GENERAL RULES

CERTIFICATION PROCESS FOR PRODUCTS AND/OR SERVICES COVERED BY THE FRENCH CONSUMER CODE

DQ CERT 24-313

Revision No. 6

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ARTICLE 1. PURPOSE AND SCOPE

As a third party accredited by the Comité Français d'Accréditation (COFRAC) in accordance with the NF EN ISO/IEC 17065 standard, the FCBA (**F**orêt **C**ellulose **B**ois-construction **A**meublement) Institute of Technology provides certification of products, services and combinations of products and services for companies in the wood, wood construction, home furnishing and related sectors (Accreditation No. 5-0011, list of sites and scopes available at www.cofrac.fr).

These General Rules set out the operating procedures for these certification activities, which are governed by articles L433-3 to L433-11 and R433-1 to R433-2 of the French Consumer Code.

Certification attests that a product, service or combination of products and services complies with the characteristics described in the certification reference document.

The certification reference document is a technical document defining the characteristics that the product, service or combination of products and services must have, and the procedures for checking compliance with these characteristics.

It is on the basis of these General Rules that certification reference document are drawn up.

These General Rules and the certification reference document are available on the FCBA website www.fcba.fr or, where applicable, on a specific website indicated in the relevant certification reference document.

To help with reading these General Rules of Procedure:

- Mark (with a capital M) specifies the distinctive sign, whatever the mark used
- Product (with a capital P) refers to the certification of a product or service (or a combined product & service) or process.

ARTICLE 2. CERTIFICATION MARK

The distinctive sign which may accompany or substantiate the certification is registered as a collective certification mark or guarantee mark.

The rules governing its use are specified in the Terms of Use of the Mark, which are referenced in the certification reference document.

ARTICLE 3. CERTIFICATION BODIES

3.1 CERTIFICATION COMMITTEE

A Certification Committee composed of 11 members has been set up under the FCBA Board of Directors.

3.1.1 Composition of the Certification Committee

This committee is made up of three panels, each with three members, to ensure that the various interests involved in the certification process are fairly represented:

- Panel of Occupational Groups – Holders of FCBA Certification
- Panel of Occupational Groups – Purchasers or Users of Certified Products and/or Consumer Organisations
- Panel of Technical Bodies and Government Authorities

And

- A member of the FCBA Board of Directors
- The General Manager of FCBA (without voting rights)

The majority of members are chosen from among active participants in certification bodies and members involved in the governance of FCBA and are appointed by the FCBA Board of Directors on the proposal of the General Manager. Their term of office is three years and may be renewed. Members must sign the Policy for Participants in Certification Bodies Managed by FCBA.

The FCBA Certification Director attends these meetings.

Decisions are taken by a majority of the members present or represented, with the Chairman having the casting vote in the event of a tie.

Deliberations are only valid if at least half of the members are present or represented, with at least one member from each panel present.

A member may be represented by a proxy given to another member of the same panel. Each member present may not hold more than two proxies in addition to his or her own vote.

To examine specific questions, the Certification Committee may enlist any person it chooses, who will not take part in the decision-making process.

The Certification Committee meets at least once a year, at the request of the Certification Director or the Chairman of the Certification Committee.

3.1.2 Responsibilities of the Certification Committee

The Certification Committee ensures that FCBA applies the principles of Product certification defined in ISO/IEC 17065 and in accordance with the French Consumer Code.

Its responsibilities include:

a) Approving the various versions of the General Rules of Procedure for certifications managed by FCBA

b) Monitoring the implementation of FCBA's certification policy

c) Monitoring the Impartiality Protection Plan

d) Monitoring the overall financial situation of FCBA's certification activities

e) Monitoring the general operation of certification activities

The Certification Committee also has the permanent task of ruling on appeals, as referred to in Article 9 below, made against decisions taken by FCBA.

To this end, it may set up a board comprising the Chairman, at least one member of each panel, the Chairman or a representative of the certification body concerned, the FCBA Certification Director and, where appropriate, a representative of the owner of the Mark.

3.1.3 Rules of the Certification Committee

The process for appointing members of the Certification Committee and the details of its operation are set out in Internal Rules approved by the Board of Directors.

