Butterfly Mark Certification Scheme Document

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Butterfly Mark Certification Scheme Document

Scheme owner: Positive Luxury Ltd.

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Document control

This document is the master Scheme Document for the Butterfly Mark certification scheme operated by Positive Luxury Ltd. (the “scheme owner”). It defines the requirements that apply to certification bodies operating the scheme, and to organisations seeking certification under the scheme. The document is structured to align with ISO/IEC 17065:2012, Conformity assessment – Requirements for bodies certifying products, processes and services.

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Distribution and access

This document is published on the Positive Luxury website and is publicly accessible. It is the master Scheme Document; the controlled version is the one published on the Positive Luxury website. Printed or locally stored copies are uncontrolled; users shall verify they are referring to the current published version. This publication is made in support of the transparency requirements applicable to certification schemes under Directive (EU) 2024/825 (the ECGT Directive).

Contents

1. Foreword

Positive Luxury Ltd. is the scheme owner of the Butterfly Mark, an independent sustainability certification awarded to brands and retailers in the luxury and premium sector that meet defined standards of environmental, social and governance performance. The certification is issued in the form of a trust mark and an associated Digital Butterfly Passport, which together communicate verified sustainability performance to consumers.

This Scheme Document defines the rules under which the Butterfly Mark is awarded. It is the master normative reference for any certification body ("CB") authorised to operate the scheme. It also describes the scheme to organisations seeking certification, to accreditation bodies, to regulators and to other interested parties.

The document is structured to align with the requirements of ISO/IEC 17065:2012, Conformity assessment – Requirements for bodies certifying products, processes and services. The structure of the document follows the clause numbering of that standard, so that a reader familiar with ISO/IEC 17065 can navigate this document by clause.

Where this document imposes requirements on a certification body, the requirements are additional to, and shall not contradict, the requirements of ISO/IEC 17065:2012. Where a requirement of this document is more stringent than the corresponding requirement of ISO/IEC 17065:2012, the more stringent requirement applies. Nothing in this document is intended to relieve a certification body of any of its obligations under ISO/IEC 17065:2012.

2. Scope and applicability

2.1 Object of certification

The Butterfly Mark certifies the environmental, social and governance (“ESG”) performance of an organisation operating in the premium and luxury sector. Certification is granted at the level of the legal entity that holds the brand, service, retail operation, or hospitality business in scope of the assessment.

Certification under this scheme is therefore a form of organisational conformity assessment as described in ISO/IEC 17065:2012, applied to the ESG management practices, performance and disclosures of the certified organisation. The Butterfly Mark is not awarded to individual products, individual sites within a multi-site organisation, or individual personnel.

Where an applicant comprises multiple brands, multiple sites, or multiple legal entities within a corporate group, the applicant shall, at the application stage (Clause 8.2.3), declare the full scope it wishes to bring within the certification: every brand, site and legal entity that is to be covered by the Butterfly Mark, and any that is to be excluded. The certification body shall record the agreed scope in the assessment plan (Clause 8.4.1) and in the certification documentation (Clause 8.7); the Butterfly Mark may only be displayed in connection with the brands, sites and entities within the agreed scope, and any extension of scope after certification is granted is treated as a new application in respect of the additional element (subject to the certification body's discretion to treat it as an amendment where the additional element is materially similar to elements already certified). Where the applicant's corporate group includes brands, sites or entities that are not brought within the scope of certification, this does not of itself prevent certification of the elements that are within scope, provided the certification documentation and any public-facing reference to the Butterfly Mark (Clause 8.12) make the certified scope clear and do not imply certification of the wider group.

As set out in Clause 8.2.3, the applicant elects, at the application stage, whether to seek a single certification covering all eligible operations within the agreed scope, or separate certifications for individual brands or business units. Where a single certification is sought, one certification decision and one Digital Butterfly Passport (Clause 8.12) cover the entire agreed scope, however many brands, sites or entities it comprises. Where separate certifications are sought for individual brands or business units, each is assessed and certified independently, with its own certification decision and Digital Butterfly Passport; references elsewhere in this document to ‘the certified organisation’ or ‘the agreed scope’ are, in that case, to be read at the level of each separately certified brand or business unit. Where the agreed scope of a single certification comprises multiple sites, multiple brands, or multiple entities, the certification body shall apply a sampling approach to the assessment, in accordance with Clause 8.4.5 and the detailed methodology set out in PL-BM-AUD-001; sampling determines which sites, brands or entities are directly assessed in a given assessment cycle, but the resulting certification decision and any non-conformity arising apply to the full agreed scope, not only to the sampled elements.

2.2 Eligible sectors

The Butterfly Mark is available to organisations operating in the following premium and luxury sub-sectors:

- Beauty, fragrance and cosmetics (including skincare, makeup, haircare, and personal care)
- Fashion and accessories (including ready-to-wear, leather goods, footwear, handbags, and other fashion accessories)
- Hotels and luxury hospitality (including resorts, serviced apartments, retreats, and DMCs)
- Interiors and living (including home décor, furniture and interior design)
- Jewellery and watches (including fine jewellery, costume jewellery, and watchmaking)
- Luxury retail (multi-brand retail operations)
- Premium drinks (including spirits, wine, champagne and other premium beverage categories)

An organisation operating across more than one of these sub-sectors may, at its choice, apply for either (a) a single certification covering all eligible operations of the legal entity, in which case the assessment shall be conducted against the same applicable criteria set (determined by SME status under Clause 10.5) across all of those operations, since the applicable criteria set does not vary by sub-sector; or (b) separate certifications for individual brands or business units within the organisation, each assessed independently. The choice shall be agreed at the application review stage (see Clause 8.3) in consultation with the scheme owner where the scope choice has implications for how the Butterfly Mark is issued or displayed. The applicable assessment criteria do not vary by sub-sector; the same criteria set (determined by SME status, Clause 10.5) applies irrespective of which eligible sub-sector or sub-sectors the organisation operates in (see Clause 10).

2.3 Geographic scope

The Butterfly Mark is available globally, subject to applicable law in the relevant jurisdiction. It is available to eligible organisations in any jurisdiction. Where local law imposes requirements that conflict with the requirements of this scheme, the certified organisation shall comply with local law and shall disclose the conflict to the certification body, which shall in turn notify the scheme owner.

2.4 Use of this document

This document may be used:

- By the scheme owner, as the master normative reference for the scheme.
- By certification bodies, as the binding rule set governing the operation of the scheme. Each certification body operating the scheme shall hold valid third-party accreditation against ISO/IEC 17065:2012 (or an equivalent international conformity assessment standard) granted by an accreditation body that is a signatory to the Global Accreditation Cooperation Incorporated (Global ACI) Multilateral Recognition Arrangement (or any successor international accreditation cooperation framework). Where the Butterfly Mark scheme is not within the certification body's existing accreditation scope at the time of authorisation by the scheme owner, the certification body shall undertake, in the Certification Body Agreement, to apply for the relevant scope extension within 18 months of notice from the scheme owner that the scheme has been accepted for assessment by an accreditation body. Until such scope

extension is granted, the certification body shall apply the same conformity assessment methodology, impartiality safeguards and reporting obligations as under full scope accreditation, in order to ensure that the third-party verification remains independent, transparent and credible in accordance with Directive (EU) 2024/825 (the ECGT Directive).

- By accreditation bodies, as a criteria document for the assessment of certification bodies operating the scheme.
- By organisations seeking certification, as a description of the requirements that the scheme will assess them against.
- By interested parties (consumers, regulators, investors, civil society), as a public description of what the Butterfly Mark certifies and how. The current version of this document is published on the Positive Luxury website.

3. Normative and informative references

The following referenced documents are indispensable for the application of this document. For dated references, only the edition cited applies. For undated references, the latest edition of the referenced document (including any amendments) applies.

3.1 Conformity assessment standards

- ISO/IEC 17000:2020, Conformity assessment – Vocabulary and general principles
- ISO/IEC 17065:2012, Conformity assessment – Requirements for bodies certifying products, processes and services
- Directive (EU) 2024/825 of the European Parliament and of the Council of 28 February 2024 amending Directives 2005/29/EC and 2011/83/EU as regards empowering consumers for the green transition (the "ECGT Directive")

3.2 Informative references

The following documents are referenced in this Scheme Document or used in its development for informative purposes only. They are not indispensable for the application of this document.

- The Greenhouse Gas Protocol – A Corporate Accounting and Reporting Standard (revised edition), World Resources Institute and World Business Council for Sustainable Development
- The Greenhouse Gas Protocol – Corporate Value Chain (Scope 3) Accounting and Reporting Standard
- ISO/IEC 17067:2013, Conformity assessment – Fundamentals of product certification and guidelines for product certification schemes
- ISO 19011:2018, Guidelines for auditing management systems
- United Nations Sustainable Development Goals (UN SDGs)
- United Nations Global Compact, Ten Principles
- OECD Guidelines for Multinational Enterprises on Responsible Business Conduct
- ILO Declaration on Fundamental Principles and Rights at Work
- Universal Declaration of Human Rights

3.3 Internal scheme documents

The following internal documents form part of the scheme. Where a CB or a certified organisation is bound by the requirements of this document, it is also bound by the requirements of the documents listed below to the extent that they are referenced.

