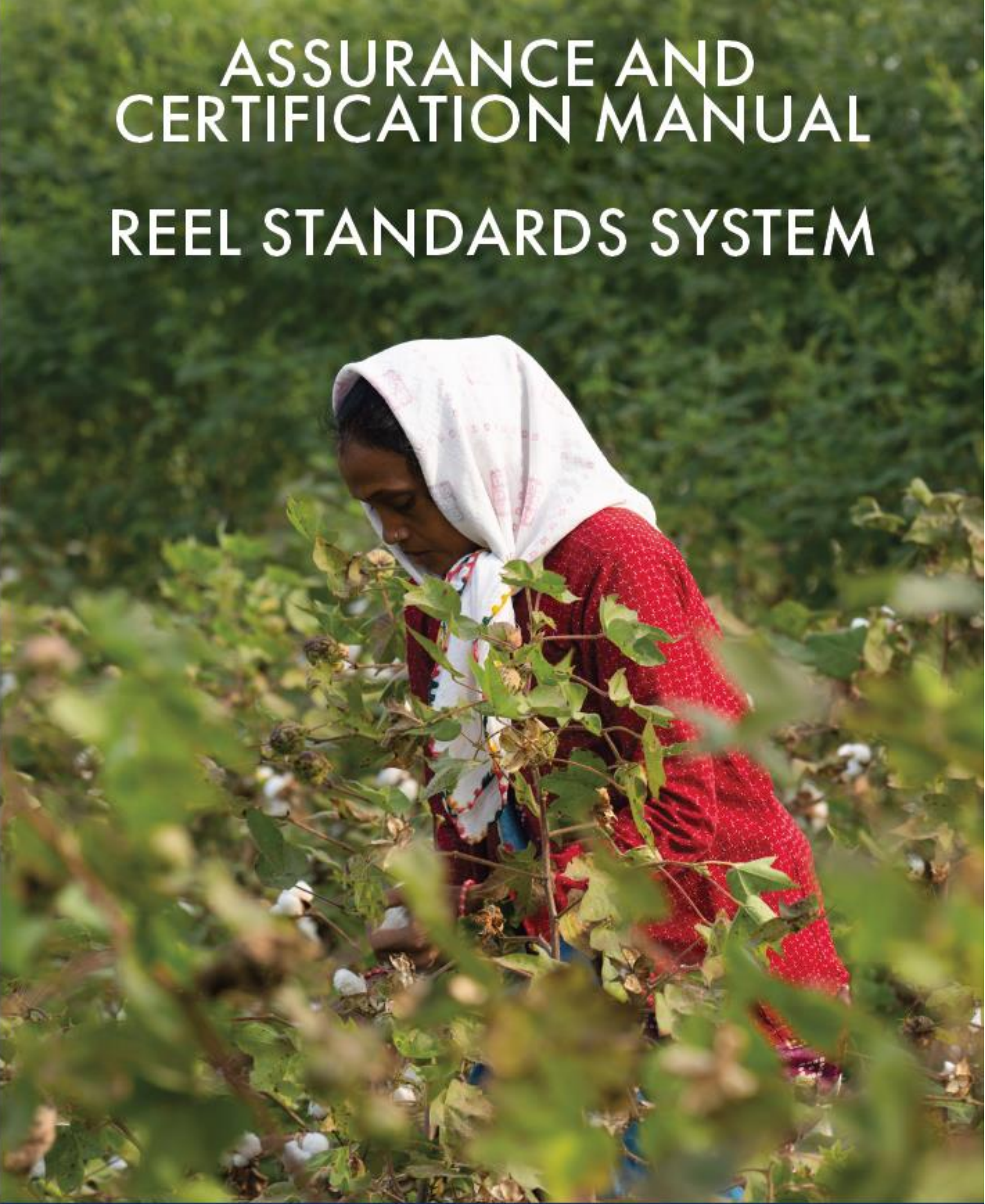
ASSURANCE AND CERTIFICATION MANUAL

REEL STANDARDS SYSTEM



COTTON CONNECT

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Contents

Abbreviations

CB	Certification Body
CoC	Chain of Custody
CAP	Corrective Action Plan
ESG	Environmental, Social, and Governance
HSSE	Health, Safety, Security, and Environment
IEC	Information Education and Communication
ISO	International Organization for Standardization
ISEAL	International Social and Environmental Accreditation and Labelling
LIP	Local Implementation Partner
M&E	Monitoring and Evaluation
NGO	Non-Governmental Organization
PG	Producer Group
QR Code	Quick Response Code
REEL	Responsible Environment Enhanced Livelihoods
SOP	Standard Operating Procedure
SGB	Standards Governance Body
WHO	World Health Organization

1. Introduction

This document outlines the Assurance and Certification system for REEL Standards system, detailing the processes and mechanisms to assure and certify Producer Groups and gins comply with the requirements. It defines the structured progression plan, evaluation criteria, certification process, and compliance measures. The scope of this document includes:

- **REEL Standards**: Standard system overview, farmer progression
- **Internal Management System**: The internal management structure of the REEL Standard projects
- **Assurance Architecture**: Defining the roles, processes, and mechanisms for both internal and third-party certification against the Standard Requirements
- **Certification Process**: Establishing criteria, procedures, and governance for certifying Producer Groups and gins.
- **Compliance and Accountability**: Outlining expectations, improvement requirements, and monitoring mechanisms
- **Stakeholder Roles**: Clarifying the requirements and responsibilities of key stakeholders including third-party certification agencies and auditors
- **Sanctions**: Detailing measures for addressing non-compliance
- **Appeal Process**: Details about how conflicts and concerns regarding assurance and certification are addressed

About REEL

Responsible Environment Enhanced Livelihoods (REEL) is CottonConnect's voluntary sustainability programme designed to improve cotton farming by promoting responsible environmental, social, and economic practices. REEL Cotton and REEL Regenerative Cotton are certification standards developed to meet the requirements of the evolving sustainability landscape. These standards help farmers adopt sustainable and regenerative farming practices, with the aim to enhancing livelihoods and fostering a resilient cotton supply chain. For better clarity, the terms 'REEL Programme' and 'REEL Projects' mentioned in the document are defined as follows:

- <u>REEL Programme</u>
    - The REEL Programme is CottonConnect's overarching sustainability initiative that sets the framework, methodologies, and governance for sustainable cotton production.

- It defines the assurance and certification processes, monitoring and evaluation mechanisms, and continuous improvement strategies.
- The REEL Programme includes both the REEL Standard and REEL Regenerative Standard

- REEL Project:
    - REEL Projects are localized implementations of the REEL Programme in specific geographies or brand collaborations.
    - Each project operates under the broader REEL Programme but is customized based on local contexts aligned with the requirements of the REEL Standards.

The primary target group of this document is those users who are actively involved in the programme, such as:

- The REEL Standard Governance Body, and Advisory Council
- The REEL Secretariat including its Programme Implementation Team, Local Implementation Partners (LIP), Producer Groups and gins adopting the Standards in the respective countries and regions.
- The Certification Bodies appointed for the REEL Standards and all internal auditors of the programme

The secondary target group is those parties in the supply chains, who intend to actively support the programme, such as brands and other industry stakeholders.

2. REEL Standards system

2.1. Development of the REEL Cotton Programme and REEL Cotton Standard System.

The 'REEL Cotton Programme' was initiated in 2010 by CottonConnect as a three-year sustainable agricultural programme providing farmers with training on sustainable cotton practices. In 2015 REEL Cotton Training Programme was transitioned into an independent 3rd party verification Code of Conduct. In the first phase of code building a draft Code was designed and prototype tested with a pilot group in Gujarat, India. The Code was then revised at frequent intervals to align with lessons learned from implementation and to benchmark against the relevant international legislations and policy framework.

