



RRSS SCH001

Scheme Management & Certification Rules

Version 1.0



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1. Introduction

1.1. International Multi-stakeholder Association for Reptile Conservation (IMARC)

The IMARC collaboration is oriented by its vision for a reptile skin trade that maintains wild reptile populations, supports local and national economies, and promotes animal welfare principles. IMARC operates as a technical platform for a multi-stakeholder mission to advance responsible and transparent supply chains of reptile skins from around the world and drive improvements in the trade's operating environment.

Objectives:

- Understand and assess worldwide reptile skin supply chains used by participating luxury brands;
- Evidence legal trade, offtake that maintains wild populations and humane treatment of species;
- Demonstrate good practice labor conditions and operational management in supply chains;
- Ensure a viable, long-term trade with positive livelihood impacts; and
- Develop and facilitate collaborative actions and multi-stakeholder engagement to promote sustainable, fair, and humane practices in supply chains, such as capacity building and assurance programs.

1.2. The RRSS

The RRSS was initiated by IMARC and developed in collaboration with a multidisciplinary consortium of specialist organizations and experts. Representatives included government agencies, social, environmental, and animal welfare NGOs, agricultural specialists, conservation scientists and commercial stakeholders, including representatives from producer states.

Ensuring high standards of welfare within the reptile skin trade is one of IMARC's key objectives. To do this, IMARC has worked to provide guidance and capacity development to stakeholders in trade in science-based animal welfare practices.

In 2018, in partnership with the Swiss Federal Veterinary Office (SFVO), IMARC published "Welfare Principles for Snakes and Monitor Lizards in the Southeast Asian Skin Trade". This guide was written specifically for stakeholders engaged in the Asian reptile skin trade, with a focus on the main lizard and snake (squamate reptiles) species currently involved in the trade. The guide is primarily intended to help stakeholders who have no coherent access to the large volume of information and skill necessary for the implementation of Science-based Animal Welfare (SBAW) standards. It provides practical guidance as well as a summary of how the trade currently works and was produced and underwent review by international experts in reptile biology, welfare, and veterinary care.

Based on this guide, the RRSS was established after field testing and three stakeholder consultation processes on Animal Welfare, Responsible Business Practice, Social Responsibility and Environmental Responsibility involving brands, tanneries, traders, hunters, farmers, collectors, NGOs, veterinarians, scientists, and local authorities.



1.3. Link between IMARC membership status and RRSS audits and outcome

IMARC members have provided the financial support to gather the right expertise able to develop the RRSS and agreed to participate in a continuous improvement process to achieve the five claims set out in IMARC's mission.

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2. RRSS Certification Scope

The RRSS certification is primarily applicable to entities that are direct suppliers of lizard and snake skins to a tannery, but can be extended to upstream supply chain nodes:

- Lizard and snake farms
- Lizard and snake processing facilities

RRSS certification can only be issued by an approved Certification Body.

The RRSS due diligence process is applicable to the direct suppliers' upstream supply chain nodes:

- Lizard and snake farms
- Lizard and snake processing facilities
- Lizard and snake transporters
- Lizard and snake harvesters

RRSS due diligence for farms and processing facilities is performed by the entities themselves who undergo a self-assessment.

RRSS due diligence for transporters and harvesters is performed by a second-party or a third-party auditor.