- PL-BM-CRT-001 – Butterfly Mark Assessment Criteria (the criteria catalogue, divided by ESG pillar)
- PL-BM-AUD-001 – Butterfly Mark Audit Manual (competence, audit methodology, and non-conformity management)
- PL-BM-MRK-001 – Use of the Butterfly Mark and Digital Butterfly Passport
- PL-BM-CMP-001 – Complaints and Appeals Procedure
- PL-BM-TR_AUD-001 – Butterfly Mark Transitional Audit

4. Terms and definitions

For the purposes of this document, the terms and definitions given in ISO/IEC 17000:2020 and ISO/IEC 17065:2012 apply. The following additional terms apply to the Butterfly Mark scheme.

Applicant	An organisation that has formally submitted an application for certification under the Butterfly Mark scheme, but for which a certification decision has not yet been issued.
Assessment	The complete set of activities undertaken by a certification body to evaluate an applicant or certified organisation against the requirements of the scheme. The assessment includes document review, evidence verification, interviews and, where applicable, remote or on-site site visits (see Clause 8.4.2 for the assessment modality rules).
Assessment criteria	The individual requirements set out in PL-BM-CRT-001 against which an organisation is assessed. Each criterion has a unique identifier, a requirement, a set of compliance requirements, indicators, guidance, and major and minor non-conformity definitions.
Audit	Used interchangeably with “assessment” in this document, except where the context requires the narrower technical meaning of an on-site or remote evidence-gathering exercise carried out by an authorised auditor.
Auditor	A natural/human person authorised by a certification body to carry out assessments under the Butterfly Mark scheme, in accordance with the auditor competence requirements set out in Clause 7.2 and in PL-BM-AUD-001.
Brand	A commercial identity under which an organisation markets products or services in the luxury or premium sector. A single legal entity may operate one or more brands.
Butterfly Mark	The trust mark awarded to organisations that achieve certification under this scheme. The Butterfly Mark is a registered trademark of PositiveLuxury Ltd., registered as a trademark in the United Kingdom, the European Union, and other jurisdictions.
Certification body (CB)	A third-party conformity assessment body, legally separate from the scheme owner, authorised by Positive Luxury to operate the Butterfly Mark scheme. A certification body shall hold valid accreditation to ISO/IEC 17065:2012 (or an equivalent international conformity assessment standard) granted by an accreditation body that is a signatory to the Global Accreditation Cooperation Incorporated (Global ACI) Multilateral Recognition Arrangement (or any successor international mutual recognition framework), and shall commit to applying for the Butterfly Mark scope extension within the timeframe set out in Clause 2.4.
Certified organisation	An organisation that has been awarded the Butterfly Mark following a successful assessment, and whose certification is current (not suspended, withdrawn or expired). A certified organisation may operate one or more brands. The terms are not interchangeable: “certified organisation” refers

	to the legal holder of the certification, while “brand” refers to the consumer-facing identity.
Compliance requirement	A specific element of an assessment criterion that must be met for the criterion to be deemed conformant. Compliance requirements are stated in PL-BM-CRT-001.
Digital Butterfly Passport	A digital artefact issued alongside the Butterfly Mark to a certified organisation, summarising verified ESG performance data and accessible to consumers and other interested parties through QR codes and digital touchpoints.
ESG	Environmental, Social and Governance: the three pillars under which the Butterfly Mark assessment is structured.
ESG+ 2.1 assessment portal	The proprietary online portal operated by Positive Luxury through which applicants and certified organisations submit assessment responses and supporting evidence.
Indicator	An item of evidence that an auditor should be able to locate or verify in order to determine whether a compliance requirement is met.
Major non-conformity	A non-conformity that, individually or in combination with other non-conformities, prevents the award or continuation of certification, as defined in Clause 8.10 and in PL-BM-AUD-001.
Minor non-conformity	A non-conformity that does not on its own prevent the award or continuation of certification, but which requires correction within a defined timeframe, as defined in Clause 8.10 and in PL-BM-AUD-001.
Pillar	One of the three top-level groupings of assessment criteria: Environmental, Social, or Governance.
Pillar conformity status	A summary of the conformity outcome for all applicable assessment criteria within a single pillar (Environmental, Social or Governance), expressed as the number of applicable criteria, the number found to be met, and the non-conformities raised, in accordance with the conformity assessment methodology defined in Clause 10.2.
Recertification	The process by which a certified organisation is reassessed at the end of its three-year certification cycle.
Scheme	The Butterfly Mark certification scheme as described in this document.
Scheme owner	PositiveLuxury Ltd., the entity that owns, develops and maintains the Butterfly Mark scheme. The scheme owner grants the licence to use the Butterfly Mark directly to certified organisations, under a written agreement.
Supporting document	An item of evidence submitted by an applicant or certified organisation in response to an assessment criterion. Supporting documents may include policies, reports, inventories, contracts, training records, certificates from other schemes, or any other artefact specified by the assessment criteria.

Surveillance	Activities undertaken between the initial certification decision and the next recertification to confirm that a certified organisation continues to meet the requirements of the scheme.

5. General requirements for the certification body

This clause sets out general requirements that apply to any certification body operating the Butterfly Mark scheme. These requirements are additional to, and shall be read together with, ISO/IEC 17065:2012 Clause 4.

5.1 Legal entity and contractual matters

5.1.1 Legal status of the certification body

The certification body shall be a legally identifiable entity, or a defined part of a legally identifiable entity, that can be held legally responsible for all of its certification activities under this scheme. A certification body that is not itself a legal entity shall provide written evidence of the legal entity within which it sits and of the authority delegated to it by that legal entity. In addition, the certification body shall be a separate legal entity from the scheme owner, as required under Directive (EU) 2024/825 (the ECGT Directive).

5.1.2 Authorisation by the scheme owner

Before a certification body may operate the Butterfly Mark scheme, it shall enter into a binding written agreement with Positive Luxury (the “Certification Body Agreement”). The Certification Body Agreement shall address at minimum:

- The scope of the certification body’s authorisation under the scheme.
- The certification body’s obligation to comply with this Scheme Document and all referenced internal scheme documents in their current version.
- The certification body's obligation to hold valid accreditation to ISO/IEC 17065:2012 (or an equivalent international conformity assessment standard) granted by an accreditation body that is a signatory to the Global Accreditation Cooperation Incorporated (Global ACI) Multilateral Recognition Arrangement (or any successor international mutual recognition framework), and to apply for the relevant Butterfly Mark scope extension in accordance with Clause 2.4.
- The certification body’s obligation to operate within the impartiality, confidentiality and conflict-of-interest requirements set out in this document and in ISO/IEC 17065:2012.
- Reporting obligations from the certification body to the scheme owner, including the obligation to notify the scheme owner of certification decisions, suspensions, withdrawals and material complaints.
- The right of the scheme owner to audit the certification body’s application of the scheme.
- Termination conditions, including the consequences of termination for organisations holding live certifications issued by the certification body.
- The certification body’s acknowledgement and obligation to operate the scheme in compliance with Directive (EU) 2024/825 (the ECGT Directive), including the requirement that the certification body remains legally separate from the scheme owner throughout the term of the agreement.
- The certification body’s obligation to notify the scheme owner within 30 calendar days of any event that may affect its continued compliance with the requirements of this

Scheme Document, including loss or suspension of accreditation, change of control of the certification body, or any regulatory or legal action against the certification body.

5.1.3 Certification agreement with the application and certified organisation

The certification body shall enter into a written, legally enforceable certification agreement with each certified organisation. The agreement shall, at minimum, require the certified organisation to:

1. Comply with the requirements of the scheme as they apply to certified organisations, in their current version.
2. Submit to assessment, surveillance and recertification activities as required by the scheme, including providing access to documentation, sites and personnel (if required).
3. Inform the certification body within 30 calendar days of any change that may affect its ability to comply with the requirements of the scheme, including changes of legal entity, ownership, scope of operations, or material changes to its sustainability practices.
4. Make only those claims regarding certification that are consistent with the scope of certification, and not use the certification or the Butterfly Mark in such a manner as to bring the scheme owner or the certification body into disrepute.
5. Comply with the rules on the use of the Butterfly Mark and the Digital Butterfly Passport set out in PL-BM-MRK-001.
6. Cease all use of the Butterfly Mark, the Digital Butterfly Passport and any associated claims upon suspension, withdrawal or expiry of certification, in accordance with PL-BM-MRK-001.
7. Cooperate with the certification body and the scheme owner in the investigation of complaints relating to the certified organisation’s certification.

5.1.4 Liability and finance

The certification body shall maintain professional indemnity insurance, public liability insurance, and any other insurance required by applicable law, at coverage levels appropriate to the scale and risk profile of its activities under the scheme. The certification body shall provide evidence of cover to the scheme owner on request, and shall notify the scheme owner if cover is lost or materially reduced.

The certification body shall demonstrate that it has the financial resources required to operate the scheme on a sustainable basis. The scheme owner may, as part of its oversight of the scheme, request confirmation from the certification body’s senior management, or a written statement of financial standing.

5.2 Management of impartiality

5.2.1 Commitment to impartiality

The certification body shall be impartial in the performance of its certification activities. Impartiality is the property of the certification body’s decisions being based solely on objective evidence obtained through the assessment process, and not influenced by other interests or by other parties.

Top management of the certification body (the person or group of people who directs and controls the certification verification process at the highest level) shall commit to impartiality.

The certification body shall document this commitment in a form suitable for demonstration to the scheme owner and accreditation body on request.

5.2.2 Identification of risks to impartiality

The certification body shall, on an ongoing basis, identify, analyse, evaluate, treat, monitor and document risks to its impartiality arising from its certification activities, the activities of its related bodies, the activities of its personnel, the activities of its subcontractors, and its relationship with the scheme owner. This assessment shall be reviewed at least annually and whenever a material change occurs in the certification body's structure, activities or client base. Material changes include (but are not limited to) ownership changes, addition of new sub-sector competences, acquisition of significant clients in the luxury sector, and new consultancy or partnership arrangements with related bodies. A review triggered by a material change shall commence within 30 days of the change.

