



ResponsibleSteel Assurance Manual

Version 2.0

19 December 2023



Version history

No.	Date	Description
Draft 1.0	14 May 2019	First draft version. Provided to ResponsibleSteel by technical partner DNV-GL, based on the Assurance Manual of the Aluminium Stewardship Initiative (ASI)
Draft 2.0	23 August 2019	Second draft version, following revision of draft 1.0 by the ResponsibleSteel Secretariat. Circulated to ResponsibleSteel members and interested certification bodies for comment and to Assurance Services International for review
Draft 3.0	05 November 2019	Third draft version, reflecting feedback received from certification bodies, ResponsibleSteel members and Assurance Services International
Draft 4.0	10 December 2019	Fourth draft version, reflecting feedback received at auditor training workshop
Draft 5.0	16 December 2019	Fifth draft version, reflecting discussions around the certification scope (2.1.4.), the audit scope (2.1.5), the Assurance Panel (1.4.4. and 1.4.5. and 4.1. and 4.2.), and the Issues Resolution System (Annex 4, 3.4.)
Version 1.0	29 December 2019	Approved version for publication
Version 2.0	19 December 2023	<p>Revision that incorporates insights from the first audits and feedback from certification bodies, sites, the Assurance Panel and other stakeholders. Some of the key changes are:</p> <ul style="list-style-type: none"> • The order of some chapters has changed and there is now more focus on pre-audit activities to ensure that planning and budgeting are appropriate • ResponsibleSteel oversight activities have become more formalised. To reflect this, requirements have been added for check-ins with ResponsibleSteel or an appointed Oversight Body at important steps in the certification process • The Excel-based 'Implementation Instructions' have been phased out and have been replaced by a number of mandatory and voluntary templates • Rules related to audit time have been clarified for individual sites and for clusters of sites

		<ul style="list-style-type: none"> • The concept of 'significant risk' has become more prominent and has effects on stakeholder engagement and actions by the certification body • Requirements on stakeholder engagement have been extended • There is now more flexibility regarding site tour and worker interviews • Requirements for surveillance audits have been extended • It has been specified that audit reports are reviewed by the Assurance Panel where they have a positive certification recommendation and that surveillance audit reports are reviewed on a risk basis • Auditor approval scopes and qualification requirements are now more specific • The Issues Resolution System (previous Annex 4) has been removed and is now a stand-alone mandatory document • Informative annexes with key audit process steps and timelines have been added
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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.

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Introduction

This chapter summarises the ResponsibleSteel certification programme and assurance process. The explanations provided in this introductory chapter serve as orientation and do not contain any requirements. The requirements for parties engaged in assurance activities are described in detail in chapters 1 to 11 and in the Annexes. Readers should note that ResponsibleSteel has drafted guidance on assurance-related issues, which can be found on the ResponsibleSteel website.

About ResponsibleSteel

ResponsibleSteel is a not-for-profit organisation and the industry's first global multi-stakeholder Standard and certification initiative for responsible steel supply chains.

We strive to enhance the responsible sourcing, production, use and recycling of steel by:

- Providing a multi-stakeholder forum to build trust and achieve consensus;
- Developing standards, certification and related tools;
- Driving positive change through the recognition and use of responsible steel.

Recognising that all of these elements are important, ResponsibleSteel currently focuses on the responsible sourcing and production of steel through an independent certification programme that aims to be in line with the Code of Good Practice set by the [ISEAL Alliance](#). We offer steel site certification against the ResponsibleSteel Standard since the end of 2019 and added voluntary requirements for responsible sourcing and GHG emissions in September 2022. The rules and processes for ensuring compliance with the Standard are laid out in this assurance manual.

The ResponsibleSteel assurance model

ResponsibleSteel's assurance model is designed to respond to stakeholder needs and expectations and to align with the requirements outlined in the ISEAL Code of Good Practice. To this end, the Assurance Manual focusses on the following principles:

- Fair and objective treatment of certification clients
- Adequate intensity of the assurance process
- Consistent application of assurance requirements, regardless of the context or the involved individuals
- Assurance activities carried out by competent individuals
- Building on or aligning with other relevant systems
- Providing meaningful opportunities for stakeholders to engage in audits
- Transparency with regards to the assurance process and audit results

- Affordable, culturally sensitive, comprehensible assurance that is within reach of the targeted certification clients

The key characteristics of audits against the ResponsibleSteel Standard are:

- Third-party audits and certification decisions to enable high levels of independence and impartiality
- Site visits to enhance confidence in audit findings
- Stakeholder engagement in audits to ensure a rich and balanced collection of information and evidence
- Risk-based quality control through the ResponsibleSteel Secretariat and an independent Assurance Panel
- Transparent audit findings and certification decisions to build and maintain trust in the ResponsibleSteel programme

ResponsibleSteel's assurance system is regularly reviewed to reflect emerging good practice in assurance and to take account of implementation experience by:

- Auditors
- Sites and certification clients
- Assurance Panel members
- The ResponsibleSteel Secretariat and
- Other stakeholders

Revisions and changes to the assurance system and their effective dates are clearly and promptly communicated to these parties.

About this document

The ResponsibleSteel Assurance Manual has been primarily written for certification bodies carrying out certification activities under the ResponsibleSteel programme. It is also relevant to the ResponsibleSteel Secretariat and the Assurance Panel. The Assurance Manual describes the roles of all parties involved in the assurance system and the processes and rules that apply when:

- Approving certification bodies and auditors eligible to assess sites against the ResponsibleSteel Standard
- Verifying conformity of sites with the Requirements of the ResponsibleSteel Standard
- Taking certification decisions and issuing ResponsibleSteel certificates

- Providing the transparency that is needed for stakeholders to understand certification decisions
- Dealing with issues raised in relation to any aspect of the ResponsibleSteel programme
- Managing appeals against certification decisions
- Overseeing effectiveness of the assurance system, including competence of individuals.

Requirements are stated in normative language while guidance is written in *italics*. Guidance is not mandatory but provides further information, good practice or advice.

Responsibility for the Assurance Manual and its content rests with the ResponsibleSteel Secretariat. The first draft version of the Assurance Manual was provided to ResponsibleSteel by our former technical partner DNV-GL who used the Assurance Manual of the Aluminium Stewardship Initiative (ASI) as primary reference since ResponsibleSteel and ASI often work with comparable supply chain companies. The ResponsibleSteel Secretariat revised this first draft version various times to tailor it to the ResponsibleSteel programme and to reflect stakeholder needs and expectations. In doing so, we drew from the Certification Body Requirements of the 'Initiative for Responsible Mining Assurance' (IRMA) and determined that ISO 17021:2015 (parts 1 and 2) forms part of ResponsibleSteel's normative requirements. This means that important issues, such as management of impartiality, liability and financing, structural requirements and management system requirements for certification bodies have not been repeated in our Assurance Manual. We shared the draft versions for feedback and input with ResponsibleSteel members, including interested certification bodies, and with 'Assurance Services International' (a specialised body overseeing the certification bodies of a number of voluntary sustainability standards). The fifth and final draft version was signed-off by the ResponsibleSteel Board and was published as ResponsibleSteel Assurance Manual Version 1.0 in December 2019.

Since then, we have collected insights and experience from witnessing audits against our Standard. We have listened to certification bodies and steel sites, to the Assurance Panel and other stakeholders to inform the revision of our Assurance Manual. The document at hand reflects our collective learnings and aims at ensuring high-quality audits and trustworthy certification decisions. ResponsibleSteel is committed to reviewing its Assurance Manual at least every five years to make sure it remains fit for purpose.

Roles and Responsibilities

In summary, the roles and responsibilities of the parties involved in the assurance system are as follows.

ResponsibleSteel Secretariat (referred to as ‘ResponsibleSteel’)

The roles and responsibilities of ResponsibleSteel include:

- Leading the drafting and regular review of the:
 - ResponsibleSteel Standard and Glossary, including guidance and interpretations
 - Assurance Manual
 - Issues Resolution System to address concerns, complaints and appeals
 - Logo and claims use rules and guidance
 - Any associated scheme documentation
- Recommending certification bodies for approval by the ResponsibleSteel Board
- Approving individual auditors of certification bodies
- Training and calibrating certification bodies and auditors
- Conducting high-level reviews of audit reports and other audit-related information
- Coordinating the activities of the ResponsibleSteel Board
- Receiving concerns, complaints and appeals and identifying the most appropriate way and party to handle them
- Issuing licenses for the use of ResponsibleSteel logos and claims and monitoring their use
- Maintaining up-to-date information on the assurance system and on certified sites and clusters on the ResponsibleSteel website
- Maintaining records on all relevant aspects and outcomes of the assurance system and process
- Maintaining and implementing an assurance system risk management plan, including the prevention of risk
- Monitoring effectiveness of the assurance system and identifying and implementing improvements
- Implementing a monitoring and evaluation programme and publicly reporting on the impacts of ResponsibleSteel certification in the context of ResponsibleSteel’s strategy.

Apart from initial approval and subsequent training and calibration of certification bodies and auditors, ResponsibleSteel monitors their activities and competence through additional oversight measures such as the witnessing of stage 2 audits, as described in the ‘ResponsibleSteel Oversight Mechanism’. ResponsibleSteel

reserves the right to partly or fully outsource the oversight function to a specialised body such as Assurance Services International.

ResponsibleSteel approved certification bodies and auditors

In summary, the roles and responsibilities of approved certification bodies and auditors include:

- Embedding the ResponsibleSteel requirements in their internal management system
- Participating in training and calibration activities as required by ResponsibleSteel
- Ensuring competence of auditors and other personnel involved in assurance activities
- Conducting audits, taking certification decisions and issuing ResponsibleSteel certificates
- Preparing audit reports for certification clients and audit report summaries for publication on the ResponsibleSteel website
- Responding to questions from the ResponsibleSteel Secretariat and the Assurance Panel in relation to audit reports and auditing activities
- Carrying out monitoring and surveillance activities
- Handling concerns, complaints and appeals

Certification clients and site management

The roles and responsibilities of certification clients and site management include:

- Contracting an approved certification body as listed on the ResponsibleSteel website to conduct audits against the ResponsibleSteel Standard
- Defining the audit scope and certification scope
- Carrying out a self-assessment against the ResponsibleSteel Standard, collecting supporting evidence, relevant media articles and other publications in preparation for the third-party audit and in line with this Assurance Manual
- Providing auditors and, if requested, the ResponsibleSteel Secretariat or the appointed Oversight Body with access to facilities, relevant information and records
- Facilitating auditor interviews with site management, workers and other stakeholders
- Supporting the auditors in stakeholder identification and outreach
- Informing the auditors of any changes to their business and their activities, and of any incidents that might impact their governance, social or environmental performance

- Identifying the root causes of non-conformities, defining and implementing corrections and corrective action to address these non-conformities
- Cooperating in the resolution of concerns, complaints and appeals, as requested
- Providing information to the ResponsibleSteel Secretariat, where requested.

ResponsibleSteel Assurance Panel

The roles and responsibilities of the ResponsibleSteel Assurance Panel include:

- Participating in training and calibration activities as required by ResponsibleSteel
- Reviewing audit reports with a positive certification recommendation and as requested by ResponsibleSteel
- Where requested by the ResponsibleSteel Secretariat, supporting resolution of issues in line with ResponsibleSteel procedures.

ResponsibleSteel Board

The roles and responsibilities of the ResponsibleSteel Board include:

- Approving the Terms of Reference and procedures for development of the ResponsibleSteel Standard and ensuring they are followed
- Commissioning the drafting and regular review of the:
 - ResponsibleSteel Standard and Glossary, including guidance and interpretations
 - Assurance Manual
 - Issues Resolution System
 - Logo and claims use rules and guidance
 - Any associated scheme documentation
- Ratifying the above-mentioned documentation
- Approving certification bodies
- Reviewing applications and selecting members of the ResponsibleSteel Assurance Panel
- Ensuring effective implementation of the risk management plan
- Ensuring effectiveness of the assurance system
- The Board may delegate some or all of its responsibilities to Board Committees at its discretion

ResponsibleSteel members

- Meeting their membership commitments
- Reviewing and approving the ResponsibleSteel Standard
- Providing input to other ResponsibleSteel scheme documentation

In the ResponsibleSteel model, certification bodies are approved by the ResponsibleSteel Board and their individual auditors by the ResponsibleSteel assurance lead. The certification bodies sign contracts with certification clients and conduct the audits, including site visits, worker interviews and stakeholder engagement. Based on the audit findings, the certification bodies draft audit reports and make certification recommendations. The ResponsibleSteel Assurance Panel reviews audit reports with a positive certification recommendation and either supports or disapproves of the certification recommendation. It might request changes to an audit report before certification decision-making can commence. The certification bodies take the decisions on certification and issue certificates to certification clients in case of positive decisions. For further details on the various roles see below.

The ResponsibleSteel certification process

Overview of the certification process

Certification against the ResponsibleSteel Standard starts with a self-assessment conducted by the site or cluster of sites that wishes to become certified. The self-assessment forms the basis of the ResponsibleSteel certification process, which has seven main steps as illustrated in Figure 1 below.

Figure 1: Summary of the seven main steps in the ResponsibleSteel certification process



The certification cycle is the period that certification is valid and is 3 years. To maintain ResponsibleSteel certification after the initial certificate has been granted, certified sites and clusters of sites must pass a surveillance audit and ongoing monitoring activities and, at the end of the certification cycle, a re-certification audit. The types of audits in the ResponsibleSteel programme and their frequency are shown in the table below.

Table 1: ResponsibleSteel audit types and frequencies

Audit type	Frequency
Initial certification audit	Once, when sites and clusters apply for ResponsibleSteel certification (see chapter 3)
Surveillance audit and ongoing monitoring	Between 12 and 18 months after initial or re-certification In addition, ongoing monitoring activities (see chapter 6)
Re-certification audit	At the end of the certification cycle (3 years)
Special audit	As needed. Audit on short notice or unannounced in case there are indications that a certified site or cluster of sites has fallen out of compliance with the ResponsibleSteel Standard (see chapter 6.10)

1. Certification body and auditor approval and maintenance of approval

1.1. General requirements

1.1.1. Only certification bodies that are approved by ResponsibleSteel or an Oversight Body appointed by ResponsibleSteel may sign contracts with certification clients and make references to offering ResponsibleSteel auditing activities. Approved certification bodies shall be understood as those published on the ResponsibleSteel website with their company name, full address and contact person's details.

1.1.2. Only auditors that are approved by ResponsibleSteel or the appointed Oversight Body may carry out audits against the ResponsibleSteel Standard. Approved auditors shall be understood as those being listed with their full name and contact details on the auditor registry maintained by ResponsibleSteel or the appointed Oversight Body.

1.2. Normative and supporting documents

1.2.1. The following normative documents in their most recent published versions shall be considered part of the ResponsibleSteel assurance system:

- a) ResponsibleSteel Standard
- b) ISO 19011: Guidelines for auditing management systems
- c) ISO 17021: Conformity assessment - Requirements for bodies providing audit and certification of management systems (Parts 1 and 2). While all of ISO 17021 is considered normative, the chapters on impartiality and management of impartiality, liability and financing, structural requirements and management system requirements for certification bodies are of particular importance since these topics have intentionally not been addressed in the ResponsibleSteel Assurance Manual
- d) 'Site self-assessment' and 'Auditor assessment' templates
- e) Templates for ResponsibleSteel audit reports, audit report summaries and certificates
- f) Guidance on offering certification services against ResponsibleSteel's additional responsible sourcing and GHG requirements
- g) Guidance on auditor soft skills and behaviour
- h) ResponsibleSteel Oversight Mechanism.

1.2.2. Certification bodies and auditors shall follow the ResponsibleSteel requirements in case of a conflict with ISO 17021 or ISO 19011.

1.2.3. The following supporting documents inform the ResponsibleSteel assurance system:

- a) 'ResponsibleSteel Certification for Sites', explaining the certification process and the roles and responsibilities of sites and certification clients
- b) Audit planning and preparation templates
- c) Claims and logo use guidelines

All normative and supporting documents developed by ResponsibleSteel can be found on the ResponsibleSteel website.

1.3. Certification body approval by ResponsibleSteel

1.3.1. To apply for approval, the certification body shall:

- a) Be a legal entity
- b) Be an Associate Member of ResponsibleSteel to demonstrate its commitment to the ResponsibleSteel vision and mission
- c) Be ISO 17021 accredited with a relevant scope such as ISO 9001 (Quality management systems), ISO 14001 (Environmental management systems) or ISO 45001 (Occupational health and safety management systems) by an accreditation body that is a member of the International Accreditation Forum (IAF)
- d) Complete the ResponsibleSteel certification body application form (see Annex 1) and submit it via email to assurance@responsiblesteel.org together with the documentation listed on the form
- e) Sign a contract with ResponsibleSteel or the appointed Oversight Body
- f) Pay to ResponsibleSteel an approval fee as per the 'ResponsibleSteel CBs Approval Fees and Payment Process' that can be found on the [ResponsibleSteel website](#)
- g) Inform ResponsibleSteel of the individual that coordinates ResponsibleSteel-related activities at the certification body and that is ResponsibleSteel's key contact at the certification body.

1.3.2. The contract shall contain clauses that specify:

- a) That the certification body shall comply with the requirements of the ResponsibleSteel Assurance Manual and ISO 17021, parts 1 and 2
- b) That copies of all documentation relating to the certification body's ResponsibleSteel auditing activities shall be made available to ResponsibleSteel or the appointed Oversight Body at the request of the ResponsibleSteel Secretariat or the appointed Oversight Body
- c) That the certification body consents to being subject to oversight activities carried out by ResponsibleSteel or its appointed Oversight Body to maintain approval
- d) That certification bodies shall not transfer their ResponsibleSteel approval to another legal entity or to a different business unit within the same entity

1.3.3. Where there are significant changes to the certification body's status or operations during the approval process, they shall be brought to ResponsibleSteel's attention. ResponsibleSteel or the appointed Oversight Body may request that the certification body submits a new application.