3.2 CERTIFICATION BODY

To assist FCBA in the management of each specific certification, a certification body must be created for certifications with more than 10 holders.

This certification body is consultative.

When this body is called the "Mark Committee", this means that only representatives appointed following an election organised by FCBA in accordance with the procedures given in the certification reference document take part in the meetings of this Committee. The Mark Committee may be the preferred body when certification involves a large number of holders.

3.2.1 Composition and role

The certification body is made up of various stakeholders (certification holders, customers, purchasers, technical bodies, etc.).

For the certification concerned, it is responsible for:

- Guidance on:
  - Marketing the certification
  - Communication and promotional activities relating to its business
- Advising on:
  - Certification operations and activities
  - Planned revisions to the standard
  - A list of stakeholders consulted for revisions to the standard, in line with the requirements of the French Consumer Code.

It may be consulted on any other matter relating to certification.

3.2.2 Operating procedures

The certification body generally meets once a year, at the request of FCBA or its Chairman.

These members are appointed by FCBA and sign the Policy for Participants in Certification Bodies Managed by FCBA. For members other than full members, this appointment is granted for a period of 4 years if the relevant certification reference document does not set a different period.

Members of the certification body may be represented by an alternate, provided that he or she signs the Policy for Participants in Certification Bodies Managed by FCBA.

A Chairman and, if necessary, one or two Vice-Chairmen are elected for 4 years by the members of the certification body if the relevant certification reference document does not set a different term.

In addition to chairing the meetings, the Chairman is FCBA's main contact for liaising with participants in the certification body. If the Chairman is absent during a meeting, he or she is replaced by the Vice-Chairman or a Session Chairman is appointed at the beginning of the meeting.

Any member of the panel of certification holders who has lost, even temporarily, the right to use the Mark, may not sit on, or be represented by, the certification body.

The certification body may set up ad hoc groups to deal with strategic, technical, communication or other issues.

Where such ad hoc groups exist on a permanent basis, their composition and operating procedures are defined in the certification reference document. Where they are temporary, their composition and operating procedures are defined by the certification body and formalised in a report.

3.2.3 Board of the Certification Body

The Board of the Certification Body includes:

- The Chairman of the certification body
- A representative of the certification holders, customers/purchasers and, where appropriate, technical bodies
- The Certification Director

Its role is to advise on certification decisions or specific subjects that cannot wait for the next meeting of the certification body. The certification body is informed at the next meeting of the matters dealt with by the Board.

ARTICLE 4. CERTIFICATION REFERENCE DOCUMENT

For each specific certification, a certification reference document is drawn up based on these General Rules and the Terms of Use for the relevant Mark.

The French Consumer Code specifies that:

- The certification body is responsible for drawing up the certification reference document, and gathers the views of stakeholders
- The standard is a technical document that defines the characteristics that a Product must have and the procedures for verifying that the Product complies with these characteristics.

Each standard specifies *at minimum* the scope of certification, management and operating procedures supplemental to these General Rules, the certification characteristics, the procedures for verifying compliance with these characteristics, and the financial scheme.

When a standard is created or amended with regard to certified characteristics or compliances control procedures, FCBA will arrange to consult with stakeholders to gather their opinions.

Opinions are collected in writing, so as to guarantee fair consultation for all stakeholders.

The group of stakeholders is generally made up of:

- Certification holders (chosen by FCBA in accordance with the procedures set forth in the certification reference document or by the relevant certification body)
- Representatives of consumer or user associations
- Representative(s) of technical bodies or government authorities
- Purchasers (town halls, departmental councils, insurers, local authorities, etc.)
- Expert(s) in the relevant field
- Etc.

To ensure that the consultation is as relevant as possible to the scope and nature of the proposed changes, the stakeholders may differ from one consultation to another.