To meet the increasing desire from brands to introduce regenerative agriculture practices into raw material production, CottonConnect developed the REEL Regenerative Code in 2021. The REEL Regenerative Code is a complementary, optional addition to the REEL Cotton Code. The REEL Regenerative Code is an impact code that draws a direct relation between regenerative farming practices and the expected impact on soil health, biodiversity, livelihood improvement and climate resilience.

In 2022 CottonConnect became a member of International Social and Environmental Accreditation and Labelling (ISEAL) demonstrating its commitment to aligning the REEL Programme with credible, internationally recognised practices for sustainability systems.

To align with the evolving sustainability landscape— including regulatory requirements such as EU due diligence laws, which are driving the adoption of approved sustainability certification schemes— as well as increasing consumer demand for transparency and traceability in supply chains, the REEL Code of Conduct was transitioned into the REEL Certification Standard System in 2025.

2.2. Progression under the REEL Standards system

The REEL Programme is built on the principle that transitioning from conventional to sustainable or regenerative production is a progressive journey, not an immediate shift. Reflecting this philosophy, the REEL Standards system follows a structured 3-year transition pathway for newly inducted Producer Groups. Each year sets out specific applicable requirements, enabling the gradual adoption of sustainability practices and a phased implementation of the standard. Upon completing the 3-year transition, all relevant standard requirements become fully applicable to the Producer Groups and gins participating in the programme.

2.3. System Review and Revision

CottonConnect is committed to the ongoing evaluation of the REEL assurance and certification framework to ensure it continuously meets its defined objectives, supports continuous improvement, and upholds the credibility of the certification process. When significant changes to the framework are proposed, CottonConnect will proactively engage all key stakeholders, including Producer Groups, Programme Partners, and Certification Bodies, through clear and timely communication. To maintain transparency, a public timeline detailing major upcoming revisions along with opportunities for stakeholder feedback will be available on CottonConnect's official website. Minor updates that do not fundamentally alter the assurance mechanisms or substantially impact cost, credibility, or accessibility may be implemented following consultation with those affected. Final decisions on major revisions rest with the REEL Standards Governance Body.

On the release of any new version of the REEL Standards and related documents, CottonConnect will promptly publish the updated requirements on the REEL Standards page of CottonConnect official website. CottonConnect field teams and Local Implementation Partners will be informed to support effective dissemination and understanding of the changes among Producer Groups / gins. For minor updates, changes will take effect immediately from the date of publication. However, for major revisions — those involving significant modifications to assurance processes - an effective date will be set considering the planning and preparations required (not less than 30 days).

2.4. Variations, Exceptions and Derogations to the Standard Requirements

Variations refer to pre-approved, context-specific adaptations to the requirements of the Standard that allow for flexibility without compromising intent. Exceptions are temporary allowances granted when compliance is not immediately feasible due to unforeseen challenges such as extreme weather events, political unrest, or structural constraints such as regulatory conflicts, or infrastructure deficits. Derogations involve formal and time-bound exemptions from specific requirements and are granted only in exceptional cases where strong justification and mitigation plans are provided.

Producer Groups or their implementing partners / gins must submit a written request for any exception or derogation, clearly outlining the requirement in question, the justification for the request, supporting evidence, and a proposed plan and timeline to return to full compliance. These requests are reviewed by the Standard Secretariat, and decisions are made by the Standards Governance Body or a committee, based on defined criteria. All approved exceptions and derogations will be time-limited, subject to review, and transparently recorded.

Upon approval, the Secretariat will formally communicate the decision to the relevant Certification Body (CB) or CBs responsible for assurance and verification of that Producer Group/gins. This ensures alignment in auditing and verification processes and maintains consistency in how the Standard is interpreted and applied. All such variations, exceptions, and derogations will be logged centrally and monitored over time to assess their frequency, rationale, and impact—supporting both continuous learning and standard improvement.

3. Internal Management System

To ensure the smooth and timely implementation of REEL Standards system and adherence to its compliance requirements, a structured approach to the internal management is followed. The farmers are organized as farmer groups and Producer Groups with supporting systems and resources in respective levels for ensuring effective implementation. This includes involvement of Local Implementation Partners, Producer Group Coordinators and Field Executives and with additional technical assistance from CottonConnect team. The core aspects of the internal management system are discussed in this section.

3.1. Farmers

In REEL projects across various regions, farmers will be classified into two distinct categories to ensure proper support and management:

- **Large Farmers:** Farm holdings with more than 15 hectares of cotton land in the same cropping season.
- **Small Farmers:** Farm holdings less than or equal to15 hectares of cotton land in the same cropping season.

3.2. Farmers Group

Individual small farmers are organized into groups, with each group comprising a minimum of 20 and a maximum of 50 farmers. These groups are formed by including farmers within the same or nearby villages to ensure ease of travel, communication, and coordination.

For large farmers, all activities including training and meetings, are conducted on group/ individual farm basis depends on the local situations / proximity etc.

3.3. Producer Group

Farmer groups are further reorganized into Producer Groups.

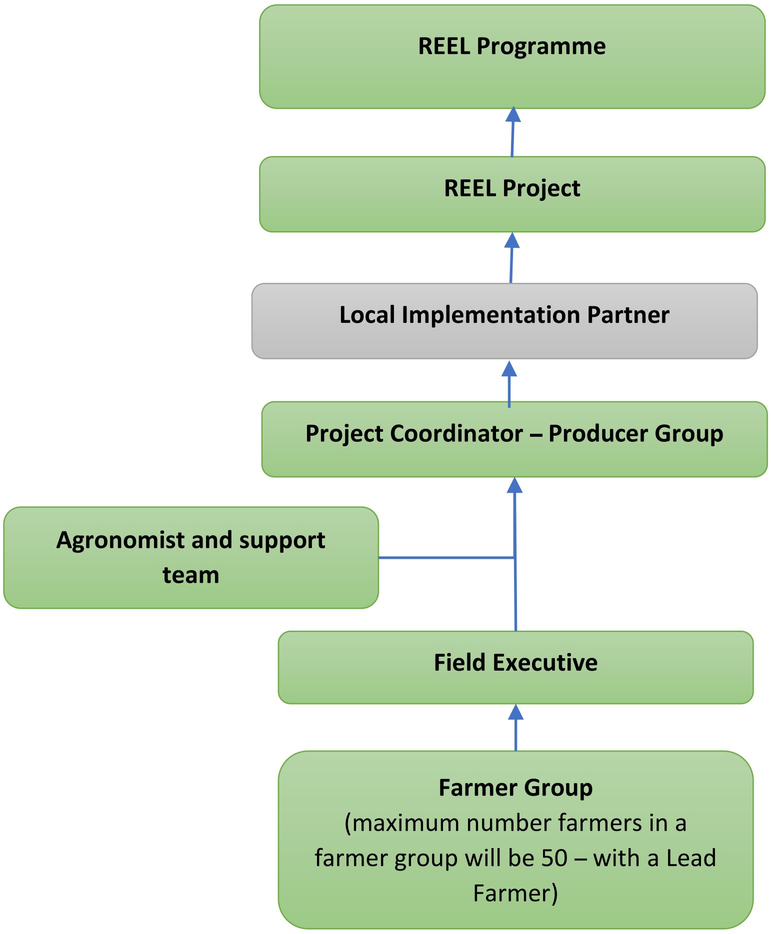
For small farmers, each group consisting of up to 4,500 farmers (deviation of up to +5% is permitted) form one Producer Group. A Project Coordinator is responsible for overseeing and managing the Producer Group, ensuring proper implementation of the REEL Standards system and compliance with its requirements.

