



GreenCircle Certification Scheme

GCC-OPS-03-1
Revision 6



Introduction

GreenCircle Certified, LLC is a third-party certifier of sustainability claims made by organizations about their product(s) or operations. GreenCircle seeks to mitigate the confusion caused by unsubstantiated or false claims made in the marketplace. GreenCircle accomplishes this through our dedication to integrity, quality and innovation. GreenCircle has an established Management System that includes this Certification Scheme, Standard Audit Plans and comprehensive internal procedures to ensure that all certification analyses are verified to the same requirements and standards. Within the GreenCircle Management System, GreenCircle adheres to several governance procedures to maintain compliance to ISO17020:2012 and ISO17065:2012.

This document outlines the certification process to manage and complete a GreenCircle Certified, LLC certification project. GreenCircle certifies a diverse range of products and operations from various industries; however, the same certification scheme is utilized to complete each certification. GreenCircle certifies the following sustainability claims:

Product Certifications

- Carbon Footprint Reduction
- Certified Energy Savings
- Closed Loop Product
- Dematerialization
- Product Optimization: Carbon Reduction or LCA Impact Reduction
- Recyclable Material: Metals
- Recycled Content

Buildings and Operations Certifications

- Sustainable Manufacturing Practices
- Sustainable Energy Practices
- Energy Usage Reduction
- Carbon Emissions Reduction
- Water Usage Reduction
- Waste Reduction
- Carbon Free or Renewable Energy Usage
- Carbon Free or Renewable Energy Usage Increase
- Waste Diversion from Landfill

Multi-Attribute Certifications

- Certified Environmental Facts
- Certified Sustainability Facts



Material Ingredient Reporting

- Declare Label Verification
- Health Product Declaration Verification
- Manufacturer Inventory Verification
- LEED v4 Compliance Certification

Living Product Challenge Certification Auditing

GreenCircle's Vision, Mission, and Values

Vision:

We empower every business to be a driver of positive global change.

Mission:

It is the mission of GreenCircle Certified, LLC to provide unbiased, transparent validation and certification for sustainability claims. Through validation and certification, we foster enthusiasm for change, inspire innovation, and promote continuous improvement. Our clients' success means value for their business, value for people and communities and value for the environment.

Values:

Integrity

We demonstrate the highest standards of integrity, both individually and as a company, ensuring honesty, impartiality, and fairness in all aspects of our business.

Respect

We have an emphasis on customer service and customer relationships. We deliver exceptional value and high-quality certification services that acknowledge our clients' continuous improvement and achievements that create a more sustainable society.

Resourcefulness and Passion for Sustainability

Our expertise and understanding of the sustainability market allows us to help our clients highlight their sustainability achievements by providing transparency and strength to their claims.

Mission Statement

GreenCircle Certified, LLC (GreenCircle) is committed to the stringent verification of our clients' environmental sustainability claims.

To fulfill our mission, GreenCircle will maintain this Certification Scheme throughout every certification offered. In conjunction with the Certification Body Authority and Integrity procedure, GreenCircle will adhere to the following key principles:



- GreenCircle will conduct all certifications with total impartiality regardless of certification outcome.
- Accurate and auditable certification records shall be the primary focus of quality verification activities.
- Business processes and quality controls shall be known and embraced by all GreenCircle employees.
- Continuous improvement shall be embedded into GreenCircle’s business processes and controls. GreenCircle welcomes feedback from all stakeholders.
- GreenCircle’s leadership is fully committed to the quality mission and will lead by example.
- GreenCircle’s Certification Scheme does not inhibit or discriminate against any applicant. GreenCircle certification is available to any and all applicants whose product(s) and/or operation(s) meet the requirements in the specified standards.

GreenCircle Certification Governance

The Certification Body Authority and Integrity procedure details the organization chart and accountability of the members of the Certification Body as well as the supporting roles within GreenCircle.