Where a risk to impartiality is identified, the certification body shall be able to demonstrate how it eliminates or minimises the risk.

5.2.3 Specific prohibited relationships

The certification body shall not:

- Provide ESG consultancy services to applicants or certified organisations under the Butterfly Mark scheme.
- Provide internal-audit-as-a-service for ESG management to applicants or certified organisations.
- Permit any auditor to assess an organisation with which that auditor has had any consultancy, employment, commercial relationship in the previous two years or that of an immediate family member.
- Permit any auditor to assess an organisation in which that auditor (or a member of their immediate family) holds a financial interest, or any other interest that could compromise the auditor's impartiality.
- Market, design or develop the Butterfly Mark scheme jointly with any applicant or certified organisation.

ESG consultancy provided by related bodies of the certification body may be permitted, provided that the related body has not provided such consultancy to the same applicant or certified organisation within the previous two years, and that this relationship is declared in writing to the scheme owner and managed as an impartiality risk under Clause 5.2.2.

5.2.4 Mechanism for safeguarding impartiality

The certification body shall have a documented mechanism for safeguarding the impartiality of its certification activities. The mechanism shall provide input on the policies and principles relating to impartiality, on any tendency on the part of the certification body to allow commercial considerations to compromise impartiality, and on matters affecting confidence in certification. The mechanism shall include balanced representation of significantly interested parties such that no single interest predominates, and shall have access to the information necessary to enable it to fulfil its functions. The operation of this mechanism shall be consistent with the requirement for separation between the certification body and the scheme owner under Directive (EU) 2024/825 (the ECGT Directive).

5.3 Confidentiality

The certification body shall be responsible, through legally enforceable commitments, for the management of all information obtained or created during the performance of certification activities. Information about an applicant or a certified organisation shall not be disclosed to a third party without the written consent of the organisation concerned, except where:

- The information is required to be disclosed to the scheme owner under the Certification Body Agreement.
- Disclosure is required by law, by an accreditation body acting within its competence, or by a court order.
- The disclosure is part of the publication of the list of certified organisations, the scope of their certification, and the validity dates of their certification, in accordance with Clause 8.8.

Where the certification body is legally required to disclose confidential information about an applicant or certified organisation, the organisation concerned shall be informed of the information disclosed, except where this is itself prohibited by law.

5.4 Publicly available information

5.4.1 Certification body publication

The certification body shall, without request, make publicly available, accurate and up-to-date information about:

- Its certification activities, geographical scope and the schemes for which it is authorised.
- Its complaints and appeals procedure.
- A description of how it obtains financial support for its activities, and any fees charged to applicants and certified organisations.
- A description of the rights and duties of applicants and certified organisations under the Butterfly Mark scheme, including conditions for granting, maintaining, extending, reducing, suspending and withdrawing certification.
- A directory of organisations holding current Butterfly Mark certifications issued by it, kept up to date and accessible online (see also Clause 8.8).

5.4.2 Scheme owner publication

The scheme owner shall make publicly available on the Positive Luxury website, in support of the transparency requirements of Directive (EU) 2024/825 (the ECGT Directive):

- The current version of this Scheme Document.
- The Butterfly Mark Assessment Criteria (PL-BM-CRT-001) or a summary thereof sufficient to describe the requirements of the scheme.
- The use rules for the Butterfly Mark and the Digital Butterfly Passport (PL-BM-MRK-001) or a summary thereof.
- The Complaints and Appeals Procedure (PL-BM-CMP-001) or a summary thereof.
- A list of certification bodies currently authorised to operate the scheme.
- A master directory of all organisations currently certified under the scheme, including the name of the certification body that issued each certification (see also Clause 8.8).

6. Structural requirements

6.1 Organisational structure and top management

The certification body shall have a documented organisational structure that defines the responsibilities, reporting lines and authorities of all personnel involved in certification activities. The structure shall identify the top management with overall authority and responsibility for:

- The development and implementation of the policies relating to the operation of the certification body.
- Decisions on certification (see Clause 8.6).
- Delegation of authority to committees or personnel to undertake defined activities on its behalf.
- Contractual arrangements with applicants, certified organisations, the scheme owner and any subcontractors.
- Provision of adequate resources for certification activities.
- Responsiveness to complaints and appeals.
- Personnel competence requirements.
- The management system of the certification body.

6.2 Relationship with the scheme owner

The certification body operates the Butterfly Mark scheme under authorisation from the scheme owner. The relationship between the certification body and the scheme owner shall be governed by the Certification Body Agreement (see Clause 5.1.2). Nothing in that relationship shall compromise the certification body's impartiality or its ability to make independent certification decisions on individual applicants and certified organisations.

In particular, the scheme owner shall not direct, influence or seek to influence the outcome of any individual certification decision, suspension, withdrawal or appeal. The scheme owner's legitimate interest is in the consistent application of the scheme by all authorised certification bodies, and in the integrity of the scheme as a whole. This separation of roles between the certification body and the scheme owner is consistent with the independence requirements for certification schemes under Directive (EU) 2024/825 (the ECGT Directive).

7. Resource requirements

7.1 Personnel of the certification body

The certification body shall employ, or have under formal contract, sufficient personnel competent for the functions they perform, including the making of any technical judgments, the definition of policies and the implementation of those policies. The certification body shall have access to the equipment, facilities and information-management systems necessary to conduct certification activities under this scheme, in accordance with ISO/IEC 17065:2012.

7.2 Competence requirements for auditors

This clause defines the minimum competence requirements for any natural person authorised by a certification body to carry out assessments under the Butterfly Mark scheme. The detailed authorisation procedure is set out in PL-BM-AUD-001.

7.2.1 Generic auditor competence

Every Butterfly Mark auditor shall demonstrate, prior to authorisation:

- Educational qualification or professional background relevant to sustainability, ESG, audit, or a sub-sector-specific discipline.
- Relevant professional experience in sustainability, ESG, audit, assurance, certification, or a closely related field.
- Successful completion of the Butterfly Mark scheme-specific training course delivered or approved by Positive Luxury.
- Demonstrated working proficiency in English sufficient for the review of written documentation and for the production of assessment outputs under this scheme. Where the working language of the certified organisation is not English, the certification body shall ensure adequate language coverage through bilingual auditors, qualified interpreters, or translated documentation.

7.2.2 Supervised assessment prior to authorisation

Before being authorised to lead an assessment, an auditor shall demonstrate practical competence through supervised participation in a minimum of 2 prior assessments (one observation and one witnessed), as specified by the certification body.

7.2.3 Ongoing competence

Authorised auditors shall undertake continuing professional development commensurate with their duties, including scheme-specific updates as notified by the scheme owner. Continued professional development must be a minimum of 40 hours annually.

7.2.4 Performance monitoring of auditors

The certification body shall monitor the performance of each authorised auditor on an ongoing basis, in accordance with ISO/IEC 17065:2012 Clause 6.1.2.2. Where performance issues are identified, the certification body shall take corrective action, which may include additional training, restriction of scope, suspension of authorisation or withdrawal of authorisation.

7.2.5 Records on personnel

The certification body shall maintain up-to-date records of the competence of its auditors and of each member of personnel involved in the certification process, in accordance with ISO/IEC 17065:2012 Clause 6.1.3.

7.2.6 Competence requirements for reviewers and decision-makers

Personnel responsible for the review of evaluation results (Clause 8.5) and for certification decisions (Clause 8.6) shall have competence appropriate to their functions, in accordance with ISO/IEC 17065:2012 Clauses 7.5 and 7.6.

7.3 Outsourcing

The certification body shall outsource evaluation activities only in accordance with ISO/IEC 17065:2012 Clause 6.2.2, and shall remain responsible for all outsourced activities. The certification body shall not outsource the certification decision (see Clause 8.6), the review (see Clause 8.5) or the management of complaints and appeals (see Clause 8.13). The certified organisation shall be informed in advance of outsourcing activities and given an opportunity to object.

8. Process requirements

8.1 General

The Butterfly Mark scheme operates as a single coherent process for each applicant or certified organisation, in line with the requirement of Directive (EU) 2024/825 (the ECGT Directive) that compliance is monitored through an objective procedure.

The process is preceded by pre-certification activities, conducted by the applicant with the support of the scheme owner:

- Onboarding (Clause 8.2.1)
- Completion of the self-assessment by the applicant (Clause 8.2.2)
- Access to general guidance materials, scheme documentation, and educational resources made publicly available by the scheme owner (e.g. published criteria, training webinars, FAQ documents)

The scheme owner's support during pre-certification activities is limited to general guidance and the provision of standardised, publicly available materials. The scheme owner does not provide applicant-specific advice on how to meet the criteria, and does not advise on, prepare, or review the applicant's evidence prior to formal submission to the certification body.

The certification process itself consists of the following sequential stages, each of which is described in the following sub-clauses and shall be conducted by the certification body:

- Formal application (Clause 8.2.3)
- Application review (Clause 8.3)
- Evaluation (Clause 8.4)
- Review (Clause 8.5)
- Certification decision (Clause 8.6)
- Issuance of certification documentation (Clause 8.7)
- Listing in the directory of certified organisations (Clause 8.8)

The scheme owner shall maintain, and make publicly accessible online, a master directory consolidating all current certifications issued under the Butterfly Mark scheme by all authorised certification bodies. The master directory shall include the same minimum information as the certification body directories listed above, plus the name of the certification body that issued each certification. Certification bodies shall provide the necessary data to the scheme owner on a timely basis to enable the master directory to be kept current.

