Higg Facility Environmental Module (FEM) Verification Program

Requirements for Verifier Bodies and Verifiers

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1 INTRODUCTION

1.1 PURPOSE

1.1.1 The purpose of this document is to ensure quality and consistency of the verification approach by all Verifier Bodies (VB). Only Verifier Bodies that are approved by Cascale may carry out external verifications and complete a Higg vFEM.

1.1.2 The document describes the requirements for Verifier Bodies, including competency requirements for Verifiers. This document does not describe the application and approval process for VBs; however, the competency requirements outlined here are the basis for application criteria.

1.1.3 VBs are subject to the Quality Assurance program described in a separate document (the Higg FEM QA Manual). The requirements listed here will be the basis for systems audits/evaluations that may be included as part of that program.

1.2 DEFINITIONS

1.2.1 **Higg FEM Self-Assessment Module (Higg FEM)**: This is the set of 'questions' that are answered by facilities to generate the FEM score. The questions are housed in the Worldly platform. These answers and supporting documents are what is 'Verified' by the Verifier Body.

1.2.2 **Worldly**: The Higg Index online platform containing a suite of sustainability assessment tools including the Higg Facility Environment Module (Higg FEM). Self-Assessment data and Verification determinations/data are entered in this platform.

1.2.3 **Verification**: The methods and processes by which a VB obtains appropriate evidence in order to express a conclusion on the reliability and accuracy of the Higg FEM self-assessment data (that is, the outcome of the measurement or evaluation of results against defined criteria).

1.2.4 **Verification Program Manager (VPM)**: The company or organization designated by Cascale to provide any or all of the oversight of the verification scheme. This may include, but is not limited to, vetting and management of service providers (e.g. Verifier Bodies), application of quality assurance procedures, risk assessment, and general project management. For the purposes of this document, references to Cascale actions may be designated as the responsibility of the VPM and thereby the terms Cascale and VPM are interchangeable.

1.2.5 **Verified Module (Higg vFEM)**: The result of the Verification process, indicating the accuracy/reliability of the self-assessment data and corrected data as needed. A Verifier Body will access and complete a Higg vFEM on the Worldly platform. Once a self-assessment is Verified, it can be shared by the facility.

1.2.6 **Verifier (VE)**: The individual(s) conducting the verifications (includes Lead Verifier and other members of the verification team).

1.2.7 **Verifier Body (VB)**: A company that is qualified and approved to perform the Verification Process in accordance with the defined procedures and protocols.

1.2.8 **Use of 'shall' or 'should'**: The word 'shall' indicates a requirement and the word 'should' indicates a recommendation.

2 VERIFIER BODY REQUIREMENTS

2.1 EXPERIENCE

2.1.1 The VB shall have minimum 3 years track record in auditing of environmental sustainability.

2.1.2 The VB shall have proven experience in the apparel/footwear/textile industry.

2.1.3 The VB shall have knowledge of national and local regulations / legislation regarding environmental management.

2.1.4 The VB shall have management systems and quality control procedures in place to select and monitor Higg FEM Verifiers and assure quality of verification process.

2.1.5 Cascale reserves the right to approve or deny VB eligibility based on their experience.

2.2 INSURANCE AND DATA SECURITY

2.2.1 The VB shall have sufficient (minimum US$1million) professional liability insurance coverage for delivery of verifications.

2.2.2 The VB shall maintain an information security management system (ISMS) that is aligned with global information security management best practices.

2.2.3 The VB shall provide any available information and data regarding the performance and management of Higg FEM verifications to Cascale (or its appointed representative) when requested to do so by Cascale.

2.3 RESOURCE AND PERSONNEL REQUIREMENTS

2.3.1 **Roles and Responsibilities**

2.3.1.1 VBs shall minimally have the following roles assigned.

2.3.1.1.1 **Scheme Manager**

2.3.1.1.1.1 This role has overall responsibility for the performance and quality of the Verifications. This manager shall act as the point of contact with Cascale to answer queries or to discuss issues for all activities globally within the stipulated timelines.

2.3.1.1.1.2 The Scheme Manager is also responsible for ensuring that Verifiers are up to date with training and updates to Cascale.

2.3.1.1.1.3 The Scheme Manager shall be an employee and not a subcontractor.

2.3.1.1.1.4 The Scheme Manager shall be fluent in English.

2.3.1.1.2 **Verifiers**

2.3.1.1.2.1 Verifiers are independent assessors responsible for conducting a verification.

2.3.1.1.2.2 All Verifiers shall be registered in the Cascale VB database and on Worldly.

2.3.1.1.3 **Quantitative Metrics Verifiers**

2.3.1.1.3.1 Quantitative Metrics Verifiers are individuals responsible for ensuring the accuracy of quantitative data in the Higg vFEM (e.g. energy and water consumption data, wastewater discharge data, and waste quantity data, etc.)

