

CERTIFICATION PROCESS OF ECOBEAUTYSCORE



VERSION 1.2: 25 SEPTEMBER 2025
(Addition of deletion process vs VERSION 1.1 30 JUNE 2025)

TABLE OF CONTENTS

1.	DEFINITIONS	3
2.	APPLICABLE SCHEME	3
3.	TRANSITION PERIOD	4
4.	ACCESS TO THE CERTIFICATION.....	4
4.1.	Scope of our service	4
4.2.	Restrictions	4
5.	REQUIREMENTS REGARDING THE VERIFICATION.....	4
5.1.	EBS Management process.....	5
5.2.	Data input.....	5
5.3.	Classification and rating of the requirements	6
5.4.	Verification localization	6
6.	THE CERTIFICATION PROCESS STEP BY STEP	7
6.1.	Third Party Verification Cycle	7
6.2.	The certification application.....	7
6.3.	Formalization of the user commitment	8
6.4.	Sampling methodology	8
6.5.	Verification duration.....	9
6.6.	Initial verification.....	9
6.6.1.	Documentaries validation and preparation of the verification	9
6.6.2.	Verification modalities	9
6.7.	Renewal certification	10
6.7.1.	Planning time	10
6.9.	Non-conformity management.....	11
6.9.1	Findings.....	15
6.9.2.	Procedures for handling non-conformities	12
6.10.	Suspension of certification or certification on hold.....	12
7.	COMPLAINTS AND APPEALS	14
7.1.	Complaints	14
7.2.	Appeals.....	14
7.3.	Users' obligation with respect to third parts claims	15
8.	REFERENCE TO EBS SCORE PUBLICATION & CERTIFICATION BODY	15

1. DEFINITIONS

Terms used in this document are defined in Annex I.

2. APPLICABLE SCHEME

The EcoBeautyScore (EBS) is a science-based system for assessing and communicating the environmental impact of cosmetic products.

The EBS footprint methodology relies on a multicriteria approach to evaluating environmental impacts, based on full Life Cycle Assessment (LCA) and aligned with the principles of the European Product Environmental Footprint (PEF) method.

The EcoBeautyScore is a comparative environmental scoring label based on a certification scheme. This scheme is built on two key components: a standard, which defines the requirements that users must comply with when calculating and communicating their scores, and a certification process, which sets out the rules for verifying that these scores comply with the standard.

The certification process relies on third-party verification, carried out on a sample of products, to assess the accuracy of the data entered in the tool and its alignment with the appropriate product segment. This verification is followed by an independent review by the Certification Body, which may then issue a certificate of conformity. This verification must be conducted prior to the use of the EcoBeautyScore label.

This environmental scoring system has been established in accordance with the Empowering Consumers for the Green Transition Directive (CED) and the EBS Terms and Conditions, which anticipate upcoming legal obligations concerning the certification of environmental claims.

This document is intended to define the requirements applicable to certification process of the use of the EcoBeautyScore, to be followed by Certification Body.

This present document details the rules concerning the third-party verification system applicable to users of the EBS platform who intend to externally publish the score, either digitally or on-packaging.

Documents of the scheme:

- EBS Certification process
- EBS standard
- EBS Input Guide
- EBS Methodology
- EBS platform Terms and Conditions

3. TRANSITION PERIOD

A transition period is applied for users up until the point at which verification is mandatory in advance of publishing scores. Publication will happen first online and won't be subject to a prior verification. The prior verification will become mandatory for on-pack communication. In addition, when a company has started to publish scores online, they will have until the renewal of their license package, and at the latest 27th September 2026, to conduct a verification of their communicated scores.

4. ACCESS TO THE CERTIFICATION

4.1. Scope of our service

EBS certification applies to all users of the EBS platform who wish to publish the score for at least one of the product segments listed below within the European market:

- Hair Wash
- Hair Treat
- Face Moisturize & Treat
- Body Wash

Third-party verifications are designed to verify the reliability and the relevance of the data reported on the platform according to the current certification process. They take place before the publication of the EBS score and concern a sampling of scored products according to the rules defined in the EBS standard.