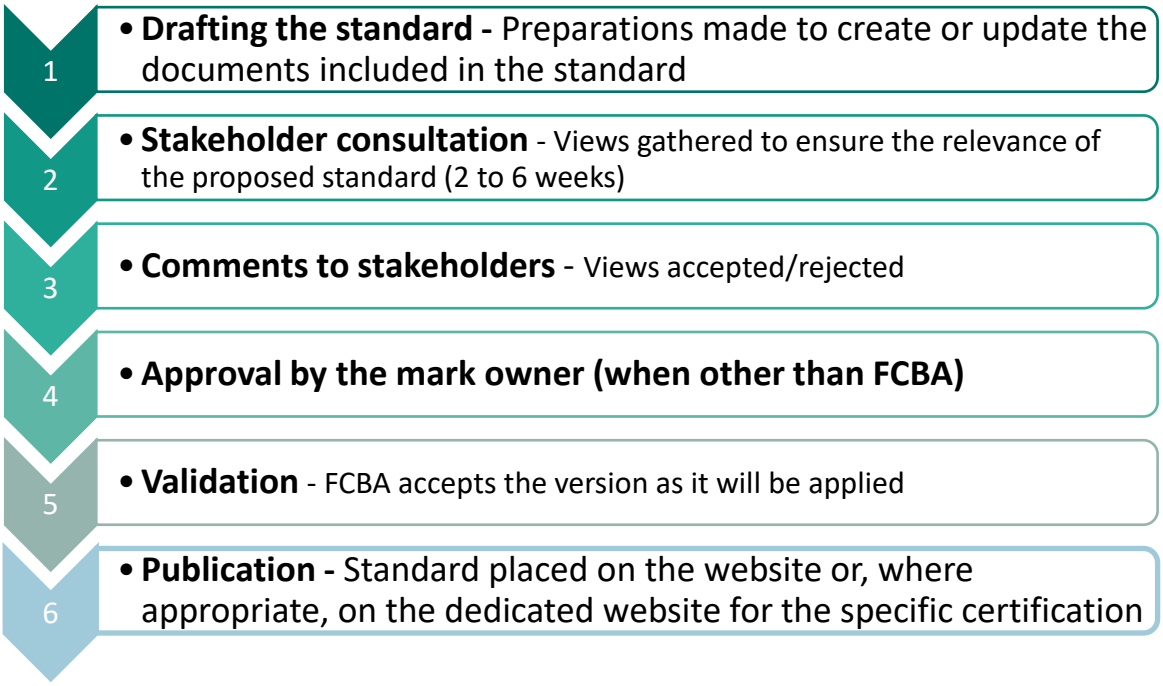
The consultation period may vary between two and six weeks, depending on schedule requirements and the extent of the proposed changes.

After the consultation, FCBA provides comments to the stakeholders consulted and the relevant certification body in order to respond to the opinions expressed.

Certification reference document owned by FCBA which use a distinctive Mark belonging to a third party may be subject to an additional approval stage in order to ensure compliance with the rules set forth by the owner of the Mark.

This version of the standard is then validated by FCBA, which means that the Certification Body agrees to implement the new version of the standard and uphold its responsibilities.

Once these stages have been completed, the new version of the standard is put online on the FCBA website or on the specific website if available, specifying, where applicable, the deadlines and procedures for implementation.



ARTICLE 5. MEANS OF ASSESSMENT

5.1 AUDIT

The purpose of the audit is to verify that the company is complying with the requirements stipulated in the certification reference document. It is conducted in accordance with ISO 19011 guidelines.

Audits are either carried out by FCBA staff or by external auditors. In this second case, external auditors may carry out audits on behalf of FCBA, provided firstly that they have been qualified in the same way as FCBA staff, and secondly that they sign a contract requiring them to respect the same rules as FCBA staff.

The frequency, duration and conditions for conducting audits are specified in each certification reference document.

If the applicant/holder requests that an audit be postponed close to the date on which it is to be carried out, the audit costs may be charged to the applicant/holder in part or in full, depending on the expenses incurred and the impact of the postponement.

5.2 TESTING AND SAMPLING

The tests stipulated in the certification reference documents are carried out in laboratories that can attest to their impartiality and compliance with the requirements of ISO 17025 for the relevant tests.

The tests are carried out either in FCBA's internal laboratories or in external laboratories on a sub-contracting basis or with test reports recognised by FCBA.

When tests carried out by certification holders are recognised by FCBA, the certification reference document specifies the conditions and specific procedures for recognition of these tests.

The sampling procedures are described in the certification reference document.

When sampling is carried out on site, the samples must be sent to the recipient laboratory by the company as soon as possible, and in no case later than 10 working days after the sampling date.

5.3 OTHER

When other types of assessment are carried out as part of a certification, they are specified in the certification reference document.