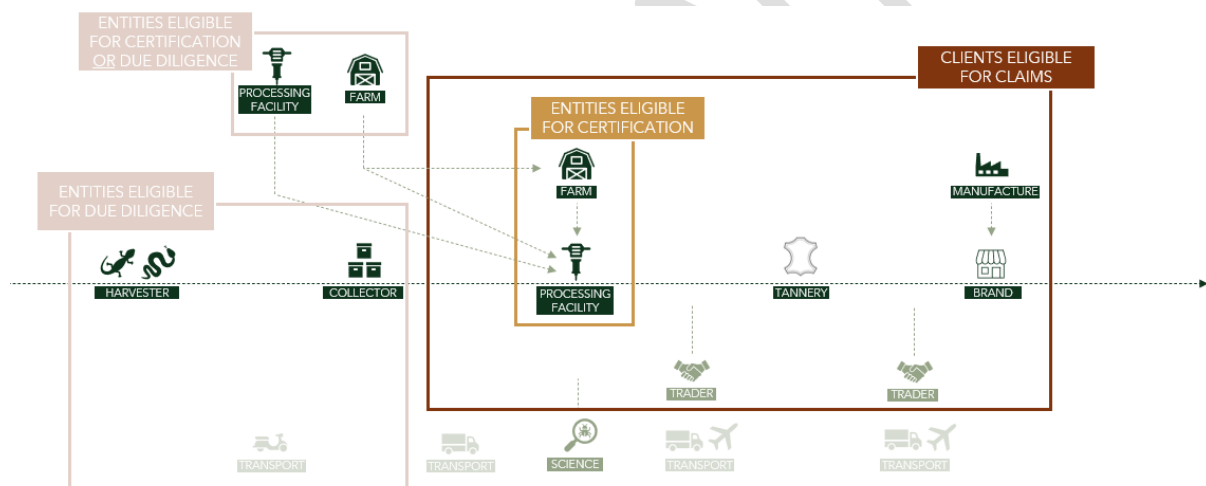


Image 1: Detailing the scope of the RRSS at different supply chain nodes within the reptile skin trade.

To obtain or maintain certification, the applicant or RRSS certified entity shall:

1. Apply to the Scheme Administrator for certification;
2. Commit to respect the Scheme Management and Certification Rules and Technical Requirements set in the RRSS at all times;
3. Appoint an approved Certification Body;
4. Undergo a certification audit that demonstrates that the entity has fully met, as a minimum, all the Critical requirements and substantially met, as a minimum, 50% of the Major and Good requirements set in the RRSS;
5. Pay all audit fees;
6. Undergo surveillance audits between certification validity periods to demonstrate continuous respect of the Technical Requirements set in the RRSS.
7. Only make claims regarding their certification that are consistent with the scope of the certificate and claims agreement.



To undergo due diligence:

- All lizard and snake farms and processing facilities that supply certified entities undergo a self-assessment against the critical requirements of the RRSS.
- Transporters are selected based on a sampling technique managed by their downstream supply chain.
- Harvesters are selected based on a sampling technique managed by their downstream supply chain.

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3. Scheme Management Rules

3.1. Scheme Owner

The Scheme Owner is IMARC (International Multistakeholder Association for Reptile Conservation), an Association de Loi 1901 with SIRET # 933 072 944 00012.

The Scheme Owner is responsible for:

- Developing and adopting the Scheme Management Rules, and ensuring adoption of the Certification Rules and the Technical Requirements;
- Calling for a Version or Edition Update and participating in the update process;
- Publishing and informing all parties of the adopted Certification Rules and Technical Requirements;
- Ensuring that the scheme is developed and maintained by persons competent in both technical and assessment aspects by
 - o Identifying and appointing the experts that constitute the Technical Advisory Committee (TAC) in line with the agreed TAC Terms of Reference
 - o Identifying the stakeholders that are part of the stakeholder consultation process to;
- Identifying, appointing and training the approved Certification Body and approving auditors;
- Funding all parties contracted by the Scheme Owner that contribute to the development, update and adoption of the Scheme Management and Certification Rules, and the Technical Requirements.

All activities can be subcontracted by the Scheme Owner.

3.2. Scheme Developer

The Scheme Developer is Baltic Academy ApS a company incorporated under the laws of Denmark registered under the number 43480642 (CVR and VAT No).

The Scheme Developer is responsible for :

- Contracting with the Scheme Owner to develop the Technical Requirements and the Scheme Management and Certification Rules;
- Contracting with, presiding and managing the TAC experts for version updates, following identification and appointment by the Scheme Owner;
- Contracting with Stakeholders and managing the Stakeholder Consultation Process, following identification and appointment by the Scheme Owner;
- Ensuring that the Scheme Management and Certification Rules and the Technical Requirements align with the ISO 17065 and ISEAL Code.



3.3. Scheme Administrator

The Scheme Owner can choose to either appoint a Scheme Administrator or carry out these responsibilities directly.

The Scheme Administrator is responsible for:

- Collecting applications and managing surveillance of certified entities;
- Managing the identified and approved Certification Body by the Scheme Owner to ensure smooth certification audit operations;
- Providing monthly certification updates to the Scheme Owner;
- In collaboration with the approved Certification Body, assessing yearly the quality of the certification scheme and share it during a meeting with the Scheme Owner;
- Publishing the certificates on a secured platform accessible to IMARC members only;
- Collecting feedback, including complaints, on the scheme and the certified entities;
- Monitoring adherence of the certification audit fees applied to applicants and certified entities by the approved Certification Body.