4.2. Restrictions

The Certification Body may refuse an application for certification when there are fundamental or known reasons such as:

- Illegal activities or repeated non-conformities of certification,
- A conflict of interest that could compromise the impartiality of decisions,
- Illegal activities, fraud, or offense,
- Inappropriate behavior (threats, insults, etc.),
- Outstanding payment on previous verification to Certification Body

5. REQUIREMENTS REGARDING THE VERIFICATION

5.1. EBS Management process

The Certification Body verifies that the applicant has a data quality management process in place, applicable for EBS. This system must include document management, data management, change management and knowledge of applicable global requirements (communication rules, tools, usage, etc.).

5.2. Data input

The Certification Body must verify the reliability of the data report into the platform in accordance with the rules of the EBS platform Terms and Conditions, based on the following evidence:

- The consistency between the formula listed in the product specification and the declarations on the platform:
 - Raw materials names and commercial references, full composition into ingredients, raw material sourcing traceability and origin (eg: certificate of origin): the verification will be adapted by the auditor during the verification, depending on the type of the raw materials. All ingredients listed on the packaging will be reviewed, while formulas will be subject to sampling-based verification according to the typology of the ingredients. Particular attention will be paid to feedstocks, carbon origin, 100% bio-based, 100% natural origin.
 - Internal audit system if existing,
 - Translation of internal to EBS nomenclature if existing.
- The consistency of products with the score:
 - Product Information File (PIF) in Europe (or equivalent system),
 - Manufacturing sheet,
 - Packaging file,
 - Sourcing of ingredients,
 - Sourcing of packaging,
 - Bill of material (BOM).

It is the responsibility of the user to ensure that all required evidence is readily accessible to the Certification Body at the time of the verification.

Product Deletion Process – Audit Compliance Requirements

If the product has been scored and approved for publication and the user wants to delete it from the platform, it must follow the established process described below before deleting it.

To ensure traceability and regulatory compliance during the deletion of a product from the platform, the user agrees to strictly adhere to the following process:

1. Score the product and approve it

2. Generation of Mandatory Reports

Two reports must be generated and exported prior to deletion:

- a. The Results report
- b. The Re-importable Data report (Excel file)

3. Download and Secure Storage of Exported Files Both exported files must be downloaded and securely stored without modification to ensure their availability for future reference.

4. Product Deletion

The product may only be deleted from the platform after the mandatory reports have been generated, downloaded, and properly saved.

Obligations in relation to the verification

In the event of an audit, the user is required to provide the two exported files, which will be reimported into the platform to restore the deleted product and enable the certification process.

5.3. Classification and rating of the requirements

During the opening meeting, contextual information will be requested from the user to ensure a clear understanding of the scoring project framework and the planned communication methods. This will help ensure the verification proceeds smoothly and that questions are appropriately targeted. The 26 requirements are categorized as two categories based on their potential impact. These are classified as follows:

1. **Implementation of the EBS project:** Understanding of the management and implementation of the EBS project including availability of information (eg: knowledge of EBS platform T&C, segmentation framework and marketing playbook).
2. **Production verification into three sub-categories:** Review of the products list per segment & verification of the tool through products declaration and scoring.

2.1. General Product Information

Objective: Verify that the product description in the EBS platform matches supporting documentation

2.2. Formula Description

Objective: Validate the accuracy of ingredient-level input data in the platform, verify the accuracy of information on the carbon origin and on the declared feedstock

2.3. Packaging Description

Objective: Ensure the declared packaging components reflect reality and match the EBS database logic, verify the accuracy of the origin of packaging materials (eg : PCR) and the element demonstrating its recyclability when relevant

During the verification, each requirement is rated by the auditor as follows:

- **Not applicable:** the requirement is not relevant considering the nature of the activity audited.
- **Compliant:** the requirement is fulfilled by the user.
- **Not compliant:** the requirement is not fulfilled or partially fulfilled by the user.

5.4. Verification localization

The initial verification must take place on-site and the renewal verification may be conducted remotely.

The verification should preferably take place at the site where the majority of supporting data can be provided. In some cases, this may be the site of the applicant's subcontractor. In all cases, the applicant

remains responsible for the supporting data and must provide the auditor with all the elements necessary for carrying out their evaluation.