2.3.1.1.3.2 Quantitative Metrics Verifiers shall be approved Higg FEM Verifiers.

2.3.1.1.4 **Report Reviewers**

2.3.1.1.4.1 Report Reviewers are individuals responsible for conducting internal quality assurance reviews of Higg FEM Verifications before the modules are finalized (i.e. put into VRC Status)

2.3.1.1.4.2 Report Reviewers shall be approved Higg FEM Verifiers or other qualified staff members.

2.3.1.2 VBs shall inform Cascale of the role assignments upon request.

2.3.2 **Competence**

2.3.2.1 VBs shall have procedures that address how VBs ensure Verifiers meet the Verifier Competence Requirements Section of this protocol.

2.3.2.2 VBs shall have procedures that address how VBs ensure staff in the roles below meet the listed Competency requirements.

2.3.2.2.1 Quantitative Metrics Verifiers shall have training and technical knowledge of appropriate practices related to the verification of environmental data (e.g., ISO14064, ISO50001, ISO46001)

2.3.2.2.2 Report Reviewers shall receive training and have knowledge of technical environmental sustainability topics related to Higg FEM and have an understanding of Higg FEM Protocols and Program Requirements.

2.3.2.2.3 Program support staff such as Scheme Managers shall have an understanding of Higg FEM Protocols and Program Requirements.

2.3.2.1 Competency requirements shall cover non-Verifier staff involved in Verification.

2.3.2.2 VBs shall maintain records that demonstrate how competence requirements are met.

2.3.3 **Training**

2.3.3.1 VBs shall have procedures on how they provide onboarding training on Higg FEM.

2.3.3.2 Onboarding training shall be provided to new hires, currently employed assessors who become Higg FEM Verifiers, and other Higg FEM program staff. This shall be provided in addition to any required Higg FEM training.

2.3.3.2.1 Global onboarding training procedures may be used, but onboarding training shall cover Higg FEM specifically.

2.3.3.2.2 Procedures shall define the length of Higg FEM onboarding training.

2.3.3.3 VBs shall provide all Verifiers with ongoing training on Higg FEM.

2.3.3.3.1 This training shall be provided at minimum once a year.

2.3.3.3.2 This training shall cover the Reporting and Verification Procedures required below.

2.3.3.3.3 This training shall be linked to the outcomes of performance monitoring.

2.3.3.3.4 Ongoing training shall be provided if there are significant changes to the Higg FEM. Cascale will notify VBs of material changes to the Higg FEM Program.

2.3.3.4 VBs shall maintain records that show all Verifiers have undergone onboarding and ongoing training.

2.3.3.5 Cascale does not define the length, format, and content for these trainings.

2.3.3.6 VBs shall ensure trainings are effective.

2.3.4 **Performance Monitoring Procedures**

2.3.4.1 VBs shall have procedures for monitoring Verifier performance.

2.3.4.1.1 VBs shall conduct an internal quality review of 100% of Higg FEM Reports before Verifications are Complete (i.e., set to VRC Status) as defined in the Higg FEM Verification Protocol.

2.3.4.1.2 VBs shall define the actions they take when Verifier performance is less than acceptable.

2.3.4.1.2.1 At minimum, VBs shall require ongoing training and conduct an observation of the Verifier in the field if performance is less than acceptable.

2.3.4.2 Cascale/VPM QA activities result in Verifier Scores, which are made available to VBs. See the Higg FEM QA Manual for details on Verifier Scoring.

2.3.4.2.1 Cascale provided Higg FEM Verifier Scoring shall be considered in Verifier performance monitoring.

2.3.4.2.2 VBs shall not rely only on Cascale Verifier Scoring for the VBs internal performance monitoring process.

2.3.4.3 Global procedures for performance monitoring covering multiple schemes may be used, but VBs shall be able to demonstrate how Higg FEM is covered.

2.3.5 Verification and Reporting Procedures

2.3.5.1 VBs shall have a documented procedure for the Verification of quantitative metrics in the Higg FEM (e.g., production volume, energy and water use quantities, wastewater discharge quantities, etc.) that includes the following:

2.3.5.1.1 Defined competency requirements for Quantitative Metrics Verifiers (e.g., education, training, and experience requirements)

2.3.5.1.2 Requirements for reviewing and verifying quantitative data in accordance with the Higg FEM Verification Protocol (Verifying Quantitative Metrics in the Higg FEM Section).

2.3.5.2 VBs shall have a documented procedure for internal quality assurance reviews of Higg FEM Verifications that includes the following:

2.3.5.2.1 Defined competency requirements for Report Reviewers (e.g., education, training, and experience requirements)

2.3.5.2.2 Requirements to ensure all of the required checkpoints listed in the Higg FEM Verification Protocol (Internal Review Section) are covered in each Internal VB quality assurance review.