For large farmers, a Producer Group will consist of 50 farmers (deviation of up to +20% is permitted). This approach aims to streamline the certification process for larger farming operations, while still maintaining rigorous standards and accountability.

Management System for Producer Group(s):

The Producer Group will be structured and established according to the organogram outlined below, ensuring a clear hierarchy and division of responsibilities for the implementation of the REEL programme. Each Producer Group will be managed and overseen by a dedicated Project Coordinator, who will be responsible for supervising all activities within their assigned group. The Project Coordinator will ensure that the group functions efficiently and adheres to the objectives, timelines, and compliance requirements while facilitating effective communication between the Producer Group and the broader project management team. Field Executives at the village level are responsible for farmer training, ongoing support, and data collection. Depending on the distribution of farmers, a Field Executive oversees either a single village or multiple villages to ensure effective implementation of the REEL Standards system.

Management Structure of the Producer Group



Responsibilities of Producer Group

i. Compliance and Implementation

- Adhere to the REEL Standards system requirements and make their best effort to ensure they are followed.
- Adhere to the progression plan, meeting the minimum required compliance score for certification.
- Maintain records of farming practices, environmental impacts, and social compliance as per the REEL Standards system.

ii. Governance and Management

- Ensure the required management structure for Producer Group is in place and functional
- Facilitate internal assessments and ensure corrective actions are taken where necessary.
- Ensure transparency in farmer enrolment, data collection, and reporting.

iii. Farmer Engagement and Capacity Building

- Participate in trainings on sustainable and regenerative agricultural practices, soil health, water management, and biodiversity conservation as per the Standard requirements.
- Ensure that Lead Farmers are equipped to support peer learning.

iv. Traceability, and Audits

- Ensuring cotton sourcing practices aligns with REEL traceability guidelines.
- Cooperate with second-party and third-party audit processes.

v. Reporting and Continuous Improvement

- Submit periodic progress reports to Local Implementation Partner.
- Identify gaps and work on continuous improvement plans for better sustainability outcomes. Producer Groups should demonstrate a clear commitment to continuous improvement across environmental, social, and economic dimensions. This involves setting progressive targets, regularly reviewing performance against the Standard, and taking corrective actions where gaps are identified. Continuous improvement is not only a requirement for maintaining certification but also essential for fostering long-term resilience, promoting innovation, and ensuring that the benefits of sustainable practices are embedded at the community level. Producer Groups must actively engage farmers in this process, build capacity through training, and document their efforts to improve practices year-on-year.
- Participate in feedback sessions and stakeholder engagements to enhance the REEL Standard's impact.

3.4. Local Implementation Partner

The Local Implementation Partner plays a critical role in the on-ground execution of the REEL Standards, acting as a bridge between CottonConnect, Producer Groups, farming communities and Certification Bodies. Responsible for facilitating farmer training, ensuring compliance with the three-year progression plan, and supporting traceability and audit processes, the partner helps drive the adoption of sustainable and regenerative practices. Additionally, they oversee data collection, community engagement, and reporting, ensuring transparency and continuous improvement. By working closely with farmers and other stakeholders, the Local Implementation Partner ensures the effective implementation of the standard while addressing region-specific challenges and opportunities.

Responsibilities of Local Implementation Partner

i. Training & Capacity Building

- Organize farmer training sessions on sustainable agricultural practices, regenerative farming, in compliance with REEL Standards.
- Ensure training quality by incorporating practical demonstrations alongside theoretical sessions

ii. Standard Implementation & Compliance

- Guide Producer Groups and ensuring they are adopting the requirements to meet the required % compliance score for certification.
- Conduct regular internal assessments and support farmers in addressing non-compliances.
- Assist Producer Groups in maintaining record-keeping and documentation to ensure compliance.

iii. Traceability & Data Management

- Ensure accurate farmer enrolment, procurement tracking, and traceability records in alignment with REEL Standard requirements.
- Support the integration of QR code-based traceability systems where applicable.
- Provide timely and accurate data entry into CottonConnect's M&E systems.

iv. Monitoring & Audit Support

- Enable Producer Groups to undertake self-assessment / first party audit
- Facilitate second-party and third-party audit visits by providing required documentation and on-ground coordination.
- Conduct pre-assessments and spot checks to ensure Producer Groups are audit ready.
- Address findings from audit reports and support corrective action plans.

v. Reporting & Stakeholder Coordination

- Provide periodic reports to CottonConnect on farmer progress, training impact, and compliance status.
- Engage with local government agencies, local resource organizations to strengthen implementation efforts.
- Act as the key liaison between Producer Groups and CottonConnect to ensure smooth programme execution.
- Submit appeals in the event of any disagreement with the certification decisions.

- Act as the custodian of the Producer Group certificates and ensure that the certificates are used only for legally valid and authorised purposes, while preventing any misuse.

3.5. Individual Large Farms

Individual large farms that are not part of a Producer Group can also be considered for certification. These farms must independently meet the compliance requirements, undergo self-assessments and second-party assessments, and implement necessary corrective actions to ensure audit readiness. The certification process for large farms will follow the same rigorous audit and traceability standards to maintain integrity and alignment with REEL's sustainability objectives.

4. REEL Certification Process

4.1. REEL Standard Requirements

4.1.1. The REEL programme ensures responsible and ethical practices throughout the cotton production and supply chain. This section outlines the certification process, designed to be transparent, efficient, and fair. It details the communication protocols and timelines for decision-making.

4.1.2. REEL Standards system defines year-specific applicable and optional requirements, enabling Producer Groups and gins to adopt sustainability practices progressively throughout the 3-year transition pathway.

- **Applicable requirements:** Standard requirements that will be considered for assessment in a specific year of progression to achieve certification.
- **Optional requirements:** Additional requirements of the Standard that are encouraged but not mandatory in a specific year of progression

4.2. Assurance Architecture

4.2.1. The assurance system of REEL is designed to verify internally and externally the compliance of Producer Groups and gins with the requirements of the 'REEL Standards system'.

Internal

4.2.2. There will be two layers of internal audit in the programme.

- First-party audit: This will be conducted by the Implementation partners (for Producer Groups) and gins.
- Second-party audit: The second-level audit by the CottonConnect Team serves as an additional layer of scrutiny to ensure the authenticity and integrity of farmer data and compliance with programme requirements. This process involves independent visits to farms and gins, random sampling of farmers and gins Staff/workers, validation of

procurement records, and cross-checking data collected by Local Implementation Partners and gins. The team also conducts spot checks, interviews with farmers / gin staff/workers, and assessments of training effectiveness to identify variations and areas for improvement.

Independent Certification Bodies

4.2.3. CottonConnect will onboard Certification Bodies (CBs) in alignment with the eligibility criteria outlined in Annexure 1: Certification Bodies. Only those agencies that meet the defined structural, operational, and competence-related requirements will be eligible for recognition under the REEL Standards system.

4.2.4. Once selected, all Certification Bodies are required to undergo a comprehensive orientation programme conducted by CottonConnect prior to undertaking any certification-related responsibilities. Certification Bodies will be oriented on the REEL Standards system, standard requirements, tools and templates, Producer Group structures, and protocols for engagement with local implementation teams. The orientation will also cover how variations, exceptions, and derogations to the standard are to be handled, including the documentation, review, and approval processes involved. Furthermore, CottonConnect will clarify expectations around impartiality, confidentiality, communication, and coordination between CBs and the REEL Secretariat to ensure consistency and credibility in certification delivery. Completion of this orientation is a prerequisite for operational engagement under the REEL certification system. *(Refer to Annexure 1 for more details on Certification Bodies and Auditor Qualifications)*

4.3. Certification Body Governance and Oversight

CottonConnect, as Scheme Owner, is responsible for defining the REEL assurance framework, approving Certification Bodies and overseeing their performance. Certification Bodies remain responsible for audit delivery, evaluation of conformity and certification decisions. Oversight by CottonConnect does not transfer certification authority to CottonConnect or allow CottonConnect to influence individual audit findings or certification decisions.