3.4. Certification Body

The Scheme Owner shall appoint one or more Certification Body(ies).

The Certification Body is responsible for :

- Employing/Contracting auditors with the right expertise and experience required to perform audits against the RRSS;
- Training and calibrating employed/contracted auditors throughout their RRSS auditing activities;
- Assessing yearly auditors' performance and quality as well as the quality of the certification scheme, to share it during a meeting with the Scheme Owner;
- Conducting certification audits
- Performing systematic technical reviews of the audit reports;
- Issuing Certificates to certified entities following technical review;
- Deciding, in consultation with the Scheme Owner, on the termination, withdrawal or suspension of certification of a certified entity;
- Transparently sharing and applying reasonable audit certification costs that shall be shared with the Scheme Owner and the Scheme Administrator.

3.5. Applicants

Applicants to the RRSS Certification Scheme shall be farms or processing facilities handling lizards and / or snakes destined for the reptile skin trade.

The scope of the certification shall cover all farmed or processed squamates, whether lizards, snakes or both.

Applicants are encouraged, though not required, to be IMARC Business Members. Only IMARC Business Members can access preparatory material prior to a certification audit.



3.6. Certified Entities

Certified entities can be farms or processing facilities handling lizards and / or snakes for the reptile skin trade that meet both of the following criteria:

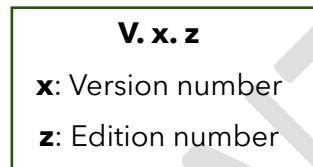
- They have been certified by an approved Certification Body following a successful RRSS certification audit, and
- The certificate is still valid (i.e. has not expired, been suspended, withdrawn or terminated).

Certified entities are responsible for ensuring the continuous respect of the Technical Requirements laid out in the RRSS.

3.7. Scheme Updates

3.7.1. Scheme Structure

The Scheme is composed of a Version and an Edition, defined with a numeric code as per below:



3.7.2. Scheme Update Rules

The Scheme is expected to be updated:

- Version: every 5 years as a minimum
- Edition: whenever required

Version updates cover substantial changes in the Technical Requirements and Certification Rules. Version updates are requested by the Scheme Owner or imposed by the update timeline.

Version updates aim to confirm that assurance benefits are being realized and to identify aspects requiring improvement, taking into account feedback, including complaints against the scheme, from interested parties. The review will also include provisions for ensuring that the scheme is being applied in a consistent manner.

Version updates require a stakeholder consultation period as well as the written sign-off from the Technical Advisory Committee (TAC).

Edition updates cover insignificant changes to the Technical Requirements and Certification Rules, as well as Scheme Management Rules updates. Edition updates are requested by the Scheme Owner and require the written sign-off from the Scheme Owner.



3.7.3. Scheme Update Transition Period

Every **Version update** can lead to substantial changes to the Technical Requirements and Certification Rules for which applicants and certified entities require some time to align with the new version. Therefore, applicants and certified entities benefit from a **transition period of 90 calendar days from the official publication date of the new version**. During the transition period, applicants and certified entities that are subject to a certification audit, or a surveillance audit can choose to be audited against the previous version or the newly updated version. Once the transition period has expired, all applicants and certified entities can only be audited against the new version.

Edition updates lead to insignificant changes to the Technical Requirements, Scheme Management and Certification Rules. Therefore all **new Editions are applicable, by default, from the official publication date**. The Scheme Owner can decide, on a case-by-case basis, to add a transition period.

3.7.4. Standard Structure

The Technical Requirements are organized into Principles and subdivided into Chapters, each indicating the Desired Outcome.

The Compliance Level and applicable scopes are detailed for each requirement. Unless explicitly stated each requirement is applicable for the reptile and entity indicated.

Against each requirement there is an audit guide that indicates what type of evidence will be sought to demonstrate compliance. This evidence is split between Observations, Interviews and Documents & Records.