The Certification Scheme outlines the key elements of the certification process, which was developed in accordance with ISO17020:2012 and ISO17065:2012 standards. GreenCircle maintains and adheres to a series of compliance procedures that define the Management System of the Certification Body, noted below.

Governance Procedure	Title
GCC-OPS-03-1	Certification Scheme
GCC-OPS-03-2	Certification Body: Authority and Integrity Procedure
GCC-OPS-03-3	Granting, Maintain, Extending, Reducing, Suspending and Withdrawing Certifications Procedure
GCC-OPS-03-4	Document Control Procedure
GCC-OPS-03-5	Internal Audit Procedure
GCC-OPS-03-6	Surveillance Procedure
GCC-OPS-03-7	Misuse of GreenCircle Mark Procedure
GCC-OPS-03-8	Appeals, Complaints and Disputes Procedures
GCC-OPS-03-9	Complaints to Clients Procedure
GCC-OPS-03-10	Subcontractor Assessment Procedure
GCC-OPS-03-11	Non-Conformance Reporting and Corrective Action Procedure

GreenCircle Certification Scheme

Throughout the below outline of the certification process, the term GreenCircle Sales is used to indicate any member of GreenCircle Sales in communication with an applicant on a GreenCircle

certification. The term GreenCircle Analyst is used to indicate any member of GreenCircle Operations performing the GreenCircle audit process.



1. Initial Inquiry

The applicant contacts GreenCircle to discuss GreenCircle certification, generally a member of the GreenCircle Sales department.

1.1 The Application:

During the initial review process GreenCircle Sales shall determine (through discussions with the applicant) if the product(s) and/or operation(s) may qualify for certification. Examples of information gathered during this process are listed below:

- The product(s) and/or operation(s) requested to be audited for certification, preliminary technical documentation to be requested
- Contact information for the proposal
- Information pertaining to the applicant, i.e. physical address, facility locations, specific information relating to the sustainability claim to be certified, etc.
- General information about the applicant as a legal entity, i.e. is the applicant under a parent organization, with internal rebranding or resale to another company for private labeling.
- Overview of client management systems that are in place that could be utilized to provide data and/or make additional process changes for future improvements following certification.

During the initial review process, explanation of all applicable certifications and procedures are discussed with applicants at length. GreenCircle can also provide, upon request, copies of public audit plans to the applicant to further clarify how GreenCircle certification(s) are conducted.

During the initial application process GreenCircle Sales may determine that more detailed information will be required to better understand the product and/or manufacturing operation to be certified. At the request of the applicant, GreenCircle may send a Non-Disclosure Agreement(NDA) to the applicant to review or may review and sign the applicant's NDAs before additional information is gathered.

1.2 Proposal

After corresponding with the applicant, GreenCircle Sales will determine if the applicant's claim can be audited for certification to the applicable standard. At this point, GreenCircle will draft a certification proposal. The certification proposal details the scope of work, information required to complete the certification, as well as the certification cost estimates. Once the certification proposal has been finalized, GreenCircle will send the proposal, along with GreenCircle's Terms and Conditions (previously titled Certification Agreement), to the applicant for review, signature,

and agreement to all terms and conditions. Once the documents are signed and returned the certification audit process is considered active.



1.3 Applicant Nonconformance

During the application process, if GreenCircle Sales determines that the product(s) and/or operation(s) may not meet fulfill the standards and data requirements utilized by GreenCircle to complete the specified certification, the applicant will be notified immediately. Applicants can reapply for certification at any time.

2. Certification Audit Plan and Evaluation Activities

The following details the certification audit plan and evaluation activities that all GreenCircle certifications will follow. These activities are further defined for each certification type in individual audit plans.

2.1 Project Review

Once the proposal and Terms & Conditions are signed by the Client (previously the “applicant”), a GreenCircle Analyst assigned to the project will review the proposal and discuss all project information in detail with the GreenCircle Operations Management.