4.3.1 Acceptance and Approval of Certification Bodies

A Certification Body must be formally approved by CottonConnect before undertaking REEL certification activities. Approval will be based on documented review of the eligibility and competence requirements in Annexure 1, including legal status, relevant accreditation, impartiality arrangements, sector experience, management systems, auditor competence, operational capacity and ability to meet REEL reporting requirements.

The approval process will include application and document review, due diligence, clarification of the proposed certification scope, completion of REEL orientation and execution of the applicable agreement. CottonConnect will document the approval decision and authorised scope, maintain the current list of approved Certification Bodies and review continued eligibility through the oversight process. Approval may be restricted, suspended or withdrawn where the Certification Body no longer meets the applicable requirements.

4.3.2 Certification Decision Authority and Outsourcing

The Certification Body retains full authority and responsibility for all certification decisions, including decisions to grant, maintain, extend, reduce, suspend, withdraw or refuse certification. Certification decisions must be made by competent personnel who were not involved in the audit or evaluation activities on which the decision is based. CottonConnect, Local Partners, clients and other interested parties shall not direct, amend or override the Certification Body's decision.

Where a Certification Body outsources any audit, inspection, technical review or other assurance activity, it remains responsible for the quality and integrity of the outsourced work and retains authority for the certification decision. Outsourcing shall not include delegation of the final certification decision. The Certification Body shall approve and monitor subcontracted personnel or organisations, manage conflicts of interest, maintain relevant records and provide CottonConnect with information on outsourced activities when requested for oversight purposes.

4.3.3 Certification Body Internal Audit

Each approved Certification Body shall conduct an internal audit at least annually to evaluate its performance against the REEL Standard System requirements and the applicable contractual requirements. The internal audit shall cover the effectiveness of audit planning and delivery, auditor competence and calibration, consistency of findings, technical review and certification decision-making, impartiality, confidentiality, complaints and appeals, subcontracted activities, reporting and completion of previously agreed corrective actions.

The Certification Body shall share the internal audit results with CottonConnect, including identified findings, root-cause analysis where applicable, corrective actions, responsible persons, target dates and evidence of closure. CottonConnect will review the results and follow up unresolved or recurring findings through the Certification Body oversight process.

4.3.4 Oversight Mechanism

CottonConnect will operate an oversight mechanism to assess whether approved Certification Bodies remain competent, impartial and consistent when carrying out REEL assurance activities. Oversight will be proportionate to the Certification Body's scope, volume of work, previous performance and identified risks. A documented performance review will be completed for each active Certification Body at least annually, supported by ongoing monitoring during the certification cycle.

Oversight activities may include:

review of accreditation, legal, competence and impartiality records;

review of audit plans, auditor allocation, sampling, audit reports, evidence and certification files;

witnessing or observation of selected audits and evaluation of auditor performance;

review of the timeliness, completeness and consistency of reports, corrective-action verification, certificates and certification decisions;

review of complaints, appeals, integrity concerns, subcontracting arrangements and changes affecting the approved scope;

review of the Certification Body's internal audit results, corrective actions and closure evidence; and

calibration activities and comparison of findings across Certification Bodies and auditors.

CottonConnect will document oversight results using the approved Certification Body performance assessment tool. Findings will be communicated to the Certification Body, which will be given an opportunity to provide clarification and, where required, submit and implement corrective actions within an agreed timeframe. CottonConnect will verify closure and consider the results when maintaining, changing, suspending or withdrawing the Certification Body's approval or scope.

4.3.5 Independence and Conflict of Interest

Certification Body performance assessments shall be carried out or reviewed by personnel who are independent of the Certification Body being assessed and who have not participated in the audit or certification decision under review. Any actual, potential or perceived conflict of interest shall be disclosed and managed, including recusal where necessary. The REEL Standard Governance Body will provide independent governance review of the effectiveness and impartiality of the oversight mechanism in accordance with its Terms of Reference, while operational oversight remains the responsibility of CottonConnect as Scheme Owner.

4.3.6 Consequences of Certification Body Non-compliance

CottonConnect will determine the response to Certification Body non-compliance based on its severity, recurrence and effect on assurance integrity. Actions may include a clarification or improvement request, a time-bound corrective-action plan, additional file review or witnessed audits, increased monitoring, restriction of scope or new assignments, suspension of approval, withdrawal of approval or termination of the agreement. Where findings may affect existing certification results, CottonConnect will require the Certification Body to review the affected work and take appropriate action while retaining its authority for certification decisions.

4.3.7 Reporting Requirements

Certification Bodies shall provide CottonConnect with the information necessary to operate the REEL assurance and oversight system. This includes audit and certification information required by the REEL reporting templates, current certificate status, changes affecting approved scope or competence, complaints and appeals relevant to REEL, use of subcontracted personnel or organisations, internal audit results, corrective-action plans and closure evidence, and any integrity issue that may affect the reliability of assurance results. CottonConnect will maintain oversight records and report material performance and integrity matters through the applicable REEL governance process.

4.3.8 Public Information on Assurance

CottonConnect will make an up-to-date summary of the REEL oversight mechanism and the Certification Body acceptance process publicly available and easily accessible on the

REEL Standards webpage. CottonConnect will also publish the current list of approved assurance providers and their authorised scope; the current list of certified clients, including certification scope, assurance status and certificate validity or expiry date; and the list of clients withdrawn from the scheme during the previous five years, including the date of withdrawal. Information may be published by CottonConnect or through an approved Certification Body where this provides equivalent public access.

4.3.9 Contractual Application

The requirements in this section form part of the mandatory requirements for approved Certification Bodies. They shall be incorporated into the Certification Body contracting template and applied in the next contracting cycle, including obligations relating to internal audit, retained certification authority, outsourcing, access to oversight information, performance assessment, corrective action and consequences of non-compliance.

4.4. Audit and Certification

4.4.1. Producer Groups and gins are assessed using the REEL Standards Assessment Tool, which ensures a structured and objective assessment process.

4.4.2. The Certification Body will issue certificates for the qualifying Producer Groups and gins based on the following criteria.

- Producer Groups/ gins undergoing audits must achieve a minimum score of 60%[1] against applicable requirements of the Standard system will be certified, subject to the following conditions.
- Even after scoring 60% minimum score If a Producer Group or gin has more than two major non-conformities, certification will be rejected or withdrawn.
- If there is any non-conformity related to the major requirements under Social Conditions, certification will be rejected or withdrawn, regardless of the total count.
- If there are up to two major non-conformities, a conditional certificate for 12 months will be issued subject to a time-bound corrective action

4.4.3. The REEL Standards Assessment Tool provides clear guidance for evaluating Producer Groups and gins against requirements. It defines specific thresholds to determine non-compliance (systemic), partial compliance (incidental), and full compliance, ensuring a consistent and objective assessment process.

Producer Groups:

4.4.4. The certification of Producer Groups in REEL programme will be carried out on a three-year cycle. All Producer Groups must undergo certification in the first year of the three-year cycle. All Producer Groups are verified to assess the current levels of compliance to the Standard system requirements.

[1] This criterion for subsequent years will be revised by following a continuous improvement approach.