6. THE CERTIFICATION PROCESS STEP BY STEP

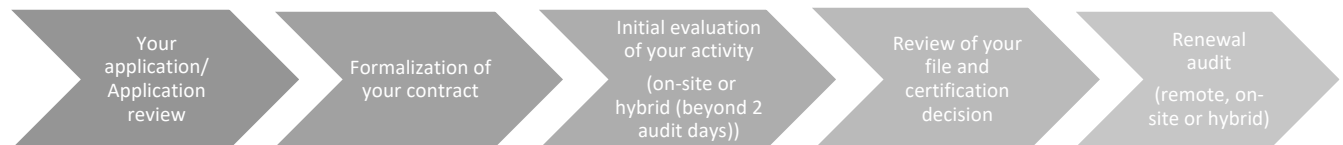
6.1. Third Party Verification Cycle

The service is based on a multi-annual cycle (3 years). Once the certification requirements are fulfilled and the initial verification is successfully completed, a conformity certificate is issued, valid for three years, allowing the user to display EBS scores with reference to the certification.

The following chapters provide details on:

- The management of the request through to the initial contractualization,
- The methodology of sampling,
- The duration of verification,
- The initial verification,
- The renewal verification,
- The verification cycle exceptions,
- The procedures for managing non-conformities,
- The certification decision.

The steps of the certification control process are the following (and are detailed below):



See in annex 2, the diagram of EBS Certification process.

6.2. The certification application

In order to give all the needed information to complete the certification process, the selected Certification Body will send the user the following documents:

- The application form(s)
- This certification process (This document)

The user will send the completed forms to collect all the necessary information needed to review the application. During the application review we will conduct an “application review”. The application review is the study of the feasibility and the definition of your project. It ensures that:

- All necessary information is specified in the forms
- The feasibility of controlling your perimeter using your data (according to the list below):

Elements to Provide

To define the sampling approach, the Certification Body will require a comprehensive overview of all products scored within the platform, distinguishing between the different statuses: new product, approved product and draft product.

Each user must provide the list of products, specifying the following details:

- Product name
- Product segment
- Type of packaging
- Score obtained
- % of scored products per product segment/per range (e.g.: publication logs, internal score database).

6.3. Formalization of the user commitment

The user selects a Certification Body from the list of EBS-approved Certification Body. Certification is formalized through a contract signed between the user and the Certification Body, in accordance with the specific terms and conditions defined by the latter.

6.4. Sampling methodology

The verification of data and calculated scores must follow the sampling rule defined below.

The sampling must be representative of:

- The segments: Hair Wash, Hair Treat, Face Moisturize & Treat, Body Wash,
- The final score A/B/C/D/E,
- Geographical area: currently EU, UK, Switzerland and Norway,
- The brands (when the sampling is global)

Sampling is determined based on scored brands or by group, depending on the user's organizational structure and the defined certification scope.

A minimum and maximum number of products will be defined for sampling, depending on the certification scope.

The minimum number of samples is determined based on the total number of product score published using the EBS methodology. This number may be adjusted to ensure adequate representation of the diversity of product segments and brands included in the scope.

The sample is selected by the Certification Body, based on the information provided by the user and in accordance with the certification process.

Sampling is therefore adapted to the complexity of the product portfolio, which is assessed notably through the number of brands and product segments covered.

Number of product references scored EBS (couple packaging x formula)	Minimum number of sample references	Maximum number of sample references
1 to 4	All	All

5 to 500	5	10
501 to 1000	1%	2%
>1000	20	2%

All the data declared for scored products must be verified using the sampling method chosen.

6.5. Verification duration

The verification duration is defined according to the methodology sampling presented in 5.4.

Number of product references scored EBS	Minimum verification day(s)	Maximum verification day(s)
1 to 500	0,5 day	1 day
501 to 1000	1 day	2 days
>1000	2 days	3 days

6.6. Initial verification

The initial verification takes place upon your commitment.

During the initial verification all the activities in scope of the certification will be verified in order to check the compliance with the standard requirement.

6.6.1. Documentaries validation and preparation of the verification

The file will be allocated to a certification officer, who will be the first point of contact for the user. This officer will send the forms needed to prepare for the approval verification that are specific to the activity of the user.

These documents are reviewed by the certification officer and used to refine the knowledge of the activity of the user and collect all necessary information for the verification.