Guidance on significant changes

These may include changes to the certification body's organisational structure, business or to procedures that are relevant to the ResponsibleSteel certification programme.

1.3.4. Within 4 weeks of receipt, ResponsibleSteel or the appointed Oversight Body shall:

- a) Review the application form and submitted documentation
- b) Carry out due diligence on the certification body
- c) Write a positive or negative recommendation for consideration by the ResponsibleSteel Board.

If certification body documentation is found to be incomplete, ResponsibleSteel shall request that additional information is provided, and the date for formal response shall be 4 weeks from the submission of the completed documentation.

Guidance on due diligence

Due diligence aims to reveal any risk that a business relationship with the certification body could pose to ResponsibleSteel's reputation. ResponsibleSteel due diligence comprises an online search on the certification body to verify submitted information. It might also include seeking references from other scheme owners, trade associations, etc. Reasons for a negative approval recommendation could be:

- *Evidence of fraudulent behaviour*
- *Intentional provision of false information or concealing information*
- *Regulatory non-compliance*
- *Assessment of track record of complaints or appeals against issued certificates or other relevant accreditations*
- *Assessment of track record of complaints against the certification body.*

Within the 4 weeks of receiving the recommendation, the ResponsibleSteel Board shall review and accept or reject ResponsibleSteel's recommendation in writing.

1.3.5. In case the application is rejected, the ResponsibleSteel Board shall work with ResponsibleSteel or the appointed Oversight Body to provide a written explanation to the certification body. ResponsibleSteel or the appointed Oversight Body shall forward the explanation to the certification body within 1 week and shall keep the explanation on file. The certification body may appeal the decision within 1 week of being notified of the rejection by triggering the ResponsibleSteel Issues Resolution System.

1.3.6. In case the application is accepted, ResponsibleSteel or the appointed Oversight Body shall inform the certification body within 1 week.

1.4. Maintaining certification body approval

1.4.1. To maintain approval, the certification body shall incorporate the ResponsibleSteel programme into its internal management system, meaning it shall include ResponsibleSteel in its internal audit programme and management system reviews, and shall meet the requirements of ISO 17021, parts 1 and 2.

1.4.2. The certification body shall pay to ResponsibleSteel an annual fee as per the 'ResponsibleSteel CBs Approval Fees and Payment Process' that can be found on the [ResponsibleSteel website](#).

1.4.3. The certification body shall cooperate with ResponsibleSteel or the appointed Oversight Body on the implementation of the 'ResponsibleSteel Oversight Mechanism'.

1.4.4. The certification body shall inform ResponsibleSteel or the appointed Oversight Body:

- a) Of the outcomes of its complaints-handling process where complaints relate to the ResponsibleSteel programme
- b) Of received appeals and shall provide a summary of the appeals process outcome.

1.4.5. The certification body shall submit to ResponsibleSteel or the appointed Oversight Body the following documentation for each of the sites or clusters undergoing audits:

- a) Fundamental information about the site or cluster
- b) Complexity and risk classification
- c) Audit time calculation
- d) List of stakeholders that will be informed of the audit
- e) List of requirements that will be excluded from the audit, including the reasons for exclusion
- f) Stage 2 audit plan for the site or cluster
- g) Audit team composition
- h) Any identified certification body and auditor conflicts of interest in relation to the site or cluster and how they were addressed
- i) Audit report.

The documentation shall be submitted to ResponsibleSteel as described in the following chapters.

1.4.6. ResponsibleSteel or the appointed Oversight Body shall review the documentation listed under 1.4.5. and shall provide written feedback on its adequacy to the certification body within 2 weeks of receiving the documentation.

1.4.7. Where ResponsibleSteel or the appointed Oversight Body require changes from the certification body to any of the submitted documentation, the certification body shall incorporate these.

1.4.8. ResponsibleSteel might impose sanctions where a certification body repeatedly:

- a) Does not follow the provisions of the Assurance Manual or other normative documents
- b) Does not follow the direction given by ResponsibleSteel or the appointed Oversight Body
- c) Has been the subject of stakeholder complaints.

Details on sanctions can be found in the ResponsibleSteel Oversight Mechanism’.

1.4.9. ResponsibleSteel reserves the right to request that approved certification bodies submit the latest versions of relevant policies, procedures and other management system documentation to ResponsibleSteel for periodic review. The review is aimed at ensuring that the management system continues to support approval of the certification body.

1.5. Auditor approval by ResponsibleSteel

1.5.1. To be able to get approved, auditors shall:

- a) Meet the qualification requirements outlined in Annex 3
- b) Follow guidance on auditing provided in ISO 19011
- c) Complete the auditor application form (see Annex 2) and submit it via email to assurance@responsiblesteel.org together with the documentation listed on the form
- d) Undergo training on the ResponsibleSteel Standard and Assurance Manual as requested and delivered by ResponsibleSteel or the appointed Oversight Body and pay a training fee as per the ‘ResponsibleSteel CBs Approval Fees and Payment Process’ that can be found on the [ResponsibleSteel website](#)
- e) Take and pass exams as requested by ResponsibleSteel
- f) Receive an approval confirmation by ResponsibleSteel.

1.5.2. Where auditors are borderline in meeting the qualification requirements, for example because they do not reach the minimum number of audits or they cannot provide all necessary auditor training confirmations, ResponsibleSteel reserves the right to grant temporary, provisional approval. To become fully approved, ResponsibleSteel might impose that these auditors:

- a) Undergo further qualification measures within a specified timeframe
- b) Are subject to stage 2 witnessing by ResponsibleSteel or the appointed Oversight Body.

1.6. Maintaining auditor approval

1.6.1. Auditors might be subject to oversight by ResponsibleSteel or the appointed Oversight Body, for example through periodic witnessing of stage 2 audits. Auditors must collaborate in oversight activities to maintain approval.

1.6.2. ResponsibleSteel reserves the right to request that approved auditors:

- a) Submit evidence of relevant training and professional development activities (see Annex 3) to support their continued approval
- b) Participate in refresher trainings, take refresher exams or participate in calibration activities in case the ResponsibleSteel Standard has been revised, where auditors have not carried out a ResponsibleSteel audit in the past three years, or where insights from conducted audits make these measures necessary.

1.6.3. ResponsibleSteel might impose sanctions on auditors where performance is lacking or where stakeholders have repeatedly filed complaints against them. Details on sanctions can be found in the 'ResponsibleSteel Oversight Mechanism'.

2. Pre-audit activities

Guidance on pre-audit activities

Prior to signing a contract with a site or cluster, the certification body will provide the client with information on the ResponsibleSteel programme and the client will provide fundamental information about its business and its environmental, social and governance performance to the certification body. The certification body will do an initial online search about the site or cluster, assess its complexity and risk exposure, determine audit time and liaise with ResponsibleSteel to ensure the effort required for the audit is estimated appropriately. The client and the certification body will then enter into a contract that covers the entire certification cycle. As a next step, the site or cluster will put together a comprehensive stakeholder list, conduct a self-assessment against the ResponsibleSteel Standard and collect the supporting evidence it deems relevant to underpin its self-assessment. All of this will be provided to the certification body so they can kick-off stage 1 of the audit. To ensure that time and effort spent on the audit are appropriate, pre-audit activities for the ResponsibleSteel programme are quite extensive. It is recommended that the certification body allocates about 1 day to pre-audit activities (excluding a potential gap analysis) and takes this into account in planning and budgeting to be able to recover the costs from the client.

Certification bodies should note that there is a separate normative guidance document on offering certification services against ResponsibleSteel's additional responsible sourcing and GHG requirements, which can be found on the ResponsibleSteel website.

2.1 Voluntary gap analysis prior to a ResponsibleSteel audit

Sometimes a site or cluster that is interested in ResponsibleSteel certification might enquire with a certification body whether a gap analysis (also referred to as stage 0 audit or readiness assessment) can be done prior to engaging in the ResponsibleSteel audit process as described below. Certification bodies are allowed to conduct gap analyses, as long as they ensure that their impartiality is safeguarded at all times and that neither they nor an entity or individual they are related to provides advice or consultancy to the site, the cluster or to their corporate owner on how to come into compliance with the ResponsibleSteel Standard.

Where a gap analysis is carried out, this shall be considered a stand-alone process that is independent of the ResponsibleSteel audit process. The certification body shall create a separate budget and contract for this activity and shall document the analysis.

2.2. Verify certification eligibility of sites

Since only sites of ResponsibleSteel members can become certified, the certification body shall verify that the site that is interested in ResponsibleSteel certification is part of a business that is a ResponsibleSteel member. ResponsibleSteel certification can be sought for individual sites and for clusters of sites.

Auditing a cluster of sites may result in time savings. However, to determine whether a given cluster of sites is eligible to apply for certification as a cluster, the certification body shall verify the following:

- a) All sites of the cluster are part of the same group of companies
- b) They have a centralised management system
- c) A central function within the group of companies has the authority to define, establish and maintain the shared management system
- d) The shared management system is subject to a centralised management review
- e) A clearly identified team manages ResponsibleSteel implementation at the cluster
- f) Outside of EU, the sites should be in one country
- g) Within the EU¹, the sites can be located in different countries, but should have similar cultural practices to facilitate an effective audit process.

Where this cannot be achieved, the sites have to seek certification individually.

2.3. Provide information on ResponsibleSteel

To ensure that the site or cluster understands how the audit will be conducted and what their roles and responsibilities are, the certification body shall point the site or cluster to the most current versions of the following ResponsibleSteel documents as held on the ResponsibleSteel website:

- a) Standard
- b) Glossary
- c) Site self-assessment
- d) ResponsibleSteel Certification for Sites
- e) Claims and logo use guidelines
- f) Any other ResponsibleSteel guidance documents developed for sites.

2.4. Request fundamental information from the site or cluster

The certification body shall request that the site provides at least the following information to serve as the basis for an offer for initial and/or re certification. Where a cluster of sites wants to apply for certification, the information shall be provided for each site in the cluster:

¹ The reason to allow sites located in different countries within European Union (EU) is because EU is a supranational political and economic union, which brings some level of harmonization in the legal overall legal framework of the different countries that are part of the union.

- a) Legal name of the site
- b) Jurisdiction of incorporation of the site
- c) Colloquial name and physical address of the site
- d) Web address of the site, if applicable
- e) Contact details of the personnel coordinating the site's ResponsibleSteel application
- f) Name of the group of companies that the site belongs to, if applicable
- g) Description of organisational context of the site
- h) General description of the activities and products of the site
- i) Facilities of the site
- j) Number of workers at the site, taking account of the definition of 'worker' in the mandatory ResponsibleSteel Glossary, which goes beyond workers that are directly employed by the site
- k) Description of any anticipated changes to the site's operations, such as expansions, acquisitions, divestments, etc.
- l) Other relevant certifications the site holds, such as:
 - ISO 9001
 - ISO 14001
 - ISO 45001
 - ISO 50001
 - SA8000
 - UK CARES Sustainable Constructional Steel scheme
 - BES 6001
- m) Whether a significant fine (> USD 10 000) or sanction (such as a settlement) has been imposed on the site due to legal non-compliance in the past 3 years. If so, details shall be provided on the causes of the fine or sanction and whether the causes have been fully addressed
- n) External publications from at least the last 3 years that concern the site's social, environmental and governance performance, both positively and negatively. The site shall include relevant online and offline articles and studies that have been published by local, regional and national news outlets, trade media, scientific institutions and civil society organisations. In addition to a copy of the respective articles or studies, the site(s) shall provide a list with the following details: Name and type of publication, title of article or study, date of publication, online link to publication (where available).
- o) A description of the certification scope and the audit scope (see below).

The site should use the 'Site application information' template provided by ResponsibleSteel to collate the required information. The site or cluster of sites shall use the 'Site application information' template in initial and/or re certification audits.

Guidance on external publications

The collation of articles and studies that have been published on the site, not by the site, is meant to inform the complexity and risk classification and audit time calculation. The articles and studies help the certification body understand the context of the site, organise stakeholder engagement and focus the audit. For these reasons, the certification body has to consider the publications before making an offer to the site. 'Articles' should be understood to also include blogs or features on relevant websites and social media.

2.4.1. The certification scope

- a) The certification body shall request that the site defines its certification scope and, in doing so, takes account of the guidance provided by ResponsibleSteel. The certification scope shall describe the facilities and associated activities that the site's certificate will cover in case the audit is successful.
- b) At a minimum, the certification scope shall comprise all facilities and associated activities that are directly related to steel making and processing, and which are on-site and under the control of the certification client. This shall include any on-site facilities that provide pre-processed materials and utilities (such as pellets, burnt fluxes, industrial gases) or intermediate products (such as coke, direct reduced iron, pig iron). For example, the coking, sintering, blast furnace, basic oxygen furnace, electric arc furnace, rolling and coating, as well input material delivery areas as well as stockpiles shall be part of the certification scope.
- c) 'Control' shall be understood as direct or indirect ownership, direct or indirect power to remove, nominate or appoint at least 50% of the members of the board or management, day-to-day executive management, or any legally recognised concept analogous to these.
- d) The description of the certification scope shall be accompanied by a map showing the facilities and associated activities that will be included in the site's certification scope.
- e) The certification scope shall also identify any Requirements, Criteria or Principles of the ResponsibleSteel Standard that the site assumes are not applicable to it and shall provide reasons for its assumptions (see also Requirement 2.1.1. of the ResponsibleSteel Standard).
- f) In defining its certification scope, the site shall not exclude facilities, activities, Principles, Criteria or Requirements that might contribute to its governance, social or environmental performance.

- g) Facilities and associated activities related to raw material extraction, including the transportation of raw materials, shall not be included in the certification scope.
- h) Where a cluster of sites intends to apply for certification, the certification scope shall be defined for each individual site of the cluster, meaning a) to g) shall be applied to each site of the cluster.
- i) The certification scope shall be reviewed and updated as necessary prior to each audit.

Guidance on the certification scope

The certification body will review the certification scope suggested by the site and will amend it where necessary to ensure it is in line with the guidance provided by ResponsibleSteel.

Where the site claims that individual Principles, Criteria or Requirements of the ResponsibleSteel Standard do not apply to them, their reasons for these omissions will be scrutinised by the auditors to ensure that all material social, environmental and governance impacts of the site are included in the certification scope. Principles, Criteria or Requirements that are not applicable to the site seeking certification do not have to be considered during the audit. This might apply, for example, in the case of:

- *Principle 4 if there is no full or partial site closure or decommissioning*
- *Criterion 7.2 on security practice, where the site does not use security providers*
- *Criterion 9.2 on free, prior and informed consent if there are no indigenous peoples in the site's area of influence*
- *Criterion 9.3 on cultural heritage if there is no cultural heritage in the site's area of influence*
- *Criterion 9.4 on displacement and resettlement if displacement or resettlement did not take place and is not planned to take place.*

It should be noted that human rights, water stewardship and biodiversity generally apply to all sites.

Guidance on mining activities

Mining activities are out of scope of ResponsibleSteel certification. However, the higher levels of the responsible sourcing requirements that were approved in September 2022 ask that a certain amount of raw materials used at a site is sourced from mines that participate in a responsible mining programme that is recognised by ResponsibleSteel.

There may be instances where there is a site with a steel plant and a mining operation. The mining operation would be out of scope of the audit and certification, as would be activities that can clearly be attributed to the mining operation, such as resettlement of local communities to expand the mine. Auditors are advised to document such instances in the audit and certification scope to limit their liability.

2.4.2. The audit scope

The audit scope describes what will be included in the audit. It takes account of the fact that a site's direct and indirect impacts reach beyond its site boundaries and must therefore be wider than the certification scope. The certification body shall request that the site defines its audit scope, which shall consist of the certification scope plus a list of stakeholders and a description of the site's area of influence. In defining the audit scope, the site shall take account of the guidance provided by ResponsibleSteel.

- a) The stakeholder list shall be based on the definition of 'stakeholder' in the mandatory ResponsibleSteel Glossary. In compiling the list, the site shall keep in mind that some of its stakeholders might not be based in the same region (such as nationally operating civil society organisations or scientific institutions) and that some might usually engage with other entities of the site's group of companies. The site shall not exclude stakeholders from the list that are sceptical of the site's activities or decisions. The stakeholder list shall include at least the following information:
- Name and type of organisation
 - Their interests in and concerns about the site
 - Their relationship with the site.

Guidance on stakeholders

Where a site uses the ResponsibleSteel template to list its stakeholders, it should note that the provided stakeholder categories are not exhaustive. Where a specific site has additional kinds of stakeholders that are relevant in the context of ResponsibleSteel, these stakeholders should be added. For example, on-site doctors or fire brigades. At the same time, some stakeholder groups listed in the template might not be relevant in the context of a specific site.

- b) The site's area of influence shall be understood as the area impacted by:

	Examples
The site's facilities and associated activities, as described in the certification scope	
Other facilities and associated activities on-site or off-site that are directly related to steel making and processing, whether they are under the certification client's control or not	Power transmission corridors, pipelines, canals, access roads, water abstraction and discharge areas, construction camps. A slag site or a waste gas facility run by a service provider. A recruitment agency and any workers it sends to the site.

	Accommodation provided to workers by the site, by recruitment agencies, subcontractors, etc.
Unplanned but predictable developments caused by the site that may occur later or at a different location	A new rolling mill that will be built in '10 years' time
Indirect site impacts on biodiversity or on ecosystem services upon which community livelihoods are dependent	A site expansion that creates many new jobs might result in new houses being built for people moving into the area. This leads to land clearing, disturbance of fauna and habitat fragmentation due to construction activities. It might also result in increased logging to retrieve firewood for cooking and heating
Associated facilities, which are facilities that would not have been constructed or expanded if the site did not exist	Railways, roads, captive power plants or transmission lines, pipelines, utilities, warehouses, logistics terminals

- c) Where a cluster of sites intends to apply for certification, the audit scope with the stakeholder list and area of influence shall be defined for each individual site of the cluster.
- d) The audit scope shall be revised and updated in case of site expansions or downsizing and prior to each audit.