4.4.5. The risk-based approach in the REEL Standards System prioritizes audits and certification efforts based on the level of risk associated with a Producer Group's compliance status. Rather than applying a uniform assessment, this approach categorizes Producer Groups based on their compliance status (non-compliance or partial compliance with major requirements) and identified risks, enabling a more targeted audit process. The Risk Framework assesses and categorizes Producer Groups based on their compliance with major Standard system requirements and classify the Producer Groups as High-risk, Medium-risk and Low-risk. The High-risk and Medium risk groups—those with non-compliance or partial compliance in critical areas—undergo annual audits and corrective actions. Low-risk groups, demonstrating consistent adherence, will follow a standard audit cycle with periodic second party audits to ensure ongoing compliance to the relevant year specific conducts and corrective actions. Any Producer Group that fails to achieve certification in Year 1 shall be automatically classified as high-risk and will undergo a full re-audit in Year 2 as part of the risk-based audit framework.

4.4.6. Year 2 and Year 3: Producer Groups that fall under the High or Medium risk category will undergo surveillance audits. Producer Group certificates, issued upon successful audits, are valid for a period of three years. Retaining these certificates during the 2nd and 3rd years depends on audit outcomes based on the risk-based matrix. Producer Groups classified as High and Medium risk will be audited in the subsequent years, with additional sample groups from low-risk category undergoing audit as well. Certificates for each Producer Group are shared with the respective ginners assigned through TraceBale (or any other traceability tool under usage), ensuring seamless traceability across the supply chain.

Table 4-1:Example of Certification Cycle: Producer Groups

Year	Year 1	Year 2	Year 3	Year 4
Certification	2nd party audits of all Producer Groups for audit readiness 3rd party audits of all Producer Groups	2nd Party audits of all Producer Groups Third party audits: Medium and High-Risk Producer Groups and a sample of low-risk Producer Groups	2nd Party audits of all Producer Groups Third party audits: Medium and High-Risk Producer Groups and a sample of low-risk Producer Groups	2nd party audits for audit readiness 3rd party Renewal Audits
Outcome	Certified / Conditional Certification /Not Certified	Continue Certification/ Conditional Certification / Reject Certificate	Continue Certification/ Conditional Certification / Reject Certificate	Certificate Renewal / Reject Certificate

Sampling Methodology for Producer Group Audits

4.4.7. The square root/2 sampling method shall be adopted for selecting farmers within Producer Groups for audit, interviews and compliance assessments. Out of the total sampled farmers the Auditor should visit minimum 15% of the sample farms for on-site verification.

Sampling Formula

4.4.8. The number of farms selected for audit is determined using the following formula:

$$n = \frac{\sqrt{N}}{2}$$

where:

- N = total number of farms in the Producer Group
- n = number of farms to be sampled

Gins:

4.4.9. In the first year of onboarding to the Standard system, gins will undergo a pre-season onboarding audit by the CottonConnect audit team, and based on the results permission to procure REEL Cotton will be granted (along with the required corrective actions). Within a week of starting the processing for the season, a comprehensive third-party audit as per the Standard system requirements will be conducted to assess full compliance with the requirements of REEL Standards. Based on the audit findings, gins that meet the required criteria will receive certification for the first and second year, ensuring continued adherence to sustainability and traceability requirements.

4.4.10. The Risk Framework under this approach assesses and categorizes gins based on their compliance with major standard requirements and classify the gins as High-risk, Medium-risk and Low-risk. The High-risk and Medium risk groups—those with non-compliance or partial compliance in critical areas—undergo annual audit and corrective actions. Low-risk groups, demonstrating consistent adherence, will follow a standard audit cycle with periodic second party audits to ensure ongoing compliance to the relevant year specific requirements and corrective actions.

4.4.11. Gins classified as High and Medium risk will be subject to audits in the subsequent years to ensure continued compliance with the REEL Standards. Based on the audit outcomes, necessary corrective actions will be implemented, and certification status will be reviewed accordingly.

4.4.12. The Certification Bodies may choose to audit some of the gins which are not included in the Risk categories on a sample basis.

4.4.13. From the second year onwards, all gins irrespective of their risk status will be covered under the second party audit of CottonConnect to ensure adherence to the Standard system Requirements and readiness for third party certification.

Table 4-2: Example of Certification Cycle: Gins

Year	Year 1		Year 2	Year 3
Certification Requirement	Onboarding Audit (CottonConnect 2nd Party audit) – all gins	3rd Party Audits – all gins	2nd Party audit – for all gins Third party audits: Medium and High-Risk gins and a sample of low-risk gins	2nd party audits for audit readiness 3rd party Renewal Audits
Outcome	Permission to Procure	Certificate Issued for Year 1 and Year 2 / Conditional Certification for one year/ Refuse Certification	Continue Certification / Conditional Certification for one year / Reject Certificate	Certificate Renewal / Reject Certificate

Table 4-3: Summary of certification

Component	Key Aspects	Details
Producer Group Certification	Certification Cycle	3-year cycle, with 3rd party audits in Year 1 and risk-based 3rd party audit in Years 2 & 3.
	Initial Audit and baseline	All Producer Groups undergo 3rd party audits in Year 1 to assess compliance levels and establish a baseline.
	Risk Categorization	Groups are classified as High-Risk, Medium-Risk, or Low-Risk based on compliance with Standard system requirement *(Risk matrix to be finalized based on Year one results)*
	Follow-up Audits	- High & Medium-Risk Groups: Audited annually in Years 2 & 3.
		- Low-Risk Groups: Follow standard audit cycle with periodic second-party audits and sample 3rd party audits.
Sampling Methodology for Producer Groups	Method	Square Root/2 Sampling method used for selecting farms within Producer Groups.
	Application	Used in both initial audit and risk-based follow-up audit.

Component	Key Aspects	Details
	Increasing Sample size	In Producer Groups with high risk a higher sampling up to square root may be adopted at the discretion of the Certification Body (considering the nature of non-conformities)
Gin Certification	Certification Cycle	2-year cycle, with 3rd party audits in Year 1 and risk-based 3rd party audits in Year 2
	Initial Certification	- Year 1: Onboarding audit by 2nd party, permission to procure. - Year 1 Commencement of gin Process: Full compliance audit to determine certification by 3rd party.
	Risk Categorization	Gins classified as High-Risk, Medium-Risk, or Low-Risk
	Follow-up Audits	- High & Medium-Risk gins: Annual 3rd party audits in subsequent years.
		- Low-Risk gins: Standard audit cycle with periodic second-party audits and sample 3rd party audits

4.5. Readiness for Certification

Producer Groups

4.5.1. The Local Implementation Partner shall work closely with the Producer Group to ensure they are fully prepared for certification. This includes guiding them through the Standard system requirements, addressing gaps identified during first party and second-party assessments, and ensuring that all corrective actions are effectively implemented. The partner will support record-keeping, traceability, and compliance audit, helping the Producer Group meet the required compliance score.

4.5.2. In the case of individual large farms, preparation for certification will involve ensuring compliance with the REEL Standards system through self-assessments, second-party audits, and corrective actions. The farm must maintain accurate records of farming practices, sustainability measures, and traceability data. Additionally, the farm operator must demonstrate adherence to social, environmental, and traceability requirements independently.

Gins:

4.5.3. Gins must demonstrate compliance with the REEL Standards through proper implementation of traceability, sourcing, and sustainability requirements. This includes maintaining accurate procurement records, ensuring segregation of REEL cotton (seed cotton and bales), and adhering to social and environmental as per the requirements of the REEL Standards. Gins must also address any corrective actions identified during the onboarding audit / previous audits and ensure that all operational processes align with the Standard system requirements.