Reference	Requirement Audit Guide	Level	Scope	
			Reptile	Entity
2.1.1. GENERAL				
2.1.1.1.	HEADING Requirement wording.....	C	ALL	ALL
	Observations: No evidence of....	M	Lizards	Processing Facilities
	Interviews: Personnel demonstrate an understanding of.....	G	Snakes	Farms
	Documents & Records: Records clearly indicate.... N/A permitted if.....	S	Aquatic Snakes	



4. Certification Rules

4.1. Technical Requirements

The Technical Requirements are composed of criteria called "requirements".

4.1.1. Principles

The Technical Requirements are classified into the following four Principles:

Principle 1 - Responsible Business Practice

Processing facilities and farms conduct business in a transparent manner that complies with applicable laws, with respect to human rights and wildlife conservation, and build trust and credibility among workers, communities, and other stakeholders.

Principle 2 - Animal Welfare

Processing facilities and farms conduct business in a way that ensures high standards of animal welfare during capture, transport, captive breeding, and processing with reference to the Five Domains Model for animal welfare.

Principle 3 - Social Responsibility

Processing facilities and farms engage with workers, stakeholders, and rights holders to maintain or enhance the health, safety, cultural values, quality of life and livelihoods of workers and affected communities.

Principle 4 - Environmental Responsibility

Processing facilities and farms engage with stakeholders to ensure that trade is planned and carried out in a manner that maintains biodiversity and ecological integrity, avoids, or minimizes negative environmental impacts and identifies and enhances positive environmental contributions.

4.1.2. Scope

Applicants for RRSS certification and RRSS certified entities are audited against all the requirements set in the RRSS Technical Requirements, except for those defined as "non applicable".

4.1.3. Compliance and Achievement Levels

Each requirement is assigned a compliance level and is assessed against a level of achievement:

Compliance level:

- Critical
- Major
- Good practice
- Star

Achievement level:

- Fully meets
- Substantially meets
- Does not meet



4.1.4. Certification and + Impact Levels

Description

The **Certification Levels** recognize the applicant's or RRSS certified entity's conformance against the Critical, Major and Good Practice Compliance Level requirements and demonstrate the entity's ability to mitigate risks in each of the four Principles.

The **+ Impact Level** recognizes the applicant's or RRSS certified entity's conformance against the Star Compliance Level requirements and demonstrates the entity's ability to generate positive impact, regardless of the Certification level achieved.

The certification audit can lead to the following 8 combinations of **Certification and + Impact Levels**:

1. Not certified
2. + Impact Only
3. Certified Bronze
4. Certified Bronze + Impact
5. Certified Silver
6. Certified Silver + Impact
7. Certified Gold
8. Certified Gold + Impact

Methodology

Certification and + Impact Levels are defined based on the following results:

	Critical (C)	Major (M)	Good (G)	Star (S)
Not certified	< 100%	N/A	N/A	N/A
Certified Bronze	100%	50%		N/A
Certified Silver	100%	75%		N/A
Certified Gold	100%	100%	95%	N/A
+ Impact	N/A	N/A	N/A	50%

Only applicant's or RRSS certified entity's that are IMARC Business Members are eligible for certification levels. Non-IMARC applicant's or RRSS certified entity's that reach the requirements for Certified Bronze or above will show as Certified.

The calculations are performed, once the applicant or RRSS certified entity have submitted corrective action plans (as per 4.1.5).

Calculation of percentages is based on the weight of each Achievement level:

Achievement Level	Weight / Score
Fully meets	2
Substantially meets	1
Does not meet	0



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To calculate the Certification Level, the Achievement level score of each criterion in the Major and/or Good requirements is assessed against the maximum possible score.

- w = # of Critical requirements
 - x = # of Major requirements
 - y = # of Good requirements
 - z = # of Star requirements
- a = # of requirements fully met in Major requirements
 - b = # of requirements substantially met in Major requirements
 - c = # of requirements fully met in Good requirements
 - d = # of requirements substantially met in Good requirements
 - e = # of requirements fully met in Star requirements
 - f = # of requirements substantially met in Star requirements

	Calculation methodology
Not certified	< w Critical requirements are fully met
Certified Bronze	w Critical requirements are fully met AND $(((a+c)*2 + (b+d)*1)/(x+y)*2))*100 \geq 50\% \text{ and } <75\%$
Certified Silver	w Critical requirements are fully met AND $(((a+c)*2 + (b+d)*1)/(x+y)*2))*100 \geq 75\% \text{ and } <95\%$
Certified Gold	w Critical requirements are fully met AND x Major requirements are fully met AND $((c*2 + d*1)/y*2)*100 \geq 95\%$
+ Impact	$((e*2+f*1)/z*2)*100 \geq 50\%$



4.2. Audits

4.2.1. On site audits

Compliance with the Technical Requirements shall be demonstrated by an on-site audit, arranged with an approved Certification Body and conducted by an approved auditor.