5.4 MANAGING NON-CONFORMITY

5.4.1 Definition of non-conformity

If, during an assessment, it is found that a requirement of the standard has not been met, this situation is dealt with using a deviation sheet.

A non-conformity is a failure to comply with a requirement in the standard, as identified during an assessment (audit, test, etc.). Depending on the severity, it is classified as a non-critical non-conformity or a critical non-conformity.

a) Non-critical non-conformity (eNC in french translation: écart Non Critique)

This is a deviation which does not directly compromise the conformity of one or more characteristics of the Product.

A non-critical non-conformity is documented on a deviation sheet and, if it is found during an audit, must be resolved by the next audit. However, during a review or renewal, the certification decision can only be taken after assessing the appropriateness of the actions taken.

A non-critical non-conformity that has not been dealt with by the company within the allotted time will automatically turn into a critical non-conformity at the next audit.

b) Critical non-conformity (eC in french translation: écart Critique)

This is a deviation that compromises the conformity of one or more characteristics of the Product. A critical non-conformity is documented on a deviation sheet and must be resolved within the timeframe specified by the certification reference document or the assessor.

Special case: An assessment may be subject to one or more observations. An observation denotes a situation that requires attention during the next audit. Observations do not require a deviation sheet but are documented in the audit conclusions.

5.4.2 Handling non-conformity

For each non-conformity, the applicant/holder defines and formalises an action plan and sends it to the FCBA assessor within a maximum of 15 days.

This action plan includes:

- An analysis of the extent of the non-conformity, to identify the scope of the actions needed
- The remedial action needed to correct the non-conformity, specifying the deadline for implementation
- An analysis of the causes and the corrective action needed to prevent the non-conformity from recurring.

The FCBA assessor will evaluate the action plan proposed by the applicant/holder before it is sent for review and a decision.

5.5 FORMAL NOTICE WITHOUT INCREASED INSPECTION

When processing a continuing assessment, and except for certification decisions processed in accordance with Article 8, FCBA may give formal notice to the certification holder to rectify a situation within a short period of time not exceeding 10 days, without an audit visit and without additional testing.

ARTICLE 6. CERTIFICATION REVIEW

Different types of certification reviews are conducted in order to respond to:

- **An application for initial certification**: a certification process for a new applicant who is not (or is no longer) a holder of the mark to which the Product requiring certification belongs.

- **An application for expansion:** a certification process involving a company which already holds Product(s) with a view to expanding its scope of certification under the same certification reference document.

- **An application for modification:** a process to take into account a modification to the certified Product (component), the production site/methods or the legal structure of the holder.

The applicant may decide, at any time during the review procedure, not to continue with the certification process. In this case, they will receive a Notice of Suspension of the proceedings.

6.1 CERTIFICATION REQUIREMENTS

Compliance with regulations is a requirement for certification, which remains the sole responsibility of the company.

FCBA's role is not to take the place of the competent market surveillance authorities, and it is therefore not authorised to verify compliance with regulations during its monitoring activities.

Nevertheless, if a regulatory non-compliance is detected during certification monitoring, FCBA reserves the right to take a certification decision in accordance with Article 8.2.

6.2 THE APPLICANT/HOLDER'S COMMITMENTS

The applicant/holder must be the natural or legal person legally responsible for the statement made in the application for Product certification.

A template agreement is included in the certification reference document and must be duly completed, dated and signed by the company's legal representative and sent to FCBA on company letterhead, bearing the company's SIREN number.

The applicant/holder agrees to:

- Comply with all applicable regulations
- Accept and enforce the conditions imposed by these FCBA General Rules of Procedure and the certification reference document
- Make available to FCBA all printed advertising materials and catalogues referring to the certification
- Facilitate audit visits and provide auditors with the resources they need to carry out their work
- Abide by the decisions taken pursuant to Article 9
- Pay the expenses charged to it by FCBA pursuant to the financial scheme set forth in the certification reference document
- Avoid any use of the COFRAC mark in connection with its certification
- Avoid any use of the Mark that would be contrary to its Terms of Use
- Accept, without prior informed consent, that FCBA may, when required by law or by contractual accreditation provisions, communicate information concerning the applicant/holder, including information considered confidential.