2.5. Develop an offer to the site or cluster

2.5.1. Review fundamental information on the site or cluster

The certification body shall review the fundamental information provided by the site or cluster and shall ensure that it meets the requirements outlined in 2.4. In particular, the certification body shall:

- a) Conduct an online search in English and in the language of the region where the site or cluster operates to add any external publications related to environmental, social or governance issues that might have been missed by the site or cluster
- b) Review the site's or cluster's stakeholder list and cross-check it with the collation of external publications to add any stakeholders that are missing
- c) Review the certification scope and audit scope of the site or cluster, considering the results of a) and b) and amend the scopes as relevant. In doing so, the certification body shall take account of the ResponsibleSteel guidance document on how to define the certification scope and audit scope. The certification body shall ensure that the site's or cluster's business and area of influence are adequately

reflected in the scopes and that all applicable Principles, Criteria and Requirements of the ResponsibleSteel Standard are included. In particular, if external publications or stakeholder concerns in relation to the site or cluster suggest that the audit scope is too narrow, the certification body shall widen it accordingly. The certification body shall inform the site or cluster of the revised certification scope and audit scope.

- d) Note that the Stage 1 audit does not have to be carried out on-site. However, where the certification body believes that an on-site visit is necessary to determine whether the site or cluster is ready for the stage 2 audit or where the site or cluster wishes to have stage 1 on-site, this should be reflected in the certification body's planning and budget.

Guidance on online search

The certification body might choose to set up Google Alerts or other online alerts specific to the site or cluster and to topics related to the ResponsibleSteel Standard to ensure it does not miss relevant information. The certification body should use a sensible combination of search terms, starting with more generic combinations such as “name of site + environmental issues” or “name of site + human rights issues” and going to more specific combinations such as “name of site + dust emissions” or “name of site + sexual harassment”, depending on the search results. In addition, the certification body should consult relevant websites such as:

- [Business & Human Rights Resource Centre](#)
- [Environmental Justice Atlas](#)
- [European Center for Constitutional and Human Rights \(ECCHR\)](#)
- [IndustriALL](#)
- [Wikipedia](#)

2.5.2. Assess site complexity and risk exposure

- a) The certification body shall use the received and researched information to assess the site's or cluster's complexity and risk exposure, taking account of table 2 and the guidance below.

Table 2: Site complexity and risk exposure assessment

Aspect	Complexity / Risk			Comment
	Low	Medium	High	
Environmental aspects related to site activities	Site conducts hot and cold forming and metal fabrication	Site conducts surface and other chemically-based treatment for metal-fabricated products	Site conducts primary production of metals (except for EAF, see 'medium')	Classification is based on International Accreditation Forum (IAF MD 5:2023)

		Site conducts primary production of metals using EAF		
Health and safety aspects related to site activities	n/a	Site conducts surface and other chemically based treatment for metal-fabricated products and for general mechanical engineering (depending on the treatment and the size of the component could be high)	Site conducts primary production of metals (including EAF) Site conducts hot and cold forming and metal fabrication	Classification is based on International Accreditation Forum (IAF MD 5:2023)
Legal compliance of site	Site is fully compliant with legal requirements	Site had a non-compliance resulting in a significant fine or sanction in the past 3 years	Site had a non-compliance resulting in a significant fine or sanction within the past year	A significant fine is considered > USD 10 000. Sanctions include settlements
Environmental context of site	Site is located in a country with a EPI score > 60	Site is located in a country with a EPI score 60 - 50	Site is located in a country with a EPI score < 50	EPI = Environmental Performance Index
Freedom context of site	Site is located in a country that is considered 'free'	Site is located in a country that is considered 'partly free'	Site is located in a country that is considered 'not free'	Freedom in the World report
Stakeholder concerns related to site	There are no known risks or issues in relation to the site	There are some known risks or issues in relation to the site	There are many and persisting known risks or issues in relation to the site	For example, risks or issues discussed in the media and other stakeholder concerns

- b) Where 2 or more of the 6 aspects in table 2 are assessed as 'high', the overall assessment of the site's complexity and risk exposure shall be 'high'.

- c) In all other cases, the certification body shall derive the site's overall complexity and risk exposure assessment by determining the average across the 6 individual aspects.
- d) In case a cluster of sites intends to seek certification, the complexity and risk assessment shall be done for each site of the cluster. The highest complexity and risk exposure assessment identified among the sites of the cluster shall be the cluster's overall complexity and risk assessment.

Guidance on site complexity and risk exposure assessment

<i>Primary production of metals includes:</i>	<i>Surface and other chemically-based treatment includes:</i>	<i>Hot and cold forming and metal fabrication includes:</i>
<ul style="list-style-type: none"> • <i>Sintering</i> • <i>Pelletising</i> • <i>Coking</i> • <i>Blast furnaces</i> • <i>Basic oxygen furnaces / oxygen converter</i> • <i>Electric Arc Furnace (EAF)</i> • <i>DRI</i> • <i>Secondary metallurgy (alloying)</i> 	<ul style="list-style-type: none"> • <i>Degreasing</i> • <i>Pickling</i> • <i>Coating</i> • <i>Hot dip galvanising and electrogalvanising</i> • <i>Tinplating</i> 	<ul style="list-style-type: none"> • <i>Hot rolling</i> • <i>Annealing</i> • <i>Cold rolling</i> • <i>Other metal fabrication (forming, drawing, slitting, blanking/welding etc.)</i>

2.5.3. Determine audit time for an individual site

- a) The certification body shall apply table 3 in calculating audit time. The times provided in table 3 shall be understood as representing the standard audit time for a site's initial certification audit as determined through the assessment of the site's exposure to complexity and risk.
- b) The audit times provided in Table 3 do not include pre-audit activities (see chapter 2) that are required to understand the site and its context and to develop an offer to the site. It is recommended that the certification body adds 1 day for these activities to its offer. The certification body shall note that a gap analysis requires a separate budget.
- c) The given audit times also do not include travel time (en-route or between facilities), breaks and time needed for translations. The certification body shall calculate time for travel and breaks and, where applicable, for the use of translators separately and have separate budget lines for these items where necessary.
- d) The certification body shall apply the definition of 'workers' provided in the mandatory ResponsibleSteel Glossary when determining audit time.

- e) If a site's complexity and risk exposure has been assessed as 'high' when it comes to stakeholder concerns (see table 2), the certification body shall note that stakeholder engagement has to be conducted not only in stage 2 but also in stage 1. To cover for this, the certification body shall add at least 10% to the audit time that results from table 3.
- f) The certification body may apply other factors it deems relevant for determining audit time and may increase audit time where they consider this necessary.
- g) The time required for an audit should be distributed as follows:
 - 25% for stage 1
 - 50% for stage 2
 - 25% for post-audit follow-up and reporting. Up to four days of that should be allocated to audit report writing. The certification body shall take note of the guidance in the ResponsibleSteel audit report template.
- h) The certification body shall check if another site of the same group of companies is already certified. If documented evidence such as policies, procedures, etc. are developed for the whole group and conformity of the current versions of the documented evidence with relevant ResponsibleSteel Requirements or elements of Requirements has already been confirmed during the other site audit, the documented evidence does not have to be reviewed again. This might reduce audit time. However, audit time shall not be less than 80% of the audit times given in table 3 since the level of awareness, understanding and implementation of the documented evidence still has to be verified at site-level.

2.5.4. Determine audit time for a cluster of sites

Where a cluster of sites intends to apply for certification, 2.4.2. shall apply. In addition, the certification body shall determine the time for the initial certification audit as follows:

- a) Sum up the workers at all sites of the cluster, applying the definition of 'workers' provided in the mandatory ResponsibleSteel Glossary
- b) Determine audit time by applying table 3 to the total number of workers in the cluster and using the result of the cluster's complexity and risk exposure assessment
- c) Add 20% to the resulting number of days to determine audit time for the cluster.

The audit time for the cluster shall be allocated to the individual sites so that the bulk of stage 2 is dedicated to those sites with the highest complexity and risk exposure.

Guidance on audit time for a cluster of sites

Audit time for a cluster of sites calculated in line with 2.5.4. cannot be reduced since each individual site in the cluster requires its own site visit, site tour, demonstration of processes and controls and worker, management and stakeholder interviews. The resulting audit report also needs to differentiate between the performance of the individual sites, so a reduction in audit time is not feasible.

Table 3: Determining audit time (including stage 1, stage 2, follow-up with the site and audit report writing) for initial certification of a site

Number of workers at the site	Audit time in auditor days (excluding travel time, breaks and use of translators)		
	Site exposure to complexity / risk		
	Low	Medium	High
1-5	2.5	2.5	3
6-10	3	3	3.5
11-15	3	3.5	4.5
16-25	3.5	4.5	5.5
26-45	4	5.5	7
46-65	4.5	6	8
66-85	5	7	9
86-125	5.5	8	11
126-175	6	9	12
176-275	7	10	13
276-425	8	11	15
426-625	9	12	16
626-875	10	13	17
876-1175	11	15	19
1176-1550	12	16	20
1551-2025	12	17	21
2026-2675	13	18	23
2676-3450	14	19	25
3451-4350	15	20	27
4351-5450	16	21	28
5451-6800	17	23	30
6801-8500	19	25	32
8501-10700	20	27	34
>10700	For sites with more workers, contact ResponsibleSteel		

Guidance on audit time

Where a certification body uses contracted auditors for ResponsibleSteel-related activities, it is expected that the certification body pays the contractors their agreed fee for all the time they spend on activities related to the ResponsibleSteel audit, including the time spent to prepare for the audit and the time spent on audit report writing.

Example for auditor days:

- 1 auditor for 2 days = 2 auditor days
- 2 auditors for 1 day = 2 auditor days

It is recommended that the certification body allocates an additional 1 day to pre-audit activities (excluding a potential gap analysis) and takes this into account in planning and budgeting to be able to recover the costs from the client.

2.5.5. Put together the audit team

2.5.5.1. The audit team shall be comprised of individuals with the skills and competency necessary to achieve the objectives of the audit. Each individual audit team member shall be approved by ResponsibleSteel prior to engaging in audit activities, and auditors shall perform audits in accordance with ISO 19011.

2.5.5.2. The auditors carrying out the stage 1 audit shall also be part of the audit team for the stage 2 audit.

2.5.5.3. The audit team:

- a) Shall be led by a lead auditor who shall be responsible for ensuring the efficient and effective conduct of the audit
- b) As a group, shall have been approved by ResponsibleSteel for all Principles of the ResponsibleSteel Standard that will be audited
- c) Shall include auditors who are familiar with the applicable law and cultural customs
- d) Should include local auditors who speak the language that is most commonly used by the site's workers. However, if translators are required, these should be independent of the certification client. Where this is not feasible, the reason for this shall be stated and the names and affiliations of any translators used shall be included in the audit report
- e) Should comprise male and female auditors
- f) May be supplemented by technical experts.

2.5.5.4. Prior to being appointed to the audit team, all potential audit team members shall be asked to identify and describe any circumstances that may pose a conflict of interest for them in relation to the site or cluster wishing to become certified and in relation to the group of companies that the site or cluster belongs to.

2.5.5.5. The certification body shall analyse these circumstances and determine whether there are any real or perceived conflicts of interest:

- a) In case of a real conflict of interest, the individual shall not be appointed to the audit team
- b) In case of a perceived conflict of interest, the certification body shall decide if and how the perceived conflict of interest can be addressed. If it cannot be effectively addressed, the individual shall not be appointed to the audit team.

2.5.5.6. Individuals that were involved in the development of systems, procedures or processes for the site, the cluster or the group of companies, or who advised on them, shall not be part of the audit team if the systems, procedures or processes are relevant to the ResponsibleSteel Standard.

2.5.5.7. Audit team composition, a confirmation that the team possesses the necessary skills and knowledge for the audit, any identified conflicts of interest and how they were addressed shall be documented by the certification body.

2.5.5.8. Auditors that have been involved in the site's or cluster's audits during two consecutive certification cycles shall be replaced by other ResponsibleSteel-approved auditors.

2.5.6. Pre-offer check-in with ResponsibleSteel

Prior to making an offer to a site or cluster, the certification body shall send the following to ResponsibleSteel or the appointed Oversight Body:

- a) Fundamental site or cluster information as per 2.4
- b) Complexity and risk exposure assessment as per 2.5.2.
- c) Audit time calculation with all underlying information as per 2.5.3. and 2.5.4.
- d) Audit team composition as per 2.5.5, including any conflicts of interest and how they were addressed, as well as technical experts or translators as relevant.

Within one week of receiving the documentation, ResponsibleSteel or the appointed Oversight Body shall provide written feedback to the certification body. Where ResponsibleSteel or the appointed Oversight Body asks for changes, these shall be accommodated by the certification body. Upon agreement of the changes by ResponsibleSteel or the appointed Oversight Body, the certification body may make an offer to the site or cluster.

Guidance on ResponsibleSteel involvement

The ResponsibleSteel programme is still relatively new. To ensure that audits can be carried out as intended and to enable certification bodies and auditors to deliver high quality work, ResponsibleSteel has defined various

checkpoints for the review of relevant information throughout the certification process. While the checkpoints are meant to support alignment of certification bodies, they will also keep ResponsibleSteel up to date of auditing activities and enable learning and progress. In addition, ResponsibleSteel or an appointed Oversight Body may want to witness the stage 2 audit of a site, following the rules presented in the ResponsibleSteel Oversight Mechanism. Understanding which audits are coming up will help the planning process.

2.6. Sign contract and confidentiality agreement with the site or cluster

2.6.1. The certification body shall sign a contract with the site or cluster that covers at least one full audit. The contract shall be based on the information described in 2.5.

2.6.2. In the contract, the certification body should reserve the right to review its quote after the stage 1 audit once it has reviewed the full documentation and self-assessment of the site or cluster and has a better understanding of potential challenges and stakeholder concerns. The certification body should also consider adding some buffer in case the stage 1 audit should be carried out on-site rather than off-site, for more extensive audit report writing time, and for an un-scheduled short notice or unannounced special audit.

2.6.3. The contract shall contain a request to the certification client to:

- a) Inform the certification body of all regulatory non-compliances or incidents that require notification to any regulatory authority as soon as they occur
- b) Inform the certification body of changes that may affect the site's ability to conform with the Requirements of the ResponsibleSteel Standard as soon as they occur
- c) Consent to the certification body carrying out special audits on short notice or unannounced where the site seems to be affected by a major non-conformity
- d) Consent to the certification body taking action in situations that pose significant risk, for example risk to people's health and life, risk of child or forced labour, or risk of long-term grave and irreversible impacts on the environment. Such action may be, for example, contacting the responsible authority, triggering a national whistleblowing mechanism, contacting the ILO Helpdesk for Business on International Labour Standards (see 3.2.5.b) for further detail)
- e) Consent to providing the certification body with all documents and records and access to workers and facilities that are relevant to the scope of the audit
- f) Consent to the ResponsibleSteel Secretariat or an appointed Oversight Body to observe audits conducted by the certification body
- g) Consent to the Assurance Panel, the ResponsibleSteel Secretariat or an appointed Oversight Body to be given full access to site data, documents, evidence, stakeholder input and other sources taken into account during the certification process for the purpose of oversight or complaint investigation. This shall exclude information expressly marked as confidential and shall be on the premise that Assurance

Panel members, ResponsibleSteel Secretariat staff or Oversight Body staff have signed a confidentiality agreement and conflict of interest declaration with the certification body.

2.6.4. In addition, a confidentiality agreement may need to be signed between the certification body and the certification client to ensure that confidential or commercially sensitive information that the auditors might get access to during the audit is not disclosed to third parties.

Guidance on confidentiality agreement

Note that some countries might require certification bodies to notify authorities of regulatory non-compliances in case the certification client has not done so. Where relevant, this should be reflected in confidentiality agreements or contracts between the certification body and the certification client.

2.7. Request additions to the stakeholder list

2.7.1. The certification body shall instruct the site or cluster to supplement the provided stakeholder list to include any stakeholders that have been added by the certification body and to ensure that the following detail is provided for each stakeholder on the list:

- a) Name of individual that is to be contacted for input to the audit
- b) Contact details of the individual
- c) Most appropriate method for contacting the individual
- d) For a cluster of sites, the stakeholder list shall clearly outline which stakeholders are relevant for which site.

2.8. Request the site or cluster self-assessment

2.8.1. Prior to the stage 1 audit, the certification body shall instruct the site or cluster to conduct a self-assessment against all Requirements of the ResponsibleSteel Standard that are applicable to the site or to individual sites in the cluster. To do this, the site or cluster shall study the Requirements of the ResponsibleSteel Standard and any associated guidance provided in the 'Site self-assessment' template that can be found on the ResponsibleSteel website. In the template, the site shall classify how it believes it lives up to each of the Requirements, marking one of the following options:

- a) Fully met
- b) Partially met
- c) Not met
- d) Not applicable

In the case of a cluster of sites, the self-assessment shall clearly distinguish between individual sites in the cluster.

2.8.2. The site shall provide comments on its self-assessment where this will contribute to the certification body's understanding of the site's operations and performance. At a minimum, the site shall identify where its classification is based on documented evidence such as policies, procedures, etc. that are developed at group-level for site-level implementation.

2.8.3. The 'Not applicable' option shall only be used where the site feels that any Principles, Criteria or Requirements do not apply to it. Where 'Not applicable' is selected, the site shall provide reasons for why they do not apply.

2.8.4. In addition, the site shall reference the supporting evidence that underpins its classification for each Requirement, shall list the evidence in the 'Supporting evidence' column and shall provide the certification body with access to the supporting evidence (see guidance below).

2.8.5. Where the site cannot provide supporting evidence for individual Requirements, it should clearly outline the reasons for why these are not available.

2.8.6. The site shall provide the completed self-assessment to the certification body together with any supporting evidence at least 2 weeks prior to the scheduled start date of the stage 1 audit.