2.3.6 Calibration

2.3.6.1 VBs shall have methods to ensure the consistency of Higg FEM verification outcomes among Verifiers.

2.3.6.1.1 Calibrations shall ensure verifications are conducted consistently.

2.3.6.1.2 Performance monitoring activities shall be used to identify where calibration is needed.

2.3.6.2 A documented procedure on calibration is not required if VBs can describe and demonstrate their internal measures for calibration.

2.3.6.3 Ongoing training and performance monitoring can be used to meet this requirement if VBs can demonstrate how the outcomes of these activities are used to calibrate Verifiers.

2.3.6.4 Scheme Managers of VBs shall attend or review recordings of all Cascale/VPM Calibration events (e.g. calibration webinars).

2.3.6.5 Scheme Managers shall ensure that calibration information is shared with all relevant Higg FEM program staff including Verifiers, Report Reviewers, and other administrative staff.

2.3.6.5.1 Verifiers should attend or review calibration events when possible.

2.3.7 Knowledge of Higg FEM Subject Areas

2.3.7.1 VBs shall make available to Verifiers up-to-date, appropriate resources on environmental sustainability subject matter covered by the Higg FEM and applicable country-specific laws.

2.3.7.2 Verifiers shall understand what resources are available and be able to access this information before or during a verification.

2.3.8 Freelance and Subcontracted Verifiers

2.3.8.1 Freelance Verifiers

2.3.8.1.1 Cascale prohibits the use of 'freelance' Verifiers. 'Freelance' means the Verifier is not a direct employee of the VB and is free to work as a contractor for any company that wishes to hire them.

2.3.8.2 Subcontracted Verifiers

2.3.8.2.1 Use of part-time or subcontracted Verifiers shall only be permitted if the following conditions are met:

2.3.8.2.1.1 Verifier works on a subcontracted/part-time basis exclusively for one (1) VB for the purpose of performing Higg FEM verifications

2.3.8.2.1.2 Part-time or subcontracted Verifier is not employed (in any capacity e.g., contract, full or part-time) at a manufacturer in the textile, footwear, apparel, home textiles, leather, outdoor equipment, chemicals industry or at any other type of employer which may create a conflict of interest.

2.3.8.2.1.3 Cascale reserves the right to review and disqualify part-time or subcontracted verifiers based on their other employment relationships.

2.3.8.2.1.4 VBs shall inform the VPM of any Verifiers that are considered sub-contractors. Failure to disclose this information can lead to loss of Verifier Body status.

2.3.8.2.2 If using part-time or subcontracted Verifiers, the VB shall exercise and enforce the same criteria as when utilizing full-time employees.

2.3.8.2.2.1 The VB's Higg FEM policies and procedures on Verifier qualifications, internal training, performance monitoring, calibration and ethics/integrity shall be applied to part-time and subcontracted Verifiers.

2.3.8.2.2.2 Any part-time/subcontracted Verifier shall also be documented to be covered by the VB's Professional Liability Insurance coverage; and/or Indemnification; Data Security, Confidentiality, and Terms of Use

2.3.8.2.2.3 Part-time or subcontracted Verifier shall have a VB Company email address for official Cascale communications. Verifier Applications shall not be accepted for individuals who do not have an assigned company email address.

2.3.8.2.2.4 VBs shall maintain documentation that demonstrates how any subcontracted/part-time Verifiers meet these requirements. This documentation may include subcontracting agreements; Internal training logs for part-time/subcontracted Verifiers; affidavits/documentation from insurer indicating coverage of such Verifiers; Performance Monitoring results for part-time/subcontracted Verifiers

2.3.9 **Registration of Verifiers**

2.3.9.1 Once approved by Cascale, Verifiers are added to the Cascale Higg FEM database and linked to their associated VB.

2.3.9.2 Informing the VPM of staff changes

2.3.9.2.1 If a Verifier ceases to be employed by a VB, the VB shall inform the VPM immediately by emailing FEM@Sumerra.com.

2.3.9.2.2 Any delays in informing Cascale of these staffing changes may result in VBs being charged applicable fees for these Verifiers.

2.3.9.3 Transfer of Verifier approvals

2.3.9.3.1 VBs that add an existing Verifier as an employee can maintain their approval status. Reapplication is not required if a Verifier transfers from one approved VB to another.

2.3.9.3.2 To maintain approval status, the Verifier or VB shall complete this Change of Company Form.

2.3.10 **Use of Translators**

2.3.10.1 VBs shall have a procedure for vetting translators to ensure they are familiar with and understand environmental sustainability subject matter and terminology.

2.3.10.2 VBs shall ensure that translators understand and abide by the VB's internal Code of Conduct, confidentiality requirements and all applicable terms of the VB approval.