In addition, in accordance with ISO/IEC 17065, the applicant/holder agrees to:

a) Continuously meet certification requirements, including the implementation of appropriate changes communicated by FCBA

b) If certification is based on mass production, ensure that the certified Product continues to meet the requirements of the Product

c) Take all steps needed to:

  - Conduct the assessment and monitoring (where applicable), including the provision of items for review such as: documentation and records, access to equipment, sites, areas, personnel and subcontractors of the customer concerned
  - Review complaints
  - Involve observers, where appropriate

d) Make statements about the certification that are consistent with the scope of the certification

e) Not use the certification of its Products in a way that may harm FCBA or make any statement about the certification of its Products that FCBA may consider misleading or unauthorized

f) In the event of suspension, withdrawal or expiry of certification, cease to use all means of communication referring thereto and fulfil all requirements laid down by the certification scheme (e.g. return of certification documents) and take any other action required

g) If the customer provides copies of certification documents to others, they must reproduce them in their entirety or as specified by the certification reference document

h) When referring to the certification of its Products in communication materials, such as documents, brochures or advertisements, comply with FCBA requirements and/or the specifications of the certification reference document

i) Comply with all requirements that may be prescribed in the Product certification scheme relating to the use of conformity marks and Product information

j) Keep a record of all complaints of which it is aware regarding compliance with certification requirements and make these records available to FCBA on request, and

- Take any appropriate action in relation to these complaints and the imperfections in the Products which impact their compliance with certification requirements
- Document the actions taken

k) Inform FCBA without delay of any changes which may impact its ability to comply with certification requirements (organisation, production method, Product modification, legal status, commercial name, etc.).

6.3 FCBA'S COMMITMENTS

In response to the company's application for certification, FCBA agrees to:

- Provide the company with the information and documentation needed to implement and maintain certification
- Inform the company of any changes to its certification reference document and the deadline for compliance
- Make the current version of the certification reference document and information on certified products available on the FCBA website or on the dedicated certification website
- Inform the company when it intends to subcontract assessment work and obtain its consent
- Maintain the confidentiality of all efforts to obtain and maintain certification
- Treat companies without discrimination in accordance with the scope of certification
- Meet the requirements of impartiality and independence through its structure, organisation and staff. Implementation and monitoring procedures are defined in the Impartiality Protection Plan (IPP).