2.2 Conference Call and Initial Data Request

The assigned GreenCircle Analyst will schedule a meeting (either live or via teleconference) with the client. The purpose of the call is to:

2.2.1 Establish introductions with the Client and conduct an interview to understand the Client’s operation(s) and/or product(s).

2.2.2 Verify the specific product(s) and/or operation(s) to be certified and review information pertaining to the product(s) and/or operation(s) (as necessary) required by GreenCircle to complete the audit and certification.

2.2.3 Explain the GreenCircle audit process, including a review of the initial data request, required documentation and the GreenCircle Standard Audit Plan.

2.2.4 Determine and agree on dates for data request submission from the client.

2.2.5 Schedule a date for the site visit and audit at the facility(ies) as applicable

2.2.6 After the initial meeting, the GreenCircle Analyst will prepare and send an data request to the Client. Included in this data request may be spreadsheets to aid in the completion of the data request, as well as a summary of the data submission dates agreed upon in the call. The GreenCircle Analyst will send periodic reminders to the client reminding them of the agreed upon data submission date and answer any questions the client may have about the data request.



2.3 Desk Audit/Data Review

Upon receiving the data requested from the Client, the assigned GreenCircle Analyst will then conduct a desk audit. The GreenCircle Analyst will follow the applicable certification audit plans and internal certification procedure(s) to verify that the data and documentation submitted by the client is complete and accurate, per the applicable standard. The following actions are completed within the desk audit procedure:

2.3.1 A review of the information received from the Client in response to the data request will be performed. The GreenCircle Analyst will ensure that the data provided is complete. If there is missing or inaccurate data or documentation, the GreenCircle Analyst will follow up with the Client regarding any missing or incomplete data via written or verbal communication.

2.3.2 Complete initial calculations as specified per the appropriate certification procedure.

3. Site Visit

Site visits are a requirement of most GreenCircle Certifications, as outlined in the audit plans. The goal of the site visit is to conduct interviews with applicable personnel, validate data and documentation and visually verify the product and/or operation claim being certified.

Exceptions: There are some instances in which a site visit is not required. For example, if an organization is making the same product, with the same recipe at multiple facilities, a site visit to each facility may not be necessary. GreenCircle may ask for documentation and photographic evidence to confirm that the products are manufactured the same way. If GreenCircle finds a discrepancy after reviewing the photo documentation and data, a site visit may be required to certify the claim.

GreenCircle may, at its sole discretion, determine that the site visit can be performed virtually. GreenCircle Operations Management will be responsible for determining if a site visit can be performed virtually and requirements will be discussed with the applicant, as well as documented for GreenCircle's records. A virtual site visit may be an active (live stream) visit, a portion may be active with a portion pre-recorded or supplemented by photographs or all pre-recorded.

In addition, GreenCircle may, at its sole discretion, determine that there is no appreciable value in completing a site visit. GreenCircle Operations Management will be responsible for determining if a site visit is deemed unnecessary and the requirements of the audit plan can otherwise be fulfilled.

3.1 Site Visit Audit

Upon arriving to the site, the assigned GreenCircle Analyst will conduct an onsite interview with the Client to review the certification audit plan which will include a discussion and presentation detailing the following:



- The current stage in the audit process and upcoming deadlines
- Outstanding data, documentation or questions regarding the data needed to complete the verification
- Review the process flow of the facility and operations with the Client.

3.2. Site Visit

3.2.1 Accompanied by the Client, the GreenCircle Analyst will conduct a walk through of the facility/operations to visually inspect and verify the appropriate information related to the specific certification.

3.2.2 As approved by the Client, the GreenCircle Analyst will take photographs documenting various information to certify the specified claim to ensure the Client is in compliance with GreenCircle's internal standards.

3.2.3 The GreenCircle Analyst will conclude the site visit with an exit meeting to discuss the remaining steps in the certification process, any additional information that will need to be collected and to answer any questions from the Client.