2.3.10.3 Additional Guidance on the use of Translators is provided in Appendix A.

2.4 VB DASHBOARD

2.4.1.1 VBs are provided with a VB Dashboard that contains important Higg FEM Program information such as program updates and calibration resources, and information regarding their Higg FEM program performance (e.g., VB and Verifier scoring). The VB Dashboard allows VBs to provide information to Cascale and the VPM such as verification schedules, VB staffing, and corrective actions for observed quality issues.

2.4.1.2 VBs shall have procedures to regularly review and update their VB dashboard.

2.4.1.3 VBs shall ensure that all required VB and Verifier staffing information (e.g., scheme manager contact(s), Verifier employment status, etc.) listed on their VB Dashboard is current and accurate.

2.4.1.4 VBs shall have procedures to monitor the Verifier Status Expiry dates of their Verifiers on the VB Dashboard to ensure that Verifiers complete the VSM process at least 20 days prior to status expiry (i.e. submit their VSM Worksheet for review).

2.4.1.5 VBs shall have procedures to ensure that verification dates for upcoming verifications are input into the VB Dashboard at least 10 business days prior to the Verifications being conducted.

2.4.1.6 VBs shall ensure that all corrective action requests (CARs) posted to their VB Dashboard are addressed in a timely manner.

2.4.1.7 VBs shall have procedures in place to review the performance scores and historical quality data available on the VB Dashboard for any existing verifiers that transfer to their organization. VBs shall also have procedures to identify and address any quality performance issues associated with the Verifier historical quality performance.

2.4.1.8 VBs shall provide any Higg FEM Program related information that is requested to be provided on the VB Dashboard.

2.5 ETHICS AND INTEGRITY

2.5.1 Ethics and Integrity Procedures

2.5.1.1 VBs shall have a professional Code of Conduct that covers ethics, integrity and impartiality.

2.5.1.2 Verifiers shall receive a copy of, and understand, the Code of Conduct.

2.5.1.3 VBs shall provide annual training on ethics and integrity to Verifiers and Higg FEM program staff.

2.5.1.4 VBs shall have procedures that address:

2.5.1.4.1 How staff can raise concerns about ethical issues, including when an organization offers a bribe or acts unethically.

2.5.1.4.2 How organizations can report on instances where Verifiers solicit or accept bribes or act unethically.

2.5.1.5 Verifiers and Higg FEM program staff must understand ethics and integrity requirements that are specific to the Higg FEM program (e.g., separation of duties for Verifiers who are also Trainers, etc.) This information should be provided during Code of Conduct training or Higg FEM program onboarding/ongoing training.

2.5.2 **Impartiality**

2.5.2.1 VBs shall undertake regular assessment of threats to impartiality and of the conflicts of interest that arise when providing Higg FEM services. Conflicts of interest can arise from a VB's relationship with its clients and unrelated bodies or from its relationship with related bodies.

2.5.2.1.1 For each Higg FEM verification a VB undertakes, the VB shall ensure there are no conflicts of interest that arise from a past or present relationship between the organization and the Verifier(s) and/or VB that will impact the integrity of the verification.

2.5.2.2 The VB shall document all possible conflicts of interest that relate to provision of Higg FEM related services and make this documentation available to Cascale if requested.

2.5.2.3 VBs shall be able to demonstrate how they eliminate or control any threats to impartiality or conflicts of interest. For example, where the VB is part of an organization involved in activities other than auditing, VB activities shall be separate from the other functions.

2.5.2.3.1 This applies to all staff roles and responsibilities associated with the VBs Higg FEM Program (e.g. Verifiers, Report Reviewers, other FEM program staff, etc.)

2.5.2.4 If a Verifier engages in consulting work (including but not limited to advisory and training services) at an organization, they are prohibited from conducting verifications at that organization for a period of 2 years.

2.6 PROVISION OF HIGG FEM TRAINING

2.6.1 VBs shall not provide external training on the Higg FEM unless they are approved by Cascale as a Higg FEM Training Body.

2.6.2 VBs that wish to provide external training to facilities should apply through the Higg FEM Training Program Manager (TPM) to become a Trainer Body.

2.7 PAYMENT OF FEES

2.7.1 VBs shall pay all applicable fees.

2.7.2 Current Higg FEM fees are published in the Higg FEM Fees Schedule document.

2.7.3 VBs are required to pay a Verification Access fee for each Verification conducted.

2.7.3.1 VBs shall inform facilities of this Verification fee and include this fee as an itemized cost in the Verification agreement established with the facility.

2.7.3.2 Cascale will invoice VBs for the sum of the owed Verification Access fee at a frequency specified by Cascale. The fee will be based on the number of Verifications completed in the prescribed timeframe.

