevant requirement. This non conformity endangers the liability of the operating Chain of Custody.

The entity cannot be certified as long as it does not meet the requirements in question and a complementary audit specific to major NC can take place before any certification decision if necessary.

If the major nonconformity damages the image of FSC, it may lead to direct suspension or withdrawal of the certificate (e.g. absence of implementation of the Controlled Wood requirements while some non-certified material is mixed with FSC certified material).

If five (5) or more Major non conformities are raised during a surveillance audit, the certificate will be suspended within 10 (10) days of the certification decision being taken until the major non conformities are closed.

Major non-conformities shall not be downgraded to minor non-conformities.

The absence of valid License Agreement for the FSC certification scheme will be treated as a major Non-Conformity and the client will be requested to correct the NC within a maximum period of two (2) months. If this NC is not closed by 2 months, it will lead to the suspension of certification.

6.3.2 Corrective Actions timeframes and upgrading

The corrective action shall answer the non-conformity and avoid any recurrence in the future. The applicant can start corrective actions to close the nonconformities as soon as the nonconformity reports are signed. The corrective action request timelines commence from the moment when they are formally presented to the client and no later than 3 months from the audit closing date.

Bureau Veritas Certification will inform the client if the closure of NC involves an additional audit on site to assess the corrective and preventive actions carried out by the client.

The Non-conformities closing shall have the following timeframes:

- a) Minor nonconformity shall be corrected within the maximum period of one (1) year (under exceptional and justified circumstances the timeline may be extended to two (2) years);
- b) Major nonconformity shall be corrected by organization within **seventy-five (75) days in order to be closed within ninety (90) days by Bureau Veritas Certification** (under exceptional and justified circumstances within six (6) months).

NOTE: Action(s) taken to correct a Major nonconformity may continue over a period of time which is longer than three (3) months. However, action must be taken within the specified period which is sufficient to prevent new instances of nonconformity within the scope of the certification.

The Audit Team shall determine whether Corrective Action have been appropriately implemented within their timeframes. If the action taken is not considered adequate, then:

- a) Minor nonconformity shall become 'Major' nonconformity and shall be corrected within a maximum period **seventy-five (75) days in order to be closed within ninety (90) days by Bureau Veritas Certification** (or in exceptional and justified circumstances six (6) months).
- b) Major nonconformity shall lead to immediate suspension of the certificate.

7 Certification

7.1 Certification Decision

Certification decision is taken regarding audit documentation (e.g. audit report, checklists, NC reports, annexes). Usually, the certification decision process takes 1 month to 1,5 month, depending on the complexity of the applicant's organization.

Bureau Veritas Certification communicates certification decisions to the client maximum: six (6) months after the main evaluation in the case of chain of custody evaluations after the main evaluation.

In case of negative certification decision, Bureau Veritas Certification provides the reasons for this decision to the client.

7.2 Certificate Issuance

When the certificate issuance is approved, a numbered certificate is issued, and the applicant becomes a FSC Certificate Holder.

The period of validity of a certificate is five (5) years. It may be extended for a single exceptional extension of up to six (6) months in order to permit re-evaluation to be completed, when justified by circumstances¹ beyond the control of the client and Bureau Veritas Certification. The client shall record such circumstances and provide it to Bureau Veritas Certification to be able to record it in its own FSC management system and update the entry in the FSC data base (info.fsc.org).

When the certificate is issued, the company can communicate on its certification and use the FSC label for promotional use or on-product labelling in accordance with trademark usage relevant standards.

8 Specific process: Evaluation of FSC Controlled Wood according to FSC-STD-40-003

Companies that source material without a FSC claim in order to sell it as FSC Controlled Wood or use it in the production of products with the FSC Mix label have to be in compliance with the requirements of the standard FSC-STD-40-005. This standard outlines the requirements for a due diligence system (DDS) for FSC Chain of Custody certified organizations in order to avoid material from unacceptable sources.

Bureau Veritas Certification will study the relevance, effectiveness and adequacy of DDS put in place by the organization as well as the risk assessments and control measures carried out by the organization in order to avoid material from unacceptable sources.

This evaluation will be led in 2 steps:

8.1 Off site evaluation

The process starts with an off site evaluation of the information provided by the applicant to verify that such information is complete, consistent, accurate, trustworthy and reliable.

A list of documents will be asked to the organization, including its written summary of DDS and its Chain of Custody procedures.

This documentation will be evaluated in order to evaluate relevance and adequacy of the DDS.

In parallel, a stakeholder consultation will be carried out by Bureau Veritas Certification.

Risk assessments conducted by the organization for its existing supply areas will be evaluated as well as the adequacy of control measures decided by the organization as part of risk mitigation.