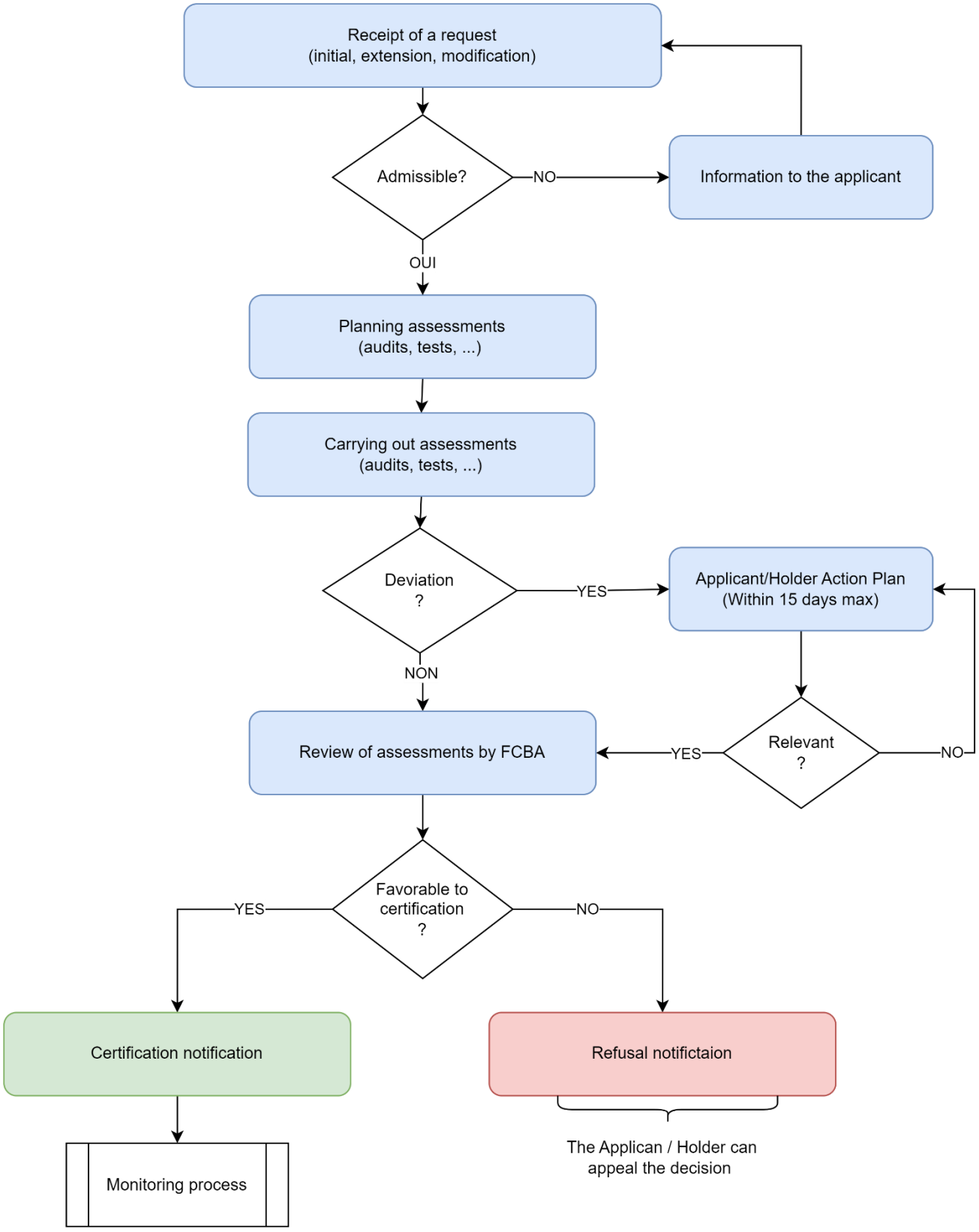
6.4 REVIEWING THE APPLICATION

Certification review procedures are specified in the certification reference document.

Steps include:

- Application eligibility: verifying the information provided in the application file to allow the certification process to be carried out
- Planning assessment activities
- Carrying out the assessments provided for in the certification reference document (audits, tests, etc.)
- Reviewing the assessments
- Issuing a decision (see article 8.1) with the possibility for the applicant to appeal (see article 9).