2.7.4 Non-member VBs are required to pay an initial program fee and an annual program fee in subsequent years.

2.7.4.1 The annual program fee shall be due by March 31st each year.

2.7.4.2 If a VB becomes approved and pays the initial program fee after June 30th, the annual program fee for the following year shall be due June 30th. In subsequent years, the annual fee shall be due on March 31st each year.

2.7.5 Failure to pay the applicable program or Verification Access fees in a timely manner shall result in deactivation of VB approval status.

2.7.6 Payment terms for all Cascale invoices are net 30 days unless otherwise noted.

2.7.7 Invoices for fees shall be issued to the VB scheme manager or designated point of contact.

3 VERIFIER COMPETENCY REQUIREMENTS

3.1 GENERALIST VERIFIER

3.1.1 Education

3.1.1.1 Verifiers shall have post-secondary education with a minimum course duration of 2 years.

3.1.1.2 Verifiers should preferably have post-secondary education in a discipline related to environmental sustainability or life sciences.

3.1.2 Experience

3.1.2.1 A Verifier shall have at least 3 years of experience in environmental auditing/assessment or 1 years' experience if they have a degree in environmental engineering or environmental science.

3.1.2.2 A Verifier shall have recent experience conducting environmental audits/assessments (at least 10 recognized environmental assessments/audits in prior 12 months)

3.1.2.2.1 Observations of on-site Higg FEM Verifications shall be recognized as equivalent assessments. Observations of offsite Higg FEM Verifications shall not be recognized.

3.1.2.3 A Verifier should preferably have experience managing environmental sustainability at a manufacturer or brand/retailer.

3.1.2.4 A Verifier should preferably hold a current EMS lead auditor certification (e.g. ISO14001 Lead Auditor)

3.1.2.5 A Verifier should preferably have additional environmental certifications/accreditation.

3.1.2.6 A Verifier should preferably have specialized training in environmental sustainability subject matter.

3.1.2.7 Verifiers should preferably have a reference from a Cascale member attesting their ability to perform high-quality Higg FEM Verification.

3.1.2.8 Only meeting the minimum requirements (defined as 'shall have') does not guarantee eligibility to become a Verifier; it only confirms the applicant has met the baseline requirements to be considered for FEM Verifier status. For example, if only the listed minimum requirements are met, applicants will be required to have additional 'preferred' listed qualifications to become eligible.

3.2 CHEMICAL SPECIALIST VERIFIER

3.2.1 Chemical Specialist Verifiers shall meet the competency requirements, be approved as a Generalist Verifier, and possess the additional qualifications/experience listed below:

3.2.2 **Education**

3.2.2.1 Chemical Specialist Verifiers should preferably have an advanced degree in the field of chemistry (e.g. Masters, PhD).

3.2.3 **Experience**

3.2.3.1 Chemical Specialist Verifier shall have experience conducting chemicals management audits/assessments (at least 10 recognized chemical management assessments/audits in prior 36 months)

3.2.3.1.1 Observations of on-site Higg FEM Verifications that include Verification of level 2 and 3 Chemicals Management questions shall be recognized as equivalent assessments. Observations of offsite Higg FEM Verifications or Verifications that do not include level 2 and 3 Chemicals Management questions shall not be recognized as equivalent assessments.

3.2.3.2 Chemical Specialist Verifiers should preferably have specialized training in chemicals management.

3.2.3.1 Chemical Specialist Verifiers should preferably have ZDHC Approved Trainer accreditation.

3.2.3.2 Chemical Specialist Verifiers should preferably have a reference from a ZDHC member attesting to their ability to perform high-quality Higg FEM Verification of advanced chemical management aspects.

3.2.3.3 Only meeting the minimum requirements (defined as 'shall have') does not guarantee eligibility to become a Chemical Specialist Verifier, it only confirms the applicant has met the baseline requirements to be considered for FEM Chemical Specialist Verifier status. For example, if only the listed minimum requirements are met, applicants will be required to have additional 'preferred' listed qualifications to become eligible.

3.3 VERIFIER TRAINING

3.3.1 Verifiers shall complete the Higg FEM Verifier Training and pass the exam before being approved as a Verifier.

3.3.1.1 This training is administered by the VPM in accordance with the Higg FEM Verifier Training Protocol.

3.3.2 Verifiers shall attend any required refresher training on a cadence (e.g. annual) as determined by Cascale.

3.3.3 Current Higg FEM Verifier Training fees are published in the Higg FEM Fees Schedule document.

4 VB STATUS & ELIGIBILITY

4.1.1 **VB Status: Active**

4.1.1.1 After applying and receiving approval from Cascale, VBs shall be granted Active status in the Cascale database.

4.1.1.2 Only VBs with Active status shall be eligible to perform Higg FEM Verification activities.

4.1.1.3 If a VB's status is deactivated, suspended or terminated, the VB shall not be able to perform Higg FEM Verification activities on the Worldly Platform.