At the end of the Off site evaluation step, Bureau Veritas Certification will have:

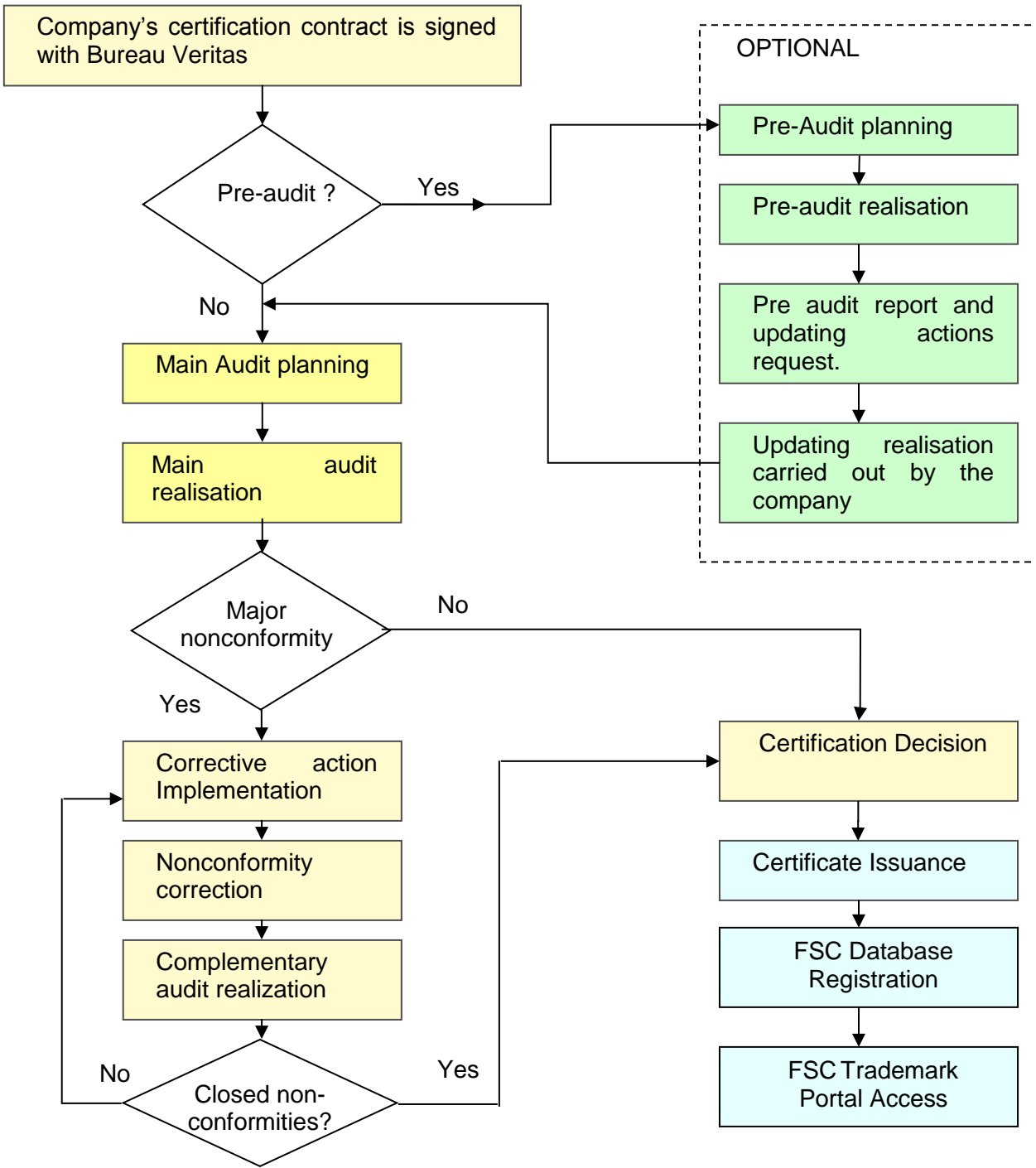
- Evaluated the DDS procedure;
- Approbated Risk assessments;
- Given instructions for the on site evaluation with a sampling (field verification at forest level or supplier/sub supplier level, control measures to be verified, documents to be sampled on site) and specific instructions.

8.2 On site evaluation

During On site audit step, Bureau Veritas Certification will have to evaluate the effectiveness of DDS on the basis of operational aspects, by sampling some documentation related to non-certified supplies, through interviews and, when applicable, forest evaluation, suppliers / sub suppliers evaluation.

¹ Justifiable circumstances for an extension exclude problems in planning or scheduling an audit.

9 Certification process synthesis



10 Certification Maintenance

10.1 Surveillance Audits

The objective of surveillance audit is to monitor the client's continued conformance to all applicable certification requirements.

