**R20.115RS ResponsibleSteel Supplement**

**Scope -** This program is governed by SRI documented information based on ISO 17021-1 and 17021-2, except where requirements are supplanted by the ResponsibleSteel Assurance Manual requirements. Primary differences are address by this program document. All numbering is based on the ResponsibleSteel Assurance Manual.

**General Requirements**

# Auditor Competency (per 3.1.10)

The audit team for Initial Certification: Stage 2 shall be comprised of individuals with the skills and competencies needed to achieve the objectives of the audit. Competency requirements are based on ISO 19011, ISO 17021-2, and Annex 3 of the ResponsibleSteel Assurance Manual. The Certification Department will complete all steps needed to assess competency and will enter all auditors that meet requirements into the Lotus Notes system.

Auditors are approved into one or more of the following scopes based on ResponsibleSteel input:

• Governance (Principles 1-2 and 12)

• Health & Safety (Principle 3)

• Social (Principles 4-7)

• GHG (Principle 8)

• Environment (Principles 9-11)

• Auditor / Lead Auditor

Auditor application start the process using the most current version of the RS Auditor Application Form.

# Determining Audit Time (per 3.1.11)

Per the May 2022 RS Program Update, surveillance is to be approx. ½ of the initial certification audit.

Complexity, risk, and total employee count (including subcontractors on site) are required inputs to the audit time determination. Risk related to shareholders concerns is estimated by reviewing the Index score of the country where the site is located for:

CPI = Corruption Perceptions Index

EPI = Environmental Performance Index

HFI = Human Freedom Index

Where 2 out of the following 4 aspects are classified as being ‘high’, the overall classification should be ‘high’:

1. environmental aspects

2. health & safety aspects

3. legal compliance

4. stakeholder concerns

The R20.41EMS and stage 1 input are used to establish the final complexity level. ResponsibleSteel Assurance Manual section 3.1.11 and audit time Table 2 are used as direct references by SRI personnel when determining audit time. Report writing time should be at least 4 days of the total time, regardless of the calculation (table time + 10% report writing time = total time), based on the standard table time allocation (stage 1- 30% of table time, stage 2- 50% of table time, 20% of time for post-audit and follow-up and reporting)

# Reaching out to stakeholders and seeking their input (3.1.13)

SRI provides a public mechanism for stakeholder input via the SRI website. In addition, we publicize:

* a dedicated email box and voicemail box
* our mailing address and front exchange number

The Certification Department will monitor all feedback, review it, share it with the assigned Lead Auditor for their review, and note the input in the account record. Input will be classified as input to the next planned audit or as the basis to conduct a short notice or unannounced audit. In addition, SRI shall request that the site informs the public about the SRI’s mechanisms to submit comments.

The Lead Auditor will review the list of engages stakeholders and add to it based on media review and or other inputs received from stakeholders. The Lead Auditor will analyze the stakeholders on the list to understand:

1. How they are organized, e.g., do they have representatives that could speak for them?
2. Are there stakeholder groups that need special attention to ensure their inclusion in the ResponsibleSteel certification process? E.g., women, indigenous peoples, marginalized and vulnerable groups
3. Their relationship with and interest in the site
4. Their positions and concerns with regards to the site

The outputs of this review shall be documented in the Implementation Instructions by the Lead Auditor, no later than the point when the next audit plan is developed.

All stakeholders on the list shall be contacted by SRI Audit Operations Department representative at least 4 weeks prior to the first day of the stage 2 audit to inform them of:

1. The ResponsibleSteel program and its aims
2. The ResponsibleSteel certification process
3. The site applying for certification
4. Opportunities to provide input during the certification process and ways to do so
5. Dates available for stakeholder interviews and how to register for an interview
6. Mechanisms for stakeholders to submit comments at any time (see guidance below)

SRI shall use the template provided by ResponsibleSteel for informing stakeholders of the certification process and inviting them to provide input. SRI shall acknowledge received stakeholder input and shall inform stakeholders how and when their input will be taken into account.

# Account Audit Program Management

The Lead Auditor uses the R20.23RS as a tool to manage the audit program. The tool will capture key events and conclusions as they related to planned, short notice or unannounced audits.