- Surveillance during the certification cycle (Clause 8.9.2)
- Recertification (Clause 8.9.3)

The certification body shall not omit or substantially shorten any of these stages. Prior evaluation by other certification schemes or assessment frameworks shall not be used as a substitute for any stage of the Butterfly Mark certification process. The certification body may take note of prior evaluations as contextual information but shall independently verify compliance with the requirements of this scheme.

8.2 Application

The application stage comprises three phases: onboarding (Clause 8.2.1), completion of the self-assessment by the applicant (Clause 8.2.2), and formal application to a certification body (Clause 8.2.3).

8.2.1 Onboarding

An organisation seeking certification under the Butterfly Mark scheme shall first engage with the scheme owner for onboarding. The scheme owner shall introduce the organisation to the scheme, assist the organisation in completing the Company Information section, and provide guidance on the requirements of the scheme and on the use of the ESG+ 2.1 assessment portal operated by Positive Luxury. Onboarding does not form part of the certification process and does not constitute evaluation.

8.2.2 Completion of the self-assessment by the applicant

Using the ESG+ 2.1 assessment portal, the organisation responds to the self-assessment and uploads the supporting evidence relevant to each criterion of PL-BM-CRT-001. As part of the self-assessment, the organisation shall also declare any environmental or social claims it has made in consumer-facing communications (including its website, social media, packaging and marketing materials) in the twelve months preceding the application, to enable the cross-check under Clause 8.4.2 and the decision criteria under Clause 8.6.2. The information and evidence provided by the organisation will be used by the certification body as input to the evaluation (Clause 8.4). The completion of the self-assessment and the upload of evidence by the organisation do not themselves constitute evaluation, and do not form part of the certification process; they are the input against which the certification body will subsequently conduct the assessment. The organisation is responsible for the accuracy and completeness of the information it submits.

8.2.3 Formal application to a certification body

Once the organisation has responded to the self-assessment and uploaded all required evidence, it submits a formal application to a certification body authorised to operate the scheme. The submission of the formal application marks the beginning of the certification process. The application review (Clause 8.3), evaluation (Clause 8.4) and all subsequent stages shall be conducted by the certification body.

The certification body shall require the applicant to provide, at minimum, the following information at the application stage:

- The legal name and address of the applicant.
- The brand or brands operated by the applicant that fall within the proposed scope of certification.
- Whether the applicant is seeking a single certification covering all eligible operations, or separate certifications for individual brands or business units within the organisation (see Clause 2.2).
- The eligible sub-sector or sub-sectors in which the applicant operates (for scope and eligibility purposes; sub-sector does not affect which assessment criteria are applicable).

- The applicant's SME status, determined in accordance with the EU SME definition set out in Clause 10.5 (employee count, turnover, balance sheet total, and group/linked/partner enterprise structure). SME status, once verified, is the sole determinant of the applicable criteria set under PL-BM-CRT-001, and of the minimum audit duration and sampling intensity under PL-BM-AUD-001, in accordance with Clause 10.5.
- The general nature, size and structure of the applicant's operations, including human and technical resources.
- The geographical extent of the applicant's operations and supply chain.
- Information on outsourced processes used by the applicant that affect conformity to the requirements of the scheme.
- Any public environmental or social claims the applicant has made in the previous year in relation to its own products, services or operations, that are substantive in nature (for example, "carbon neutral", "sustainable", "eco-friendly", "climate positive").
- A signed declaration that the information provided in the application is true and complete to the best of the applicant's knowledge.

8.3 Application review

The certification body shall conduct a documented review of each application before accepting the assessment. The review shall confirm that:

1. The information about the applicant is sufficient for the conduct of the certification process.
2. Any difference in understanding between the certification body and the applicant is resolved, including agreement on the scope of certification.
3. The scope of certification sought is defined and falls within the scope of the Butterfly Mark scheme.
4. The declared SME status and sub-sector(s) of the applicant have been verified, and the applicable criteria set under PL-BM-CRT-001 (as determined under Clause 10.5 by reference to SME status) has been identified and documented.
5. The means are available to perform all evaluation activities, including the availability of auditors with the necessary sub-sector technical competence (see Clause 7.2).
6. The certification body has the competence and capability to perform the certification activity.
7. There are no impartiality or conflict-of-interest issues that would prevent the certification body from accepting the application.
8. The scope election made by the applicant under Clause 8.2 (single certification covering all eligible operations, or separate certifications for individual brands or business units) is appropriate given the structure and ESG management approach of the applicant.

Where the certification body declines to accept an application, it shall record the reasons in writing and inform the applicant and, refer to the scheme owner. The scheme owner may refer the application to a list of authorised certification bodies with appropriate competence, or, where no such other body is available, advise the applicant accordingly.

8.4 Evaluation

8.4.1 Assessment plan

The certification body shall prepare a documented assessment plan for each accepted application. The plan shall identify:

- The scope of the assessment, by reference to the agreed scope of certification.
- The applicable criteria set against which the organisation will be assessed, identified by reference to the version of PL-BM-CRT-001 in force at the time of the assessment and to the applicant's SME status as confirmed at application review (Clause 8.3 and Clause 10.5).
- The members of the audit team and their roles, including the lead auditor.
- The locations to be assessed (where applicable).
- The estimated duration of the assessment, by stage.
- Any documents to be requested from the applicant in advance of the on-site or virtual assessment activities.

8.4.2 Conduct of the assessment

- Document review of policies, procedures, reports, inventories and other supporting documents submitted via the ESG+ 2.1 assessment portal.
- Verification interviews with relevant personnel of the applicant, conducted only where the specific criterion in PL-BM-CRT-001 expressly requires verification by interview; the assessment is otherwise evidence-based and does not require interviews as a routine activity (see PL-BM-AUD-001 for detail).
- Site visits where applicable, conducted remotely or on-site as determined under the assessment modality rules below.
- Cross-checks against publicly available information, including regulatory disclosures, prior sustainability reports and credible third-party reports relating to the applicant. The cross-check shall include the applicant's consumer-facing channels (website, social media, packaging, marketing materials) for any environmental or social claims made in the previous twelve months that may not have been declared under Clause 8.2; undeclared substantive claims are recorded as a finding.

The default assessment modality is remote, conducted through document portal review, video interviews, virtual walkthroughs, and the public-facing channel cross-check described above. Remote assessment applies to all certified organisations regardless of sector, business model, or size.

In addition, the certification body shall conduct unannounced site visits to a random sample of certified organisations each year. The size of the sample, the selection methodology, the basis on which organisations may be excluded from sampling (for example, where the organisation has no physical operations to inspect), and the conduct of the unannounced visit are set out in PL-BM-AUD-001. Unannounced site visits are subject to the same evidence and reporting standards as scheduled remote assessments. The selection of organisations for unannounced visits is independent of any individual brand's audit cycle and shall not be communicated to the organisation in advance.

Each assessment criterion in PL-BM-CRT-001 has its own compliance requirements, indicators and guidance, which the auditor shall apply consistently. The auditor shall record, for each applicable criterion: whether the criterion is met or not met, the evidence reviewed, and any non-conformity raised.

8.4.3 Communication of findings to the applicant

The certification body shall inform the applicant of all non-conformities identified during the assessment. Where non-conformities have been identified and the applicant expresses interest in continuing the certification process, the certification body shall provide information on the additional evaluation tasks needed to verify that the non-conformities have been corrected. If the applicant agrees to the additional evaluation tasks, the assessment process is repeated for those tasks. The applicant shall close major non-conformities within 180 days of notification, unless a longer period is agreed in writing with the certification body on the basis of a documented rationale for the extension. Where the applicant does not respond within 30 days of notification, or fails to complete corrective actions within the agreed period, the certification body may close the assessment as unsuccessful. Until all major non-conformities have been satisfactorily corrected, the certification decision shall not be positive (see Clause 8.6). In the event of documented minor non-conformities the applicant has up to 12 months to close these, subject to the automatic escalation of accumulated minor non-conformities under Clause 8.10.3A.

8.4.4 Documentation of evaluation results

The results of all evaluation activities shall be documented in an assessment report prior to the review stage. The assessment report shall include, at minimum:

- Identification of the assessed organisation, the scope of assessment, the date(s) of assessment and the audit team.
- The version of PL-BM-CRT-001 used for the assessment.
- For each applicable criterion: a determination of whether the criterion is met or not met, a reference to the evidence reviewed, and any non-conformity raised.
- A summary for each pillar (Environmental, Social, Governance) showing the number of applicable criteria, the number of criteria met, and the non-conformities raised. The pillar-level conformity summary is used internally by the certification body to support the certification decision and to provide structured feedback to the assessed organisation. It is not communicated to consumers or used in any consumer-facing marketing or claims.
- A summary of all major and minor non-conformities and the proposed treatment.
- A recommendation, by the audit team leader, on the certification decision.

8.4.5 Sampling and audit duration

The certification body shall apply a documented sampling approach where the assessment covers multiple sites, product lines, brands or entities within a certified organisation. The sampling approach shall be risk-based, shall be proportionate to the scope of certification, and shall be justified in the assessment report (see Annex A, Section 2).

The certification body shall allocate adequate audit duration to each assessment, anchored in the applicant's SME status (Clause 10.5) and adjusted for the complexity, number of sites and sub-sector(s) in scope of the certified organisation. Minimum audit duration guidance and detailed sampling rules are set out in PL-BM-AUD-001.

