



ResponsibleSteel Exception Procedure

Version 1.0

01 September 2023

Version history

No.	Date	Description
Version 1.0 draft	02 August 2023	Initial endorsement of these procedures by the ResponsibleSteel Standard, Assurance and Claims Committee (SACC)
Version 1.0 Final	01 September 2023	Board of Directors approved the V 1.0 of the Exception procedure

Disclaimer

The official language of this document is English. The definitive version is held on the ResponsibleSteel website <https://www.responsiblesteel.org/>. Any discrepancy between copies, versions or translations shall be resolved by reference to the definitive English version.

Table of Contents

1. Introduction	4
2. General conditions	4
3. Receiving an exception request	4
4. Decision making process	5
5. Record keeping and publicity of exceptions	6
6. Appeals	6



About this document

This document defines the conditions and procedure to be followed for managing exceptions to the ResponsibleSteel™ Assurance Manual and Claims. The procedure is written to comply with the ISEAL Codes of Good Practice for Standard Setting (V6.0) and Assurance (V2.0), and were endorsed by the ResponsibleSteel™ Standard, Assurance and Claims Committee (SACC) of the Board.

The procedure includes:

- General conditions for exceptions;
- The main steps to submit and consider an exception request;
- The decision-making procedure;
- Information management and publication requirements;
- Appealing decisions on exception requests.

1. Introduction

Exceptions are justifiable decisions to temporarily exempt certified sites from compliance with particular assurance and/or Claims rules. Exceptions are aimed at granting the flexibility that might be needed when unforeseen or extraordinary situations where it is impractical to meet certain requirements of the Assurance Manual or Claims rules. Exceptions are not applicable to the Standard. The Standard Development Procedure for Standards outlines the routes for dealing with issues relating to the standard itself, via urgent revisions, clarifications and/or interpretations.

2. General conditions

1. Exceptions may be made where they are deemed to not compromise or contradict the RS mission and vision.
2. Exceptions shall not compromise or pose a risk to ResponsibleSteel's reputation.
3. Exceptions shall not be abused, not be the norm, and shall only be granted when compliance with specific Standard or assurance requirements cannot be realistically achieved.
4. Exceptions should ensure overall benefit for workers, environment and society.
5. Not all exceptions are equal in nature and therefore cannot follow the same process. These differences are defined in this procedure.
6. Exception requests may come from one or several stakeholders. These stakeholders may be ResponsibleSteel members, certified sites or approved certification bodies.
7. Exceptions shall include actions that shall be put in place by the certified site and shall be monitored by the relevant certification body.
8. Exceptions shall have an expiration date.
9. Exceptions shall be considered during ResponsibleSteel's regular review and revision processes for inclusion in the Standard, Assurance Manual and Claim rules.
10. Exceptions are not applicable to the Standards of ResponsibleSteel.

3. Receiving an exception request

The organisation requesting an exception shall send a formal request for exception to the ResponsibleSteel



Secretariat at assurance@responsiblesteel.org, including at least the following information:

- The requirement(s) or procedure(s) that cannot be complied with, referring to the specific numbering of the document;
- The reason(s) why the organisation cannot comply with the respective Assurance Manual or Claims rules requirements and why it is requesting the exception;
- Evidence to support the request;
- The time period for which the exception is required for;
- The impact or consequences that not granting the exception could have for the organisation;
- Actions the organisation will undertake to come into compliance with the Assurance Manual or Claims requirements beyond the validity of the exception and the associated timeline;
- Mitigation actions to deal with the exceptional cases while the exception is valid;
- A signature on the request by the official representative of the organisation.

The ResponsibleSteel Secretariat will evaluate the information and documentation received and liaise with the organisation in case something is unclear or missing. Once the ResponsibleSteel Secretariat is satisfied with the level of information and detail provided in the exception request, the decision-making procedure will commence.

4. Decision-making procedure

The decision-making procedure can take two different routes, depending on the nature of the request and potential negative impacts that the exception may have on ResponsibleSteel. The decision on which route to take rests with the ResponsibleSteel Secretariat, but where there is lack of certainty within the Secretariat, the decision shall be referred to the SACC. The two possible routes are:

a. Route A

This is the route to be followed in case the exception request is technical by nature and does not represent a clear risk for ResponsibleSteel Standards reputation.

In this case, the Secretariat shall process the exception request and propose a decision for approval by the RS Executive Director/CEO.

b. Route B



This is the route to be followed in case the exception request involves non-technical issues and more complex situations and can represent a clear risk to the Standards or reputation of ResponsibleSteel .

In this case, the Secretariat shall establish an independent Ad-Hoc panel with at least two subject-matter experts to evaluate the exception request and propose a resolution to the Secretariat. The Secretariat shall process the recommendation by the Ad-Hoc panel and propose a decision for consideration and endorsement by the SACC and approval by the Board.

For any of the two above routes, the ResponsibleSteel Secretariat might reach out to relevant stakeholders to seek their views on the exception request, taking account of confidentiality issues as relevant. The decision shall be communicated to the organisation that requested the exception and shall be made publicly available on the ResponsibleSteel website. The certification body involved in the respective site's certification process and impacted by the exception decision shall be informed by the ResponsibleSteel Secretariat as well.

5. Record keeping and publication of exception decisions

ResponsibleSteel shall maintain a list of all exceptions that have been received and processed together with details on how these were addressed and decided on, so this information can be used to inform future revisions of the Standards or Assurance Manual.

For transparency reasons, all approved exception requests shall be made public on the ResponsibleSteel website, including the validity period of the exception.

6. Appeals

The organisation requesting the exception has the right to appeal to the final decision on its exception request. The organisation must follow the Issues Resolution System outlined in the ResponsibleSteel Assurance Manual to submit an appeal.