The approval verification is assigned once your application has been processed.

The auditor in charge of the verification plans with the user a verification appointment. About a minimum of 10 days before the verification, the auditor sends to the user a verification plan and reminds to keep documents available by sending a notification of passage.

Once the user confirms the date and place of the verification assessment, the auditor will complete a verification assessment plan and share it with the user. This document includes the purpose and the scope of the verification, a list of the information to define the sampling, records and documents the user should prepare, objectives, steps of the verification and the planned agenda.

In order to prepare the verification, the user can consult the EBS Input Data Guide.

6.6.2. Verification modalities

The verification is carried out according to the following steps:

- The opening meeting: the auditor presents the objectives and the different points to check, confirms the scope and the verification plan,
- The documentation evaluation,
- The using of the EBS platform and the interviews with the data quality administrators,
- The closing meeting: the auditor makes a summary of the on-site verification.

The verification is conducted on-site, however, beyond 2 audit days, the user can request a hybrid verification.

6.6.3. Summary of the verification

During the verification, non-conformities with standards requirements can be found. These non-conformities require actions (called “corrective actions”) from the user in order to get in compliance.

The user receives following the verification, the details of any nonconformity and information regarding the additional evaluation tasks needed to verify that nonconformities have been corrected. (see chapter 6.9 “non-conformity management”)

6.7. Renewal certification

The renewal certification takes place every three years.

6.7.1. Planning time

The decision to renew the certification must be made before the expiration of the conformity certificate from the previous labelling cycle.

6.7.2. Preparation

The Certification Body will send the user who has committed the forms it needs to prepare for its renewal verification, depending on its activity. The user must communicate all changes that have taken place since its last contact with the Certification Body and that have a potential impact on the scope of certification: new segment, new product references, product formulation, etc.

Each year, the user must inform the Certification Body of any potential changes to the certification scope and/or any modifications made to the scored products.

The renewal verification is carried out under the same conditions as previous verification.

6.7.3. Verification modalities

The renewal verification follows the same procedure as the initial verification, but can be carried out remotely, on-site or in a hybrid format, depending on technical feasibility.

6.8. Certification cycle exceptions

Additional verification may be scheduled during the three-year verification cycle under the following exceptional circumstances:

- Changes made by the user: changes in product formulation and/or addition of a new segment, or new product references, if the number of references scored changes the sampling methodology level.
- Changes to the EBS methodology having a direct impact on product scoring, including database update.

These changes will require an additional verification to ensure prior verification of the products, prior to the publication of scores by the users.

The additional verification may be conducted through the various modalities: onsite, remote, or hybrid, depending on technical feasibility.

6.9. Non-conformity management

The verification report is sent to the Certification Body decision team, which is responsible for validating the report. The certification team sends the verification report to the user within a minimum of 10 days following the verification.

6.9.1. Findings

The verification report includes the verification findings, which are presented as follows:

Findings	Definitions
Minor non-conformity	Deviation with no impact on the final score or the integrity of the EBS data.
Major non-conformity	Deviation that significantly affects the EBS data management system or the EBS score. A non-conformity initially classified as minor may be upgraded to major if it is identified again during the renewal verification after having already been raised during the initial verification.

6.9.2. Procedures for handling non-conformities

During the verification, any non-compliance with the requirements of the standard is identified. These non-conformities require corrective actions from the user in order to achieve compliance. The procedures for addressing non-conformities are detailed below according to their level of severity.

The type of a non-conformity as either minor or major is determined by the auditor based on the findings observed during the verification.

Regarding product data, non-conformities may be identified as either isolated or recurring, depending on the findings observed by the auditor during the verification.

Possible findings	Handling procedures
Minor non-conformity	The procedure is defined in the verification report according to the sanction plan section, depending on the case of non-conformity. The procedure can be either an action plan or a corrective action to fulfill within a specific period of time. In case of recurrence, the non-conformity will be treated as MAJOR.
Major non-conformity*	The procedure is defined in the verification report according to in the sanctions plan section, depending on the case of non-compliance. The procedure can be either an action plan or a corrective action to fulfill within a specific period of time.