8.5 Review

The certification body shall assign at least one person to review all information and results related to the evaluation. The review shall be carried out by a person or persons who have not been involved in the evaluation. The reviewer shall verify that:

- The assessment was conducted in accordance with the assessment plan and with PL-BM-AUD-001.
- The version of PL-BM-CRT-001 applied is the version in force at the time of the assessment.
- Each applicable criterion has been assessed and that the determinations of conformity (met/not met) are supported by the evidence cited.
- All non-conformities have been correctly classified as major or minor (see Clause 8.10).
- The applicable criteria set (determined by the applicant's SME status under Clause 10.5) has been correctly applied, and the pillar-level conformity summary has been correctly compiled.
- Any inconsistencies, gaps or quality issues in the assessment have been resolved before the certification decision.

Recommendations for a certification decision based on the review shall be documented, unless the review and the certification decision are completed concurrently by the same person. Recommendations for a certification decision based on the review shall be documented in all cases, including where the review and the certification decision are completed by the same person. The documentation shall record the basis for the certification decision sufficient to enable subsequent verification by an accreditation body or scheme owner.

8.6 Certification decision

8.6.1 Authority for certification decisions

The certification body is responsible for, and shall retain authority over, all decisions relating to certification under this scheme, including granting, refusing, maintaining, recertifying, expanding (extending the scope of certification to additional products, services or operations), reducing (narrowing the scope of certification), suspending, reinstating and withdrawing certification. The certification decision shall be made by a person or persons who have not been involved in the evaluation.

Personnel making certification decisions shall be employed by, or under written contract with, the certification body or an entity under the organisational control of the certification body. The scheme owner shall not make, direct, influence or seek to influence any individual certification decision.

8.6.2 Decision criteria

A positive certification decision (initial certification or recertification) shall be made only where all of the following are satisfied:

1. All applicable assessment criteria, as determined by the applicant's SME status in accordance with Clause 10.5, have been assessed against PL-BM-CRT-001 and found to be met, subject to the treatment of minor non-conformities under Clause 8.10.3.
2. All major non-conformities raised during the assessment have been corrected to the satisfaction of the certification body, and the corrective action has been verified.
3. Any minor non-conformities are subject to a documented corrective action plan with defined timelines (see Clause 8.10).
4. Any public environmental or social claims made by the applicant in the previous year (see Clause 8.2) have been reviewed, and any claims not substantiated by the evidence collected during the assessment have been withdrawn by the applicant or are being corrected under an agreed corrective action plan.
5. The certification agreement (see Clause 5.1.3) has been completed and signed.
6. All applicable fees have been paid in full, including (a) the certification body's audit and certification fees in accordance with its published fee schedule, and (b) the scheme owner's certification and Mark licence fees in accordance with the scheme owner's published fee schedule.

Where the decision is to refuse certification, the certification body shall notify the applicant in writing, identify the reasons for the refusal, and inform the applicant of the right to appeal in accordance with Clause 8.13. The certification body shall also notify the scheme owner of the refusal decision (without disclosing confidential audit detail unless authorised by the applicant), so that the scheme owner can maintain accurate records of certification activity under the scheme.

8.7 Certification documentation

Following a positive certification decision, the certification body shall provide the certified organisation with formal certification documentation. The documentation shall clearly convey, or permit identification of:

- The name and address of the certification body.
- The name of the scheme (Butterfly Mark) and a reference to this Scheme Document and its version.
- The date on which certification is granted (which shall not precede the date on which the certification decision was made).
- The legal name and address of the certified organisation.
- The scope of certification, including the brands and sub-sectors covered.
- The expiry date of certification (three years from the date of grant, subject to surveillance, see Clause 8.9).
- A reference or link to the Digital Butterfly Passport associated with the certification, where the detailed assessment results are made available.
- A means of verifying the current status of the certification (for example, a QR code or direct URL to a verification page), consistent with Annex B.
- The signature or other defined authorisation of the person of the certification body assigned responsibility for issuing the documentation.

Formal certification documentation shall be issued only after, or concurrent with, the certification decision and the signing of the certification agreement. The certification body shall provide the certified organisation with a copy of the documentation in electronic form.

8.8 Directory of certified organisations

The certification body shall maintain, and make publicly accessible online, a directory of organisations that hold current certification issued by it under the Butterfly Mark scheme. The directory shall contain, at minimum:

- The legal name of the certified organisation.
- The brand or brands covered by certification.
- The scope of certification (sub-sector(s) and any geographical limitation).
- The date of grant and the date of expiry of certification.
- The current status of certification (current, suspended, withdrawn).

The scheme owner shall additionally maintain a master directory of all certified organisations under the scheme, drawing data from each certification body. The master directory shall include, for each certified organisation, the name of the certification body that issued the certification. The scheme owner shall make this directory publicly accessible on the Positive Luxury website, in support of the transparency requirements of Directive (EU) 2024/825 (the ECGT Directive).

In addition, the scheme owner shall maintain, and make publicly accessible online on the Positive Luxury website, a master directory consolidating all current certifications issued under the Butterfly Mark scheme by all authorised certification bodies, in support of the transparency requirements of Directive (EU) 2024/825 (the ECGT Directive). The master directory shall include the same minimum information as the certification body directories listed above, plus the name of the certification body that issued each certification. Certification bodies shall provide the necessary data to the scheme owner on a timely basis to enable the master directory to be kept current.

8.9 Certification cycle and surveillance

8.9.1 Length of certification cycle

The Butterfly Mark certification cycle is three years from the date of grant of certification. At the end of the cycle, the certified organisation must undergo a full recertification assessment in accordance with this clause if it wishes to retain certification. Certification expires automatically at the end of the cycle if recertification has not been completed.

8.9.2 Surveillance during the certification cycle

During the three-year cycle, the certification body shall conduct surveillance activities to confirm that the certified organisation continues to meet the requirements of the scheme. These surveillance activities collectively constitute the ongoing third-party monitoring required for the scheme under Directive (EU) 2024/825 (the ECGT Directive). The standard surveillance approach is as follows:

- In each of years 1 and 2 of the cycle (counted from the date of grant), the certified organisation shall submit, via email, an annual continuance declaration. The declaration confirms that there have been no material adverse changes in the organisation's ESG management practices, that any minor non-conformity corrective actions agreed at the previous assessment are on track or completed, and that the organisation continues to meet the conditions for certification.

- The certification body shall review each annual continuance declaration. Where the declaration discloses a material adverse change, an unresolved minor non-conformity, or a credible third-party concern, the certification body shall conduct a targeted surveillance assessment, the scope of which is determined by the issue identified.

8.9.3 Recertification at the end of the cycle

At the end of the three-year cycle, the certified organisation shall undergo a full recertification assessment, conducted in accordance with Clauses 8.4 to 8.6. The recertification shall be conducted against the version of Butterfly Mark standard criteria in force at the time of recertification, which may include criteria revised, added or removed since the previous assessment.

The certified organisation shall initiate the recertification process by submitting a formal request to the certification body no later than six months before the expiry date of the existing certification. The certification body shall plan the recertification so that the assessment, review and certification decision are completed before the expiry date of their certification. Where the recertification process has been initiated within the timeframe set out above and the certified organisation is actively cooperating with the certification body, the certified organisation may continue to display the Butterfly Mark and the Digital Butterfly Passport, with the Scheme Owners written permission, for a period not exceeding three months from the expiry date of the existing certification, pending the recertification decision. During this extension period, the certified organisation shall be subject to all obligations applicable to certified organisations under this Scheme Document, including those relating to the use of the Mark (Clause 8.12), the certification agreement (Clause 5.1.3), and the requirement to provide access to documentation, sites and personnel as required by the recertification assessment. Continued display of the Mark during this extension period is subject to all of the following conditions: (a) the recertification request was submitted within the six-month window; (b) the certified organisation responds to requests from the certification body within the timeframes set by the certification body and does not delay the assessment by more than 30 calendar days through inaction; (c) all applicable fees, including any recertification fees, have been paid in accordance with Clause 8.6.2; and (d) the certified organisation has not been subject to any suspension or withdrawal action under Clause 8.11 during the recertification process. Where any of these conditions is not met, or where the recertification decision is not issued within three months of the expiry date, certification shall expire and the organisation shall cease all use of the Butterfly Mark and the Digital Butterfly Passport in accordance with Clause 8.12, until such time as a new positive certification decision is issued. Where the recertification request is not submitted within the six-month window, the certified organisation shall be treated as a new applicant and shall be assessed in accordance with Clauses 8.1 to 8.6; the certified organisation shall not benefit from the extension period set out in this clause; certification shall expire on the expiry date and the organisation shall not display the Butterfly Mark or the Digital Butterfly Passport until a new positive certification decision has been issued.

8.9.4 Changes affecting certification

Where the certification body becomes aware of a material change affecting a certified organisation — whether notified by the certified organisation under Clause 5.1.3, identified during surveillance, or raised by a third party or through a complaint under Clause 8.13 — the certification body shall assess whether the change affects continued conformity with the requirements of the scheme. Based on the outcome, the certification body shall decide whether to:

- confirm the continuation of certification without modification;
- require corrective action and apply the non-conformity process of Clause 8.10;
- vary the scope of certification (e.g. add or remove product lines, brands, business units, or geographical operations from the scope), based on documented evidence reviewed during surveillance; or
- suspend or withdraw certification under Clause 8.11.

The decision shall be documented and communicated to the certified organisation within 10 working days of the surveillance review being completed In the event the detailed timeframe is not met, the applicant can follow the established complaints procedure.

8.10 Non-conformity classification and management

The detailed procedure for the classification and management of non-conformities is set out in PL-BM-AUD-001. The summary requirements are set out below.