Instruction process



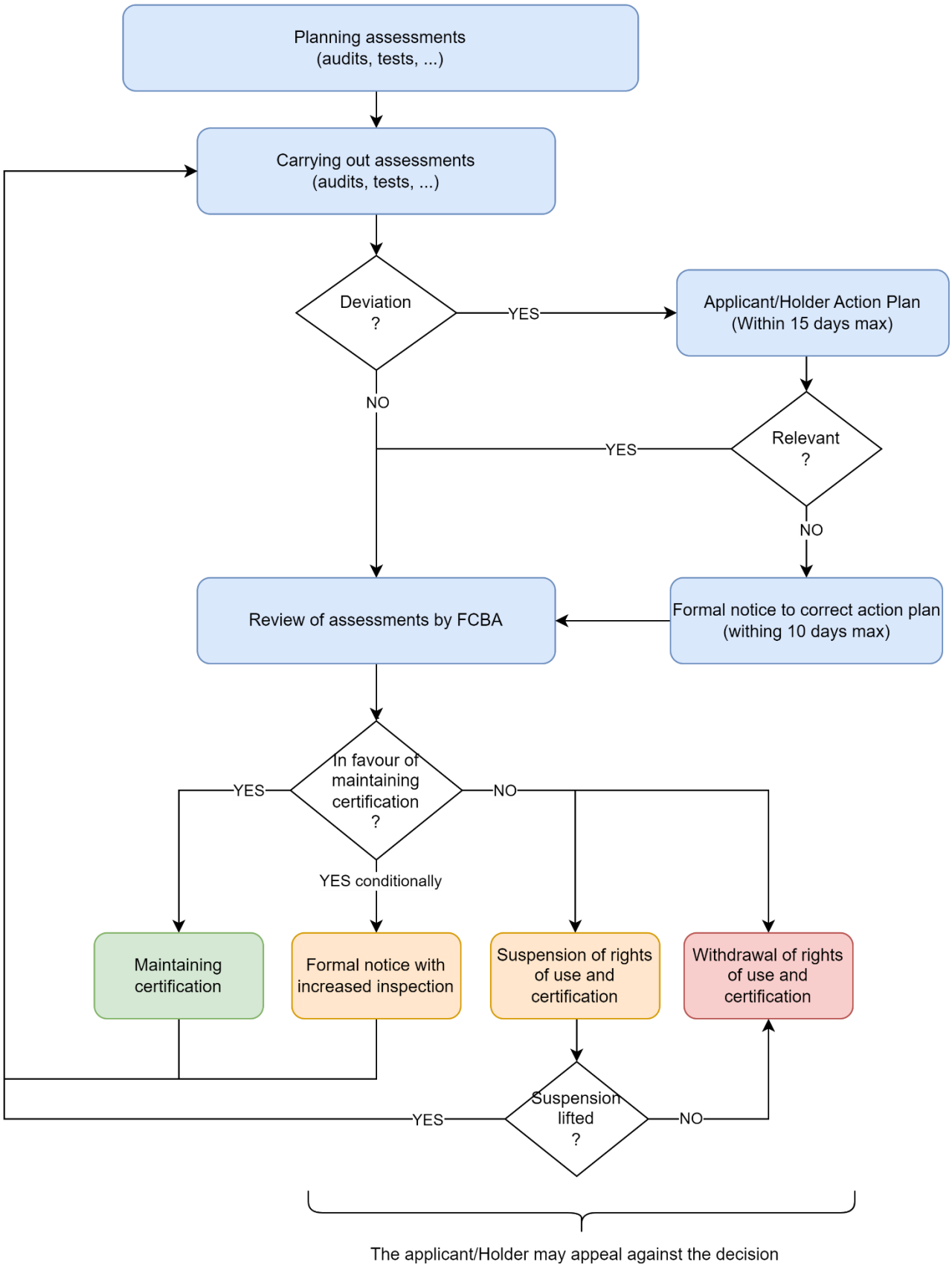
ARTICLE 7. CERTIFICATION MONITORING

Procedures for certification monitoring, both by the certification holder itself and by FCBA, are specified in the certification reference document.

Steps include:

- Planning assessment activities
- Carrying out the assessments provided for in the certification reference document (audits, tests, etc.)
- Reviewing the assessments
- Issuing a decision (see article 8.2) with the possibility for the applicant to appeal (see article 9).

Monitoring process



ARTICLE 8. DECISIONS

After the review, and pursuant to its monitoring duties, the Certification Director, acting on behalf of the General Manager of FCBA, will issue certification decisions with total impartiality.

For each decision, the applicant/holder receives a notification and/or certificate signed by the Certification Director.

8.1 REVIEW DECISIONS

At the end of the review process, FCBA notifies the applicant of its decision to:

- **Award** certification and the right to use the Mark to the applicant, who becomes the holder of the Mark.

or

- **Refuse certification**, stating the reasons.

8.2 MONITORING DECISIONS

Any failure on the part of a holder to comply with the requirements of the certification reference document, the General Rules of Procedure and/or the Terms of Use of the Mark will result in one of the following decisions:

a) Formal notice with increased inspection

Formal notice to rectify the irregularities or shortcomings within a given timeframe, with additional assessment(s) to be carried out at the expense of the holder (tests, audits, document review, etc.).

b) Suspension

Suspension of the right to use the Mark for a set period or time, with the possibility of reducing or extending this period depending on the actions taken by the company. The suspension decision is accompanied by the conditions the company must meet to recover the right to use the Mark at the end of the suspension period.

c) Withdrawal

Withdrawal of certification and the right to use the Marks, without prejudice to possible legal action.

Decisions b) and c) have the effect of preventing the holder from using the Mark in any form whatsoever. These suspension or withdrawal decisions may be subject to prior consultation with the Board of the Mark Committee or Certification Body concerned.

The nature of the decision depends on the seriousness of the irregularity(ies) found. Decisions may apply at any stage in the manufacture and/or marketing of the Products concerned.