4.6. Request for Certification

Producer Groups

4.6.1. The Local Implementation Partner, on behalf of the Producer Group, shall initiate a certification request once they determine that the group is audit ready. The request will be submitted to the relevant certification body, ensuring that all requirements under the REEL Standards have been met and documented. The REEL Secretariat will facilitate the request for certification from the local implementation partner to the certification body.

4.6.2. In case of individual large farms, direct request should be made by the Farms to the certification body through REEL Secretariat.

Gins

4.6.3. Gins will initiate a request for certification after addressing any corrective actions. The request will be made to the certification body through the REEL Secretariat.

4.7. Certification Decision & Issuance

4.7.1. The Certification Body shall produce a comprehensive assessment report (in English language) following each audit conducted under the REEL Standards system. This report must detail the findings of the audit, including observations on compliance with the standard, any non-conformities identified, and corrective actions required. The report shall also include the applicable score achieved by the Producer Group/ gin against the relevant standard requirements. The assessment report must be clear, accurate, and transparent, serving as a key document to support certification decisions and to provide actionable feedback to Producer Groups and other stakeholders.

4.7.2. The report should be prepared in the agreed template (assessment and reporting template)

4.7.3. The Report will be shared with REEL Secretariat for further sharing with the Local Implementation Partner on behalf of the Producer Group.

4.7.4. REEL Secretariat may choose to request for technical review of sample audit reports. Upon such requests, the Certification Body shall share the draft report with REEL Secretariat within 14 days of completion of the Audit. REEL Secretariat will respond with any issues observed within 7 days of receipt of the report. If no responses received within 7 days, the report will be finalized by Certification Body. If REEL Secretariat raises any technical issues the Certification Body will review the issues raised and share the final report within 7 days of receipt of comments.

4.7.5. Based on the score achieved from the assessment, a certification decision is made. The Certification Body shall make the certification decision in accordance with the requirements of the REEL Standard. This decision must be based on the comprehensive assessment report, including the evaluation of compliance, applicable scores, and any corrective actions taken by the Producer Group. The CB's decision shall be impartial, well-documented, and consistent with the established certification criteria of the REEL Standard:

- The Certification Body shall communicate the certification decision and provide certification to successful Producer Groups within 21 days of completion of the audit, allowing them to sell their cotton under the REEL Supply Chain.
- The Certification Body shall communicate the certification decision and provide certification to eligible Producer Groups and eligible gins within 21 days of completion of the audit, allowing them to process and sell REEL cotton.
- The Producer Groups/ gins with up to two major non-conformities shall submit proposed corrective actions within 7 days of receipt of the audit report for issuance of Certificate. The Certification Body shall review the corrective actions and upon receipt of any final clarifications, shall finalize the certification decision within 7 days.
- The Certificate will have the following information:
    - Name of the Certified Entity (Producer Group and Local Implementation Partner or Gin)
    - Unique Certificate Number
    - Scope of Certification
    - Standard name: REEL Standard or REEL Regenerative Standard
    - Certification Status (e.g., Certified / Conditionally Certified)
    - Name of Certification Body
    - Name of Standard Owner: CottonConnect
    - Date of Certification Issuance
    - Certificate validity
    - Conditions or Limitations
    - QR Code or Reference ID for digital verification
    - Signature Authorised signatory of the Certification Body
    - List of famers, with village details and Cotton area (for Producer Group)
- Producer Groups/gins where immediate corrective actions are required to be qualified shall share evidence for corrective actions within the timeline agreed as per the corrective action plan. The Certification Body will issue certificates within 7 days of submission of the evidence post review and validation (desk based / remote) of the corrective actions.
- Certified Producer Groups/gins must maintain compliance through continuous improvement efforts.
- Surveillance audits (scheduled or unannounced) may be conducted by Certification Bodies to ensure ongoing adherence. If major non-conformities arise, existing certification can be suspended or revoked.

- Certification is valid for a set period (as per the certification expiry date mentioned in the certificate) after which Producer Groups/gins must undergo a recertification audit.

4.7.6. The certificate issued will remain valid for the period specified therein, provided the Producer Group or gin continues to meet the requirements of the REEL Standard and successfully implements any corrective actions within the defined timelines.

4.7.7. These certificates validate the authenticity of REEL Cotton and confirm its origin and compliance at every stage. Certificates will be shared within the TraceBale or other digital traceability systems for easy access and record-keeping

4.8. Corrective Action Plans

4.8.1. Corrective Action Plans (CAPs) are a critical part of the REEL Standards assurance system, designed to address non-conformities identified during certification process.

4.8.2. Producer Groups and gins shall submit their CAPs to REEL Secretariat within 14 days of receipt of the audit report.

4.8.3. The Producer Groups/ gins with any major non-conformities shall submit proposed corrective actions within 7 days of receipt of the audit report.

4.8.4. The CAP must include clear, time-bound actions that the Producer Group / gin commits to undertake to resolve the non-conformity and prevent its recurrence. The status of the corrective actions will be tracked by CottonConnect to ensure timely and effective resolution.

4.8.5. The CAPs and the status of actions will be shared with the relevant Certification Bodies by REEL Secretariat for further verification during subsequent audits (if required).

4.9. Renewal of Certification

4.9.1. Upon expiry of certification, Producer Groups (through local implementation partners) and gins are required to initiate the renewal process to maintain their certified status. The renewal process will follow the same audit and certification protocols as initial audits, with a focus on continuous compliance and improvements observed during the certification cycle.

4.10. Sanctions and Disciplinary Measures:

4.10.1. The REEL Standard Governance Body maintains a documented sanctions policy (Annexure 2) outlining the steps to be taken in cases of non-compliance by Producer Groups and supply chain partners. This policy will differentiate between measures for:

- Minor non-conformities: A deviation from the standard system requirements that does not pose an immediate risk to the integrity of the standard system and sustainability goals but requires corrective measures.
- Major non-conformities of the standards: A significant violation that directly impacts sustainability outcomes, integrity of certification, or supply chain credibility. (Refer to

Appendix 1 for major Standard Requirements where non-compliance can lead to major non-conformity).

4.11. Appeal Process

4.11.1. REEL has an appeal and complaint redressal process to address any concerns. This is accessible to any stakeholder who has an issue with the outcomes of the audits and decisions made on certification.

Scope

4.11.2. The scope of the appeal procedure is to provide a formal process for addressing complaints or appeals related to the Certification decisions made under REEL Standard certification process.

4.11.3. Feedback and grievances about REEL activities outside the scope of this can be submitted as per the CottonConnect Grievance and Complaints Policy as outlined here.

Appeal Procedure:

4.11.4. Appeals can be accepted up to 10 working days from the date of issue of the certificate/ communication of decisions regarding certifications to Producer Groups or supply chain partners.

Step 1- Appeal Submission

4.11.5. Appeals must be submitted in writing to appeals@cottonconnect.org to the REEL Secretariat. All supporting documents must be provided at the time of appeal submission. Appeals without relevant supporting proof of evidence will not be accepted.

Step 2- Appeal Eligibility

4.11.6. Upon receiving the appeal, the REEL Secretariat will review, whether the appeal is admissible as follows:

- Must be submitted within 10 working days from the date of issue of the certificate/ communication of decisions regarding certifications.
- Must use the appropriate format (Refer: Appeal Submission Format – Annexure 4)
- All supporting documents and evidence are enclosed with the appeal application.
- Must be submitted by the Project Coordinator for Producer Group or by the farm owner (in case of individual farm certification), proprietor, or CEO/Senior Management Official of cotton processing units.
- The REEL Secretariat will inform the applicants of the acceptance or rejection of the appeal or complaint within 7 working days.
- If found inadequate, or non-admissible the Producer Group/ gin will be communicated about the same and will give additional 7 days to resubmit the application (resubmission is allowed only once).
- The appellant is free to withdraw the appeals within 7 days of submission of the appeal

Step 3- Appeal Processing

- Upon acceptance of the appeal, REEL Secretariat will submit the appeal to the Certification Body for review the decision
- The Certification Body will take a minimum of 7 days and a maximum of 14 days to decide from the date of receiving the appeal.
- During this period additional evidence or documents can be requested and the same should be provided by the appellant within 5 days of request.