The audit shall be performed by the auditor using the checklist provided and shall involve different techniques to gather sufficient and reasonable evidence of compliance for each RRSS Principle, as defined in the Technical Requirements. The techniques applicable to the audits are:

- Observations
- Interviews
- Document & Records

Auditors shall be allowed to:

- Access all relevant documentation and records.
- Conduct interviews with relevant personnel.
- Observe farming and processing operations.

It is essential that for farming operations there are reptiles present and that all applicable stages of production, available on site at the time of the audit, are sampled. Processing facilities shall also be operational during the audit, with holding areas, handling and humane killing processes observed.

4.2.2. Remote audits

The approved Certification Body, may under extreme circumstances replace the on-site audit with a remote audit (live video streaming and online document review), providing documentary evidence of the reasoning is maintained.

Such circumstance may include official travel or gathering restrictions in the region of the applicant / certified entity or of the auditor (including any transit areas) or any health and safety issues relating to environmental or climatic incidents (such as earthquakes, flooding, etc.).

The remote audits will be conducted require the same access as on-site audits, but relying on live video streaming for interviews and observations and online access to documents and records for review.

4.2.3. Auditor Requirements

The approved Certification Body shall ensure that auditors appointed to conduct RRSS audits meet the following requirements, as a minimum:

- A minimum of three years auditing experience, ideally in at least one of the four RRSS principles, with an associated external auditor qualification.
- Fluent in the language (oral) where audits are to be conducted (at least CEFR B1 and ideally CEFR B2). Interpreters may be used, but the preference is for the auditor to lead the conversations directly.
- Proficient in the language of the approved Certification Body (written and oral)
- Practical experience of agrifood systems, ideally across multiple livestock farming sectors.
- Willingness to undergo training and demonstrate competence in reptile welfare, local/national context and laws and RRSS content and audit methodology.



Initial training of auditors shall be overseen by the approved Certification Body and Scheme Owner, with approval also being a joint responsibility.

The approved Certification Body shall ensure that competency is assessed annually, through peer reviews which will include feedback from the technical review of audit reports, auditor calibration meetings and witnessed audits.

4.3. Corrective Action Process

Non compliances recorded against a Critical requirement shall be rectified in full, before certification can be granted.

Non compliances recorded against Major or Good requirements may be rectified in line with the Compliance Level being sought.

Corrective action plans shall be implemented and suitable objective evidence shall be provided to demonstrate the relevant achievement level within the specified timeline.

Evidence of corrective action may be in the form of documents, photographs, invoices or action plans as appropriate. Where a significant number of non-compliances have been identified or where the nature of the non-compliance is such that documentary evidence of corrective action alone cannot demonstrate compliance, a partial on-site or remote audit may be required.

Applicants will have up to 28 days to provide objective evidence of corrective action to demonstrate conformance with non-compliances raised against Critical requirements. Corrective action for other non-compliances shall be presented within 90 days, where applicable.

Where no evidence of corrective action is provided within the timescales defined, or the information provided is insufficient, the certification process will end. A new application will be required, followed by a full re-audit.

Certified entities will have up to 7 days to provide objective evidence of corrective action to demonstrate conformance with non-compliances raised against Critical requirements. Corrective action for other non-compliances shall be presented within 28 days, where applicable.

Where no evidence of corrective action is provided within the timescales defined, or the information provided is insufficient, the certificate will be suspended.

Corrective Action Timescales	Applicants	Certified entities
Critical	28 days	7 days
Major*	90 days	28 days
Good*	90 days	28 days

*Where corrective action is needed to reach the Compliance level sought



4.4. Certification Decision

Once suitable objective evidence of corrective action to demonstrate the relevant achievement level within the timescales defined has been confirmed, the audit report will be presented for a certification decision.