Guidance on classification against Requirements

The classification done by the site or cluster will help the auditors understand the situation of the site or cluster, draft an appropriate audit plan and amend their budget if needed. The classification informs the audit and will be scrutinised and amended, where necessary, by the auditors during stage 1 and stage 2.

Guidance on supporting evidence

Supporting evidence is verifiable information gathered prior to or during an audit by the site(s) or by the certification body. Supporting evidence can be qualitative or quantitative. Examples include:

- *Documents, data and records: Includes policies and procedures necessary to implement the ResponsibleSteel Standard or data or records generated from the implementation of processes and procedures. Note that in very small businesses, systems do not necessarily have to be documented to be effective. Documents and records will be provided to the certification body by the site(s), the certification client, workers or external stakeholders.*
- *Observations: Information gathered through observation of activities and practices can also be used as supporting evidence. However, it is important to verify understanding of what has been observed. Observations will be gathered by the auditors.*
- *Interviews: Testimonials or information gathered from interviews with workers and other stakeholders (such as affected communities and labour unions) are important sources of evidence. Testimonial*

evidence can be verified by cross-checking it with records, on-site observations or interviews with other workers or stakeholders to ensure it is objective. Interviews will be conducted by the auditors.

3. Independent third-party audit

Guidance on independent third-party audits

Audits are conducted by independent third-party certification bodies and auditors that must have been approved by ResponsibleSteel. The purpose of an audit is to verify that a site's or cluster's policies, systems, procedures and processes are effective and conform to the Requirements of the ResponsibleSteel Standard. The self-assessment and the supporting evidence provided by the site or cluster are the basis for the audit. Published articles and studies help the auditors understand public perceptions of the site or cluster and the stakeholder list supports them in identifying who to approach for input to the audit. Leaning on the logic of ISO 17021, the audit is divided into 2 stages, with the first stage serving to become familiar with the site's or cluster's operations and situation, and the second stage comprising the on-site visit and external stakeholder interviews.

Certification bodies should note that there is a separate normative guidance document on offering certification services against ResponsibleSteel's additional responsible sourcing and GHG requirements, which can be found on the ResponsibleSteel website.

3.1. Certification audit stage 1

Guidance on the stage 1 audit

In summary, the certification body will carry out the following activities during the stage 1 audit. Note that the activities are not listed in chronological order and that some activities might be carried out in parallel:

- *Review the site's or cluster's self-assessment and supporting evidence*
- *Review audit reports of relevant other certifications of the site or cluster for the purpose of recognition*
- *Start filling in the 'Auditor Assessment' template to capture the level of conformity of documented evidence such as policies and procedures and to inform the stage 2 audit*
- *Identify areas of concern and determine 'the site's or cluster's readiness for stage 2*
- *Put together the audit team*
- *Plan the stage 2 audit, potentially including a revised estimate of audit time*
- *Identify and inform external stakeholders of the audit*

3.1.1. Start the stage 1 audit

3.1.1.1. The certification process shall start with a stage 1 audit. Stage 1 does not have to be carried out on-site. However, where the certification body believes that an on-site visit is necessary to determine whether the site or cluster is ready for the stage 2 audit or where the site or cluster wishes to have stage 1 on-site, at least parts of the stage 1 audit should be carried out on-site.

3.1.1.2. The certification body should consider carrying out interviews with personnel based elsewhere in the same group of companies, if applicable. For example, where that personnel is responsible for developing or maintaining group-wide policies, procedures, etc. that are implemented at site-level and that relate to the ResponsibleSteel Standard. Interview partners to consider should also include individuals responsible for group-wide occupational health and safety and environment, as well as sourcing personnel as their views might help the certification body prepare for the stage 2 audit.

3.1.2. Review the site's self-assessment and supporting evidence

3.1.2.1. The certification body shall review the site's or cluster's self-assessment and supporting evidence. Where conformity with ResponsibleSteel Standard Requirements or elements of Requirements can be classified through the review of documented evidence such as policies and procedures, the certification body shall capture its findings in the 'Auditor Assessment' template.

3.1.2.2. The certification body may adopt conformity classifications that have been given to other already certified sites of the same group of companies if the following is the case: Documented evidence such as policies, procedures, etc. are developed for the whole group and conformity of the current version of the documented evidence with ResponsibleSteel Standard Requirements or elements of Requirements has already been confirmed during the other site audits. However, if the audits of the certified sites were done by other certification bodies, the applicant site or cluster shall provide its own certification body with access to the relevant findings of the other certification bodies and with the underlying evidence, so that its own certification body can review them before taking a decision on conformity.

3.1.2.3. In any case, the certification body shall make sure that awareness, understanding and effective implementation of documented evidence such as policies, procedures, etc. is verified on-site during the stage 2 audit, so that not only the content of the documented evidence is taken into account.

3.1.2.4. Where the site or cluster has stated that a Principle, Criterion or Requirement is 'Not applicable', the certification body shall review the site's or cluster's reasons for this and shall verify that the exclusions are appropriate.

Guidance on the 'Auditor Assessment' template

The completed 'Auditor Assessment' template will become part of the audit report. It is strongly recommended to fill in the template diligently and comprehensively to save time later on for extensive revisions. The certification body is advised to consider the guidance and examples provided by ResponsibleSteel in the audit report template before making use of the 'Auditor Assessment' template.

Guidance on supporting evidence

A lack of supporting evidence for a site or cluster does not necessarily mean that there might be a non-conformity. For example, a site or cluster may have a documented emergency preparedness and response procedure but the need to use it has not yet arisen since there has not been an emergency so far. Therefore, records or evidence that would be generated through the application of that procedure do not exist. This does not automatically constitute a non-conformity, but the site or cluster should clearly outline the reasons for why records or evidence do not exist and should be in a position to explain how the procedure would be applied if an emergency would occur. The auditors can establish whether the procedure as written meets the respective Standard Requirement. However, if the auditors are unable to confirm effective implementation of the procedure, they should note this in the 'Auditor Assessment' template.

3.1.3. Review existing certifications of the site

3.1.3.1. To determine whether a finding for a specific requirement of another relevant scheme can be recognised to confirm conformity with a ResponsibleSteel Requirement, the certification body shall:

- a) Review the most recent audit report of the other scheme: Do the audit and certification scopes match the scopes defined for ResponsibleSteel? Is the supporting evidence presented in the audit report sufficient to confirm conformity with the respective ResponsibleSteel Requirement?
- b) Review outstanding non-conformities, if applicable: Does the site or cluster make adequate progress in addressing outstanding non-conformities of the other scheme?
- c) Check the other certification body: Is the body that conducted the audit on the other scheme accredited for that scheme by a member of the International Accreditation Forum (IAF) or does it otherwise seem reputable and competent?
- d) Compare your own observations with the audit report of the other scheme: Do the 'auditors' own observations during the audit align with the audit report findings on the other scheme?

3.1.3.2. If the answer to a) to d) in 3.1.5.1. is yes, the certification body may recognise the other scheme finding as confirmation of conformity with the respective ResponsibleSteel Requirement and shall capture its decision in the 'Auditor assessment' template.

Guidance on other certification bodies

Accreditation by a member of the International Accreditation Forum (IAF) is one way to demonstrate solid reputation and competence. Where IAF accreditation is not present, information provided on the respective certification body's website might be helpful in judging whether it is reputable and competent. For example, does the certification body make inappropriate statements that promise simple and cheap certification, maybe in conjunction with a certain consultancy firm? This would be an indication that the certification body's reputation and competence is lacking.

3.1.4. Start stakeholder engagement in case of high stakeholder concerns

Guidance on stage 1 stakeholder engagement

Stakeholder engagement is a key component of the ResponsibleSteel programme. Apart from the site(s), stakeholders are the most substantive source of information for the auditors and successful consultation will instil confidence in stakeholders that the audit was informed by a balanced, accessible and equitable process to which they could meaningfully contribute. Where there are many and grave stakeholder concerns in relation to a site, stakeholder engagement must be conducted as part of the stage 1 audit and as part of the stage 2 audit. This will ensure that stakeholders are given ample opportunity to share their views and concerns and that certification bodies are enabled to fully grasp the issues and take account of them when developing their audit findings. Chapter 3.1.4. is only applicable where a site has been assessed as being of 'high' complexity and risk exposure when it comes to stakeholder concerns (see table 2). Engagement during stage 1 might be done through a stakeholder workshop, focus groups, individual or group interviews with stakeholders, it might be done remote or in-person, depending on the cultural context and technical capabilities of the stakeholders. Other formats of engagement are also possible.

Certification bodies should also take note of the guidance on reaching out to stakeholders that is provided further below.

3.1.4.1. In case the site has been assessed as being of 'high' complexity and risk exposure when it comes to stakeholder concerns (see table 2), the certification body shall follow 3.1.7.1 to 3.1.7.4 to analyse the site's stakeholder landscape.

3.1.4.2. The certification body shall develop a proposal to ResponsibleSteel on the most suitable ways to reach out to stakeholders and to consult with them to understand the issues they have with the site and how they relate to the ResponsibleSteel Standard. In developing the stage 1 engagement proposal, the certification body shall consider the stakeholders cultural context and their likely technological capabilities.

3.1.4.3. The certification body shall discuss its proposal with ResponsibleSteel and work with ResponsibleSteel to refine the engagement format and to announce and prepare for the engagement. ResponsibleSteel reserves the right to play an active part in this stage 1 stakeholder engagement exercise.

3.1.4.4. The certification body shall notify the site that a stage 1 stakeholder engagement will take place. The site shall be invited to provide input to the engagement and shall be asked to not interfere with the engagement process or seek to influence stakeholders in any way.

3.1.4.5. With the support of ResponsibleSteel, the certification body shall reach out to all stakeholders on the stakeholder list at least 4 weeks prior to the stage 1 engagement and shall provide them with the following information:

- a) The ResponsibleSteel programme and its aims
- b) The ResponsibleSteel certification process
- c) The site or cluster of sites applying for certification
- d) The opportunity to engage and the format of engagement during the stage 1 audit
- e) Opportunities to provide input during the stage 2 audit and ways to do so
- f) Mechanisms for stakeholders to submit comments at any time.

3.1.4.6. About 2 weeks prior to the stage 1 engagement, the certification body shall remind those stakeholders on the list who have not responded about the opportunity to engage.

3.1.4.7. The certification body shall keep a written record of views and issues shared by stakeholders during the engagement and shall use this record to inform the subsequent steps of the audit. The written record shall be shared with ResponsibleSteel but not with the site.

3.1.4.8. The certification body shall thank stakeholders for their engagement, shall inform them how and when their input will be taken into account and shall remind them of the stage 2 opportunities to provide further input.

3.1.5. Identify areas of concern and determine readiness for stage 2

3.1.5.1. The certification body shall identify weaknesses of the site or cluster related to the ResponsibleSteel Standard in the 'Auditor assessment' template.

3.1.5.2. Based on the weaknesses and the information and documentation provided by the site or cluster, the certification body shall determine whether the site or cluster is ready for the stage 2 audit and shall inform the site or cluster of its conclusion.

3.1.6. Develop the stage 2 audit plan

3.1.6.1. There shall be a maximum period of 12 months between the stage 1 and stage 2 audit.

3.1.6.2 In exceptional circumstances, such as enduring force majeure (which is an extraordinary event or circumstance beyond the control of the certification body, site or cluster, such as a war, riot or epidemic), the stage 2 audit may be divided into discrete phases. Where this is the case, the certification body shall seek ResponsibleSteel's written agreement to this exception.

3.1.6.3. In developing the stage 2 audit plan, the discrepancies between the site's or cluster's self-assessment and the certification body's identification of weaknesses in relation to the ResponsibleSteel Standard shall be taken into account. The complexity and risk exposure assessment for the site or cluster shall be reflected in the stage 2 audit plan.

3.1.6.4. The certification body shall include the following in the stage 2 audit plan:

- a) Audit objectives
- b) Dates, places and times of the on-site visit
- c) Facilities to be seen while on-site
- d) Meetings to be held with site management, workers and, where applicable, the site's nominated ResponsibleSteel co-ordinator
- e) Functional roles to be interviewed, number and types of worker interviews to be held, including justification for deviating from the number of worker interviews given in table 4 (below)
- f) Where applicable, dates, places and times of the visit to the corporate owner of the site or cluster
- g) Dates, places and times of interviews with external stakeholders, including, where applicable, their affiliations but not giving stakeholder names and names of organisations to safeguard their privacy
- h) Likely documentation to be reviewed
- i) Times for miscellaneous activities such as inductions and breaks
- j) Time to revisit and review information

3.1.6.5. The stage 2 audit plan shall be flexible to allow:

- a) Changes in emphasis during the audit where this seems appropriate
- b) Effective use of the available site and auditor resources
- c) Adjustments of timelines and agendas to ensure that stakeholders can make best use of opportunities for input and feedback.

3.1.6.6. The certification body shall consult with the site on the stage 2 audit plan. The final audit plan shall be presented to the site at least 2 weeks prior to the commencement date of the stage 2 audit.

3.1.7. Post-stage 1 check-in with ResponsibleSteel

At least 4 weeks prior to the stage 2 audit, the certification body shall send the following to ResponsibleSteel or the appointed Oversight Body:

- a) List of exclusions and the reasons for exclusions as per 3.1.2.4
- b) List of stakeholders as per 2.4.2.a) and 2.7.1.
- c) Where applicable, the written record of stakeholder views and concerns as per 3.1.4.6.
- d) The stage 2 audit plan as per 3.1.6.

Within one week of receiving the documentation, ResponsibleSteel or the appointed Oversight Body shall provide written feedback to the certification body. Where ResponsibleSteel or the appointed Oversight Body asks for changes, these shall be accommodated by the certification body.

3.1.8. Reach out to stakeholders and seek their input

Guidance on stakeholder engagement

Stakeholder engagement is a key component of the ResponsibleSteel programme. Apart from the site(s), stakeholders are the most substantive source of information for the auditors and successful consultation will instil confidence in stakeholders that the audit was informed by a balanced, accessible and equitable process to which they could meaningfully contribute. The requirements in this chapter lay the foundation for stakeholder engagement during stage 2 audits. Note that site workers are key stakeholders. However, since they work on-site or for the site, they must be treated differently. For this reason, they are singled out rather than being considered part of the other stakeholder groups.

3.1.8.1. The certification body shall have public mechanisms that allow stakeholder comments to be submitted at any time during the audit and during the validity of a certificate. The mechanisms shall comprise a mix of channels for stakeholders to submit comments, for example through letters, emails, submissions via the certification body's website, phone calls, or by speaking to an intermediary.

Guidance on public mechanisms to submit comments at any time

'Public' means that the mechanisms are accessible by the public. For example, in regions with wide-spread and stable internet coverage for the public, the mechanisms might be posted on the certification body's website. In regions where this is not the case, the mechanisms or how to access them might be posted at central locations of neighbouring communities (such as the city hall, citizen centre, church, etc.).

The certification body may ask the site or cluster to help make known the mechanisms for receiving stakeholder input. For example, the site might link from an obvious location on its own website (e.g. its sustainability section) to the respective page on the certification body's website. Or, the mechanisms might be posted on the site's front gate.

3.1.8.2. The certification body shall analyse the full stakeholder list to understand:

- a) How stakeholders are organised, e.g. do they have representatives that could speak for them?
- b) Are there stakeholder groups that need special attention to ensure their inclusion in the ResponsibleSteel certification process? E.g., women, indigenous peoples, marginalised and vulnerable groups
- c) Their relationship with and interest in the site(s)
- d) Their positions and concerns with regards to the site(s)

The outputs of this exercise shall be documented by the certification body.

3.1.8.3. The stakeholder analysis shall be updated by the certification body at least prior to each audit.

3.1.8.4. The certification body shall take note of the ResponsibleSteel guidance document when preparing for stakeholder engagement and shall consider using the template provided therein to inform stakeholders of the certification process and to invite them to provide input.

3.1.8.5. The certification body shall liaise with the site or cluster to discuss and agree on the most appropriate ways to publicly announce the upcoming audit and to make known the certification body's mechanisms to submit comments.

3.1.8.6. The audit announcement shall be made public and all stakeholders on the list shall be contacted at least 4 weeks prior to the first day of the stage 2 audit with the following information:

- g) The ResponsibleSteel programme and its aims
- h) The ResponsibleSteel certification process
- i) The site or cluster of sites applying for certification
- j) Opportunities to provide input during the certification process and ways to do so
- k) Dates available for stakeholder interviews and how to register for an interview
- l) Mechanisms for stakeholders to submit comments at any time.

3.1.8.7. When engaging with stakeholders, the certification body shall mind that its communication and attitude is culturally appropriate and takes account of stakeholders' technological capabilities. The certification body shall ensure that the ways for stakeholders to provide input and feedback are appropriate and responsive to their needs.

Guidance on reaching out to stakeholders

It is important that all stakeholders on the stakeholder list get an opportunity to provide input to the audit.

Since neither the site nor the certification body may be aware of everybody who considers themselves a stakeholder, it is important that not only direct emails, letters or similar are sent to individual stakeholders, but that the audit is announced publicly through channels and venues that are suitable for the respective context of the site. For example, it might be appropriate to announce the audit on a notice board at a central place such as the community centre, the church or the mayor's office. In larger communities, the announcement should be done in various locations, for example at schools, sports clubs or supermarkets in addition to the central places mentioned earlier. An announcement in the local newspaper or radio station might be an additional way to make stakeholders aware of the audit. For direct messages to individual stakeholders, it might be useful if the certification body and site are stated as the senders of the message. Stakeholders will usually know of the site's existence but they might not be aware of the certification body, so seeing a familiar sender on the message can help ensure that stakeholder have confidence in the legitimacy of the audit process.

It is difficult to predict how many stakeholders will want to engage in the audit process. However, the certification body and its auditors must be prepared to accommodate stakeholder schedules and needs to ensure that everybody interested in providing input can do so.