# Scheduling

1. One surveillance is planned 12 to 18 months from the certificate start date.
2. Re-certification audit planned and completed prior to certificate end date.
3. Major nonconformities require a special audit, when the site has addressed the issue(s) **Note:** typically, 6 months or less. If the Major is not accepted at the first special audit; a second special audit is scheduled within 6 months.
4. If other events trigger short notice or unannounced audits, the Certification Department will notify Scheduling and Customer regarding the need for a short notice audit. If the audit in unannounced, that status will be clearly identified to ensure normal customer notifications are not publicized.

# Record Keeping (per 8.0)

SRI shall retain the following records in relation to certified sites, previously certified sites

and, where relevant, certification clients for the duration of the current certification cycle plus 1 full

certification cycle:

1. Completed Implementation Instructions
2. Audit reports
3. All received stakeholder input
4. All media articles and other publications
5. Records relating to implementing the issues resolution procedures.
6. Evidence of audit team member competence and of the absence of conflicts of interest and, where relevant, on how conflicts of interest were addressed.

Records are protected per SRI procedure QP 10.0 Recordkeeping and Retention.

# Appeals (per Annex 4)

Organizations that wish to appeal to SRI should follow QP 8.0. SRI will notify the ResponsibleSteel Secretariat about appeals received and their outcome. If stakeholders or other parties wish to appeal to ResponsibleSteel, use the process described in ResponsibleSteel Assurance Manual Annex 4. If organizations are not satisfied with the outcome of SRI’s appeal process, they can approach ResponsibleSteel to seek further consideration of the issue.

# Changes in Scope, Ownership or Auditing Body (per Section 10)

## 10.1. Certification Scope Changes

The certification scope may change if there is a change to the site's business, such as:

1. Organizational restructure
2. Divestments and acquisitions or change to the equity share of businesses
3. Changes to activities, products, and processes
4. Changes to the locations and distribution of the site's facilities
5. External influences such as changes in the statutory environment, regulations and/or other stakeholder expectations and commitments that affect the site.

If the certification client wishes to add facilities or associated activities to its existing certification scope, a new certification audit shall be conducted, including the additional facilities and associated activities.

The ResponsibleSteel Secretariat shall be notified by the certification body of changes to the site's business and to the published certification scope as soon as these changes become known.

## 10.2 Divestments and acquisitions

At times, the control of a certified site may change through divestment or acquisition. For the

ResponsibleSteel certification status of the acquired site to continue, the new site in control, if not already a ResponsibleSteel certification client, shall become a ResponsibleSteel certification client within 6 months of the acquisition.

A surveillance audit of the certified site shall be conducted if already scheduled, or within 12 months of the acquisition, whichever is first. The scope of the surveillance audit shall be determined based on areas of potential changes due to the acquisition. The certification body shall document the rationale for any changes to the certification scope in the Implementation Instructions and audit report.

If the new owner is not a ResponsibleSteel certification client within 6 months of the acquisition, or a surveillance audit is not completed within 12 months, the ResponsibleSteel certificate covering the acquisition shall be withdrawn by the certification body.

## 10.3 Certification client changing the certification body

Certification clients shall be free to select a certification body from the list of approved certification bodies and to change their certification body. However:

1. A certification client shall not transfer to another certification body during an ongoing audit
2. A site with suspended certification shall use the same approved certification body until the major nonconformities have been closed
3. The validity date of the current site certificate shall not change due to the certification body transfer.

Certification clients may transfer from a certification body who has lost or given up ResponsibleSteel approval at any time.

When the time has come to transfer the certification client, the current certification body shall provide the following documentation to the succeeding certification body covering the period of the current certification cycle:

1. Copies of previous audit reports, including reports from certification, surveillance, special and recertification audits, as available
2. The completed Implementation Instructions and any referenced supporting evidence
3. Records of monitoring activities and results
4. The collection of media articles and other publications on the certified site

On the date of the certification client transfer, the succeeding certification body shall inform the

ResponsibleSteel Secretariat of the site's new certificate code. The ResponsibleSteel Secretariat shall update its website accordingly.

**Primary Service Delivery Sequence**

2.0 Pre-Audit Activities

# 2.1 Site Application

The R20.118RS application will be provided to any potential ResponsibleSteel clients. The application:

* includes verification that the site is part of a business that is a ResponsibleSteel member.
* Provides links to the most current ResponsibleSteel documents.
* Requires the completion of the sheet 'Site application details' in the ResponsibleSteel document 'Implementation Instructions,' which includes the client’s proposed Certification Scope.
  + This scope shall take into account all facilities and associated activities that are directly related to the organization’s production activity (e.g., steel making) which are on-site and under the control of the client. See Assurance Manual 2.1.4 and 2.1.5 for full details of scope requirements.