**In the event of a major non-conformity after the score has been published, the digital*

communication must be updated within 15 days following the verification, along with submission of proof of this change to the Certification Body.

6.10. Suspension of certification or certification on hold

At this stage, depending on the level and severity of the identified non-conformities, the Certification Body may decide to place the certification on hold or to suspend it.

During the initial verification:

If the user is within its first certification cycle, certification will be put on hold, regardless of the severity of the non-conformity. The user must send the Certification Body a corrective action plan for minor non-conformities, and propose corrective actions for major non-conformities, in order to resume the certification process.

If the action plan and/or corrective action are not sent within the allotted timeframe, the certification decision will be made according to the process outlined below (see Certification Decisions).

During renewal:

This results in the suspension of certification until the user has addressed the non-conformities that impact the score (i.e. major non-conformities).

To lift these non-conformities, the user must submit the required evidence within the specified timeframe.

If the non-conformities are not resolved within this timeframe, the labelling decision will be made according to the process outlined below (see Certification Decisions).

6.11. Certification decision

On the basis of the information received following the verification, the Certification Body reviews the elements making up the User's file and decides whether or not to grant the label.

There are three types of certification decision:

- Granting of certification,
- Suspension of certification,
- Refusal or withdrawal of certification

6.11.1. Granting of certification

The certification decision is positive. It is made either when no non-conformity has been identified, or when such non-conformities have been addressed within the given timeframes.

The Certification Body then sends the user its certification documents.

It is specified for all practical purposes that any positive certification decision may be modified, suspended or even withdrawn, in the event that the user no longer meets the requirements of the Label.

6.11.2. Suspension of certification

The certification decision is positive but subject to conditions.

This vigilance is required when an element needs to be monitored or validated during the renewal process. The vigilance may be documentary or may consist of carrying out a supplementary verification.

6.11.3. Refusal or withdrawal of certification

The certification decision is negative.

This is notably the case when non-conformities have not been addressed within the given timeframes. The Certification Body informs the user by letter and identifies the reasons for this decision.

In the initial verification:

In the initial verification, certification is refused.

The user may submit a new application, starting again at the request stage, subject to a minimum 3 months waiting period from the notification of refusal. This period may be extended depending on the nature of the refusal (for example, in the case of proven fraud regarding eligibility, etc.), with the decision taken in consultation with the EBS Board of Directors.

The user is certified:

There is a withdrawal or non-renewal of the certification: this results in the withdrawal of the certification and the immediate cancellation of the certification for all of the user's products. The user may no longer display the EBS score for any of their products. This prohibition also applies to all other communication media.

6.12. Conformity certificate

The certification decision is communicated to the user by the Certification Body.
It is accompanied by a certificate of certification in the event of a positive decision.

The certificate of certification clearly identifies:

- The date of the certification,
- The name and address of the user,
- The expiry date of the document,
- The scope of labelling (segments),
- The name and address of the Certification Body.

The validity and authenticity of certificate of certification may be verified upon request at any time with EBS.

Any costs incurred by the user (e.g., label printing, etc.) in anticipation of a certification decision that has not yet been issued are the sole responsibility of the user and cannot be covered by the EBS or the Certification Body.

7. COMPLAINTS AND APPEALS

You may be asked to submit to the Certification Body complaints about our services, or to appeal a certification decision taken by the Certification Body.

The Certification Body is committed to deal with complaints and appeals in a timely manner and according to our internal procedures.

7.1. Complaints

Anyone can send a complaint to the Certification Body. Complaint can concern documentary validation, other client, Certification Body service.

A response will always be sent to the individual who made the complaint under a delay of 10 days.

All complaints are recorded by the quality manager, as well as measures taken and an analysis is made on a regular basis to improve our service.

7.2. Appeals

You may appeal any decision on certification by sending a written notice to the department,

To be eligible, your appeal must:

- Be a written notice (letter or email),
- Be done within 10 days, following the receipt of the certification decision,
- Be duly justified: new items that have not yet been brought to the attention of the Certification Body must be provided.

If the appeal is admissible, it is processed by Certification body service.

If you refute the outcome of your first appeal, you can make a second appeal to the Certification Body decision Committee. It must be made within 10 days of receipt of the information of the adverse decision following the first appeal.