8.10.1 Classification of non-conformities

Each non-conformity raised during an assessment shall be classified as either a major non-conformity or a minor non-conformity, in accordance with the definitions below. The audit team leader is responsible for the initial classification; the reviewer (Clause 8.5) shall verify the classification before making or recommending a certification decision.

Classification	Definition
Major non-conformity	A non-conformity that, individually or in combination with other non-conformities, indicates one or more of the following. Across all individual criteria of PL-BM-CRT-001, the touchstone for a major non-conformity is positive, specific evidence of intentional fabrication or misrepresentation by the organisation; an inability to verify a claim, an incomplete or unclear evidence submission, or a finding that does not meet a compliance requirement is a minor non-conformity unless intentional fabrication or misrepresentation is positively evidenced. The four grounds below give effect to that touchstone and shall not be read as creating a broader, fault-free basis for a major non-conformity: • A required compliance element of the scheme has been falsely represented as implemented, where it has not in fact been implemented (for example, a policy document or record that has been altered, back-dated, or otherwise fabricated to create the false appearance of compliance). • The organisation's conduct in connection with the assessment (for example, fabricated evidence, a coached or staged interview, or interference with an unannounced site visit) creates a substantive risk to the integrity, credibility or impartiality of the certification.

Classification	Definition
	• Material evidence submitted to support a certification decision is positively shown to have been fabricated, falsified, or knowingly misrepresented – as distinct from evidence that is merely missing, incomplete, unclear, or that the auditor is simply unable to verify, which is addressed as a minor non-conformity under Clause 8.10.3 and at the relevant criterion in PL-BM-CRT-001. • The organisation has made a public claim regarding sustainability performance that is materially inconsistent with the evidence reviewed, where the organisation knew or could reasonably be expected to have known of the inconsistency at the time the claim was made; a public claim that simply has not yet been updated to reflect more recent internal data, or that reflects a good-faith but mistaken interpretation of the organisation's own evidence, is a minor non-conformity. • The non-conformity count threshold in Clause 8.10.3A is met or exceeded: the organisation has three or more open minor non-conformities within the same ESG pillar at the same time, or five or more open minor non-conformities across the scheme as a whole at the same time. This ground operates independently of the fabrication/misrepresentation touchstone above – it is a deliberate, count-based exception reflecting that a sufficient accumulation of minor non-conformities can itself indicate systemic weakness, irrespective of fault or intent. Where this is the trigger for classification as major, Clause 8.10.3A – not the audit team's case-by-case judgement on the four grounds above – governs the classification, notification and treatment of the resulting major non-conformity. • A minor non-conformity which has not been closed within the required timeline will be upgraded to a major non-conformity.
Minor non-conformity	A non-conformity that does not on its own meet the threshold of a major non-conformity. Typical examples include: • Documentary evidence is present but contains gaps that can be remedied within a defined corrective action period. • An action or commitment is documented but lacks one secondary element (for example, a missing time dimension or a missing role assignment). • An isolated administrative inconsistency that does not affect the substantive content of the evidence.

Criterion-specific examples of major and minor non-conformities, including worked examples, are set out in PL-BM-AUD-001 and in the guidance accompanying PL-BM-CRT-001. The general categories above prevail in case of any conflict. The full procedure for the automatic escalation referred to in the table above – including the definition of an “open” minor non-conformity, the notification requirements, and how escalation interacts with the audit team’s ordinary discretion to classify any individual non-conformity as major on the facts of the case – is set out in Clause 8.10.3A.

8.10.2 Treatment of major non-conformities

A major non-conformity must be corrected, and the correction verified by the certification body, before a positive certification decision can be issued. The certified organisation shall propose a corrective action with root-cause analysis within 30 calendar days of being notified of the major non-conformity. The corrective action shall be implemented and verified within 150 calendar days (so that the total correction period, including the response period, does not exceed 180 calendar days), unless the certification body grants a written extension on the basis of a justified request from the organisation.

Where a major non-conformity is identified during initial certification or recertification, and the corrective action is not implemented and verified within the timeframe set out above, the certification body shall refuse certification or recertification, as applicable. Where a major non-conformity is identified during surveillance of an existing certification, and the corrective action is not implemented and verified within the timeframe set out above, the certification body shall suspend certification in accordance with Clause 8.11.

8.10.3 Treatment of minor non-conformities

A minor non-conformity does not on its own prevent the award or continuation of certification, but it shall be addressed by the applicant or certified organisation, as applicable, under a documented corrective action plan agreed with the certification body. The standard corrective action period for a minor non-conformity is 12 months from the date of notification, unless the certification body sets a shorter period on the basis of risk.

The closure of a minor non-conformity shall be verified within 12 months of the date of notification (or such shorter period as the certification body has set under the preceding paragraph). A minor non-conformity not closed within the applicable period is treated as an open non-conformity for the purposes of Clause 8.10.3A (escalation) and shall be carried forward and reviewed at the next assessment activity of any kind.

8.10.3A Escalation of repeated or accumulated minor non-conformities

An accumulation of minor non-conformities, even where each is individually minor, can in aggregate indicate the kind of systemic weakness that Clause 8.10.1 treats as a major non-conformity. To give effect to this principle in a predictable way, the following automatic escalation rule applies in addition to the audit team’s ordinary discretion to classify a non-conformity as major under Clause 8.10.1 on the facts of the individual case.

- Pillar-level escalation: where an organisation has three or more open minor non-conformities within the same ESG pillar (Environmental, Social, or Governance) at the same time, whether identified during the same assessment or accumulated across multiple assessments, this shall be automatically escalated to and recorded as a single major non-conformity for that pillar. The certification body shall notify the organisation of the escalation, identifying the constituent minor non-conformities, and the treatment and timelines of Clause 8.10.2 (major non-conformities) shall apply from the date of escalation.
- Scheme-level escalation: irrespective of pillar distribution, where an organisation has five or more open minor non-conformities across the scheme as a whole at the same time, this shall be automatically escalated to and recorded as a single major non-conformity. The certification body shall notify the organisation of the escalation,

identifying the constituent minor non-conformities, and the treatment and timelines of Clause 8.10.2 shall apply from the date of escalation.

- De-escalation of a scheme-level major non-conformity: where a major non-conformity has been created by scheme-level escalation under this clause, the certification body shall continue to track the minor non-conformities individually. If the organisation closes at least two of the five minor non-conformities (or if more than five non-conformities exist, closes a sufficient number so that no more than three remain) within 180 days of the date of escalation, the escalated major non-conformity shall be removed, and the treatment and timeline of clause 8.10.2 shall cease to apply from the date the condition is met. Any non-conformities that remain open at that date shall be recorded and treated as minor non-conformities, subject to the ordinary treatment and timelines set out in clause 8.10. Where fewer than two of the minor non-conformities have been closed within 180 days of the date of escalation, the major non-conformity shall remain in effect and shall continue to be treated as per clause 8.10.2.

For the purposes of this Clause, a minor non-conformity is “open” from the date it is notified to the organisation under Clause 8.10 until the certification body has verified its closure. Where escalation under this Clause results in a major non-conformity by way of pillar-level escalation, the underlying minor non-conformities are treated as resolved by way of the corrective action applied to the escalated major non-conformity and are not separately tracked once the major non-conformity is closed. Where escalation results in a major non-conformity by way of scheme-level escalation, the underlying minor non-conformities remain individually tracked in accordance with the de-escalation mechanism set our above, and are not treated as automatically resolved by the closure of the major non-conformity. Escalation under this Clause does not prevent the audit team or reviewer from separately classifying any individual non-conformity as major under Clause 8.10.1 where the facts of that non-conformity independently justify it

8.10.4 Records of non-conformities

Records of non-conformities are confidential between the certified organisation, the certification body, and the scheme owner. Non-conformities and corrective actions are not made public, except where required by law or by the certification body's accreditation body. Where a non-conformity has resulted in suspension or withdrawal of certification, the public-facing certification status (e.g. in the directory under Clause 8.8) shall reflect the change in status, but the underlying non-conformity detail remains confidential. Records may be disclosed in summary form to regulators or accreditation bodies on legitimate request, with appropriate redaction of confidential business information.

8.11 Suspension, withdrawal and reduction of certification

8.11.1 Grounds for suspension

The certification body shall suspend certification under one or more of the following circumstances:

- A major non-conformity identified during certification or surveillance has not been corrected within the timeframes set out in Clause 8.10.2.

- The certified organisation has failed to allow surveillance activities to be conducted at the required frequency.
- The certified organisation has voluntarily requested in writing, the suspension of its certification.
- The certified organisation has misused the Butterfly Mark or the Digital Butterfly Passport in a manner that has not been remedied within the timeframe set by the certification body.
- The certified organisation has failed to pay applicable fees within a defined period after written notice.
- Information has come to the attention of the certification body or the scheme owner that, on a reasonable assessment, indicates a serious risk that the organisation no longer meets the requirements of the scheme.

8.11.2 Effect of suspension

During suspension, the organisation shall not display the Butterfly Mark, the Digital Butterfly Passport, or any associated claims of certification. The certification body shall update its directory of certified organisations to record the justification for suspension. The scheme owner shall update the master directory accordingly.

The certification body shall set, in writing, the conditions for the lifting of the suspension and the maximum period of suspension. The maximum period of suspension shall not exceed six months. Where the suspension cannot be lifted within the maximum period, the certification body shall withdraw certification.