Applications are taken only on a site basis, no sampling or grouping of sites is allowed.

Prior to signing the contract with a client, SRI submits the R20.118RS Site Application, Risk Classification and Audit Time Calculation to ResponsibleSteel for review and approval.

# 2.2 Contract and confidentiality agreement with the certification client

SRI contract shall cover at least one full certification cycle, defined as the initial certification audit, ongoing monitoring activities, the surveillance audit, and the re-certification audit. SRI’s contract terms and conditions (R20.03RS) reserve the right to review the quote after the initial audit: Stage 1 activity is completed, establishes agreements related to un-scheduled short notice or unannounced audits, and coverers all requirements specified in Assurance Manual section 2.2.3.

If a contract is signed, SRI will inform the client of the requirement to complete the Implementation Instructions, including requirements in Assurance Manual sections 2.3 Identify stakeholders, 2.4. Collate relevant media articles and other publications, 2.5. Site self-assessment. All information related to the Implementation Instructions is due to SRI at least 2 weeks prior to the start of Initial Audit: Stage 2.

# 3.1 Initial Certification: Stage 1

The initial certification process begins with a stage 1 audit, which may be conducted on site or remote, at SRI’s discretion. SRI’s ResponsibleSteel Audit Plan template is used to identify key objectives and activities associated with this stage of certification, as described in 3.1.1 to 3.1.9.

During the stage 1, the following are reviewed and confirmed:

* The list of exclusions and the rationales for the exclusions
* The stakeholder list

Once established by the Lead Auditor, both lists are communicated immediately to the SRI office, which transmits the lists without delay to ResponsibleSteel. SRI will coordinate any additional activities need based on the RS review and feedback.

The audit team for Initial Certification: Stage 2 shall be comprised of individuals with the skills and competencies needed to achieve the objectives of the audit. Competency requirements are based on ISO 19011, ISO 17021-2, and Annex 3 of the ResponsibleSteel Assurance Manual. The Certification Department will complete all steps needed to assess competency and will enter all auditors that meet requirements into the Lotus Notes system.

3.1.a Communications with ResponsibleSteel Prior to Stage 2

Four (4) weeks prior to the stage 2 audit, certification bodies shall share the following with ResponsibleSteel:

* Stage 2 audit plan (clause 1.4.3.b)
* Audit team composition (clause 1.4.3.d)
* Auditor and certification body conflicts of interest (clause 1.4.3.e)

# 3.2 Initial Certification: Stage 2

## 3.2.2 Opening Meeting

The SRI Lead Auditor will conduct the opening meeting used the R20.19RS. The names of those attending shall be recorded for the permanent audit record.

## 3.2.3 Gathering supporting evidence

Each of the twelve ResponsibleSteel Principles is the basis for a number of Criteria and underlying Requirements. Conformity with the ResponsibleSteel Standard shall be audited at the level of the Requirements specified for each Criterion. The audit team will follow ISO 19011 guidelines and supporting evidence that have not been reviewed during the stage 1 audit and that are either listed in the Implementation Instructions documents or are otherwise relevant to the audit shall be obtained by the audit team through sampling. The audit team shall record specific details of all collected supporting evidence in the Implementation Instructions document.

During the site visit, the audit team shall seek to acquire a good understanding of the site's operations, the work environment, and conditions. To this end, the audit team shall:

1. See all facilities that, together with their associated activities, contribute to the social, environmental and governance performance of the site
2. Receive demonstrations or explanations of activities that serve to verify the effectiveness of the site's policies, systems, processes, and procedures, such as the measurement of air emissions and water quality or the identification of training needs.

The audit team shall request and review any relevant documents and records which they could not obtain from the site for the stage 1 audit or that they consider to be relevant to determine conformity levels. It is up to the audit team to decide whether any documents and records should be reviewed while on-site or whether it is feasible for them to take electronic copies and review these remotely. Remote reviews of documents and records shall happen prior to the closing meeting.