3.3 Post Site Visit

The GreenCircle Analyst will complete the following to finalize the applicable GreenCircle certification:

3.3.1 Review site visit notes/photos documentation and file in the proper electronic project folder to be available for review and retention as supporting documentation of the certification.

3.3.2 If additional documentation or data is required to verify the sustainability claim, the GreenCircle Analyst will send the Client a detailed request for additional documentation and/or data required to complete the analysis and certification.

3.3.3 If the GreenCircle Analyst identifies any non-conformities while reviewing site visit documentation, an action will be taken to meet with GreenCircle Operations Management or Certification Officer to determine next steps. Please see 4.6 Certification Nonconformance Section below for more information.

4. Final Calculations and Draft Deliverables

4.1 Final Calculation Completion

After collecting all required documentation and data, the GreenCircle Analyst will complete the final calculations for the specified certification. After completing these calculations, the GreenCircle Analyst will send the calculations to a peer reviewer to perform a quality check.

4.2 Quality Check Review

A peer reviewer, an independent GreenCircle Analyst, will perform a technical quality check review of the final certification calculations. This review is to ensure all supporting data and



documentation is present, all calculations are complete and accurate, and the certification has met the applicable standards. The peer reviewer will place their initials next to all reviewed and approved calculations signifying a review has been completed.

4.2.1 If there are no changes to be made, the peer reviewer will send an email of approval to the GreenCircle Analyst. The GreenCircle Analyst will then proceed to generate the GreenCircle certificates as detailed below.

4.2.2 If there are edits or updates required within the calculations, the peer reviewer will notify the GreenCircle Analyst of the required edits which may include calculation corrections, or additional documentation in order for the calculations to be approved. The GreenCircle Analyst will make the appropriate changes and return to the peer reviewer for final approval.

4.2.3 If there are unresolved items from the peer review that the Certification Analyst cannot resolve or does not agree with the comment, then these items are to be presented to the Certification Officer for review and final decision.

Both the certificates and Certification Report must also be reviewed and approved by the peer reviewer for Technical QC verification.

4.3 GreenCircle Certificate

Once the calculations have been reviewed and approved, the GreenCircle Analyst will generate draft certificates and then complete the following steps:

5.1.1 The draft certificates will be sent to a peer reviewer, an independent GreenCircle Analyst for review and approval.

5.1.2 Upon approval from the peer reviewer, the draft certificates will be sent to the Certification Officer for review (per section 4.5) and approval before sending to the client.

5.1.3 After the Client gives final approval, the GreenCircle Analyst will document Client approval, send the final certificates, update the GreenCircle Certified Product Database, as well as notify GreenCircle Marketing to contact the Client to discuss needs for marketing support.

All certificates will reference the applicable Standard Audit Plan (with revision date) to which the certification audit was conducted.

4.4 GreenCircle Final Report

In parallel with the generation of certificates, the GreenCircle Analyst will draft a final report and all final deliverables. The report and final deliverables will be sent to a peer reviewer, an independent GreenCircle Analyst, for review and approval prior to sending to the Certification Officer. The final report will summarize GreenCircle's certification process, as well as depict the results of the audit and certification.



4.5 Certification Officer Decision

The Certification Officer will review the completed calculations, draft certificate and draft

Certification Report after the Technical QC process has been completed in entirety. Verification that the Standard Audit Plan has been followed by GreenCircle and all data requirements have been met by the client must be received from the Certification Officer.

4.6 Certification Nonconformance

During the certification process, if the GreenCircle Analyst and GreenCircle Operations Management determine that the product(s) and/or operation(s) do not conform to the standards utilized by GreenCircle to complete the specified certification, the Client will be notified immediately. GreenCircle may outline further actions that must be completed by the Client in order for the product(s) and/or operation(s) to comply with the applicable standards. Once the Client fulfills the data requirements and applicable standards they will be able to reapply for certification.