8.11.3 Grounds for withdrawal

The certification body shall withdraw certification under one or more of the following circumstances:

- A suspension cannot be lifted within the maximum period set in accordance with Clause 8.11.2.
- The certified organisation has ceased to exist or has become legally incapable of meeting the requirements of the scheme.
- The certified organisation has voluntarily requested withdrawal, whether by notification to the certification body or to the scheme owner. Where the scheme owner receives such a request, it shall promptly notify the certification body, which shall manage the withdrawal procedure.
- Substantive evidence shows that the certified organisation does not, and within a reasonable corrective period cannot, meet the requirements of the scheme.
- The certified organisation has engaged in a material misuse of the Butterfly Mark, the Digital Butterfly Passport, or related claims, that is not capable of remedy.
- The certified organisation has failed to pay applicable fees (whether to the certification body or to the scheme owner) within the timeframe set in the relevant fee schedule, and the failure has not been remedied within a reasonable period following written notice.

8.11.4 Reduction of certification scope

Where a non-conformity affects only part of the scope of certification (for example, a single sub-sector or brand within a multi-brand certification), the certification body may, in agreement with the certified organisation and in consultation with the scheme owner where the scope reduction has implications for how the Butterfly Mark is issued or displayed, reduce the scope of certification to exclude the affected part rather than suspend or withdraw the entire certification. Where scope is reduced, the certification body shall update its directory of certified organisations to reflect the revised scope, and the scheme owner shall update the master directory accordingly, in accordance with Clause 8.8.

8.11.5 Notification and consequences

Suspension, withdrawal or reduction of certification shall be communicated to the certified organisation in writing, with reasons. The certified organisation shall be informed of the right to appeal in accordance with Clause 8.13. The certification body shall notify the scheme owner within five working days of any suspension, withdrawal or reduction of certification, using the designated contact channel notified by the scheme owner.

8.12 Use of the Butterfly Mark and the Digital Butterfly Passport

The Butterfly Mark and the Digital Butterfly Passport are intellectual property of Positive Luxury Ltd. Their use by certified organisations is governed by PL-BM-MRK-001. The summary requirements are set out below.

8.12.1 Right of use

A certified organisation acquires a non-exclusive, non-transferable, revocable right to display the Butterfly Mark and the Digital Butterfly Passport, granted directly by the scheme owner to the certified organisation under a written agreement, for the duration of its current certification, within the scope of certification, and in accordance with PL-BM-MRK-001.

8.12.2 Permitted uses

Subject to the conditions set out in PL-BM-MRK-001, a certified organisation may use the Butterfly Mark on:

- Its corporate website and the websites of brands within the scope of certification.
- Marketing and corporate communications materials referring to the certified organisation, the certified brands, or both.
- Product pages, packaging and physical points of sale, in conjunction with the Digital Butterfly Passport, where appropriate.
- Sustainability reports and stakeholder communications.

Any use of the Butterfly Mark in consumer-facing communications shall be accompanied by, or linked to, information sufficient to enable the consumer to understand the nature and scope of the certification, in line with the requirements applicable to sustainability labels under Directive (EU) 2024/825 (the ECGT Directive).

8.12.3 Prohibited uses

The certified organisation shall not:

- Use the Butterfly Mark or the Digital Butterfly Passport on any product, brand, business unit or jurisdiction that falls outside the scope of certification.
- Modify, recolour, distort or recreate the Butterfly Mark, except as expressly permitted by PL-BM-MRK-001.

- Make any claim in connection with the Butterfly Mark that suggests endorsement, ranking or comparison beyond what the certification expresses.
- Continue to use the Butterfly Mark or the Digital Butterfly Passport after the suspension, withdrawal or expiry of certification, except during a recertification extension period operating under Clause 8.9.3.

8.12.4 Monitoring of mark use

The certification body shall monitor the use of the Butterfly Mark and the Digital Butterfly Passport by its certified organisations, including through periodic review of the organisation's public touchpoints. Where misuse is identified, the certification body shall require the organisation to correct the misuse within a defined timeframe; failure to do so may lead to suspension or withdrawal of certification (see Clause 8.11).

The certification body shall notify the scheme owner of any material misuse that it has identified, and of any enforcement action taken, as part of its routine reporting under the Certification Body Agreement (see Clause 5.1.2).

In addition to the certification body's monitoring activities, the scheme owner, as the legal owner of the Butterfly Mark trademark, shall conduct independent monitoring of public uses of the Mark for the purpose of protecting the trademark and ensuring consistency with PL-BM-MRK-001. Where the scheme owner identifies a potential misuse, it shall reciprocally notify the relevant certification body, which shall investigate and take enforcement action under this clause. The two monitoring activities are complementary and independent: the certification body's monitoring is part of the audit and certification process; the scheme owner's monitoring is exercised in its capacity as trademark proprietor.

8.12.5 Approval of specific mark uses

Routine use of the Butterfly Mark in accordance with the published brand guidelines (PL-BM-MRK-001) does not require prior approval by the scheme owner. This includes general brand communications that state or reference the fact of certification without making additional substantive claims.

Prior approval by the scheme owner is required before first use of the Butterfly Mark in:

- specific quantitative or qualitative ESG claims connected to the Butterfly Mark (for example, percentage reductions or category-specific claims);
- comparative claims referencing the Butterfly Mark;
- product-level claims where the Butterfly Mark is used to imply or suggest that a specific product (rather than the certified organisation as a whole) has been individually certified, for example, language such as 'this product is Butterfly Mark certified' or 'Butterfly Mark approved formulation'. Standard organisation-level use of the Mark on product packaging (indicating that the manufacturing organisation is certified) does not require prior approval and is governed by PL-BM-MRK-001;
- major consumer-facing campaigns (including packaging redesigns, national advertising campaigns and co-branded campaigns with third parties).

The scheme owner shall respond to requests for approval within 14 calendar days of receipt. Detailed procedures for submission and approval are set out in PL-BM-MRK-001.

8.13 Complaints and appeals

The detailed procedure for the management of complaints and appeals is set out in PL-BM-CMP-001. The summary requirements are set out below.

8.13.1 Definitions for the purposes of this clause

- A complaint is an expression of dissatisfaction by any person or organisation about (i) the certification activities of a certification body operating the scheme, (ii) the activities of a certified organisation in connection with its certification, or (iii) the scheme itself.
- An appeal is a request by an applicant or a certified organisation for the certification body, or for the scheme owner, to reconsider a decision relating to certification.

8.13.2 Where complaints and appeals are addressed

Complaints and appeals concerning the certification activities of a certification body shall in the first instance be addressed to the certification body that issued the certification. Complaints concerning a certified organisation (including complaints from consumers) may be addressed either to the certification body that issued the certification or to the scheme owner. The scheme owner will forward complaints received to the relevant certification body where appropriate, while retaining oversight of the matter. The certification body shall publish, on its website, accessible contact details for the lodging of complaints and appeals.

Where a complainant is not satisfied with the outcome of the certification body's handling of a complaint or appeal, or where the complaint concerns the integrity of the scheme as a whole, the matter may be escalated to the scheme owner. Positive Luxury maintains an independent complaints contact for this purpose: complaints@positiveluxury.com. Details of the complaints and appeals procedure are published on the Positive Luxury website.

8.13.3 Receipt and acknowledgement

Complaints and appeals shall be acknowledged in writing within five working days of receipt. Acknowledgement shall include an indication of the procedure to be followed and the expected timeframe.

8.13.4 Investigation and decision

Complaints and appeals shall be investigated by personnel who have not been involved in the activity that is the subject of the complaint or appeal. The investigation shall be evidence-based and shall consider the relevant requirements of the scheme. A documented decision shall be issued in writing, with reasons, within 60 calendar days of receipt of the complaint or appeal, unless the complexity of the matter justifies a longer period (in which case the complainant shall be informed of the revised timeline).

8.13.5 Onward escalation

A complainant or appellant who remains dissatisfied with the decision of a certification body may, within 30 calendar days of the decision, escalate the matter to the scheme owner. A complainant or appellant who remains dissatisfied with the decision of the scheme owner may pursue any other remedy available under applicable law, including (where applicable) escalation to the relevant accreditation body or to the consumer protection authority in the relevant jurisdiction.

8.13.6 No detriment

No applicant, certified organisation or any other person shall be subject to discriminatory action by the certification body or the scheme owner as a consequence of having lodged a complaint or appeal in good faith.

8.14 Records and retention

The certification body shall maintain records that demonstrate that the requirements of the scheme have been effectively met, including records of applications, audit reports, certification decisions, non-conformities, complaints, appeals, and surveillance activities, in accordance with ISO/IEC 17065:2012 Clause 7.12. Records shall be retained for a minimum of six years from the date of the most recent certification activity to which they relate, or for the period required by applicable law if longer. Records shall be stored securely, with controlled access, and shall be retrievable in a usable form throughout the retention period.

9. Management system requirements for the certification body

The certification body shall establish, document, implement and maintain a management system that supports and demonstrates the consistent achievement of the requirements of this Scheme Document and of ISO/IEC 17065:2012 Clause 8. The certification body may meet this requirement either by implementing a management system in accordance with ISO 9001 (Option A in ISO/IEC 17065:2012) or by implementing a management system meeting the elements set out in ISO/IEC 17065:2012 Clause 8.2 to 8.8 (Option B). Either option is acceptable to the scheme owner.