Interviews

As part of the stage 2 audit, a representative number of workers shall be interviewed (see guidance from ResponsibleSteel on conducting worker interviews). Interviews shall be conducted with:

1. Site management
2. Other full, part-time, and temporary workers of the site and of contractors
3. Minority and, where relevant, migrant workers of the site and of subcontractors
4. Workers of different shifts.

Prior to selecting workers for interviews, the audit team shall liaise with the site to understand the composition of the workforce, including contractors. The mix of individual and group interviews shall be in line with table 3, which is included in the audit plan template. If the audit team has reason to deviate from the figures given in the table, this shall be justified and documented in the audit plan via redline comments.

The audit team shall conduct worker interviews privately or off-site where this is deemed appropriate or where this is requested by the respective individual due to confidentiality or comfort issues. Off-site interviews shall be held at a location where the interviewed workers feel comfortable to share their views and experiences with the audit team. The audit team may seek the support of local organizations trusted by workers for finding an adequate location. Workers and their representatives shall be interviewed in a confidential setting without any supervision or management personnel present. If a labor union exists, a labor union representative shall be permitted to attend the interview at the request of the interviewee(s).

The audit team shall maintain a list of interviewed individuals. This list shall not be shared with the

site or certification client. The list shall be used to ensure that different individuals are interviewed during subsequent audits or to do follow-up interviews at future audits where appropriate.

The audit team shall use SRI’s ResponsibleSteel contact cards to provide workers with the contact information of the audit team and of the ResponsibleSteel Secretariat or, alternatively, ensure that this information is made available to workers by the site. Workers shall be informed that the contact information may be used to provide input to the audit in a confidential manner.

In addition to workers interviews, the audit team shall hold interviews with all other stakeholders that registered for an interview or agreed to be interviewed. These interviews shall take place off-site, for example at town halls, offices or other appropriate locations that offer sufficient privacy for undisturbed conversations. The audit team shall consider the ResponsibleSteel guidance document on engaging stakeholders when preparing and conducting the interviews. The audit team shall add summaries of all conducted interviews to the audit report, ensuring that interviewed individuals cannot be identified.

## 3.2.4. Recording audit findings and classifying conformity

The audit team shall review and cross-check supporting evidence obtained during the audit process.

Information obtained from stakeholders shall be independently corroborated from a second source, wherever possible. Stakeholder input shall be evaluated objectively and meaningfully to determine whether it constitutes evidence of conformity or non-conformity with any Requirement of the ResponsibleSteel Standard. The audit team shall discuss its audit findings and record and classify them in the 'Assessment' sheets of the Implementation Instructions to enable a robust certification recommendation.

The audit team shall substantiate all classifications of conformity and non-conformity with clear and concise detail about the conforming or non-conforming practice, process, or outcome. The documentation of findings of conformity and non-conformity in the Implementation Instructions document shall include:

1. A reference to the Requirement(s)the finding of conformity or non-conformity relates to
2. A brief and concise description of the supporting evidence that led to the respective classification. The description shall be generalized to not compromise confidentiality, security, or commercially sensitive information
3. For non-conformities, a brief and concise description of the nature of the non-conformity
4. An explanation of the strategy for sampling documents and interviewees and a rationale for the choice of samples.

The audit team shall not engage in root cause analysis of the non-conformity or otherwise assist the site in addressing the issue. The audit team shall attempt to resolve any diverging opinions between the audit team and the site concerning supporting evidence or findings, and unresolved points shall be recorded by the audit team. When received stakeholder input does not contribute to audit findings, the nature of the input and the reasons for the omission shall be documented by the audit team in the 'Assessment' sheets of the Implementation Instructions document. The audit team shall also record opportunities for improvement. Where supporting evidence is known to exist or should exist but cannot be located because of poor record keeping practices or other management issues, a non-conformity shall be raised.