Note that ResponsibleSteel will announce upcoming stage 2 audits on its website and in newsletters 4 weeks prior to the start of the stage 2 audit. The information to be published will be:

- *Dates of the stage 2 audit*

- *Name and location of the site(s)*
- *Activities of the site(s)*
- *Facilities that are part of the certification scope*
- *Name and contact details of the certification body, so stakeholders can register their interest to get engaged in the audit.*

3.1.8.8. About 2 weeks before the commencement of the stage 2 audit, the certification body shall remind those stakeholders on the list who have not responded about the opportunity to provide input.

3.1.8.9. The certification body's efforts for engaging stakeholders shall reflect:

- a) The scale, scope of activities, complexity and risk exposure of the site(s)
- b) The level and nature of any past, current, and anticipated conflicts with stakeholders.

3.1.8.10. The certification body shall acknowledge received stakeholder input and shall inform stakeholders how and when their input will be taken into account.

3.2 Certification audit stage 2

Guidance on the stage 2 audit

In summary, the stage 2 audit comprises the following activities, which are described in detail below. Note that the activities are not listed in chronological order and that some will be conducted on-site and others off-site:

- *Site visit opening meeting and closing meeting*
- *Obtaining supporting evidence through tour of site, interviews with workers and other stakeholders, and review of additional information*
- *Cross-checking and evaluating supporting evidence and information*
- *Documenting conformities and non-conformities*
- *Evaluating overall conformity*
- *Determining any necessary follow-up action and the timing of follow-up audits.*

3.2.1. Site and cluster audit at the Requirement level

Each of the 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. For a site to achieve and maintain certification, all applicable Requirements shall be audited and there shall be no major non-conformity with any Requirement. Minor non-conformities do not preclude certification but shall be corrected. The same applies to individual sites in a cluster seeking certification. Each site in the cluster shall be audited according to the same process as an individual site.

3.2.2. Opening Meeting on-site

Upon arrival of the audit team on-site, an opening meeting shall be held. The names of those present shall be recorded by the audit team. Where the opening meeting is attended by a very large number of individuals, the audit team shall at least record the names and functions of attending senior managers.

3.2.3. Gather supporting evidence

3.2.3.1. Sampling

During the stage 2 audit, supporting evidence that has not been reviewed during the stage 1 audit and that is either listed in the completed 'Site self-assessment' template or is otherwise relevant to the audit shall be obtained by the audit team. The audit team shall gather evidence for all applicable requirements. In some cases, this will require sampling, for example when it comes to interviewing workers or reviewing the results of air emissions measurements. Methods to obtain supporting evidence shall include, but are not limited to:

- a) Observation of processes and activities
- b) Review of documents and records
- c) Interviews.

3.2.3.2. Contradicting information

If the information obtained so far is contradictory or not mutually reinforcing, the audit team shall gather additional supporting evidence to determine whether conformity is given. The audit team shall record specific details of all collected supporting evidence in the 'Auditor assessment' template.

3.2.3.3. Observation of processes and activities

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:

- a) Visit facilities that, together with their associated activities, contribute to the environmental, social and governance performance of the site
- b) 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.

Guidance on facilities to be seen

In the case of a very large site or a complex cluster of sites it might not be feasible to see all facilities and associated activities at the initial audit since it would take too much time. In such cases, the audit team should focus on those facilities and activities that contribute most materially to the site's environmental, social and governance performance and should visit other facilities during consecutive audits. Examples for facilities that

should be visited, either during the initial audit or later on, include steel shops, blast furnaces, coking plants, sinter plants, rolling mills, finishing lines, input material delivery areas and (on- or off-site) slag sites. Office buildings are not considered to contribute to a site's social, environmental and governance performance.

3.2.3.4. Review of documents and records

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.

3.2.3.5. Conduct worker interviews

- a) As part of the stage 2 audit, a sample of workers shall be interviewed. Interviews shall be conducted with:
 - Site management
 - Other full, part-time and temporary workers of the site and of contractors
 - Minority and, where relevant, migrant workers of the site and of subcontractors
 - Worker representatives
 - Workers of different shifts, functions and departments.
- b) Prior to selecting workers for interviews, the audit team shall liaise with the site or cluster to understand the composition of the workforce, including contractors. The selected sample of workers shall reflect the workforce composition of the respective site.
- c) Where a cluster of sites is audited, the worker interviews shall be split between the different sites and the distribution of interviews shall reflect the number of workers at the respective sites.
- d) The audit team shall conduct a mix of individual and group interviews in line with the numbers given in table 4. If the audit team has reason to deviate from the figures given in the table, this shall be documented and justified in the audit report. An interview with an individual worker should be estimated to take 20-30 minutes and about twice the time for a group of workers. A group interview should not comprise more than 6 individuals to ensure that everybody can contribute to the conversation.
- e) In preparing and carrying out the interviews, the audit team shall follow the 'Guidance on auditor soft skills and behaviour' provided by ResponsibleSteel. Interview questions shall be tailored to the respective workers and reflect, for example, the role they have at the site, the time they have been working at the site, topics of the ResponsibleSteel Standard that are relevant to them.

- f) The audit team shall conduct worker interviews off-site where this is deemed appropriate, for example where this is requested by the respective individual due to confidentiality or comfort issues, or where this seems necessary to ensure the safety of workers and auditors. 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 organisations trusted by workers for finding an adequate location.
- g) If an individual prefers to be interviewed privately without the presence of other workers, the audit team shall accommodate their request.
- h) Workers and their representatives shall be interviewed in a confidential setting without any supervision or management personnel present. If a labour union exists, a labour union representative shall be permitted to attend the interview at the request of the interviewee(s).

Table 4: Workers to be interviewed and time spent on worker interviews during stage 2 audits for initial certification

Number of workers	Total approximate number of workers to be interviewed individually and in groups	Total hours spent approximately on interviews
1-5	1-2	0.75
6-10	1-2	0.75
11-15	5	1
16-25	5	1
26-45	10	3
46-65	10	3
66-85	10	3
86-125	15	4
126-175	15	4
176-275	15	4
276-425	20	5
426-625	20	5
626-875	25	7
876-1175	30	7
1176-1550	35	7
1551 - 2025	35	9
2026 - 2675	40	9
2676 - 3450	40	9

3451 - 4350	45	11
4351 - 5450	45	11
5451 - 6800	50	11
6801 - 8500	50	11
8501 - 10700	50	11
> 10700	For sites with more workers, contact ResponsibleSteel	

- i) The audit team shall maintain a list of interviewed workers. This list shall not be shared with the site or cluster. The list shall be used to ensure that a different representative sample of the workforce is interviewed during subsequent audits or to do follow-up interviews at future audits where appropriate. For example, where a worker interview uncovers grave issues, the auditors should consider following up with the respective worker(s) during the next audit to see if and how the situation has changed.
- j) The audit team shall use appropriate methods 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.

3.2.3.6. Conduct stakeholder interviews

- a) 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.
- b) Stakeholder interviews should take place off-site, for example at town halls, offices or other appropriate locations that offer sufficient privacy for undisturbed conversations.
- c) The audit team shall follow the 'Guidance on auditor soft skills and behaviour' and consider the 'Guidance on stakeholder engagement' provided by ResponsibleSteel when preparing and conducting the interviews. Interview questions shall be tailored to the respective stakeholders and reflect, for example, their interests and concerns related to the site, the relationship they have with the site, topics of the ResponsibleSteel Standard that are relevant to them.
- d) The audit team shall add summaries of all conducted interviews to the audit report, ensuring that interviewed individuals cannot be identified. The audit team may share a high-level summary of received stakeholder input with the site, but shall be careful to protect their identities

3.2.4. Record audit findings and levels of conformity

- a) 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.
- b) Any received 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.
- c) The audit team shall discuss and record its audit findings in the 'Auditor assessment' template. Where a cluster of sites seeks certification, the audit team shall distinguish between the different sites of the cluster when recording their findings. Classifications of conformity and non-conformity as well as opportunities for improvement shall align with table 5 and shall be substantiated for each Requirement as follows:
 - A brief and concise description of the supporting evidence that led to the respective classification.
 - An auditor rationale that gives precise reasons for the chosen conformity classification. The rationale shall cover each element of the respective Requirement, so that it becomes clear why the audit team chose the respective classification. For non-conformities, the rationale shall concisely describe the nature of the non-conformity
- d) The audit team shall make sure that descriptions and rationales are generalised enough to not compromise confidentiality, security or commercially sensitive information.
- e) The audit team shall not engage in root cause analysis of any non-conformities or otherwise assist the site or cluster in addressing any identified issues.
- f) The audit team shall attempt to resolve any diverging opinions between the audit team and the site or cluster concerning supporting evidence or findings, and unresolved points shall be recorded by the audit team in the 'Auditor assessment' template.
- g) Where 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 'Auditor assessment' template.
- h) 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.

Guidance on documenting conformity or non-conformity findings

Ambiguous or poorly worded information on conformity or non-conformity findings will not be accepted by ResponsibleSteel and the Assurance Panel as it will prevent the Assurance Panel from concluding whether to support or reject positive certification recommendations. The audit team will be requested to revise the information. This might be the case, for example, when the audit team does not clearly distinguish between the different sites of a cluster or when the provided information is not conclusive in that the audit team has not addressed each element of a given Requirement. In the worst case, the audit team will have to go back to the site or cluster to revisit the issue, leading to increased cost and time, which might damage the relationship of the certification body with its client and harm the certification body's reputation. It is strongly advised to put great emphasis on high-quality documentation of audit findings.

The following are good practice principles for documenting non-conformities:

- *Communicate the extent of the problem fully*
- *Use familiar terminology*
- *Do not draw unsubstantiated conclusions*
- *Do not focus on individuals or their mistakes*
- *Do not use criticism*
- *Give, where relevant and related, regulatory or external references*
- *Avoid contradictory messages*
- *Review the non-conformities with the site and certification client to ensure the facts are correct and fair.*

The description of the supporting evidence could include, for example:

- *Functional roles interviewed*
- *External stakeholders interviewed, respecting confidentiality*
- *Documents and records sighted and reviewed, including dates and unique identifiers*
- *Activities and facilities observed.*

3.2.5. Classify conformity

- a) The audit team shall apply the conformity classifications defined in table 5 to the site for all Requirements of the ResponsibleSteel Standard. In case a cluster of sites seeks certification, the audit team shall make clear where the level of conformity differs for the different sites of the cluster.

Table 5: Conformity classifications

Conformity classification	Finding
Conformity	Fulfilment of a Requirement.
Minor non-conformity	A non-conformity shall be considered minor if: <ol style="list-style-type: none"> 1. It is an isolated lapse, or

	<ol style="list-style-type: none"> 2. It is unusual or non-systemic, or 3. Its impacts are limited in their temporal and organisational scale, and 4. The non-conformity does not result in a fundamental failure to achieve the objective of the relevant Requirement or related Criterion.
Major non-conformity	<p>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:</p> <ol style="list-style-type: none"> 1. Continue over a long period of time, or 2. Are systemic, meaning they go back to the same or similar root cause, or 3. Are recurrent, meaning the same non-conformities had been identified and seemingly closed before, or 4. Affect a wide range of the site's production or of the site's facilities, or 5. Affect the integrity of the ResponsibleSteel programme, or 6. Are not adequately addressed by the site within the defined periods for corrections and corrective action. <p>It may also be a situation where the site does not comply with applicable law or the situation presents a significant risk to workers, the environment or communities.</p> <p>Significant risk refers to situations where there is a high chance of:</p> <ul style="list-style-type: none"> • Injury or illness to one or more people resulting in permanent partial impairment or disability or death • Child or forced labour • 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 licence to operate'.
Opportunity for improvement	<p>A situation where the observed evidence indicates that a Requirement has been effectively implemented, but where effectiveness or robustness might be</p>

	increased using a modified approach. A situation that could lead to a future non-conformity if not addressed.
Not applicable	The Requirement or Criterion does not apply to the site or cluster seeking certification and, therefore, is disregarded in the audit. The site's or cluster's reasons for considering a Requirement or Criterion to be "not applicable" shall be verified by the certification body and shall be documented in the 'Auditor assessment' template.

- b) In situations that pose significant risk (see above), the audit team shall contact ResponsibleSteel for guidance. Situations of significant risk may require or justify the following actions:
- Contacting the responsible authority
 - Triggering a national whistleblowing mechanism
 - Contacting the National Contact Point (NCP) for the OECD Guidelines for Multinational Enterprises
 - Contacting the ILO Helpdesk for Business on International Labour Standards
 - Contacting a relevant civil society organisation
- c) A group of minor non-conformities shall be elevated to a major non-conformity if there is evidence that the minor non-conformities are:
- Related: In terms of the Requirement, activity or nature of the non-conformity, or
 - Repetitive: With the same issue evident throughout the site's business, symptomatic of a systemic failure or absence of controls, or
 - Persistent: Due to ineffective corrective action to address the root cause.

Guidance on elevating non-conformities

For example, numerous instances of missing required records across multiple different Requirements of the ResponsibleSteel Standard, identified for an individual site or, in case of a cluster, for various sites, indicate a related and repetitive issue. In such a case, the audit team should elevate one of the minor non-conformities to a major, list all the minor non-conformities that contributed to the elevation, and explain that this minor was elevated to a major due to the related and repetitive nature.

Another example is where a number of minor non-conformities found across different Criteria or Principles of the ResponsibleSteel Standard indicate that implementation of policies is lacking. Since the ResponsibleSteel Standard requires that "Responsibility for implementing the values, policies and commitments defined by the corporate owner has been assigned to specific members of senior management", the audit team should raise a major non-conformity against Requirement 1.2.2. of the Standard.

The key to differentiating between a minor and major non-conformity classification is to assess how isolated the instances are, or whether they are related in such a manner that indicates common root causes through weaknesses in management systems.

3.2.6. Overall conformity and obligations resulting from non-conformities

Table 6 sets out how overall conformity shall be determined and captured in the 'Auditor assessment' template and outlines the obligations for follow-up action where non-conformities are identified during an audit. In the case of a cluster of sites,

Table 6: Overall conformity and obligations resulting from non-conformities

Overall conformity	Audit outcomes and obligations for the site / cluster and certification body
Conformity	<ol style="list-style-type: none"> 1. A site or cluster 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. 2. The site or cluster shall have completed a re-certification audit by 3 years after the certificate has been issued, if it wishes to remain certified.
Minor non-conformity	<ol style="list-style-type: none"> 1. A site or cluster with only minor non-conformities shall be eligible for a 3-year certificate, provided it conducts a root cause analysis and develops plans for corrections and corrective actions. 2. Within 1 month of the minor non-conformities being raised, the site or cluster shall submit the root cause analysis and plans for corrections and corrective actions to the certification body. In case of a cluster, the analysis and plans must distinguish between the different sites, where relevant. 3. Effective implementation of the corrections and corrective actions shall be verified at the next audit. 4. The certification body shall also conduct monitoring activities on the site or cluster on an ongoing basis. 5. The site or cluster shall have completed a re-certification audit by 3 years after the certificate has been issued, if it wishes to remain certified.
Major non-conformity	<ol style="list-style-type: none"> 1. If any major non-conformities are found: <ul style="list-style-type: none"> • during the initial certification audit, the site or cluster shall not become certified. • during a surveillance or re-certification audit, the certificate shall be immediately suspended if one or more of the identified major non-conformities poses significant risk as defined in 3.2.5. Table 5. The certification body shall inform the site or cluster of the suspension

	<p>and shall request the site or cluster to immediately cease use of any trademarks and claims related to ResponsibleSteel certification.</p> <ul style="list-style-type: none"> • during a surveillance or re-certification audit, but none of the major non-conformities pose a significant risk as per 3.2.5. Table 5, the site shall remain certified. <ol style="list-style-type: none"> 2. If the site or cluster still wants to become certified, wants to maintain its certification or wants its certificate to be reinstated, the site or cluster shall conduct a root cause analysis and develop SMART (see below) plans for corrections and corrective actions. 3. The root cause analysis and plans for corrections and corrective actions shall be submitted to the certification body within 1 month of the major non-conformities being raised and shall distinguish between the different sites of the cluster, where relevant. The plans shall be suitable to effectively address the issues within 6 months of the non-conformities being raised. The site's or cluster'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 or cluster shall revise its analysis and plans and resubmit them to the certification body. 4. Effective implementation of the corrections and corrective actions shall be verified at a special audit, which shall be carried out within 6 months of the major non-conformities being raised. At the special audit, the site or cluster shall demonstrate that it is now in conformity with the respective Requirements or that the non-conformities have been reduced to 'minor'. If reduced to 'minor', the site or cluster has until the next regular audit to lift its performance to 'conformity'. 5. If the special audit shows that the major non-conformities persist, the site or cluster shall have another special audit conducted by 6 months after the first special audit. 6. If the second special audit shows that the major non-conformities persist, the site or cluster: <ul style="list-style-type: none"> • shall not become certified where certification was not previously granted, • shall have its certificate suspended, or
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	<ul style="list-style-type: none"> in case the certificate had already been suspended, shall have its certificate withdrawn. <p>7. Sites or clusters whose certificate was withdrawn and those who were not issued a certificate may choose to undergo a new certification audit once they are ready to do so.</p> <p>8. Sites or cluster whose certificate has been suspended may undergo one other special audit to have its certificate reinstated. Where they do not succeed in the special audit, the certification shall be withdrawn and clause 7. shall apply.</p>
Opportunity for improvement	Where an opportunity for improvement has been identified, the site or cluster should seek ways to address it as omission to do so could lead to a future non-conformity.
Not applicable	Prior to the next audit, the site or cluster shall review any Requirements and Criteria that were considered “not applicable” before and, if relevant, shall determine that they are now applicable. This is because the site’s or cluster’s operations, facilities, strategy might have evolved or because the ResponsibleSteel Requirements and Criteria might have changed.