4.1.2 **VB Status: Deactivated**

4.1.2.1 VB Status may be deactivated for the following reasons:

4.1.2.2 Failure to pay applicable VB Fees by the required deadline including annual non-member VB Program Fees or Verification Access Fees.

4.1.2.3 Failure to participate in VB Calibration events or complete required training on the STEP Platform.

4.1.2.4 Failure to complete the VB Management System Check (MSC) self-assessment within the timelines defined by Cascale or the VPM.

4.1.2.5 Failure to adhere to Higg FEM Program protocol requirements after receiving a warning from Cascale.

4.1.2.6 Failure to provide required or requested information via the VB Dashboard or other means requested by Cascale or the VPM in a timely manner (e.g., VB staffing information, upcoming Verification schedules, registration of repeat verifications, corrective action request (CAR) information).

4.1.3 **Reactivating VB Status**

4.1.3.1 If a VB's status is deactivated due to failure to pay applicable fees, VB status will be reactivated once payment is received in full.

4.1.3.2 If a VB's status is deactivated for failure to adhere to FEM Program protocol requirements, VB status will be reactivated after the defined actions required by Cascale or the VPM are completed.

4.1.3.3 If a VB's status is deactivated for failure to provide required or requested information or participate in calibration events or mandatory training, VB status will be reactivated once the required action is completed and information is provided (if required) and deemed sufficient by Cascale or the VPM.

4.1.4 **VB Status: Suspension**

4.1.4.1 Cascale holds the right to suspend any VB at any time due to the following:

4.1.4.1.1 Unethical behavior (a minimum 12-month suspension applies for any unethical behavior).

4.1.4.1.2 Serious quality concerns.

4.1.4.1.2.1 Reports of unethical behavior and/or serious quality concerns can also be reported outside of the Higg FEM program and need not be identified by Cascale to be considered grounds for suspension.

4.1.4.1.3 Non-conformance or repeated breaches of Higg FEM program requirements or protocols.

4.1.4.1.4 Breach of Higg FEM VB Agreement.

4.1.4.2 Suspended VBs shall be ineligible to perform Higg FEM Verification activities for the defined suspension period.

4.1.4.3 ***Lifting VB Suspension***

4.1.4.4 To qualify for reactivation after suspension, the following shall be met:

4.1.4.4.1 The applicable suspension period must have passed; and/or

4.1.4.4.2 Cascale has reviewed and approved of the VBs documented corrective actions and system/procedure improvements to address the suspension issue.

4.1.5 **VB Status: Terminated**

4.1.5.1 Cascale holds the right to terminate a VB, which means permanent removal of VB approval without possible re-entry into Higg FEM program due to the following:

4.1.5.1.1 Severe breach of ethics/integrity.

4.1.5.1.1.1 Reports of severe breach of ethics/integrity can also be reported outside of the Higg FEM program and need not be identified by Cascale to be considered grounds for termination.

4.1.5.1.2 Breach of Cascale VB Terms of Use that results in serious harm to Cascale.

5 VERIFIER STATUS & ELIGIBILITY

5.1.1 **Verifier Status: Active**

5.1.1.1 After applying, completing training and receiving approval from Cascale, Verifiers are granted Active status in the Cascale database.

5.1.1.2 Only Verifiers with Active status are eligible to perform Higg FEM Verification activities.

5.1.1.3 If a Verifier's status is deactivated, suspended or terminated, the Verifier shall not be able to perform Higg FEM Verification activities on the Worldly Platform.

5.1.2 **Verifier Status Maintenance**

5.1.2.1 Once an individual is approved as a Verifier, they shall be required to maintain their status annually.

5.1.2.2 Status maintenance shall be demonstrated by completion of recognized professional development activities defined in the Higg FEM Verifier Status Maintenance (VSM) Protocol.

5.1.2.2.1 Annually, each Verifier shall submit a VSM Worksheet for review and approval by the VPM. VSM worksheets are available on and submitted through the STEP platform.

5.1.2.2.2 Generalist Verifiers who are also Chemical Specialist Verifiers shall only submit one (1) VSM worksheet. Both statuses are renewed through a single VSM process.

5.1.2.2.3 Verifiers shall have a 30-day grace period after the one-year anniversary of approval (giving them 12 to 13 months of total approval period).

5.1.2.3 Verifiers shall enroll in the VSM Course on STEP and submit their VSM Worksheet at least 20 days prior to their status expiring.