5. GreenCircle Certification

GreenCircle Certification is achieved when all the previous steps have been completed and the Certification Officer has provided approval through the certification decision review process.. The Certification Officer shall be the final authority on the issuance of any GreenCircle certificate.

The issuance date of all certificates will be on or following the issuance of the Certification Report or receipt of payment; whichever is later. Certification periods follow the allowance set by Standard Audit Plan for the certification type. If the certification audit is complete prior to the previous certification period expiration, the next certification period will begin immediately following the previous period.

Once the final deliverables (Certification Report and certificates) are issued the certification process is complete.

6. Recertification

6.1 GreenCircle Recertification Procedure

All GreenCircle product and operation claims are recertified on an annual basis to ensure accuracy of the claims. As a part of this process GreenCircle will:

- 6.1.1** Notify the client at least 90 days prior to the expiration date noted on their certificates. GreenCircle Sales will prepare a proposal to be sent to the Client detailing the scope of work, information required to complete the recertification, and recertification cost.



6.1.2 Communication with the client will confirm the intent to recertify, and may include notification of any changes that may have occurred within the Client's product or process that will affect the Client's sustainability claim.

Please Note: Recertification may require a site visit audit if there are significant recipe, materials, supplier, or process alterations over the certification period resulting in the need to visually verify this change.

6.1.3 Once the proposal is signed and returned to GreenCircle, the assigned GreenCircle Analyst will begin the data collection process. After the GreenCircle Analyst receives the updated data they will follow the guidance in the individual certification audit plan.

6.1.4 Compare data collected from the previous year and evaluate any changes in the product or operations within the past year.

6.1.5 The recertification process will follow the same steps as the certification process.

6.2 GreenCircle Certification Expiration

If certificate holders do not meet the requirements for recertification or do not undergo the recertification process with GreenCircle, the certificate(s) will be revoked at the expiration of the certification time period. All expired certificates are automatically removed from GreenCircle's Certified Product Database. The client will be notified by the Certification Officer per the GreenCircle Sales procedures. Please see the Suspension, Withdraw or Termination of Certification section for more details.

Key Terminology

Applicant: The terminology used to describe a Client in the initial review phase of the certification process before a contract is entered with GreenCircle.

Audit Plan: Specifies how GreenCircle conducts a particular audit and describes the data requirements and analysis GreenCircle will complete.

Certificates: One of the final deliverables of a GreenCircle certification. The certificate will provide a clear and easy to understand description of the certification that the client achieved. All certificates for certified product(s) and/or operation(s) will be listed on the [GreenCircle Certified Product Database](#).

Desk Audit: Includes a detailed review of all requested Client submitted information to verify that it is complete and in compliance with the certification proposal. The Certification Analyst will complete a desk audit prior to visiting the site, as applicable. The Certification Analyst will also complete a desk audit for all recertifications.

Final Report: One of the final deliverables of a GreenCircle certification. The final report will detail the certification process, the data that was reviewed, the audit findings, observations for improvement, and final certification results. The final report is strictly confidential and will not be listed online.



Initial Data Request: The information that the Certification Analyst will request from the Client complete the certification. This information will be collected prior to the site visit, as applicable.

ISO/IEC 17020:2012: This International Standard defines the requirements for the operation of various types of bodies performing inspection. GreenCircle adheres to these requirements in the development of the certification process and audit plans.

ISO/IEC 17065:2012: This International Standard defines the requirements for bodies certifying products, processes and services. GreenCircle adheres to these requirements in the development of the certification process and audit plans.

Nonconformance: A product(s) and/or operation(s) that does not conform to the standards utilized by GreenCircle to complete the specified certification.

Operation(s): Refers to the manufacturing process at a facility.

Procedure: The document(s) to be referenced by GreenCircle complete a specific step in the certification process.

Products: Refers to the Client's product to be certified.

Proposal: The document signed by the client confirming participation in GreenCircle certification. The proposal will detail the scope of work, specific information requirements, GreenCircle deliverables, and associated costs.