Classifying conformity

|  |  |
| --- | --- |
| **Conformity classification** | **Finding** |
| **a) Conformity** | Fulfilment of a Requirement. |
| **b) Minor non-conformity** | A non-conformity shall be considered minor if:   1. It is an isolated lapse, or 2. It is unusual or non-systemic, or 3. Its impacts are limited in their temporal and organizational scale, and 4. The non-conformity does not result in a fundamental failure to achieve the objective of the relevant Requirement or related Criterion.   **NOTE:** A group of minor non-conformities shall be elevated to a major non-conformity if there is evidence that the minor non-conformities are:   1. Related: In terms of the Requirement, activity, or nature of the non-conformity, or 2. Repetitive: With the same issue evident throughout the site's business, symptomatic of a systemic failure or absence of controls, or 3. Persistent: Due to ineffective corrective action to address the root cause. |
| **c) Major non-conformity** | A non-conformity shall be considered major if, either alone or in  combination with further non-conformities, it results in or is likely to result in a fundamental failure to achieve the objective of the relevant Requirement or related Criterion or Principle within the scope of the audit. Such fundamental failures may be indicated by non-conformities which:   1. Continue over a long period of time, or 2. Are systemic, or 3. Affect a wide range of the site's production or of the site's facilities, or 4. Affect the integrity of the ResponsibleSteel program, or 5. Are not adequately addressed by the site within the defined periods for corrections and corrective action. 6. The site does not comply with applicable law, or the situation presents a significant risk\* to workers, the environment, or communities. |
| **d) Opportunity for**  **improvement** | A situation where the observed evidence indicates that a Requirement has been effectively implemented, but where effectiveness or robustness might be increased using a modified approach. A situation that could lead to a future non-conformity if not addressed. |

\* Significant risk refers to situations where there is a high chance of:

* Injury or illness to one or more people resulting in permanent partial impairment or disability or death
* Long-term grave and irreversible impacts to the environment, sensitive species, habitats, ecosystems, or areas of cultural importance
* Heavily affecting a local community or multiple stakeholder groups and impacting on the site’s ability to retain its ‘social license to operate’.

In situations that pose significant risk, the audit team shall contact the ResponsibleSteel Secretariat for guidance.

## 3.2.5 & 3.2.6 Preparing Audit Conclusions and Closing Meeting

The preparation and closing meeting are covered via the R20.19RS.

## 3.2.7Audit Report Development / Routing and 4.0 Assurance Panel Review

The audit report shall be documented within the ResponsibleSteel audit report template. The report will be in English, unless otherwise agreed within the contract. The report will summarize the auditors' findings and conclusions as to the status and effectiveness of the site's policies, systems, procedures, and processes in meeting the Requirements of the ResponsibleSteel Standard. The Lead Auditor shall ensure the report statements are fair, complete, and true and written in clear, concise and unambiguous language. Report information may be pulled directly from the Application Site Details or other sheets of the Implementation Instructions.

Report Routing

Within 4-6 weeks, the report is sent to the client for review or factual errors and to ensure that confidentiality agreements are met.

Within 2 weeks of receiving the report back from the site, the certification body shall send the final audit report and the completed Implementation Instructions to the ResponsibleSteel Secretariat. If the report appears to meet all content requirements, ResponsibleSteel will forward the report to the full Assurance Panel for review, consideration, and decision. They shall reach overall agreement, which shall be either:

1. In support of the (re-)certification recommendation. This may include a request to the certification body to make changes to the audit report. Where changes are required, the Assurance Panel shall specify where, why and what changes shall be made, or
2. Disapproval of the (re-)certification recommendation. This shall include a request to the certification body to make changes to the audit report and to then re-submit it for another review. The Assurance Panel shall specify where, why and what changes shall be made.

**Note:** The Assurance Panel shall disapprove of the (re-)certification recommendation if:

1. There was a serious procedural error in the audit process that was material to the fairness of the audit, or
2. The certification body accepted corrections or corrective action plans by the site in relation to one or more non-conformities that cannot be implemented effectively, or
3. The conformity classification done by the certification body in relation to one or more Requirements of the ResponsibleSteel Standard cannot be justified, and the effect of the classification was material to the (re-)certification recommendation.

# 5.1 Certification and Re-Certification Decision and Certificate Publication

For a site to achieve and maintain certification, there shall be no major non-conformity with any Requirement. Minor non-conformities do not preclude certification but shall be corrected. Once these conditions are met, the certification decision process can begin by contacting the ResponsibleSteel Assurance Panel.

If the Assurance Panel supports the (re-)certification recommendation, SRI will begin its certification decision-making process (RRP). The information reviewed by the certification body prior to taking a certification decision shall include the Assurance Panel report and the final version of the audit report.

# 5.2 Issuing a certificate

SRI utilizes a certificate template based on the requirements of 5.2a.-o. Once published, SRI will provide the ResponsibleSteel Secretariat with the site certificate and the final audit report a summary which is the final report excluding the section described in 3.2.7.2.6a:

All the Requirements of the ResponsibleSteel Standard, their conformity classifications, descriptions of audit findings, and supporting evidence.