5.1.2.4 Candidates whose verifier status has expired without valid reason, shall be required to complete the following to reactivate their status:

5.1.2.4.1 Submit a written request to VPM

5.1.2.4.2 Completion of any required Higg FEM related training (i.e. If training has been revised or updated)

5.1.2.4.3 Submittal of VSM Worksheet covering the prior 12 months immediately preceding the reactivation request

5.1.2.4.3.1 VSM may be subject to automatic audit/verification of VSM-related material

5.1.2.4.4 Must pay a $200 re-activation fee plus the VSM fee

5.1.2.5 Cases where a Verifier's status has expired for more than 6 months will be reviewed by the VPM to determine the suitable path and requirements for status reactivation.

5.1.3 **Verifier Status: Deactivated**

5.1.3.1 Verifier Status may be deactivated for the following reasons:

5.1.3.1.1 Failure to participate in required Verifier Calibration events or complete required training on the STEP Platform.

5.1.3.1.2 Failure to adhere to Higg FEM Program protocol requirements after receiving a warning from Cascale.

5.1.3.1.3 Failure to complete the VSM Process prior to their status expiry date.

5.1.3.1.4 If the VB they are associated with has their VB approval status deactivated, suspended, or terminated.

5.1.4 **Reactivating Verifier Status**

5.1.4.1 If a Verifier's status is deactivated due to failure to participate in Verifier Calibration events or complete required training, their status will be reactivated once the calibration activities or training is complete.

5.1.4.2 If a Verifier's status is deactivated for failure to adhere to FEM Program protocol requirements, their status will be reactivated after the defined actions required by Cascale or the VPM are complete.

5.1.4.3 If a Verifier's status is deactivated due to failure to complete the VSM process before their status expires, the Verifier will be required to complete the reactivation process listed in the Verifier Status Maintenance section above.

5.1.4.4 If a Verifier's status is deactivated due to loss of VB Status, their status will be reactivated if:

5.1.4.4.1 They become employed by another approved Higg FEM VB and completed the change of company process.

5.1.4.4.2 Their VB's approval status is reinstated.

5.1.5 Verifier Status: Suspended

5.1.5.1 Cascale holds the right to suspend Verifiers at any time due to unethical behavior, serious quality issues, serious or repeated protocol violations, or failure to meet status maintenance requirements.

5.1.5.1.1 If a Verifier is suspected of unethical behavior, an investigation is conducted as outlined in the Higg FEM Ethics Investigation Protocol.

5.1.5.2 Verifiers may be suspended for serious quality issues, including:

5.1.5.2.1 Repeated verification quality issues or quality scores that are significantly lower than a baseline (defined by Cascale) and do not improve over time.

5.1.5.2.2 More than 1 report is invalidated within a 12-month period.

5.1.5.2.3 More than 1 substantiated complaint received within a 12-month period.

5.1.5.2.4 Other serious quality issues or negligence during the Verification process.

5.1.5.3 Verifiers who are at risk of becoming suspended due to quality issues shall be notified by the VPM prior to their suspension and informed of actions necessary to avoid suspension. VBs who use Verifiers that are at risk of being suspended may be required to complete a corrective action request (CAR) to address the quality issues.

5.1.6 Lifting Verifier Suspension

5.1.6.1 Verifiers that are suspended for unethical behavior or serious quality issues may reapply to become Verifiers after the end of the suspension period and the VB that employs them can demonstrate they have taken sufficient measures to improve the Verifier's quality.

5.1.6.2 Verifier suspensions can be lifted after the applicable suspension period has passed by:

5.1.6.2.1 Submitting a written request for re-application to the VPM.

5.1.6.2.2 Receiving approval from Cascale of documented corrective actions to address the suspension issue.

5.1.6.2.3 Paying a US$200 re-activation fee.

5.1.6.2.4 Completion of any required Higg FEM related training (i.e. If training has been revised or updated).

5.1.6.3 If a Verifiers status has been suspended due to failure to complete the Status Maintenance process, the VSM process noted above shall be completed before Verifier status is reinstated.

5.1.7 Verifier Status: Terminated

5.1.7.1 Cascale holds the right to terminate Verifiers, which means permanent removal without possible re-entry into the Higg FEM program at any time due to unethical behavior or for serious quality issues.

5.1.7.2 Failure to sufficiently address corrective actions issued by Cascale during a suspension may result in termination.

6 GRIEVANCE PROCEDURE

6.1 PROCESS

6.1.1 If a VB wishes to make a complaint about the implementation of the procedures described in this document or any other Higg FEM program document or procedure, or if another person or organization wishes to make a complaint regarding the conduct or qualifications of a VB or Verifiers in relation to these or any other Cascale requirements or procedures, this should be communicated in writing to the VPM via FEM@sumerra.com or by submitting a Higg FEM Complaint Form.

6.1.2 The VPM will seek to resolve the complaint. This may include mediation between the relevant parties to agree to a resolution.

6.1.3 If no agreement can be reached to the satisfaction of all parties, the VPM shall refer the complaint to Cascale, which may convene an adjudication subcommittee to investigate and resolve the complaint.