Recertification: The process the Client must go through on an annual basis with GreenCircle to verify any changes in the sustainability claim and renew the certification.

Site Visit: Part of the GreenCircle audit process, the goal is to conduct interviews with applicable personnel, validate data and documentation, and visually verify the product and/or operation claim being certified.

Complaints, Appeals and Disputes

GreenCircle investigates complaints and appeals in compliance with its Appeals, Complaints and Disputes Procedure. In the case of complaints against the actions of an GreenCircle client, the complainant should first attempt to resolve the issue with that client prior to requesting that GreenCircle become involved. In the case of appeals, the appellant must lodge its appeal with GreenCircle against any adverse decision taken by GreenCircle **within thirty (30) calendar days** after notification of the decision.

The Client must keep a record of any complaints brought against their certification. The records must be made available to GreenCircle upon request and the appropriate action must be taken if deficiencies are found with either the product and/or operation claim that has been certified. Steps taken to rectify the situation must be documented.



Suspension, Withdrawal or Termination of Certification

GreenCircle reserves the right to suspend, withdraw or terminate a certification if the Client does not follow the Certification Requirements as stated in the GreenCircle Terms and Conditions. GreenCircle will document the reason for the suspension, withdraw and/or termination of the certification and will note any corrective action that will take place to rectify the situation. During this time frame the Client must discontinue the use of the GreenCircle mark in any and all marketing materials (i.e. brochures, websites, packaging, etc.) to ensure the integrity of the GreenCircle mark.

Guidelines for Private Label User

Client will advise any private label Clients, or downstream re-sellers of the product certified to enter into a separate Agreement with GreenCircle regarding the use of the GreenCircle Mark on private label product and promotional materials.

Labeling Requirements

As agreed upon by signing GreenCircle's Terms and Conditions, the Client agrees to promptly cease display and use of the GreenCircle Certified, LLC mark: (1) Upon expiration of the certification period; (2) If Client is no longer in compliance with one or more of the terms and conditions of the GreenCircle Certification Scheme. Please reference the **GreenCircle Certified Mark Usage Guidelines** for further details and more information on using the mark. The Client shall take caution to ensure that the GreenCircle Certification mark is not associated with products and/or operations which do not comply with the GreenCircle Certification Scheme (GCCS). The Client will be asked to remove the GreenCircle mark immediately if it is found that they have applied the mark on a non-conforming GCCS product and/or operation. If the Client fails to remove the misused mark, an investigation will be conducted pertaining to the misuse, in which the full cost of the investigation shall be borne by the Client. The Manufacturer shall not allow the GCCS Certification mark to remain on non-conforming products offered for sale. Such action could invite prosecution under U.S. Trademark statutes or attract other penalty provisions in other U.S. or State law.

Surveillance of GreenCircle Mark

GreenCircle will complete quarterly assessments via internet searches and other means to ensure the integrity of GreenCircle mark usage. Upon completion, the results will be shared with the Certification Officer and Vice President of Marketing to take additional actions as applicable.

Confidentiality



GreenCircle understands that the confidentiality of information provided by the Client is of high importance. This information between the Client and GreenCircle will be held in strict confidence as required by GreenCircle’s company policy, proposal Terms & Conditions, and as applicable, Non-Disclosure Agreements.

Amendment History

Date	Issue	Summary of Amendments
7/1/2009	Rev. 0	Official issue date of document.
1/16/2014	Rev. 1	Added updated links to documents.
5/1/2016	Rev. 2	General editorial updates.
9/16/2016	Rev. 3	Integrated applicable peer review comments
5/1/2023	Rev. 4	General editorial updates and new Certification Officer
10/1/2023	Rev. 5	Added Carbon Footprint Reduction product certifications and updated Sales recertification process
3/1/2024	Rev. 6	Updated for certification decision process

Certification Officer: *Michelle Gorenne*