**6. Surveillance**

# 6.2 Ongoing Monitoring

SRI uses Google Alerts to monitor each certified site in-between audits and for determining appropriate action following monitoring results. The aim of this process shall be two-fold:

1. Keep up to date with site-related events that might be relevant for its performance against the ResponsibleSteel Standard.
2. Decide whether the relevant, analyzed information will be used as an input to planning for the next scheduled audit or whether the information warrants an un-scheduled short-notice or unannounced audit to investigate the issue.

Ongoing monitoring includes:

1. Analysis of media articles, civil society, and scientific publications. Articles and publications that are relevant with regards to the site's performance in relation to the ResponsibleSteel Standard shall be recorded in the 'Articles and other publications' sheet of the Implementation Instructions.
2. Review of received stakeholder input, if any.

SRI shall record monitoring activities, their results, any actions taken and how they were determined in the 'Monitoring' sheet of the Implementation Instructions. Depending on the performance of the site, received stakeholder input and the results of monitoring activities, the scope of stage 2 of the surveillance audit may be less extensive than stage 2 of the certification audit.

# 6.3 Surveillance

## 6.3.1 Surveillance Audit Stage 1

Prior to stage 1 of the surveillance audit, the SRI shall ask the site to review the Implementation Instructions as follows:

1. Update the information provided in the sheet 'Site application details' where changes have occurred
2. Update the sheet 'Stakeholders' to reflect developments since the last audit
3. Update the sheet 'Articles and other publications' to reflect developments since the last audit
4. Update the status of implementation of its corrections and corrective action plans.

SRI Audit Operations Department shall request to the site and, where relevant, the certification client to submit the following information, covering the period since the last audit:

1. Updated and new documentation and figures related to the site's social, environmental and governance performance, such as revised policies and procedures, air emissions data, worker data
2. Any new audit reports of other relevant schemes
3. Any complaints that have been received via the site's grievance mechanism

SRI CCC will reach out to all identified stakeholders about 8 weeks prior to the surveillance stage 2 audit to seek information about any site-related events that might be relevant for the site's performance against the ResponsibleSteel Standard and to schedule interviews with stakeholders during surveillance stage 2. Identified stakeholders shall include those on the site's stakeholder list, those that the certification body identified and those that provided input during the last audit.

During stage 1 of the surveillance audit, the SRI’s Lead Auditor shall:

1. Review the information and updates submitted by the site and the certification client
2. Review audit reports of other relevant schemes (e.g., ISO 14K, 45K, tec.) certified by SRI or other IAF recognized CB sources as per section 3.1.5. of the ResponsibleSteel Assurance Manual.
3. Collate and review information resulting from monitoring activities and from stakeholder input, where input has been received.

Based on the listed inputs and considering any facilities and associated activities of the site and any Requirements of the ResponsibleSteel Standard that received less attention in the previous audit, the Lead Auditor shall define the audit scope for stage 2 of the surveillance audit and establish an audit plan that reflects priority areas for assessments.

## 6.3.2. Surveillance audit stage 2

Surveillance stage 2 is conducted per the audit plan, which includes all relevant input from surveillance stage 1, as well as the audit objectives and activities of the surveillance stage 2 audit plan template (based on ResponsibleSteel Assurance Manual section 3.2).

Use of ResponsibleSteel trademarks related logos will be reviewed per the criteria identified in R20.06RS. All violations will result in a nonconformity which will be communicated within one week to the ResponsibleSteel Secretariat.

The duration of the stage 2 surveillance audit is 1/3 to 1/2 of the initial certification. Accordingly, interviews conducted during the audit per the table included in the audit plan will be adjusted by the same factor used to reduce the initial audit duration (i.e., if the stage 2 surveillance is 1/3 the days as the initial certification, then the minimum interviews are 1/3 the applicable total within the table.)

## 6.3.3. Surveillance audit report

The surveillance audit report shall meet the requirements of section 3.2.7. However, the section 'List of audit results for each Requirement' may be limited to those Requirements that were considered during the surveillance audit. Where the certification body includes the results of all Requirements, it shall highlight which results originate from the surveillance audit and which ones from the initial certification or re-certification audit.