Guidance on number of non-conformities

Some Requirements of the ResponsibleSteel Standard are quite complex, and so the audit team may raise more than one non-conformity against the same Requirement. For example, there may be multiple sources of supporting evidence suggesting that the site's system to identify and comply with applicable law is not effective. Evidence may vary from a minor technical mishap such as failing to issue a compliance report on time to more serious breaches that have the potential to cause significant harm to people or the environment. In this scenario, 2 non-conformities may be raised with the late reporting issue graded as a minor non-conformity and the serious breach graded as a major non-conformity.

Another example may relate to a Requirement that asks for the existence and implementation of a documented process. A minor non-conformity may be raised if the documentation has small gaps, whereas a major non-conformity may be raised if the process has not been communicated and has not been properly implemented throughout the site's business, particularly if the process has been developed to control a high-risk activity.

Guidance on SMART plans for corrections and corrective actions

Plans for corrections and corrective actions must meet the SMART criteria. SMART stands for:

- Specific:** is the correction or corrective action clear and unambiguous? Does it address the underlying cause of the non-conformity?*
- Measurable:** Can the implementation of the correction or corrective action be monitored and measured?*

- ***Achievable:** Does the correction or corrective action have clearly assigned responsibilities and the means for implementing the action?*
- ***Realistic:** Is the correction or corrective action realistic and fit for purpose, given the nature of the non-conformity? Have the means and resources been assigned to implement the correction or corrective action?*
- ***Timely:** Does the timeframe for completing the correction or corrective action correspond with the timelines given in Table 6 above? In some cases, actions involving capital works or approvals may require more time. In these cases, progress milestones during the certification cycle should be set and interim short-term corrective measures implemented to mitigate the effects of the non-conformity.*

3.2.7. Prepare the audit conclusions

Prior to the closing meeting, the audit team shall:

- Collect and integrate the findings of conformity and non-conformity, opportunities for improvement and observations of each team member in the 'Auditor assessment' template
- Review the results in light of the audit objectives
- Agree upon the audit conclusions
- Agree on any necessary follow-up actions

3.2.8. Closing Meeting

A closing meeting shall be conducted before the audit team departs from site to verbally present the findings to the site. The names of those present at the closing meeting shall be recorded. The auditors shall use the meeting to:

- Ensure that the site understands the findings of conformity and non-conformity as well as the opportunities for improvement
- Explain that the findings of conformity and non-conformity presented during the closing meeting are preliminary and that the findings may change due to the certification body's internal quality assurance process or due to audit report reviews by ResponsibleSteel or the Assurance Panel
- Provide an overview of the next steps for the audit team and the certification body and the responsibilities of the site in the next steps
- Communicate the timeframe for the audit report
- Describe the reviews by ResponsibleSteel and by the Assurance Panel (see chapter 4)
- Communicate the recommended timing for subsequent audits (surveillance or re-certification)
- Answer any questions by the site

- h) Clarify misunderstandings and points of difference, in particular in relation to any raised non-conformities
- i) Provide information about the ResponsibleSteel Issues Resolution System, which includes the management of appeals
- j) Discuss any significant limitations encountered during the audit.

Guidance on "Understands the findings"

"Understands the findings" does not necessarily mean that the site agrees with the findings.

3.2.9. Force majeure during the stage 2 audit

In exceptional force majeure circumstances, the stage 2 audit should either be stopped or, where appropriate and reasonable, should be continued remotely. Where feasible, the audit team should contact ResponsibleSteel for advice and for approval of the decision to stop or continue the audit remotely prior to communicating the decision to the site or cluster.

3.2.10. Post-stage 2 check-in with ResponsibleSteel

After the stage 2 audit, the certification body shall contact ResponsibleSteel to:

- a) Confirm that the stage 2 audit took place
- b) Report any unusual events such as force majeure, if the audit team was not able to contact ResponsibleSteel during the audit
- c) Provide information on any major non-conformities that have been raised. This will allow ResponsibleSteel to capture improvements in a structured way in case the site or cluster intends to continue to pursue certification or reinstatement of certification.

3.2.11. Audit report

- a) Within 4 to 6 weeks after the closing meeting, the certification body shall deliver an audit report to the site or cluster. For a cluster, the date of the closing meeting of the last site that was visited shall mark the start of the reporting timeline.
- b) The audit report:
 - Shall consist of a high-level summary that the certification body shall produce using the ResponsibleSteel audit report template and of the fully completed 'Auditor assessment' template
 - Shall be written in English and, if agreed with the site or cluster, in a language other than English

- Shall address each applicable Requirement of the ResponsibleSteel Standard in the case of initial certification and recertification audits. For surveillance audits, the report can be more focused and shall reflect chapter 6 on surveillance audits
 - Shall contain rationales that are fair, complete and true and written in clear, concise and unambiguous language
 - Shall list the reviewed evidence for each applicable Requirement
 - Shall reflect on the complexity and risk exposure assessment
 - Where relevant, shall clearly outline differences in site-level performance in the case of a cluster of sites
 - Shall ensure that the identity of interviewed workers and stakeholders is protected and that confidentiality arrangements with the site or cluster are safeguarded
 - Shall take account of the guidance provided in the ResponsibleSteel audit report template
 - Shall include the site's or cluster's plans for corrections and corrective actions
 - Shall include details on previously identified major non-conformities, the actions implemented by the site or cluster to address them and how the certification body verified effective implementation of the actions
 - Shall have been subject to an internal quality review by the certification body to implement the four-eyes principle.
- c) The site or cluster shall be given up to 4 weeks to review the audit report for errors of fact and to ensure that confidentiality agreements are met. Where a site or cluster does not agree with the findings in the audit report and the certification body and client are not able to settle the disagreements, the client may trigger ResponsibleSteel's Issues Resolutions System.
- d) Within 2 weeks of receiving the report back from the site or cluster, the certification body shall send the final audit report to ResponsibleSteel. This applies if the audit report recommends that the site becomes certified or that its certification is upheld.
- e) Where the audit report does not contain a positive recommendation to issue a certificate or to uphold certification, a special audit shall be conducted in line with 3.2.6 Table 6 and chapter 6.10. If the special audit results in a positive recommendation to issue a certificate or to uphold certification, clause a) to c) of 3.2.11 shall apply.
- f) In case of an initial certification, the total period accepted between the stage 2 audit and a positive certification decision is 2 years. In case the process takes longer than this, a new certification audit will be required, including stage 1 and 2.

Guidance on "reflect on the complexity and risk exposure assessment"

Where the complexity and risk exposure assessment was 'high', the audit team should reflect on relevant observations, interviews, records and other evidence they collected during the audit. For example, if the site or cluster was classified as high complexity and risk for stakeholder concerns related to air emissions, the audit team should pick up on this and reflect in the audit report whether the concerns were substantiated during the audit and how they relate to the ResponsibleSteel Standard Requirements.

4. Audit report review by ResponsibleSteel and the Assurance Panel

4.1. ResponsibleSteel audit report check and Assurance Panel line-up

4.1.1. Within 1 to 2 weeks of receiving the audit report with a positive recommendation to issue a certificate or to uphold certification, ResponsibleSteel shall:

- a) Check that the report aligns with the requirements in 3.2.11.b) and that the certification body has followed the procedure outlined in the Assurance Manual (this document). Where there are gaps, the Secretariat shall request the certification body to amend the report by filling the gaps or by providing explanations on the gaps. The certification body shall submit the revised audit report to ResponsibleSteel within 2 weeks of receiving the request to amend it.
- b) In case of initial certification and re-certification, determine whether the audit report will be subject to a partial or full additional Assurance Panel review, based on a risk evaluation. Where an additional review will be conducted, ask the Assurance Panel members to identify and describe any circumstances that may pose a conflict of interest for them in relation to:
 - 1. The site or cluster wishing to become (re-)certified
 - 2. The certification body or any audit team members who were involved in the audit of the site or cluster
 - 3. Any complaining party, in case the site or cluster has been or is subject to a complaint or issue addressed through ResponsibleSteel's Issues Resolution System
 - 4. Public controversy concerning the site or cluster.
- c) Analyse the circumstances that may pose a conflict of interest to Assurance Panel members. Where ResponsibleSteel finds that there are conflicts of interest, the respective individuals shall not be involved in the review of the audit report and shall be informed accordingly.

4.1.2. As soon as the audit report, in original or amended form, has been received from the certification body, ResponsibleSteel shall forward the report to those Assurance Panel members who will conduct the audit report review. Where no Assurance Panel review will be conducted, the certification body shall proceed to chapter 5.

4.2. Assurance Panel review and conclusion

4.2.1. Within 3 to 6 weeks of receiving the audit report from ResponsibleSteel, the members of the Assurance Panel shall:

- a) Individually review the report and document and questions and feedback they have as per the Assurance Panel terms of reference
- b) Hold a meeting, convened and coordinated by ResponsibleSteel, to discuss the report and the certification recommendation by the certification

4.2.2. Their review of the audit report shall help determine whether:

- a) The audit report contains sufficient detail to support an informed (re-)certification decision
- b) The supporting evidence and rationales given in the audit report support the conformity classifications
- c) The (re-)certification recommendation based on the audit report is conclusive and the defined post-audit activities are appro

4.2.3. Where Assurance Panel members have questions or require further detail, they shall contact ResponsibleSteel at least 1 week prior to their meeting. In such cases, ResponsibleSteel shall liaise with the certification body to demand the required information, which shall be provided in time for the Assurance Panel meeting.

4.2.4. During their virtual or in-person meeting, the Assurance Panel members shall discuss the audit report and any additional information received via ResponsibleSteel in light of 4.2.2. above. They shall reach overall agreement, which shall be either:

- a) In support of the positive (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
- b) Disapproval of the positive (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.

4.2.5. The Assurance Panel shall disapprove of the positive (re-)certification recommendation if:

- a) There was a serious procedural error in the audit process that was material to the fairness of the audit, or
- b) The certification body accepted corrections or corrective action plans by the site or cluster in relation to one or more non-conformities that cannot be implemented effectively or that do not seem suitable for addressing the root cause of the issue, or

- c) 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 is material to the (re-)certification recommendation.

4.2.6. On behalf of and following the directions of the Assurance Panel, ResponsibleSteel shall draft a written communication containing the following:

- a) Any differences of opinion that the Assurance Panel members had and how they were resolved
- b) The agreement the Assurance Panel reached and what further steps are expected from the certification body
- c) Records of all additional information that the Assurance Panel obtained during the review process.

4.2.7. Within 1 week of reaching an agreement about the positive (re-)certification recommendation, ResponsibleSteel shall forward the communication to the certification body on behalf of the Assurance Panel. The certification body shall be allowed 2 weeks or longer, where granted by the Assurance Panel, to:

- a) Review the Assurance Panel communication
- b) Seek clarification where needed
- c) Make changes to the audit report, as requested
- d) Submit the revised audit report with tracked changes to ResponsibleSteel for another review, if requested by the Assurance Panel.

4.3. Audit report re-submission by certification body

Where the certification body submits a revised version of the audit report, ResponsibleSteel shall forward it to the Assurance Panel without delay. Within 1 to 4 weeks of receiving the revised audit report, the Assurance Panel shall:

- a) Review the changes to the audit report to determine if 4.2.2. is now satisfied
- b) Discuss and conclude on the changes as outlined in sections 4.2.4. and 4.2.5. The Assurance Panel discussion and conclusion may take place by email and shall be facilitated by ResponsibleSteel.

ResponsibleSteel shall inform the certification body of the Assurance Panel's conclusion without delay. The process outlined in 4.4 may be repeated if necessary for the Assurance Panel to come to a final conclusion.

4.4. Appeal against ResponsibleSteel or Assurance Panel conclusions

If the certification body, site or cluster does not agree with the conclusions of ResponsibleSteel or the Assurance Panel, they may trigger the ResponsibleSteel Issues Resolution System. In such a case, no (re-)certification decision shall be made until the issue is resolved.

Guidance on Issues Resolution System

The ResponsibleSteel Issues Resolution System may be triggered by any party on any issue related to the ResponsibleSteel certification programme. This includes objections to certification body certification recommendations and decisions by ResponsibleSteel or the Assurance Panel.

5. Certification and re-certification decision and publication

5.1. Certification body certification decision

If the Assurance Panel supports the positive (re-)certification recommendation, the certification body shall start its certification decision-making process. The information reviewed by the certification body prior to taking a certification decision shall include the written communication on behalf of the Assurance Panel and the final version of the audit report.

5.2. Issuing a certificate and publishing certification information

5.2.1. Sites and clusters that receive a positive (re-)certification decision shall be issued a certificate by the certification body. To this end, the certification body shall contact ResponsibleSteel to request the ResponsibleSteel certificate template and audit report summary template and shall complete the templates as indicated. For a cluster of sites, the audit report summary must distinguish between the individual sites to reflect any differences in environmental, social and governance performance as relevant.

5.2.2. In coordination between the certification body, ResponsibleSteel and the site or cluster, the certificate and audit report summary shall be posted on the ResponsibleSteel website and announced more broadly where agreed. The certificate and audit report summary shall be updated as needed after subsequent audits and re-posted to the ResponsibleSteel website.

6. Surveillance

Guidance on surveillance

The aim of surveillance is to maintain confidence that the site or cluster continues to meet the Requirements of the ResponsibleSteel Standard with only minor non-conformities between (re-)certification audits. In summary, surveillance comprises the following:

- *Ongoing monitoring of the site or cluster*
- *Surveillance audit and report, focusing on non-conformity close-out and recent developments in relation to the site or cluster or ResponsibleSteel Standard Requirements*
- *Short-notice and unannounced audits, where necessary*

6.1. Site activities after certification

After certification and if the site or cluster wishes to remain certified, it shall do the following:

- a) Monitor any changes in its operations to make sure it remains in line with the ResponsibleSteel Standard Requirements
- b) Effectively implement its plans for corrections and corrective actions
- c) Keep track of any revisions to the ResponsibleSteel Standard as well as new guidance or interpretations being issued.

6.2. Carry out ongoing monitoring

6.2.1. The certification body shall have a process for monitoring the site or cluster in-between audits and for determining appropriate action following monitoring results. The aim of this process shall be two-fold:

- a) Keep up to date with events that might be relevant for the site's or cluster's performance against the ResponsibleSteel Standard
- b) Decide whether the analysed information will be taken into account during the next scheduled audit or whether the information warrants an un-scheduled short-notice or unannounced audit to investigate the issue.

6.2.2. Ongoing monitoring shall include, at least:

- a) Analysis of external publications identified through an online search. External publications that are relevant with regards to the site's or cluster's performance in relation to the ResponsibleSteel Standard shall be recorded by the certification body
- b) Review of received stakeholder input, if any.

6.2.3. The certification body shall record monitoring activities, their results, any actions taken and how they were determined.

Guidance on "analysis of online search"

In line with the guidance to 2.1.5., the certification body might choose to set up Google Alerts or other online alerts specific to the site or cluster and to topics related to the ResponsibleSteel Standard to ensure it does not miss relevant information. The certification body should use a sensible combination of search terms, starting with more generic combinations such as "name of site + environmental issues" or "name of site + human rights issues" and going to more specific combinations such as "name of site + dust emissions" or "name of site + sexual harassment", depending on the search results. In addition, the certification body should consult relevant websites such as:

- [Business & Human Rights Resource Centre](#)

- [Environmental Justice Atlas](#)
- [European Center for Constitutional and Human Rights \(ECCHR\)](#)
- [IndustriALL](#)
- [Wikipedia](#)

6.3. Plan the surveillance audit

6.3.1. The certification body shall schedule a 2-staged surveillance audit with the site or cluster to take place approximately 12 months after the certificate was issued. The certification body's planning shall aim to have all process steps concluded by 18 months after the certificate was issued, including the audit report review by the site and by ResponsibleSteel, as well as potential audit report revisions by the certification body. Depending on the performance of the site or cluster, received stakeholder input and the results of monitoring activities, the scope of the surveillance audit may be less extensive than of the (re-)certification audit.

6.3.2. The certification body shall make sure that the site or cluster is aware of the latest version of the 'Site self-assessment' template, including ResponsibleSteel Standard Requirements, guidance and interpretations that ResponsibleSteel has revised or issued since the last audit. The certification body shall also make the site or cluster aware of the latest version of the ResponsibleSteel Glossary.

6.3.3. The certification body shall ask the site or cluster to review the fundamental information (see chapter 2.4) about its business and operations and to update it where changes have occurred, including the collation of external publications.

6.3.4. The certification body shall ask the site or cluster to review its certification scope (see chapter 2.4.1.) and audit scope (see chapter 2.4.2.), including the stakeholder list, to reflect any developments since the last audit. In case the audit scope is extended, the certification body shall take account of this in planning the surveillance audit. In case the certification scope is extended, the certification body shall follow chapter 10.

6.3.5. The certification body shall ask the site or cluster to update the status of implementation of its corrections and corrective action plans.

6.3.6. The certification body shall request the site or cluster to submit the following information to the certification body, covering the period since the last audit:

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

6.3.7. The certification body shall review any Requirements and Criteria the site or cluster considers 'not applicable' and the reasons for this determination. Where needed, the certification body shall decide that they are applicable nonetheless and shall inform the site or cluster of the decision and its underlying reasons.

6.3.8. The certification body shall review any feedback received by ResponsibleSteel and the Assurance Panel in relation to the last audit report and shall take that into account when planning the surveillance audit.

6.3.9. The certification body shall review and update the site's or cluster's complexity and risk exposure assessment and calculate audit time according to Table 3. The resulting time shall be divided by two for the surveillance audit. The certification body may increase surveillance audit time if this seems necessary to cover all developments and changes since the last audit. However, the time shall not be less than half of the time for the initial certification audit.

6.3.10. The requirements of section 2.5.5. relating to the audit team shall also apply to surveillance audits.

6.4. Conduct the surveillance audit stage 1

6.4.1. During stage 1 of the surveillance audit, the audit team shall:

- a) Review the information and updates submitted by the site or cluster as outlined in 6.3.3. to 6.3.6.
- b) Collate and review information resulting from monitoring activities and from stakeholder input, where input has been received
- c) Identify weaknesses of the site or cluster related to the ResponsibleSteel Standard in the 'Auditor assessment' template and determine whether the site or cluster is ready for stage 2 of the surveillance audit. The certification body shall inform the site or cluster of its conclusion.