A trained, competent reviewer, who is independent of the audit process, is responsible for verifying the evaluations made by the auditor and for making the certification decision.

The approved Certification Body shall ensure that a documented procedure is established and implemented clearly defining roles, responsibilities and timelines for each step in the certification process. This procedure will be shared with and agreed by the Scheme Owner.

4.5. Certification Documentation

The approved Certification Body shall provide the applicant / certified entity with formal certification documentation that clearly conveys, or permits identification of the following:

- the name and address of the approved Certification Body;
- the date certification is granted (the date shall not precede the date on which the certification decision was completed);
- the name and address of the certified entity;
- the scope of certification;
- the date of the last audit and the version of the RRSS audited against;
- the term or expiry date of certification;
- the Certification and + Impact Level reached, where applicable.

4.6. Certification Validity Periods

Certificates for applicant's or RRSS certified entity's that are IMARC Business Members will be issued for a period of 24 months.

Certificates for non-IMARC applicant's or RRSS certified entity's will be issued for a period of 18 months.

For applicants entering the scheme for the first time, the certificate is issued from the audit date. For certified entities, the certificate is issued from the expiry date of the previous certificate.

Under conditions of force majeure, extensions, of up to three months, may be granted, with the certificate expiry date amended accordingly. Extensions shall be agreed in writing between the approved Certification Body and Standard Owner and reviewed every three months, where conditions continue.

4.7. Surveillance

Once certification has been granted (following successful completion of the initial certification audit) a certified entity shall undergo surveillance audits to maintain their certified status.

Surveillance audits may be undertaken within one to six months of the certificate expiry date. This window allows for the audit to cover differing activities or seasons to the last, while still allowing time for any non-compliances to be addressed.

Surveillance audits shall cover all criteria of the standard and will be carried out in the same way as the initial certification audit.

4.8. Changes Affecting Certification

The certified entity shall inform the approved Certification Body, without delay, of changes that may affect its ability to conform with the certification requirements. Such changes may include:

- the legal, commercial, organizational status or ownership,
- organization and management (e.g. key managerial, decision-making or technical staff),
- modifications to the product or the production method,
- contact address and production sites,
- major changes to the quality management system.

The approved Certification Body will assess the risk associated with the changes and advise on the course of action.

4.9. Suspension, Termination or Withdrawal of Certificate

An approved Certification Body has the right to suspend a certification if:

- the certified entity unreasonably delays or refuses a surveillance audit.
- the certified entity fails to rectify any non-compliances within a specified timescale;
- the certified entity fails to comply with these Rules or the Technical Requirements;
- evidence which the approved Certification Body or Scheme Owner reasonably believes to be reliable is received from a third party, indicating that the certified entity is not conforming to the Technical Requirements to a material extent;

The approved Certification Body shall confirm in writing the reason for suspension and the action needed to be taken by the certified entity to allow for the suspension to be lifted. Providing adequate evidence of remedial action is received within the timescales specified, certification will be re-instated.

If certification has been suspended and the certified entity does not take the agreed remedial action within 3 months of such suspension, the certification may be terminated with immediate effect by written notice served by the approved Certification Body.

Following termination, certification can be regained only by following the procedure for a new applicant.

Any certified entity may at any time give notice in writing to withdraw their certification immediately.

If certification is suspended, terminated or withdrawn, the approved Certification Body shall make all necessary modifications to formal certification documents and public information to ensure it provides no indication that the entity continues to be certified.

4.10. Fees

The Scheme Owner and the Scheme Administrator will agree, in collaboration with the approved Certification Body, the structure and thresholds for audit and certification fee calculations.

Certification is conditional on payment of applicable fees.



5. Chain of Custody and Claims

On-product claims relating to the RRSS Certification Scheme are not allowed.

A certified entity may make the following claim: "We are certified against the RRSS, which aims to articulate and provide assurance to the key components of a sustainable and responsible reptile skin trade. Certified by ABC Cert #12345678."

Direct or indirect clients of the certified entity are allowed to communicate at corporate level only when they are IMARC Members.

Communication depends on the scope of the certification and the traceability in place and should take the form of the following examples:

- x% of our direct suppliers of exotic leather are certified to the RRSS, which aims to articulate and provide assurance to the key components of a sustainable and responsible reptile skin trade.
- x% (by volume) of our exotic leather has been sourced from direct suppliers that are certified to the RRSS, which aims to articulate and provide assurance to the key components of a sustainable and responsible reptile trade.