Step 4- Appeal Decision

- All appeal decisions and evaluations will be documented.
- The final decision on an appeal shall be taken by, or formally reviewed and approved by, individuals who have not been involved in the certification activities connected to the original complaint or appeal.
- All decisions and evaluations will be provided in writing, including the rationale behind each decision.

Step 5- Communication Appeal Decision

- The decision will be communicated to the applicant in writing via email.
- All decisions will be final.
- The applicant will be informed of the decision within a maximum of 25 working days from the acceptance of the appeal.

Confidentiality

4.11.7. Due to the sensitive nature of appeals or complaints, the results will not be made public. Decisions will be communicated directly to the applicant. However, REEL Secretariat can share this information if there is a legal obligation to do so (with brands and other partners) or if an involved party makes a public statement regarding the complaint. CottonConnect reserves the right to share information about appeal and complaint processes in an anonymized form, whether within the organization or for external reporting, to support the continuous improvement of the standards system, SOPs, and manuals.

4.12. Chain of Custody

4.12.1. The Chain of Custody (CoC) ensures traceability and transparency in the movement of raw materials through the supply chain. In the REEL Standards, the CoC is applicable only up to the gin level, meaning that certification covers the journey of cotton from Producer Groups to the ginning process.

4.12.2. Stakeholders (processors beyond gins, and brands are encouraged to promote compliance to voluntary REEL Chain of Custody guidelines (covering the entire supply chain up to Garment manufacturing stage) in their respective supply chains for ensuring Chain of Custody and supporting claims.

Annexure 1: Certification Bodies

Independent third-party agencies will be appointed as Certification Bodies (CBs) to conduct audits and issue certifications for REEL programmes implemented under the REEL Standards system (REEL Cotton Standard and the REEL Regenerative Standard).

To ensure the credibility, transparency, and impartiality of the certification process, the Certification Body must be a legally registered, independent third-party organisation with no direct or indirect involvement in the implementation of REEL programmes. The CB must operate in accordance with internationally recognised norms and shall have clearly defined, documented policies and procedures outlined in its Quality Manual and Operating Procedures.

Furthermore, the CB must have a formal organisational structure that includes sufficient staffing, technical expertise, and infrastructure capacity to support its certification activities. These requirements must align with the principles and provisions set out under ISO/IEC 17065

To uphold the integrity and credibility of the REEL Standard certification system, Certification Bodies (CBs) must comply with the following institutional, operational, and ethical requirements:

- **Impartiality**: The CB must maintain impartiality at all stages of its operations—from planning and audit implementation to communication and decision-making. It must proactively manage conflicts of interest and ensure that certification activities are free from bias or external influence.
- **Management System**: A well-documented, structured management system must be in place to ensure consistency, traceability, and quality control throughout the certification process. This system should be subject to regular internal reviews and continuous improvement mechanisms.
- **Legal Status**: The CB must be a legally registered entity. It shall provide valid documentation confirming its independent third-party status and legal authority to conduct certifications.
- **Separation of Duties**: The CB must ensure that individuals responsible for final certification decisions are different from those who conducted audits or verifications of the programme. This segregation of responsibilities is essential for ensuring objectivity and independence in decision-making.
- **Liability Coverage**: Adequate arrangements must be in place—such as professional liability insurance or equivalent safeguards—to cover any liabilities arising from the CB's operations or decisions.
- **Financial Resources**: The CB must demonstrate financial stability and maintain the necessary resources to ensure sustained, high-quality delivery of certification services without risk of disruption.
- **Qualified Personnel**: The CB must employ and retain enough technically qualified and experienced professionals with expertise relevant to agricultural systems, sustainability

standards, and audit methodologies. Personnel qualifications must be continually assessed and enhanced through periodic training.

- **Internal Quality System**: An effective Internal Quality Management System must be maintained to oversee the certification process, monitor performance, and drive continual improvements. This includes standard operating procedures, documentation protocols, and audit quality reviews.
- **Independence from External Pressures**: The CB must be structured and governed in a way that shields it from commercial, financial, political, or personal pressures that could influence certification outcomes. Its operations must reflect transparency, neutrality, and professional judgment.
- **Confidentiality**: The CB must put in place robust policies and technical safeguards to ensure confidentiality of all data and information accessed during audits. This includes protecting sensitive information about Producer Groups, supply chain actors, internal staff, and buyers.
- **Grievance Redressal**: A formal grievance mechanism must be established, allowing stakeholders to raise complaints or concerns about the certification process or outcomes. This mechanism must include timely investigation, transparent resolution, and documentation protocols.

Competence

Certification Bodies must demonstrate operational competence by maintaining adequate human resources, effective financial management, and sector-specific expertise. CB staff must possess appropriate training and experience in auditing agricultural production systems, evaluating sustainability performance, and applying certification methodologies. The certification process must address all relevant dimensions of the REEL Standard, including environmental, social, and economic aspects of cotton production and sourcing.

Independence

The CB must establish governance frameworks and internal controls to safeguard its independence from vested interests. Organisational, procedural, and financial arrangements must be designed to eliminate any risk of undue influence—whether commercial, political, or relational—over certification decisions.

Confidentiality

Confidentiality is a cornerstone of the certification process. The CB must employ appropriate safeguards—technical, procedural, and contractual—to ensure the secure handling and protection of all information obtained during the certification process. This includes data related to Producer Groups, internal audit findings, supply chain participants, and brand affiliations. No information shall be disclosed to unauthorised parties without explicit, written consent.

Auditor Qualification

Certification Bodies (CBs) are responsible for ensuring that their team members and auditors operate under clearly defined lines of authority to guarantee accountability, maintain confidentiality, and uphold the integrity of the certification process. The CB shall assume full responsibility for the conduct and actions of all personnel involved in certification activities, including any subcontracted individuals or external experts.

Auditors appointed by the CB must demonstrate a high level of professional competence and sector-specific expertise. Specifically, auditors are required to possess:

- Strong expertise in assessing internal management systems, enabling them to critically evaluate the operational controls, procedures, and compliance mechanisms within Producer Groups.
- Proven experience in providing assurance and accountability statements, ensuring audit findings and certification decisions are well-founded, transparent, and credible.
- In-depth knowledge of sustainability-related reporting systems, including familiarity with frameworks and methodologies used to measure and report on environmental, social, and governance (ESG) performance.
- Familiarity with impact-related reporting in global agricultural supply chains, allowing auditors to assess the broader implications of production practices on sustainability goals and stakeholder commitments.
- Strong facilitation and feedback skills, enabling auditors to engage constructively with Producer Groups, stakeholders, and certification bodies, providing clear guidance and actionable recommendations.
- Local experience in auditing and verifying key sustainability standards at the cotton farm level, ensuring contextual understanding of agricultural practices, cultural nuances, and regulatory environments relevant to cotton production.
- Background in agriculture economics with extensive knowledge of the cotton sector, particularly regarding cotton farming methods, supply chain dynamics, and economic factors influencing farmer livelihoods.
- Experience in analysing and verifying the reliability of economic, social, and environmental data, ensuring that data used to support certification claims is accurate, consistent, and trustworthy.
- Auditors must be proficient in English, as it is the official working language for certification documentation and reporting. Additionally, auditors should possess adequate proficiency in the local language(s) where audits are conducted or demonstrate the ability to work effectively with qualified translators. This ensures clear communication with Producer Groups, accurate data collection, and culturally appropriate interactions.