The surveillance audit shall be performed at least annually.

If 5 or more major NCs are issued, the certificate is suspended within ten (10) days of the certification decision being taken.

NOTE: In the context of surveillance "annually" is to be interpreted as follows: at least once per calendar year, but not later than 15 months after the last audit (determined by the date of the on-site audit or desk audit).

During the certificate period of validity, if Bureau Veritas Certification notices major nonconformities entailing major corrective actions requests, the certificate may be suspended until the company implements the appropriate measures to be compliant.

Once per year, before the surveillance audit, the certified company shall provide Bureau Veritas Certification the list of "FSC certified products" purchased and sold with, when applicable, species, quantity and suppliers. The information is considered as strictly confidential.

If the certificate holder would like to include a new product in its FSC product group list, the related product description shall be provided to Bureau Veritas Certification and formally asked to be included into the certification scope.

10.2 Re-certification Audit

During this audit Bureau Veritas Certification makes a complete evaluation as a Main audit.

In order to reduce the risk of gap between two (2) certification periods, the certification holder is supposed to ask for re-accreditation at least six (6) months before the certificate validity expires.

10.3 Certificate Scope modification

The scope of the certificate can be modified (extended or reduced) under request of each parties (Bureau Veritas Certification or the certificate holder).

In case of scope extension, Bureau Veritas Certification reserves the right to inspect the site of the certificate holder. Any scope modification cannot extend the validity period of the certificate.

11 Trademark use management system

Prior to each new use of the FSC trademarks, the organization shall ensure trademark use control by implementing an internal trademark approval process or by receiving external approval from Bureau Veritas Certification.

The organization may ask Bureau Veritas Certification for being granted the status of "FSC trademark self-approver".

Instead of submitting all intended uses of FSC trademarks to Bureau Veritas Certification for approval, the organization may implement its own trademark use management system with an internal control system. This system shall be approved by the Bureau Veritas Certification before the organization may start using it. Organization shall ask Bureau Veritas for the procedure to comply with in order to obtain the status of "FSC trademark self-approver".

12 Certification Costs

12.1 Certification process cost

The costs of the certification process include:

Administrative fees

The audits preparation: Gathering of the applicants' information and a planning of the operations (audit team constitution, stakeholders' preliminary consultation, diverse documents realization, and communication to the applicant).

Audits cost: (pre-audit, initial audit, complementary audit and surveillance audit) correspond to the evaluation time, on the field, of the audit team

Audit Reporting cost: It depends on the evaluation length and the number of auditors involved.

FSC AAF fees: which is linked to the certification according to the annual turnover of the certificate holder. When the certificate is granted, an annual fee is invoiced and payable annually by the certified organizations, calculated according to the company's turnover (global Wood & fiber related turnover). That fee is set by a price list attached in the contract.

Traveling and accommodation costs: During the audits, the auditors traveling and accommodation costs are charged to the applicant or the certified organization as pre-agreed at a fixed rate or at cost.

FSC trademark use validation: Bureau Veritas Certification will invoice to certificate holder FSC trademark approval fees as defined in the contract.

Scope and certification modification fees: It includes any modification on FSC website and (or) the certificate. The cost shall be charged according to the contract with certificate holder.

13 Certificate: Suspension/Withdrawal, Scope modification

In case of disrespect of the certification rules or damage on the FSC™ image some disciplinary measure will be engaged.

For example: Absence of major corrective action implementation in the defined timelines

The Certification committee then takes the suspension decision depending on the importance of the nonconformity. Evidence of a deliberate non conform status

In case of serious and indisputable failure to comply with the requirements of the standards, Bureau Veritas Certification remains authorized to suspend the certificate, temporarily and without consulting the Certification committee.

Bureau Veritas Certification will suspend certification at latest 3 months after the closing meeting of a surveillance audit if a certification decision to maintain the certification cannot be taken due to circumstances beyond its control (for example if client or other parties prevent from the use of audit findings and/or delayed or declined acceptance of audit findings...)

In order to cancel a certificate suspension, a complementary audit (documentary or onsite audit) shall be conducted in order to verify the carrying out of the requested corrective action(s).

A FSC certificate cannot be suspended for more than twelve (12) months. After this 12-month suspension, the certificate will be terminated. Upon justified and exceptional circumstances the suspension period may be extended to six (6) additional months to allow the client to correct nonconformities. In that case, to lift the suspension a surveillance audit and a positive certification decision will have to be performed.

In the particular condition of FSC™ AAF payment, if the certificate holder refuses to pay the fees, the certificate will be suspended and if no action is taken by the Certificate holder, the certificate will be withdrawn after 3 month of suspension. A suspended certificate doesn't give the allowance to sell any FSC™ certified products.