Further claim guidance is to be developed in line with the ISEAL Code.

6. Complaints and Appeals

A formal complaint may be raised to either the Scheme Owner or the approved Certification Body, dependent on its nature. All such complaints will be investigated and dealt with in accordance with the applicable parties' complaints procedure.

Appeals against the application, audit or certification decision processes may be lodged in writing with the approved Certification Body. All such appeals will be investigated and dealt with in accordance with the approved Certification Body's appeal procedure.

The effective resolution of complaints and appeals is an important means of protection for all stakeholders of the certification scheme against errors, omissions or unreasonable behavior. Confidence in the certification scheme is safeguarded when complaints and appeals are processed appropriately.

Appeals and complaints that have not been, or cannot be, resolved by the approved Certification Body can be addressed to the Scheme Owner.



7. Confidentiality and Data Protection

The Scheme Owner and approved Certification Body have arrangements in place to protect the confidentiality of information provided by the parties involved in the certification scheme. Personal data will be treated in accordance with their published Privacy Policy.

The approved Certification Body may provide the following, limited information to any third parties who have a legitimate interest in knowing the same (including entities' customers and suppliers)

- Details of certification status (being full, suspended, withdrawn or a non-member)
- Date of last audit
- Certification expiry date

The Scheme Owner is entitled to receive copies of audit reports from the approved Certification Body.

The Scheme Owner shall be entitled to produce and publish statistical reports drawing upon aggregated Scheme data, provided that individual performance data cannot be traced back to certified entity.

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8. Appendices

Common European Framework of Reference (CEFR) Descriptors for oral and written language levels¹.

General linguistic range	
C2	Can exploit a comprehensive and reliable mastery of a very wide range of language to formulate thoughts precisely, give emphasis, differentiate and eliminate ambiguity. No signs of having to restrict what they want to say.
C1	Can use a broad range of complex grammatical structures appropriately and with considerable flexibility. Can select an appropriate formulation from a broad range of language to express themselves clearly, without having to restrict what they want to say.
B2	Can express themselves clearly without much sign of having to restrict what they want to say. Has a sufficient range of language to be able to give clear descriptions, express viewpoints and develop arguments without much conspicuous searching for words/signs, using some complex sentence forms to do so.
B1	Has a sufficient range of language to describe unpredictable situations, explain the main points in an idea or problem with reasonable precision and express thoughts on abstract or cultural topics such as music and film. Has enough language to get by, with sufficient vocabulary to express themselves with some hesitation and circumlocutions on topics such as family, hobbies and interests, work, travel and current events, but lexical limitations cause repetition and even difficulty with formulation at times.
A2	Has a repertoire of basic language which enables them to deal with everyday situations with predictable content, though they will generally have to compromise the message and search for words/signs. Can produce brief, everyday expressions in order to satisfy simple needs of a concrete type (e.g. personal details, daily routines, wants and needs, requests for information). Can use basic sentence patterns and communicate with memorised phrases, groups of a few words/signs and formulae about themselves and other people, what they do, places, possessions, etc. Has a limited repertoire of short, memorised phrases covering predictable survival situations; frequent breakdowns and misunderstandings occur in non-routine situations.
Orthographic control	
C2	Writing is orthographically free of error.
C1	Layout, paragraphing and punctuation are consistent and helpful. Spelling is accurate, apart from occasional slips of the pen.
B2	Can produce clearly intelligible, continuous writing which follows standard layout and paragraphing conventions. Spelling and punctuation are reasonably accurate but may show signs of mother-tongue influence.
B1	Can produce continuous writing which is generally intelligible throughout. Spelling, punctuation and layout are accurate enough to be followed most of the time.
A2	Can copy short sentences on everyday subjects, e.g. directions on how to get somewhere. Can write with reasonable phonetic accuracy (but not necessarily fully standard spelling) short words that are in their oral vocabulary.

¹ <https://rm.coe.int/chapter-5-communicative-language-competences/1680a084c3>



9. Document Control

Revision date	Version	Nature of revision	Approved by
2026.02.05	1.0	Document creation	IMARC Secretariat

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