Just like during an initial certification or re-certification audit, the site shall be given opportunity to review the audit report for errors of fact and to ensure that confidentially agreements are met. Where necessary based on feedback received from the site, SRI shall revise the audit report within 1 to 2 weeks of receiving the report back from the site.

## 6.3.4. Surveillance decision and publication

If SRI decides the certification is upheld, it shall send the final surveillance report to the ResponsibleSteel Secretariat and to the site and certification client.

# 6.4. Special audits

When SRI monitoring activities or stakeholder input imply that the site may face a major non-conformity, SRI shall carry out a special audit on short notice or unannounced. The scope of short-notice and unannounced audits shall be limited to the issue(s) brought up through monitoring activities or stakeholder input.

SRI may decide that the full special audit is carried out off-site with any stakeholder interviews happening remotely. However, where this is the case, SRI shall document its reasons for doing so.

A short-notice audit shall follow the requirements for a surveillance audit and will be conducted in two stages. Where stage 1 of the short-notice audit generates strong evidence that no major non-conformity is present, stage 2 may be cancelled. In such a case, the certification body shall draft a short audit report describing:

1. The circumstances that led to the assumption of there not being a major non-conformity
2. The certification body's activities and findings during stage 1
3. The certification body's reasons to drop the case.

An unannounced audit shall consist of a surveillance stage 2 audit only and shall comply with the requirements for an audit report and for certification decision and publication of decision. However, lead times and number of taken document samples might be reduced for both types of special audits and interviews carried out with workers and external stakeholders may be limited to those who might hold relevant information in relation to the issue the special audit seeks to address. The Lead Auditor will document the scope and objectives of the unannounced and or short-notice audit on the audit plan.

If either an unannounced or a short-notice audit is conducted, SRI’s audit report will follow section 3.7 of the ResponsibleSteel Assurance Manual, but the report will be limited to those findings that were raised during the special audit.

SRI will send the special audit report to the site to check for errors of fact. Within 2 weeks of receiving the report back from the site, SRI shall send the final special audit report and the completed Implementation Instructions to the ResponsibleSteel Secretariat.

# 7. Re-certification

Re-certification audits are conducted using a two-stage approach and following the same steps described in sections 2 to 5 above.

# Annex

Table 5 Overall conformity and obligations resulting from non-conformities

|  |  |
| --- | --- |
| **Overall Conformity** | **Audit outcomes and site obligations** |
| **a) Conformity** | A site with zero non-conformities shall be eligible for a 3-year certificate, provided it passes ongoing monitoring activities conducted by the certification body and a surveillance audit 12 to 18 months after the certificate has been issued. |
| **b) Minor non-conformity** | 1. A site with only minor non-conformities shall be eligible for a 3-year certificate, provided it conducts a root cause analysis and implements effective corrections and corrective actions to close out the minor nonconformities by the time of the next surveillance or re-certification audit, whichever is earlier. 2. Effectiveness of the corrections and corrective actions and continued conformity with the ResponsibleSteel Standard shall be verified during the next audit. The certification body shall also conduct monitoring activities on the site on an ongoing basis. 3. The site shall have completed a re-certification audit by 3 years after the certificate has been issued, if it wishes to remain certified. |
| **c) Major non-conformity** | 1. If any major non-conformities are found during an audit, the site shall not become certified. 2. If the site still wants to become certified or if it had already been issued a certificate, the site shall conduct a root cause analysis and develop and implement SMART plans for corrections and corrective actions to effectively address the issues within 6 months of the nonconformities being raised. 3. The site's root cause analysis and plans for corrections and corrective actions shall be reviewed by the certification body and accepted if they meet the SMART criteria. If not accepted, the site shall revise its analysis and plans and resubmit them to the certification body. 4. Effectiveness of the corrections and corrective actions and conformity with the ResponsibleSteel Standard shall be verified at a special audit, which shall be carried out when the site believes that it has successfully closed out the major non-conformities. If the site fails at the special audit, the site shall not become certified or, if already certified, the certificate shall be suspended. 5. Sites that still want to become certified and suspended sites shall implement corrections and corrective actions to close out the major non- conformities by 6 months after the first special audit. Effectiveness of the corrections and corrective actions and conformity with the ResponsibleSteel Standard shall be verified at another special audit. If the site fails at this second special audit, it shall not be issued a certificate or, where already suspended, its certificate shall be withdrawn. |