6.4.2. When planning stage 2 of the surveillance audit, the certification body shall take account of:

- a) The inputs from 6.4.1
- b) Any facilities and associated activities of the site or cluster and any Requirements of the ResponsibleSteel Standard that received less attention in the previous audit
- c) Any feedback received by ResponsibleSteel and the Assurance Panel in relation to the last audit report.

6.4.3. The audit team shall reach out to all identified stakeholders about 4 weeks prior to the 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 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

6.5. Post-surveillance audit stage 1 check-in with ResponsibleSteel

6.5.1. The certification body shall submit to ResponsibleSteel or the appointed Oversight Body the following information about 4 weeks prior to the start of stage 2 of the surveillance audit:

- a) Fundamental information about the site or cluster
- b) Complexity and risk classification
- c) Audit time calculation
- d) List of stakeholders that will be informed of the audit
- e) List of requirements that will be excluded from the audit, including the reasons for exclusion
- f) Stage 2 audit plan for the site or cluster
- g) Where the site or cluster is not deemed ready for stage 2, the weaknesses the certification body has identified
- h) Audit team composition
- i) Any identified certification body and auditor conflicts of interest in relation to the site or cluster and how they were addressed.

6.5.2. Within one week of receiving the documentation, ResponsibleSteel or the appointed Oversight Body shall provide written feedback to the certification body. Where ResponsibleSteel or the appointed Oversight Body asks for changes, these shall be accommodated by the certification body.

6.5.3. ResponsibleSteel shall announce stage 2 of the surveillance audit on its website.

6.6. Conduct the surveillance audit stage 2

6.6.1. Stage 2 of the surveillance audit shall follow section 3.2. of this document, noting that the audit team shall interview about ½ the workers that were interviewed during the initial certification.

6.6.2. Where interviews with workers or stakeholders uncovered issues related to the ResponsibleSteel Standard in the last audit, the audit team shall make efforts to interview the respective workers or stakeholders again to understand how the situation has changed since the last audit.

6.6.3. In addition, from the moment that the ResponsibleSteel licence agreement is in place, the certification body shall verify if the site or cluster has used the ResponsibleSteel trademarks without a signed licence agreement in place or has made claims related to certification that do not correspond with the approved ResponsibleSteel claims.

6.6.4. If the site or cluster has used the trademarks without a license agreement or sold products as certified, the certification body shall raise a nonconformity and shall instruct the site or cluster to immediately cease use of the trademarks and selling products as certified.

6.6.5. The certification body shall notify ResponsibleSteel of the non-conformity within 1 week of raising the non-conformity and, where possible, email an image of the non-conformity to ResponsibleSteel.

Guidance on audit time for surveillance audits

Where the certification and audit scopes remain unchanged, the time required for surveillance audits is approximately 1/2 the time spent on the initial certification audit or the re-certification audit. The same goes for the number of conducted worker interviews and the number of taken document samples. In the case of many minor non-conformities raised during the last audit and requiring review and potential close-out in the surveillance audit, the time for a surveillance audit, including worker interviews, may be greater than indicated.

6.7. Post-surveillance audit stage 2 check-in with ResponsibleSteel

After stage 2 of the surveillance audit, the certification body shall contact ResponsibleSteel to:

- a) Confirm that stage 2 took place
- b) Report any unusual events such as force majeure, if the audit team was not able to contact ResponsibleSteel during the audit
- c) Provide information on any major non-conformities that have been raised. This will allow ResponsibleSteel to advise on next steps and to capture improvements in a structured way in case the site or cluster intends to maintain certification.

6.8. Surveillance audit report

6.8.1. The surveillance audit report shall meet the requirements of section 3.2.11. However, it 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.

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

6.8.3. Surveillance audit reports shall be subject to ResponsibleSteel review as outlined in 4.1.1.a). At the discretion of ResponsibleSteel, the surveillance audit report might be subject to a full or partial Assurance Panel review as described in 4.1.1.b) and following.

6.9. Surveillance decision and publication

When the certification body has taken the decision on whether certification is upheld, it shall send the final surveillance report and a summary thereof to ResponsibleSteel and to the site or cluster. ResponsibleSteel shall post the surveillance report summary on its website.

6.10. Short-notice and unannounced special audits

6.10.1. Where monitoring activities, new stakeholder input or information provided by the site or cluster imply that the site or cluster faces a major non-conformity, the certification body shall carry out a special audit on short notice or unannounced. Reasons for a special audit may be, for example, a fatal accident or an accident with grave environmental damage at the site or cluster, or indications that child or forced labour or other illegal activities occur at the site or cluster. A special audit shall also be carried out to verify that major non-conformities identified in a regular audit have been effectively addressed.

6.10.2. The scope of short-notice and unannounced special audits shall be limited to the issue(s) that might result or have resulted in a major non-conformity and shall generally follow the requirements of a surveillance audit as described in 6.3 to 6.9.

6.10.3. The certification body may decide that the special audit is carried out entirely off-site with any stakeholder or worker interviews happening remotely. Where this is the case, the certification body shall document its reasons for doing so in the audit report.

6.10.4. Unlike a surveillance audit, a special audit that is carried out unannounced shall consist of a stage 2 audit only. Neither the site or cluster nor stakeholders shall be informed of the audit and it shall not be announced on the ResponsibleSteel website. An unannounced special audit might be carried out where there are indications of child or forced labour or other illegal activities.

6.10.5. Audit time might be reduced for both types of special audits depending on the extent of the issues and shall be determined based on the professional judgement of the certification body. Interviews carried out with workers and stakeholders may be limited to those who might hold relevant information in relation to the issue the special audit seeks to address.

6.10.6. The certification body shall submit to ResponsibleSteel or the appointed Oversight Body the following information prior to the start of stage 2 of the special audit or prior to the start of the unannounced special audit:

- a) The issues that might result or have resulted in a major non-conformity
- b) Audit time calculation
- c) List of stakeholders that the certification body will seek to interview during stage 2
- d) Stage 2 audit plan for the site or cluster, where applicable
- e) Audit team composition
- f) Any identified certification body and auditor conflicts of interest in relation to the site or cluster and how they were addressed.

6.10.7. Within one week of receiving the documentation, ResponsibleSteel or the appointed Oversight Body shall provide written feedback to the certification body. Where ResponsibleSteel or the appointed Oversight Body asks for changes, these shall be accommodated by the certification body.

6.10.8. Where stage 1 of the short-notice audit generates strong evidence that no major non-conformity is present, stage 2 may be cancelled.

6.10.9. The certification body shall follow the requirements in 6.8 and 6.9 related to audit report writing, review, decision-taking and publication of the decision. Where stage 2 of the short-notice audit was cancelled, the report shall describe:

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

6.10.10. The circumstances that led to the assumption of there not being a major non-conformity shall be reviewed by the certification body during the next regular audit.

7. Re-certification

7.1. Sites and clusters that wish to remain certified shall undergo a re-certification audit, which is a new full 2-stage certification audit. The re-certification audit shall be completed before the current certificate expires. The re-certification audit shall follow the requirements for an initial certification audit as described in chapters 2 to 5 of this document, including all provisions for audit time calculation, stakeholder engagement, worker interviews, etc.

7.2. Re-certification audits shall be conducted against the versions of the ResponsibleSteel Standard, Glossary and Assurance Manual that apply at the time of the re-certification audit. The certification body shall ensure that the most current versions of any mandatory ResponsibleSteel templates and guidance documents are used.

Guidance on the timing of re-certification audits

Note that ResponsibleSteel will not extend existing certificates unless there are exceptional circumstances that are beyond the control of the site, cluster or certification body (such as political unrest, explosion, flood, earthquake, pandemic, etc.).

8. Record keeping

The certification body shall retain the following records in relation to certified sites or clusters and previously certified sites or clusters for the duration of the current certification cycle plus 1 full certification cycle:

- a) Audit reports, including the completed final versions of the 'Auditor assessment' templates
- b) All received stakeholder input
- c) All external publications
- d) Records relating to implementing the Issues Resolution procedures
- e) Evidence of audit team member competence and of the absence of conflicts of interest and, where relevant, on how conflicts of interest were addressed.

9. ResponsibleSteel Oversight

9.1. ResponsibleSteel and the Assurance Panel shall carry out oversight activities to support the integrity and credibility of the ResponsibleSteel programme. These activities are described in the chapter 'Roles and responsibilities'. More detail on oversight activities carried out by ResponsibleSteel are described in the 'ResponsibleSteel Oversight Mechanism' which is available on the ResponsibleSteel website.

9.2. In addition, ResponsibleSteel shall maintain information on the site's or cluster's certification status and the certification body's approval status on the ResponsibleSteel website.

9.3. ResponsibleSteel shall occasionally review audit reports for consistency with this Assurance Manual and to understand how ResponsibleSteel Standard Requirements are interpreted and applied.

9.4. ResponsibleSteel may choose to outsource some or all of the oversight functions to a specialised Oversight Body.

10. Changes in Scope, Ownership or Auditing Body

10.1. Certification Scope Changes

10.1.1. The certification scope may change if there is a change to the site's or cluster's business, such as due to:

- a) Organisational restructure
- b) Divestments and acquisitions or change to the equity share of businesses
- c) Changes to activities, products and processes
- d) Changes to the locations and distribution of the site's facilities and associated activities
- e) External influences such as changes in the statutory environment, regulations or other stakeholder expectations and commitments that affect the site or cluster.

10.1.2. If the site or cluster wishes to extend its certification scope by adding facilities or associated activities to its existing certification scope, a new certification audit shall be conducted, including the additional facilities and associated activities.

10.1.3. ResponsibleSteel be notified by the certification body of changes to the site's or cluster's business and to the certification scope as soon as these changes become known.

10.2. Divestments and acquisitions

10.2.1. At times, the control of a certified site or cluster may change through divestment or acquisition. For the ResponsibleSteel certification status of the acquired site or cluster to continue, the new site or cluster in control, if not already a ResponsibleSteel member and certified, shall apply for ResponsibleSteel membership and certification within 6 months of the acquisition.

10.2.2. A surveillance audit of the certified site or cluster 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 audit report.

10.2.3. If the new owner has not applied for ResponsibleSteel membership and certification 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. Site or cluster changing the certification body

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

- a) A site or cluster shall not transfer to another certification body during an ongoing audit
- b) A site or cluster with suspended certification shall use the same approved certification body until the major non-conformities have been closed

- c) The validity date of the current site or cluster certificate shall not change due to the certification body transfer and any outstanding audits of the current certification cycle shall be carried out as stated in this Assurance Manual.

10.3.2. Sites and clusters may transfer from a certification body who has lost or given up ResponsibleSteel approval at any time.

10.3.3. When the time has come to transfer the site or cluster, the current certification body shall provide the following documentation to the succeeding certification body covering the period of the current certification cycle plus the last full certification cycle, where applicable:

- a) Copies of previous audit reports, including reports from certification, surveillance, special and re-certification audits, as available, plus the corresponding completed 'Auditor assessment' templates
- b) Any referenced supporting evidence
- c) Records of monitoring activities and results
- d) The collection of external publications on the certified site or cluster

10.3.4. On the date of the site or cluster transfer, the succeeding certification body shall inform ResponsibleSteel of the transfer and shall submit to ResponsibleSteel the site or cluster certificate including the new certificate code. ResponsibleSteel shall update its website accordingly.

11. References

- Aluminium Stewardship Initiative, Assurance Manual, Version 1, December 2017
- International Accreditation Forum (IAF), MD 1: 2023, Audit and Certification of a Management System Operated by a Multi-Site Organization
- International Accreditation Forum (IAF), MD 5: 2023, Determination of Audit Time of Quality, Environmental, and Occupational Health & Safety Management Systems
- IRMA (Initiative for Responsible Mining Assurance): Certification Body Requirements, 2023
- ISEAL Alliance, Code of Good Practice for Assuring Compliance with Social and Environmental Standards, Version 2, 2018
- ISO/IEC 17021:2015(en) Conformity assessment – Requirements for bodies providing audit and certification of management systems. Parts 1 and 2
- ISO 19011:2018(en) Guidelines for auditing management systems
- SAAS (Social Accountability Accreditation Services): SAAS Procedure 200:2019. Audit Requirements for Accredited Certification Bodies for the SA8000 Program.

Annex 1 (normative): Certification body application form

The form below shall be completed by certification bodies seeking approval for ResponsibleSteel. The completed form and any supporting documentation shall be submitted by email to the ResponsibleSteel Secretariat at assurance@responsiblesteel.org or to the appointed Oversight Body. Note that only application forms submitted in English and substantiated by relevant evidence can be considered.

The submitted information shall be reviewed by ResponsibleSteel or the appointed Oversight Body to determine whether the certification body meets the requirements described in section 1.3.

Certification body detail	
Certification body legally registered name and address	<i>Please state the address of the certification body's office that is responsible for its ResponsibleSteel application</i>
Contact person for ResponsibleSteel	<i>Please state their name, position, email and phone number</i>
Legal status (please attach documentation) and company registration number or equivalent	<i>E.g. company, sole trader, non-profit E.g. certificate or articles of incorporation</i>
Tax number or equivalent	
VAT number or equivalent	
Certification body motivation to seek approval for ResponsibleSteel	<i>Describe why you want to offer ResponsibleSteel conformity assessment services</i>
Certification body evidence that it has access to sufficient resources to manage ResponsibleSteel activities in the countries where it seeks to offer ResponsibleSteel certification services	<i>Resources include personnel (such as number and locations of auditors that currently meet the ResponsibleSteel qualification requirements), language knowledge, management systems, affiliate offices or subcontractors, arrangements to cover potential liabilities from certification activities, etc.</i>
Description and documentation of certification body structure	<i>Describe your relationship with other departments in your organisation, other divisions within your group of companies, and with any other legal entities related to your organisations and how independence of conformity assessment services is safeguarded Also attach an organisation and/or group chart to visualise this</i>

Description of other conformity assessment services you offer to the steel sector and, if applicable, where and by whom you are accredited for them	
Description of consultancy, training and other services offered in the steel sector and links to relevant webpages	<p><i>Describe the services offered by you, other departments in your organisation or other divisions of your group.</i></p> <p><i>Provide links to webpages where these services are described</i></p>
Description of any management system consultancy that you or a body related to you has provided to a steel company and where this consultancy ended in the last two years.	<p><i>Describe the management system consultancy that you, other departments in your organisation or other divisions of your group provided to a steel company. Providing management system consultancy to a potential certification client is a significant threat to impartiality. A recognised mitigation of this threat is to not certify the respective management system for a minimum of two years. Due to this, you only need to describe any steel company management system consultancy if that consultancy ended less than two years ago.</i></p>
Description and documentation of certification body's management system	<p><i>In particular, we are interested in understanding your approach to the following:</i></p> <ul style="list-style-type: none"> <i>• Risk management</i> <i>• Management of impartiality</i> <i>• Internal auditing</i> <i>• Auditor competence</i> <i>• Management of complaints and disputes</i> <p><i>Please also attach relevant documentation, such as your quality manual, policies or procedures</i></p>
Description of how the ResponsibleSteel programme will be incorporated into the certification body's internal management system	
Evidence of ISO 17021 accreditation and scopes you consider to be relevant for ResponsibleSteel (please attach)	<p><i>Relevant scopes are e.g. ISO 9001, ISO 14001, ISO 45001</i></p>
Description of any incidents of the certification body's ISO 17021 accreditation having been suspended or withdrawn	<p><i>Explain when and why suspension or withdrawal occurred and measures taken by the certification body to become re-accredited</i></p>

Annex 2 (normative): Auditor application form

The form below shall be completed by auditors seeking approval for ResponsibleSteel audits and applying for participation in ResponsibleSteel auditor training. The completed form, an updated CV and any supporting documentation shall be submitted by email to the ResponsibleSteel Secretariat at assurance@responsiblesteel.org or to the appointed Oversight Body. Note that only application forms submitted in English and substantiated by relevant evidence can be considered. The following auditor approval scopes exist:

- Responsible Sourcing (Principle 3)
- Occupational Health and Safety (Principle 5)
- Social (Principles 6 and 7)
- GHG (Principle 10)
- Environment (Principles 11, 12 and 13)
- Auditor and Lead Auditor

Note that the scopes 'Governance' (Principles 1, 2 and 4), 'Stakeholder Engagement and Communication' (Principle 8) and 'Local Communities' (Principle 9) are part of any auditor and lead auditor approval.

The submitted information shall be reviewed by ResponsibleSteel or the appointed Oversight Body to determine whether the auditor meets the minimum qualification requirements and to organise auditor trainings. The details submitted to ResponsibleSteel or the appointed Oversight Body shall be kept confidential. In completing the form, auditors shall take account of the details outlined in Annex 3 (Minimum auditor qualification requirements).