Orientation for Certification Bodies

To ensure consistent and credible assurance, all certification bodies (CBs) intending to conduct audits must undergo a structured orientation. This orientation will cover:

- **Overview of the REEL Standard(s)**: Including its purpose, structure, and progression framework over the three-year cycle.

- **Scoring**: Detailed explanation of scoring methodology, and guidance for assessment
- **Verification Protocols**: Sampling guidance, triangulation methods, documentation requirements, and interaction with Producer Groups and gins.
- **Use of Tools**: Introduction to CottonConnect's digital platforms (e.g., for data upload and report submission), including dashboards and traceability integration where applicable.
- **Ethical Considerations and Field Conduct**: Expectations on impartiality, gender-sensitive interviewing, consent procedures, and respecting local norms.

Annexure 2: Sanctions Policy

Purpose and Scope

This policy defines the corrective actions applicable to Producer Groups and supply chain partners in cases of non-compliance with REEL Standards system. It differentiates between minor and major non-conformities and establishes a structured response mechanism to ensure continuous improvement while maintaining the integrity of the standard system. The policy also ensures that non-compliance issues are addressed in a transparent, fair, and consistent manner, balancing the need for accountability with the opportunity for remediation.

Definitions

- **Minor Non-conformity:** A deviation from the standard that does not pose an immediate risk to the integrity of the standard and sustainability goals but requires corrective measures.
- **Major Non-conformity:** A significant violation that directly impacts sustainability outcomes, integrity of certification, or supply chain credibility. (Refer to Annexure 3 for Standard Requirements where non-compliance can lead to major non-conformity).

Sanctions Framework

Minor non-conformity

Minor non-conformities are addressed through a progressive corrective action plan to ensure timely resolution. The steps include:

1. **Assessment Report** – A formal notification detailing the identified non-conformity, required corrective actions, and a defined timeline for resolution (typically by the next cropping season).
2. **Corrective Action Plan (CAP)** – The Producer Group or supply chain partner must submit and implement a CAP,
3. **Increased Monitoring & Training** – Additional technical support will be recommended to prevent recurrence and will be monitored through follow-up 2nd party audits.

Failure to achieve improvement against non-conformities within the specified timeframe may lead to listing of the Producer Group into the risk category.

Major non-conformity

Threshold for Certification Decision:

- If a Producer Group or gin has more than two major non-conformities, certification will be rejected or withdrawn.

- If there is any non-conformity related to the major requirements under Social Conditions, certification will be rejected or withdrawn, regardless of the total count.
- In cases where there are up to two major non-conformities (excluding Social Conditions), the Producer Group or ginner can be granted a conditional certification (for one year), subject to corrective actions and close monitoring.

Major non-conformities demand immediate and stringent responses to safeguard the credibility of REEL Standards. The steps include:

1. **Assessment report and immediate inclusion under the Risk Framework**: A formal notification detailing the identified non-conformity, required corrective actions, and a defined timeline for resolution (immediate action or within the next cropping season).
2. **Corrective Action Plan (CAP)** – The Producer Group or supply chain partner must submit a CAP.
3. **Conditional Certification/Continued Engagement** – Based on the review and CAP a conditional approval shall be granted for an additional monitoring period (upcoming cropping season) by the Certification Body and will be monitored through follow-up 2nd party audits.
4. **Suspension of Certification/Engagement** – In subsequent third-party audits, if improvement is not observed, temporary suspension until corrective measures are verified through the 3rd party audit.
5. **Exclusion from Certification or Programme** – If non-conformities persist or involve deliberate misconduct as per the subsequent third-party audits, the Producer Group or supply chain partner shall be disqualified from participation. In addition to standard requirement related non-conformities, other aspects such as non-cooperation for audits and assessments can also lead to actions amounting to suspension/ exclusion from certification.

Appeals Process

Entities subject to sanctions may appeal through the formal process to the respective Certification Body (facilitated by the REEL Secretariat). Appeals must be submitted within 10 days of notification, supported by evidence of compliance. The REEL Standard appeal procedure will be followed.

Implementation & Review

This policy will be reviewed annually by the REEL Standards Governance Body to ensure effectiveness and alignment with evolving sustainability legislation and policy expectations.

Annexure 3: Standard Requirements considered for Major Non-Conformities

Number		Standard Requirements	Group
REEL	REEL Regen		
1	**1**	**Integrated Management System**	
1.2.1.3	1.2.1.3	A documented farmer profile shall be maintained	PG
1.4.1.2	1.4.1.2	Cotton shall be protected from contamination with foreign materials during and after picking. Reference: MEL Guidelines	PG
1.4.1.3	1.4.1.4	The flow of REEL Cotton products shall be documented up to the ginner level and maintained.	PG & G
1.4.2.3	1.4.2.3	Traceability tools (e.g. TraceBale) and techniques shall be accessible, and all required data shall be maintained and processed at the ginner level. Ref: TraceBale Manual	G
1.6.1.2.3	1.6.1.2.3	The training of ginners shall cover programmatic training, quality, traceability management systems, and HSSE (Health, Safety, Security, and Environment)	G
4	**4**	**Pest Management**	
4.2.2.1	4.2.2.1	Cotton farmers shall not use pesticides containing substances listed in WHO Classes Ia and Ib.	PG
4.2.2.2	4.2.2.2	Cotton farmers shall not use any substances listed as prohibited chemicals by the international protocols or governance bodies followed by CottonConnect, including WHO, POP, PIC, and Montreal (refer to the annex of the standards for links to these lists).	PG
6	**6**	**Ecosystem protection and conservation of high carbon stock areas**	
6.1.1.1	6.1.1.1	Primary forests and land protected by law shall not be destroyed for the purpose of cotton cultivation.	PG
9.	**9.**	**Social Conditions**	
9.2.1.1	9.2.1.1	There shall be no evidence of forced labour.	PG & G
9.3.1.1	9.3.1.1	The minimum age of children employed shall not be less than the age of completion of compulsory schooling and, in any case, shall not be less than 14.	PG & G
9.4.1.1	9.4.1.1	There shall be no evidence of trafficked, bonded, forced, or abused labour.	PG & G
9.7.1.1	9.7.1.1	There shall be no discrimination based on race, caste, national origin, religion, disability, gender, sexual orientation, union membership, political affiliation, or age in recruitment, remuneration, access to training, promotion, disciplinary measures, termination, or retirement.	PG & G
9.7.1.2	9.7.1.2	The organisation and its members shall not engage in or support the use of corporal punishment, mental or physical coercion, or verbal abuse.	PG & G
10.	**10.**	**Animal Welfare**	

Number		Standard Requirements	Group
NA	10.1.4	Animals must not endure prolonged hunger and shall have access to an adequate source of fodder throughout the year.	PG

Annexure 4: Appeal Submission Format

REEL Standards: Appeal Submission Format

To appeal against the certification related decisions of REEL Standard, please send your appeal to appeals@cottonconnect.org

Appeals are reserved for rare instances where there's clear evidence of a significant error by the verifier. If the applicant believes there is strong evidence of misjudgement or negligence by the verifier, please submit your appeal in this format.

1. **Background information**

Name of Applicant	
Implementing Partner/Producer Group/ Gin	
Date of certificate decision received	
Date of appeal Submission	

2. **List of NC / PC being appealed**

Standard Requirement Number	Standard Requirement	Compliance status as per report - FC/PC/NC	Appeal Statement	Supporting Document/Details of evidence provided

#Add rows as required

Signature of the Authorized Signatory