The suspension or withdrawal of the right to use the Mark takes effect on the date notified, but the company is obliged to pay the sums due.

Specific conditions for the application of these decisions may be specified in the certification reference document.

The holder may decide to temporarily or permanently cease to enjoy the right to use the Mark. In this case, FCBA will take a decision to:

- Voluntarily suspend certification under the same conditions as described in article 8.2b)
- Voluntarily withdraw certification under the same conditions as described in article 8.2c)

The company will be billed for any additional work involved in reviewing the decision.

ARTICLE 9. APPEALING DECISIONS

9.1 APPEALS

The applicant/holder may appeal the decision notified by the FCBA and request a re-examination of its case, providing justification for its objection.

Upon receiving notification of the decision, the applicant/holder has 15 days in which to formulate and submit an appeal to FCBA.

FCBA will register and acknowledge receipt of this appeal to the applicant/holder and, within a maximum period of 2 months, re-examine the case if it is deemed eligible on the basis of the information provided.

FCBA may consult the Board of the Mark Committee or Certification Body concerned, with the possibility for the holder to be heard.

Following this examination, a new decision will be taken by FCBA which will confirm, amend or reverse the contested decision. The party concerned will be notified by registered letter with acknowledgement of receipt.

This review has no suspensive effect. The original decision therefore remains in force during this period.

9.2 FURTHER APPEALS

The company may further appeal a suspension or withdrawal decision taken after a review during an earlier appeal procedure.

The appeal must be addressed to the FCBA Certification Director, who will acknowledge receipt and refer the matter to the Board of the FCBA Certification Committee.

The Certification Committee Board will meet within 2 months of receipt of the appeal.

The decision taken at the end of the Certification Committee meeting may not be challenged under these General Rules.

ARTICLE 10. COMPLAINTS

A complaint is an expression of dissatisfaction with certification activities made in writing by:

- A customer of a holder of an FCBA certification against this same holder

or

- An applicant/holder against FCBA.

10.1 COMPLAINTS FROM CUSTOMERS OF A CERTIFICATION HOLDER

Upon receiving a complaint from a customer against a certification holder, FCBA will register and acknowledge receipt of the complaint to the complainant and ask them to deal directly with the certification holder, if this has not already been done.

If the complainant is dissatisfied with the handling of the complaint by the certification holder, FCBA will analyse the information collected and ask the holder for explanations on the handling of this complaint.

If FCBA finds a breach on the part of the certification holder, a formal notice will be sent to the holder to provide a satisfactory solution to the complainant.

FCBA will inform the complainant of the decision. Complaints from customers of a certification holder may lead to a decision set forth in article 8.2.

10.2 COMPLAINT BY AN APPLICANT/HOLDER AGAINST FCBA

Upon receiving a complaint from an applicant/holder, FCBA will register and acknowledge receipt of the complaint to the complainant.

FCBA will analyse the complaint on the basis of the information collected in order to assess its eligibility for review.

If the complaint is deemed eligible, FCBA will take the necessary steps to deal with the dissatisfaction.

FCBA will keep the complainant informed at every stage of the complaint process, from intake to conclusion.

If the complaint is deemed ineligible, FCBA will inform the complainant, specifying the reasons for its ineligibility.

ARTICLE 11. PROMOTING THE MARK

The certification reference document specifies the information maintained by FCBA on the certified Products as well as the procedures for communicating this information.

Actions to promote the mark are submitted to the relevant certification bodies.

The procedures for financing and managing promotional activities are set forth in the certification reference document.

ARTICLE 12. FINANCIAL SCHEME

Each certification reference document describes how certification is to be financed under a financial scheme that includes:

- Management costs
- Assessment costs (audits, sampling, tests, etc.)
- Right of use fees

The rates established for the financial scheme are updated by FCBA each year according to an index defined in the certification reference document. If the index is negative, rates will not fall and there will be no increase. If the index is exceptionally high, FCBA reserves the right to reduce the rate increase.

For each update, rates are sent to the certification holders.

ARTICLE 13. APPROVAL AND AMENDMENTS TO THESE GENERAL RULES

These General Rules of Procedure for the certification of products and/or services covered by the French Consumer Code were validated by the FCBA Certification Committee on 11/07/2024.

They may only be amended after consultation with and approval by the Certification Committee.