Auditor details		
Salutation		
Full name		
Email address		
Country in which they live		
Languages in which they work		
Name of ResponsibleSteel-approved certification bodies they have a relationship with and the nature of that relationship	<i>E.g. staff or contractor for certification body xyz</i>	
Which approval scopes are you applying for? (mark with an "x" as	Governance (Principles 1, 2 and 4)	
	Responsible Sourcing (Principle 3)	

appropriate, taking account of the qualification requirements in Annex 3)	Occupational Health and Safety (Principle 5)			
	Social (Principles 6 and 7)			
	Stakeholder Engagement and Communication and Local Communities (Principles 8 and 9)			
	GHG (Principle 10)			
	Environment (Principles 11, 12 and 13)			
	Lead Auditor			
	Which auditor training courses have you successfully completed? (on the right, complete as appropriate and attach related training certificates and, where available, test results)	Course	Duration in days	Year(s) training was taken
AA 1000 SES				
EN 19694-2				
ISO 19011				
ISO 9001				
ISO 14001				
ISO 14040				
ISO 14064				
ISO 14067				
ISO 14404				
ISO 20400				
ISO 20915				
ISO 26000				
ISO 45001				
ISO 50001				
PAS 2050:2008				
PAS 2080:2023				
SA8000				
SMETA				
Other relevant auditor training, please specify				
How many audits have you conducted that included visits to production sites? (attach audit log showing the audited standards, the types of companies that were audited, the dates and durations of	Audited standard	No. of audits		
		at crude steel production sites	at other metal smelting, refining or processing sites	in other industries

the audits, for at least the last three years)	AA 1000 SES			
	EN 19694-2			
	ISO 19011			
	ISO 9001			
	ISO 14001			
	ISO 14040			
	ISO 14064			
	ISO 14067			
	ISO 14404			
	ISO 20400			
	ISO 20915			
	ISO 26000			
	ISO 45001			
	ISO 50001			
	PAS 2050:2008			
	PAS 2080:2023			
	SA8000			
	SMETA			
Other standard (please specify)				
What is your highest level of education and for which disciplines? (please attach proof)	<i>E.g. university degree in metallurgy, general high school degree</i>			
How many years of professional experience outside of auditing have you gained and in which fields? (please attach proof)	<i>E.g. 5 years as health & safety manager at a chemical company</i>			
In which areas do you consider yourself to possess extensive knowledge? (please mark with an "x" and describe what that knowledge comprises and how you obtained it. Attach related training certificates, test results or similar, where available)	Area	Mark	Describe	
	Human rights		<i>E.g. Master of Law in Human Rights or series of human rights training courses</i>	
	Labour rights			
	Occupational health and safety			
	Social Impact Assessment methodologies			

	Greenhouse gas emissions		
	Air emissions		
	Water		
	Waste		
	Biodiversity		
	Ecosystem services		
	Environmental Impact Assessment methodologies		
	Responsible Business Conduct		
	Responsible Supply Chains		
	Stakeholder engagement		
	Sustainability		
How do you ensure continued professional development?	<i>Describe how you generally ensure that you gain new competences and refresh existing competences</i>		
Do you have experience with stakeholder engagement? Please describe	<i>E.g. I have conducted a number of environmental and social impact assessments, which require extensive consultation with stakeholders, such as local community representatives, civil society organisations and regulators</i>		
Have you conducted consultancy for any steel companies in the past? If so, please describe	<i>E.g. In 2015, I consulted steel company xyz on their environmental management system</i>		

Annex 3 (normative): Minimum auditor qualification requirements

1. All auditors: Qualification requirements	
1.1. Knowledge of audit practices and techniques	<p>a) Successful completion of a 4 to 5-day auditor training course that is relevant for the approval scopes applied for (see below) and that was based on ISO 19011 principles, plus participation in at least 5 on-site audits of crude steel production sites or other metal smelting, refining or processing sites in the last 3 years OR</p> <p>b) Participation in at least 10 on-site audits of crude steel production sites or other metal smelting, refining or processing sites in the last 3 years</p> <p>c) In addition to a) or b), continued professional development as relevant</p>

	for the types of conducted audits, e.g. through advanced courses.
2. Social, responsible sourcing and health and safety auditors: Additional qualification requirements	
2.1. Academic degree or relevant professional experience	<p>a) Academic degree in a social science OR</p> <p>b) High school (or similar) graduation plus at least 3 years of professional experience in one of the following areas:</p> <ol style="list-style-type: none"> 1. Human relations 2. Occupational health and safety 3. Compliance 4. Occupational psychology 5. Other areas with a human-centred focus
2.2. Relevant background knowledge, specifically on social issues and responsible sourcing	<p>Comprehensive understanding of laws, agreements, conventions, standards or guidelines in at least 2 of the following areas:</p> <ol style="list-style-type: none"> a) Human rights (e.g. UN Guiding Principles on Business and Human Rights, human rights impact assessment, rights-compatible grievance mechanisms) b) Labour rights (e.g. ILO Core Conventions, employment laws, other labour standards) c) Responsible Business Conduct (e.g. OECD Due Diligence Guidance for Responsible Business Conduct, UN Guiding Principles on Business and Human Rights) d) Responsible Supply Chains (e.g. OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High Risk Areas) e) Social impact assessment methodologies f) Stakeholder engagement (e.g. AA1000 Stakeholder Engagement Standard) g) Sustainability (e.g. IFC Environmental and Social Performance Standards, UN Global Compact)
2.3. Relevant background knowledge, specifically on health and safety	<p>Comprehensive understanding of at least 2 of the following:</p> <ul style="list-style-type: none"> • ILO Occupational Health and Safety Conventions • OHS regulations • Health and safety risk assessment • Health and safety-related workplace monitoring

	<ul style="list-style-type: none"> • WHO occupational health guidance • Other relevant occupational health and safety agreements, conventions, standards or guidelines
2.4. Relevant social auditor training and practice	<p>The auditor training and at least 2 of the audits mentioned under 1.1. shall have been conducted against a standard or against specifications with a social dimension, such as:</p> <ul style="list-style-type: none"> a) Corporate social responsibility specifications b) SA8000 c) ISO 26000
2.5. Relevant auditor training and practice, specifically for responsible sourcing	<p>The auditor training and at least 5 audits shall have been conducted against a standard with a responsible sourcing or supply chain due diligence component, such as ISO 20400, SMETA.</p>
2.6. Relevant auditor training and practice, specifically for health and safety	<p>The auditor training and at least 2 of the audits mentioned under 1.1. shall have been conducted against ISO 45001 or an equivalent standard.</p>
3. Environmental and GHG auditors: Additional qualification requirements	
3.1. Academic degree or relevant professional experience	<ul style="list-style-type: none"> a) Academic degree in one of the following areas: <ul style="list-style-type: none"> 1. Civil engineering 2. Process engineering 3. Environmental or natural resources management 4. Environmental science 5. Sustainable development OR b) High school (or similar) graduation plus at least 3 years of professional experience in positions with a strong environmental focus working with large-scale industrial sites
3.2. Relevant background knowledge for environmental auditors	<p>Comprehensive understanding of laws, agreements, conventions, standards or guidelines in at least 2 of the following areas:</p> <ul style="list-style-type: none"> a) Air emissions b) Water c) Waste d) Biodiversity

	<ul style="list-style-type: none"> e) Ecosystem services f) Environmental Impact Assessment methodologies g) Stakeholder engagement (e.g. AA1000 Stakeholder Engagement Standard) h) Sustainability (e.g. IFC Environmental and Social Performance Standards, UN Global Compact)
3.3. Relevant background knowledge, specifically for GHG	<p>Comprehensive understanding of at least 2 of the following:</p> <ul style="list-style-type: none"> a) GHG Protocol Corporate Accounting and Reporting Standard b) GHG Protocol Corporate Value Chain (Scope 3) Standard c) Recommendations of the Task Force on Climate-Related Financial Disclosures d) Science-based targets initiatives e) UNFCC Paris Agreement f) World Steel Association CO2 Data Collection User Guide g) Other relevant GHG agreements, conventions, standards or guidelines
3.4. Relevant environmental auditor training and practice	<p>The auditor training and at least 2 of the audits mentioned under 1.1. shall have been conducted against a standard or against specifications with an environmental dimension, such as:</p> <ul style="list-style-type: none"> a) ISO 14001 b) ISO 20400 c) ISO 50001 d) Corporate social responsibility specifications
3.5. Relevant auditor training and practice, specifically for GHG auditors	<p>The auditor training and at least 5 audits shall have been conducted against one of the following standards:</p> <ul style="list-style-type: none"> a) EN 19694-2 b) GHG Protocol Corporate Accounting and Reporting Standard c) GHG Protocol Corporate Value Chain (Scope 3) Standard d) ISO 14064 e) ISO 14067 f) ISO 14404 g) ISO 20915

	<ul style="list-style-type: none"> h) PAS 2050:2008 i) PAS 2080:2023
4. Lead auditors: Additional qualification requirements	
4.1. Audit management skills	<ul style="list-style-type: none"> a) Successful completion of a 4 to 5-day auditor training course that is relevant for the approval scopes applied for (see above) and that was based on ISO 19011 principles, plus participation in at least 15 on-site audits of crude steel production sites or other metal smelting, refining or processing sites b) Experience in allocation of team resources c) Experience in stakeholder engagement, including managing conflicts d) Experience in external team representation during audit process.

Annex 4 (informative): Key timelines in the audit and oversight process

Clause number	Title of clause and timelines
2.5.6.	<p>Pre-offer check-in with ResponsibleSteel:</p> <p>Prior to making an offer to a site or cluster, send the following to ResponsibleSteel:</p> <ul style="list-style-type: none"> • Fundamental site or cluster information as per 2.4 • Complexity and risk exposure assessment as per 2.5.2. • Audit time calculation with all underlying information as per 2.5.3. and 2.5.4. • Audit team composition as per 2.5.5, including any conflicts of interest and how they were addressed, as well as technical experts or translators as relevant. <p>ResponsibleSteel provides written feedback within one week</p>
3.1.4.	<p>Start stakeholder engagement in case of high stakeholder concerns:</p> <ul style="list-style-type: none"> • Where the site or cluster shows 'high' complexity and risk with regards to stakeholder concerns, consult with ResponsibleSteel on the most suitable ways to reach out to stakeholders • Notify the site that a stage 1 stakeholder engagement will take place (in addition to stakeholder engagement during stage 2) • Inform stakeholders 4 weeks prior to stage 1 about the opportunity to engage, with the support of RS • Remind stakeholders 2 weeks prior to stage 1 about the opportunity to engage
3.1.5.	<p>Identify areas of concern and determine readiness for stage 2:</p> <p>Note that there is supposed to be a maximum period of 12 months between the stage 1 and stage 2 audit</p>
3.1.7.	<p>Post-stage 1 check-in with ResponsibleSteel:</p> <p>At least 4 weeks prior to stage 2, send the following to ResponsibleSteel:</p> <ul style="list-style-type: none"> • List of exclusions and the reasons for exclusions as per 3.1.2.4 • List of stakeholders as per 2.4.2.a) and 2.7.1. • Where applicable, the written record of stakeholder views and concerns as per 3.1.4.6. • The stage 2 audit plan as per 3.1.6.

Clause number	Title of clause and timelines
	ResponsibleSteel will provide written feedback within one week
3.1.8	Reach out to stakeholders and seek their input: <ul style="list-style-type: none"> • Update the stakeholder analysis at least prior to each audit • Announce audit publicly and contact all identified stakeholders at least 4 weeks prior to the first day of the stage 2 audit • Remind stakeholders about the opportunity to provide input about 2 weeks before the start of stage 2
3.2.5.	Classify conformity (Table 5): <p>If major non-conformities are identified that present significant risk or a high chance of the following, contact ResponsibleSteel for guidance:</p> <ul style="list-style-type: none"> • Injury or illness to one or more people resulting in permanent partial impairment or disability or death • Child or forced labour • 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 licence to operate'
3.2.10.	Post-stage 2 check-in with ResponsibleSteel: <p>Contact ResponsibleSteel to:</p> <ul style="list-style-type: none"> • Confirm that the stage 2 audit took place • Report any unusual events such as force majeure, if the audit team was not able to contact ResponsibleSteel during the audit • Provide information on any major non-conformities that have been raised
3.2.11.	Audit report: <ul style="list-style-type: none"> • Within 4 to 6 weeks after the closing meeting, deliver an audit report to the site or cluster, including any action plans by the site to address non-conformities • Give the site or cluster up to 4 weeks to review the audit report for errors of fact and to ensure that confidentiality agreements are met

Clause number	Title of clause and timelines
	<ul style="list-style-type: none"> For reports with a positive recommendation to issue a certificate or to uphold certification: Within 2 weeks of receiving the report back from the site or cluster, send the final audit report to ResponsibleSteel
4.	Audit report review by ResponsibleSteel and the Assurance Panel: <ul style="list-style-type: none"> Within 1 to 2 weeks, ResponsibleSteel reviews the audit report Reports with a positive recommendation to issue a certificate or to uphold certification are reviewed (in parts or fully) by the Assurance Panel within another 4 to 6 weeks Within 1 week of the Assurance Panel reaching an agreement about the positive (re-)certification recommendation, ResponsibleSteel informs the certification body of the Assurance Panel decision The certification body has 2 weeks (or longer, if granted by the Assurance Panel) to revise the audit report
4.3.	Audit report re-submission by certification body: <p>If the revised audit report has to undergo another Assurance Panel review, this will happen within 1 to 4 weeks of receiving the revised audit report from the certification body</p>
5.2.	Issuing a certificate and publishing certification information: <p>The certification body compiles the audit report summary and sends it together with the certificate to the client and ResponsibleSteel for publication on the ResponsibleSteel website</p>
6.2.	Carry out ongoing monitoring after a certificate has been issued: <p>For example, using Google alerts</p>
6.3.	Plan the surveillance audit: <ul style="list-style-type: none"> Schedule a 2-staged surveillance audit with the site or cluster to take place approximately 12 months after the certificate was issued Plan it so that all process steps are concluded by 18 months after the certificate was issued (including the audit report review by the site and by ResponsibleSteel, as well as potential audit report revisions by the certification body) Surveillance audit time shall not be less than half of the time for the initial certification audit, but it can be more than that

Clause number	Title of clause and timelines
6.5.	<p>Surveillance audit stage 1 check-in with ResponsibleSteel:</p> <p>About 4 weeks prior to the start of stage 2 of the surveillance audit, send the following to ResponsibleSteel:</p> <ul style="list-style-type: none"> • Fundamental information about the site or cluster • Complexity and risk classification • Audit time calculation • List of stakeholders that will be informed of the audit • List of requirements that will be excluded from the audit, including the reasons for exclusion • Stage 2 audit plan for the site or cluster • Where the site or cluster is not deemed ready for stage 2, the weaknesses the certification body has identified • Audit team composition • Any identified certification body and auditor conflicts of interest in relation to the site or cluster and how they were addressed. <p>ResponsibleSteel will provide written feedback within one week</p>
6.7.	<p>Post-surveillance audit stage 2 check-in with ResponsibleSteel:</p> <p>Contact ResponsibleSteel to:</p> <ul style="list-style-type: none"> • Confirm that stage 2 took place • Report any unusual events such as force majeure, if the audit team was not able to contact ResponsibleSteel during the audit • Provide information on any major non-conformities that have been raised.
6.8.	<p>Surveillance audit report:</p> <ul style="list-style-type: none"> • Give the site or cluster opportunity to review the audit report for errors of fact and to ensure that confidentially agreements are met • Revise the audit report within 1 to 2 weeks of receiving the report back from the site or cluster, then send it on to ResponsibleSteel • ResponsibleSteel will review the surveillance audit report and may decide that it will be subject to a full or partial Assurance Panel review

Clause number	Title of clause and timelines
6.10.	<p>Short-notice and unannounced special audits:</p> <ul style="list-style-type: none"> • Special audits may be announced or unannounced, on-site or off-site, and comprise of 1 or 2 stages, depending on the circumstances • Submit to ResponsibleSteel the following information prior to stage 2 of the special audit or prior to the start of the unannounced special audit: <ul style="list-style-type: none"> - The issues that might result or have resulted in a major non-conformity - Audit time calculation - List of stakeholders that the certification body will seek to interview during stage 2 - Stage 2 audit plan for the site or cluster, where applicable - Audit team composition - Any identified certification body and auditor conflicts of interest in relation to the site or cluster and how they were addressed. <p>ResponsibleSteel will provide written feedback within one week</p>
7.	<p>Re-certification:</p> <p>The same process and requirements apply as for initial certification.</p>

Annex 5 (informative): Consequences and timelines of conformity and non-conformity findings

Overall conformity	Audit outcomes, consequences and timelines
Conformity	<ol style="list-style-type: none"> 1. A 3-year certificate is issued by the certification body 2. The certification body carries out ongoing monitoring 3. A surveillance audit is started 12 months after the certificate has been issued and is completed by 18 months after the certificate has been issued 4. A re-certification audit is completed by 3 years after the certificate has been issued
Minor non-conformity	<p>The site or cluster submits a root cause analysis and plans for corrections and corrective actions to the certification body within 1 of the minor non-conformity being raised</p> <p>Steps 1. to 4. described under 'Conformity' apply</p>
Major non-conformity	<ol style="list-style-type: none"> 1. Identified during the initial certification audit: The site or cluster does not become certified. 2. Identified during a surveillance or re-certification audit: The certification body suspends the certificate immediately if the identified major non-conformity poses significant risk as defined in 3.2.5, Table 5 3. Identified during a surveillance or re-certification audit, but none of the major non-conformities pose a significant risk as per 3.2.5. Table 5: The site remains certified <p>The following steps and timelines apply for cases 1. to 3. above:</p> <ul style="list-style-type: none"> • The site or cluster submits a root cause analysis and SMART plans for corrections and corrective actions to the certification body within 1 month of the major non-conformity being raised. The certification body reviews and accepts the action plans if they seem appropriate and realistic • The certification body verifies effective implementation of the corrections and corrective actions at a special audit, which must be carried out within 6 months of the major non-conformity being raised. • If the major non-conformity is fully closed, the site or cluster becomes certified or remains certified. The same applies if the major non-conformity is reduced to 'minor' during the special audit. In this case, the

Overall conformity	Audit outcomes, consequences and timelines
<p>Major non-conformity (continued)</p>	<p>site or cluster has until the next regular audit to lift its performance to 'conformity'</p> <ul style="list-style-type: none"> • If the special audit shows that the major non-conformity persists, the site or cluster must have another special audit conducted by 6 months after the first special audit • If the major non-conformity persists during the second special audit, the certification body: <ul style="list-style-type: none"> - does not certify the site or cluster - suspends the certificate where this has not been done before since the major non-conformity did not pose significant risk as defined in 3.2.5, Table 5 - withdraws the certificate if it had already been suspended • A site or cluster whose certificate has been suspended may undergo one other special audit to have its certificate reinstated. Where they do not succeed in the special audit, the certificate is withdrawn and clause 7. Applies.