Appeals are not suspensive of the decision subject to the appeal. These decisions therefore apply until a new decision has been made after evaluation of your appeal.

7.3. Users' obligation with respect to third parts complaints

The user is responsible for managing third party complaints that are addressed to you directly. The user must keep a record of all complaints made known to it relating to compliance with certification requirements and makes these records available to Certification Body. These records must keep track of the appropriate action taken and these actions must be documented.

8. REFERENCE TO EBS SCORE PUBLICATION & CERTIFICATION BODY

The communication rules defined by each Certification Body apply and must be strictly observed by the user.

By engaging in the certification process, the user agrees to fully comply with the requirements of the relevant Certification Body, as well as the EBS Platform Terms & Conditions.

EBS has defined scoring display and logo usage guidelines in the EBS Marketing Playbook, which is made available to users with access to the EBS Platform.

Any misuse of the Label or erroneous reference to certification, assessment or Certification Body by a user will result in the implementation of appropriate measures such as suspension, reduction or withdrawal of the label.

ANNEX I: Definitions

The terms used in this document are defined as follows:

Appeal: A written request submitted by the user to EBS/Certification Body to reconsider a decision of refusal or suspension of the conformity certificate.

Approved product: The product is approved by the user, meaning that all the information needed has been filled in, the footprint calculated, and the score evaluated. An information of the product's approval is automatically sent to EBS (key information, such as reference of the product, its Score and related footprint). It is a needed step to be able to publish the score on their website and/or on the product packaging.

Approval verification: a verification is defined as approval when the contract is signed by the user

Assessment: Refers to the planning, preparation and implementation activities such as a verification, documentary verification, and issuance of the verification report, aimed at providing information in relation to the specifications.

Conformity certificate: Document providing assurance of conformity with certification requirements.

Certification Body: Independent third party mandated for the assessment and certification decision of users.

Certification Body Decision Committee: Second appeal instance of the Certification Body

Certification Process: The set of rules and activities related to evaluation and decision-making to verify and certify the user's compliance with certification requirements.

Certification scheme (CED definition): "certification scheme" means a third-party verification scheme that certifies that a product, process or business complies with certain requirements, that allows for the use of a corresponding sustainability label, and the terms of which, including its requirements, are publicly available and meet the following criteria: (i) the scheme is open under transparent, fair, and non-discriminatory terms to all traders willing and able to comply with the scheme's requirements; (ii) the scheme's requirements are developed by the scheme owner in consultation with relevant experts and stakeholders, (iii) the scheme sets out procedures for dealing with non-compliance with the scheme's requirements and provides for the withdrawal or suspension of the use of the sustainability label by the trader in case of non-compliance with the scheme's requirements; and (iv) the monitoring of a trader's compliance with the scheme's requirements is subject to an objective procedure and is carried out by a third party whose competence and independence from both the scheme owner and the trader are based on international, Union or national standards and procedures

Complaint: An expression of dissatisfaction, other than an appeal, made by a person or organization concerning its activities, to which a response is expected.

Corrective Action: Action taken to eliminate the cause of a detected non-conformity or other undesirable situation.

Criteria: Rules to be followed by the user to obtain the certification

Draft status (in the platform): Product opened by a user on the platform and edited

EBS: Refers to the owner of the Label.

EBS Platform Terms & Conditions: Refers to the user's terms of use.

Evaluation: See "Assessment".

Hybrid verification: An assessment conducted by combining remote verification elements with onsite verification components.

On-site verification: An assessment carried out with physical presence at the user's premises.

Published score: The score is available on the website and/or on the packaging of the product.

Reference: according to EBS definition, the product reference encompasses formula and packaging

Remote verification: an assessment conducted without physical presence at the user's premises, using digital communication tools to verify the requirements.

Requirement: A practice that must be complied with by the user to obtain or maintain certification.
Synonym: criterion.

Standard: Set of process rules, which constitute a list of technical requirements to be met by the user.

User: Refers to any legal entity seeking to obtain or maintain eligibility for certification.

Verification: A set of activities aimed at assessing the conformity of a product, service, or system with applicable requirements, by combining verification on site or remote and independent review of the documentation, in order to reach an impartial and justified certification decision.

ANNEX 2 : Diagram of EBS Certification process