7 RELATED DOCUMENTS

Higg FEM Fees Schedule

Higg FEM Verifier Training Protocol

Higg FEM Quality Assurance Manual

Higg FEM Verifier Status Maintenance Protocol

Higg FEM Verification Protocol

Higg FEM Ethics Investigation Protocol

8 DOCUMENT CHANGE LOG

Date	Section	Summary of Changes
2022-04-28 FEMVBR2021041.0	n/a	• Updated document format Replaces Higg FEM Verifier Body Program Requirements (VPM – 012) • Added details on Quantitative Metrics Verifiers (Section 2.3)
	New Section – 2.1 & 2.2	• Verifier Body Eligibility Requirements
	Updated Section – 2.3	• Added details on Scheme Manager, Quantitative Metrics Verifier, and Report Reviewer Roles.
	New Section – 3.0	• Verifier Competency Criteria
	New Section – 4.0 & 5.0	• VB and Verifier Status & Eligibility Criteria
	New Section – 6.0	• Grievance Procedure
	New Section – 7.0	• Related Higg FEM Documentation Links
2024-04-24 FEMVBR2024041.1	Section 2.3.2	• Revised “should” to “shall” for Quantitative Metrics Verifiers competency requirement
	Section 2.3.3	• Added VE training requirement to include the required VB Reporting and Verification Procedures
	Section 2.3.5	• Added new section with requirements for VBs to have documented procedures for verification of quantitative metrics and internal QA review processes.
	Section 2.6	• Added details on Verification Fee for VBs.
	All	• Updated for Cascale (formerly SAC) rebrand.
2026-06-17 FEMVBR2026061.2	Section 2.1	• Added clarification that Cascale reserves the right to approve or deny Verifier Bodies based on their experience.
	New Section - 2.4	• Added information about the VB dashboard and required VB interactions.
	Section 2.3.6	• Clarified requirements for attendance/review of Cascale/VPM calibration events.
	Section 3.1 & 3.2	• Clarified Verifier eligibility criteria for meeting base requirements and preferred criteria.
	Section 4	• Added details on VB Status deactivation
	Section 5	• Added details on Verifier Status deactivation

9 APPENDICES

9.1 APPENDIX A – GUIDANCE ON THE USE OF TRANSLATORS FOR HIGG FEM VERIFICATION

9.1.1 Cascale no longer provides country-specific approval for Verifier Bodies (VB) or Individual Verifiers. This allows VBs to serve clients in all countries/regions including using non-local Verifiers where necessary.

9.1.2 Generally, 'non-local' means that the verifier is not a native citizen or resident of the country/region and/or does not speak the local language(s) of facility staff.

9.1.3 In cases where non-local Verifiers perform Verification (on or off-site), the use of Translators shall be required.

9.1.3.1 The following requirements shall be met when the use of Translators is required:

9.1.3.1.1 Prior to assigning a Verifier, the VB shall verify with facility staff the language(s) spoken by relevant facility personnel (including management and employee level staff), as well as the languages in which all relevant documents are written.

9.1.3.1.2 Translators should be used if Verifiers do not speak the language(s) spoken by a significant percentage of relevant facility staff and/or if the relevant supporting documentation is in a language that the Verifier is not able to read fluently.

9.1.3.1.3 Translators do not need to be Higg FEM Verifiers and may be an employee of the VB, third party translation service providers or a freelance individual.

9.1.3.1.4 The VB shall ensure that the Translator is competent and understands the technical content and terminology of the Higg FEM.

9.1.3.1.5 Translators shall work under the direct supervision of the Verifier and shall not conduct any part of the Verification themselves.

9.1.3.1.6 The VB shall be responsible to ensure that Translators understand and abide by the VBs internal Code of Conduct and all applicable terms of Cascale Verifier Code of Professional Conduct.

9.1.4 VBs shall ensure non-local verifiers are familiar with applicable environmental legislation and norms in countries where they perform Verifications.

9.1.5 Verifications conducted by non-local auditors may be subject to additional QA reviews by the VPM.

9.1.5.1 Failure to ensure a high-quality verification by a non-local verifier shall reflect negatively on VB and Verifier scoring and may result in additional actions from Cascale including removal of VB or Verifier status.

9.1.6 If requested by Cascale, VBs shall provide supporting documentation to demonstrate compliance with the use of translators for Higg FEM Verification including:

9.1.6.1 Internal procedures or policies regarding the use of Translators

9.1.6.2 Excerpts from contracts or service agreements (specifically relating to above noted obligations)

9.1.6.3 Documented qualifications and experience of Translators (e.g., education, accreditations)

9.1.6.4 Other documentation deemed necessary to determine the Translators competence or understanding of Higg FEM content or Terminology.