If the certificate is suspended or withdrawn, the organization shall remove all FSC™ Trademark uses within 3 months after certificate termination.

Bureau Veritas Certification shall not be obliged to grant or maintain certification, if activities of the company conflict with the obligations of Bureau Veritas Certification as specified in its accreditation contract with ASI, or which, in the sole opinion of Bureau Veritas Certification, reflect badly on the good name of Bureau Veritas Certification.

14 Complaints and Appeals process

14.1 Complaints

It's a formal expression of dissatisfaction relating to the activities of Bureau Veritas Certification and/or its subsidiaries.

The formal complaint shall be transmitted to Bureau Veritas Certification Local Office (LO).

Client can refer its complaint to Bureau Veritas Certification's policy for Complaints and Appeals Management for forest & wood certification.

Complaints could be registered directly on-line by the complainant on Bureau Veritas Certification website, or directly on the Bureau Veritas Certification local office's.

14.2 Appeals:

An appeal can be initiated if the appellant against either Bureau Veritas Certification or and/or its subsidiaries don't agree with:

- a decision made by Bureau Veritas Certification
- a grade of NCR and no agreement possible between the auditor and the client

- a NCR raised and no agreement possible between the auditor and the client
- a rejection of corrective action proposed by the client and no agreement between the auditor and the client
- a decision made by Bureau Veritas Certification following the management of its complaint

In case of appeal, the formal appeal shall be transmitted to Bureau Veritas Certification FSC Hub Office.

15 Applicable Standards

15.1 FSC-STD-40-004

To demonstrate efficiency of the chain of custody implemented in the company, compliance with the FSC-STD-40-004 applicable version shall be demonstrated.

The FSC-STD-40-004 has to be respected in all sites concerned by the certification scope.

15.2 FSC-STD-40-005

If the company would like to mix non FSC certified material with FSC certified material, in order to produce "FSC Mix" certified products and to ensure the credibility of the system, compliance with the FSC-STD-40-005 shall be demonstrated in addition with the Chain of Custody standard.

15.3 FSC-STD-40-003

In case of multiple site certifications, the applicant has to designate the Central Office which shall centralize and manage the different chains of custody operations involved in the group and multi-sites. Compliance with this standard shall be demonstrated in case of group and multi-site scheme and chain of custody standard applied in every site involved in the certification scope.

15.4 FSC-STD-40-007

If the product output to be included in the scope of certification is issued from reclaimed material, the sourcing of this material shall be assessed against FSC-STD-40-007 standard in addition with Chain of Custody standard.

16 Confidentiality

The Bureau Veritas Certification office staff and its auditors commit themselves to deal in a strictly confidential manner with any information or any documents which they get know n during audits.

The confidentiality can be invalid in the following conditions:

- Legal appeal.
- Written agreement granted by the Company.

Bureau Veritas Certification is responsible for the management of all information obtained or created during the performance of certification activities. Information is considered proprietary and shall be regarded as confidential, except for information that the client makes or is required to make publicly available, that FSC and ASI are entitled to access, or when agreed between the Bureau Veritas Certification and the client (e.g. for the purpose of responding to complaints).

The company ensures to Bureau Veritas Certification, ASI and to the FSC a free access to the persons and bodies providing outsourcing services to the client, the sites, relevant equipment, location(s), areas, the documents and confidential information during the certificate validity period and, if a complaint requires extra information, after a certificate suspension or withdrawal.

17 Observer's participation to audit

Bureau Veritas Certification can be led to associate observers to its Certification or monitoring audits. These observers can be:

- Bureau Veritas Certification in-house auditors (within the scope of Bureau Veritas Certification in-house audit activities)
- Bureau Veritas Certification International in-house auditors (Bureau Veritas Certification in-house audit by Bureau Veritas Certification International network)
- Bureau Veritas Certification auditors in training
- ASI auditors (Accreditation Services International - Accreditation Organization for FSC) (at the time of a Bureau Veritas Certification audit within the scope of accreditation programs)

The company has to accept the presence of an accreditation organization representative during Bureau Veritas Certification audits. In the other cases, the observer's presence is submitted to the Company's agreement.

18 Management of change

The company must inform Bureau Veritas Certification within ten (10) days of changes in the ownership, structure of the organization (e.g. changes in key managerial staff), certified management systems or circumstances which relate to the implementation of FSC certification requirements.

A change of scope may be necessary as a result of changes in ownership, structure of the organization, or management systems.

If a standard is revised, Bureau Veritas Certification will contact the client and communicate the actions to be done to get the certification against the new standard revised. Clients that were certified prior to the effective date of approval of a new or revised applicable FSC normative document shall be audited against the requirements of the new or revised document in accordance with the applicable transition requirements.