9.1 General management system requirements

The management system shall include, at minimum:

- A documented quality policy and quality objectives relating to the certification body’s activities under the scheme.
- Document control procedures covering the creation, review, approval, issue, distribution, revision and obsolescence of all documents required by the scheme.
- Records control procedures covering the identification, storage, protection, retrieval, retention and disposition of records (see Clause 8.14).
- Management review at least annually, with documented inputs (including audit results, complaints, appeals, surveillance trends, and feedback from the scheme owner) and documented outputs (including improvement actions and resource decisions).
- Internal audits at least annually, covering all elements of the certification body’s management system relating to the scheme, conducted by personnel independent of the activities being audited.
- Procedures for the identification and management of corrective actions and preventive actions arising from internal audits, complaints, non-conformities or other sources.

9.2 Audit by the scheme owner

In addition to any third-party accreditation audits, the scheme owner reserves the right to conduct, or to commission a competent third party to conduct, audits of the certification body's application of the Butterfly Mark scheme, with reasonable prior notice. The scope of such audits is limited to the application of the scheme. Audits by the scheme owner are complementary to, and do not replace, third-party accreditation audits.

The certification body shall provide reasonable cooperation and access to records, personnel and facilities for any such audit, subject to the confidentiality protections set out in Clause 5.3 (information about applicants and certified organisations is shared with the scheme owner only as required under the Certification Body Agreement and applicable data-protection law).

10. Assessment framework

This clause sets out the framework against which an organisation is assessed under the Butterfly Mark scheme. The detailed catalogue of assessment criteria is maintained in PL-BM-CRT-001 (Butterfly Mark Assessment Criteria). This clause defines the structure of that catalogue, the conformity assessment methodology, the format of an individual criterion, the applicability of criteria by SME status, and the rules under which the catalogue may be revised.

10.1 Pillar structure

Assessment criteria are organised under three pillars:

- Environmental: Gross Scope 1 GHG Emissions; Gross Scope 2 GHG Emissions; Corrective Actions for Scope 1 GHG Emissions; Corrective Actions for Scope 2 GHG Emissions; Supplier Engagement on GHG Emissions Reduction; Circular Economy Measures; Water Conservation Strategies (7 criteria).
- Social: Employee Wellbeing; Employee Handbook and Working Conditions; Living Wage; Employee Engagement Monitoring; Modern Slavery Statement; Human Rights Risk Assessment; Supply Chain Human Rights (7 criteria).
- Governance: Sustainability Purpose; Sustainability Culture; Material Sustainability Priorities; Business Code of Conduct; Anti-Corruption and Bribery; Supplier Code of Conduct; Sustainable Procurement (7 criteria).

Each thematic area contains one or more assessment criteria. The full criteria catalogue in PL-BM-CRT-001 comprises 21 criteria in total, with seven criteria under each of the three pillars (Environmental, Social and Governance). Each criterion has a unique identifier, the structure of which is documented in PL-BM-CRT-001.

10.2 Conformity assessment methodology

10.2.1 Determination of conformity per criterion

Each applicable assessment criterion is evaluated by the auditor on a binary basis: the criterion is either met or not met. A criterion is deemed met where all its compliance requirements are satisfied on the basis of the evidence reviewed, in accordance with the rules stated in the criterion. Where the compliance requirements are not satisfied, the criterion is deemed not met and a non-conformity is raised. The auditor shall classify each non-conformity as either a major non-conformity or a minor non-conformity in accordance with Clause 8.10. The set of criteria that applies to a given organisation is determined by the organisation's SME status in accordance with Clause 10.5; criteria outside this applicable set are not assessed and have no bearing on the certification outcome.

The applicability of a criterion to a particular organisation is determined under Clause 10.5 (by SME status). A criterion that is not applicable to the organisation is excluded from the assessment and is not recorded as either met or not met. Where a criterion within the applicable set provides for organisation-specific non-applicability (for example, where the criterion expressly does not apply to organisations without certain operations), this shall be documented in the assessment report with reasons.

10.2.2 Basis of certification eligibility

To be eligible for certification or recertification, an organisation shall have all applicable assessment criteria (as determined under Clause 10.5) assessed as met, subject to the following: (a) all major non-conformities raised during the assessment shall have been corrected and the correction verified by the certification body in accordance with Clause 8.10.2 prior to the certification decision; and (b) any minor non-conformities raised during the assessment may be carried forward under a documented corrective action plan in accordance with Clause 8.10.3, with closure verified at the next surveillance activity, annual declaration statement submission or at the latest at the next recertification. A criterion that is not met and where the related major non-conformity is not corrected within the applicable timeframe prevents certification.

10.2.3 Communication of certification status

The pillar-level conformity summary (see Clause 8.4.4) for a certified organisation is recorded in the assessment report and is referenced in the certification documentation. It is used by the certification body to support the certification decision and, where appropriate, to provide structured feedback to the certified organisation. The pillar-level conformity summary is not displayed in the Digital Butterfly Passport and is not disclosed in consumer-facing communications.

The Butterfly Mark certification is communicated to consumers as a binary outcome: an organisation is either certified under the Butterfly Mark scheme or it is not. Pillar-level conformity summaries are not converted into ranks, tiers, letter grades or percentages, and any other partial or comparative metrics shall not be displayed in the Digital Butterfly Passport, on product packaging, in advertising, on the certified organisation's website, or in any other consumer-facing channel. Internal conformity data (criterion-level results and pillar-level summaries) may be shared with the certified organisation as feedback for improvement, and with regulators or accreditation bodies on legitimate request, but not in any form that reaches the consumer.

10.3 Format of an assessment criterion

Every criterion in PL-BM-CRT-001 is set out in a standardised format, designed to ensure consistent application by all auditors and to provide transparent guidance to assessed organisations. Not every field is present for every criterion (in particular, “Answer options” appears wherever the criterion presents a defined list of selectable options – including a simple two-option Yes/Not applicable list – but not for a free-text numeric entry; and a criterion may contain more than one Guidance entry where several distinct requirements or sub-topics need separate interpretive treatment); the format is otherwise as follows:

Identifier	A unique alphanumeric identifier for the criterion. Identifiers are stable across versions; a criterion that is materially changed is given a new identifier and the previous identifier is deprecated.
Pillar	The pillar to which the criterion belongs (Environmental, Social or Governance), as defined in Clause 10.1.
Thematic area	The thematic area to which the criterion belongs, as defined in Clause 10.1.
Requirement	The exact requirement text presented to the organisation in the ESG+ 2.1 assessment portal, together with a note stating its applicability (SME, non-SME, or both, any differentiated threshold, and any threshold that increases at recertification) and answer format (numeric entry, binary yes/no, or multiple-select).
Answer options (where applicable)	This field is present wherever the criterion presents the organisation with a defined list of selectable options in the assessment portal – whether a multi-option corrective-action or policy-content list with a minimum qualifying count, or a simple two-option Yes/Not applicable list for an all-or-nothing criterion. It does not appear for criteria with a free-text numeric entry (e.g. a GHG emissions figure) that has no selectable options at all. Where present, the available options are listed (frequently including a “Not applicable” option with its own qualifying conditions, where relevant) and the minimum number or combination of qualifying options required for the criterion to be deemed met is stated, together with any SME/non-SME differentiation in that threshold.
Criterion overview	A plain-language description of what the criterion is intended to assess.
Compliance requirements	The specific requirements that must be met for the criterion to be deemed conformant. These are the binding rules applied by the auditor.
Indicators	The items of evidence that the auditor should be able to locate or verify in order to determine whether the compliance requirements are met.
Guidance	Interpretive guidance to support consistent application of the compliance requirements across organisations and across auditors. Guidance may include acceptable forms of evidence, illustrative examples and clarifications of edge cases. A criterion may contain several guidance entries, each addressing a specific requirement, element or sub-topic.

Auditor Decision Summary	A consolidated PASS/FAIL decision table drawing together the compliance requirements, indicators and guidance into the exhaustive set of conditions under which the criterion is met (PASS) and the exhaustive set of conditions under which a non-conformity is raised (FAIL). Where the criterion has a distinct SME applicability gate (i.e. it does not apply to SMEs at all, rather than applying to SMEs at a different threshold), this is stated as a preliminary step before the PASS/FAIL table. This is the section the auditor applies directly when making the conformity determination; the preceding sections provide the supporting rationale and interpretive detail.
Major non-conformity	The conditions, drawn from the FAIL conditions in the Auditor Decision Summary, under which a finding against the criterion would be classified as a major non-conformity rather than a minor non-conformity (see Clause 8.10). For most criteria, this requires positive evidence of intentional misrepresentation or fabrication; the absence of such evidence is itself stated as the boundary between major and minor for that criterion.
Minor non-conformity	The conditions under which a finding against the criterion would be classified as a minor non-conformity, ordinarily corresponding to any FAIL condition in the Auditor Decision Summary that does not meet the major non-conformity threshold above. This field also states what the organisation must do, and by when, to close the non-conformity, consistent with the 12-month closure timeline in Clause 8.10.3 and the escalation rule in Clause 8.10.3A.

10.4 Maintenance and revision of the criteria

PL-BM-CRT-001 is reviewed by the scheme owner at least every three years, and more frequently where warranted by material developments in the sector, regulatory changes or stakeholder feedback. Material revisions are subject to consultation with significantly interested parties (including certification bodies, certified organisations and external stakeholders), and are issued with a defined effective date. The certification body shall apply the version of PL-BM-CRT-001 in force at the time of an assessment. Material revisions of PL-BM-CRT-001 shall not have retroactive effect on certification decisions already made; their effect is on the next surveillance, recertification or fresh assessment under the revised version.

Where a revision of PL-BM-CRT-001 introduces a more demanding criterion, the scheme owner shall publish the revised criterion together with a defined transition period of not less than 12 months before the revised criterion takes effect for assessments. Publication shall be made on the Positive Luxury website (see the Document control statement), and the scheme owner shall notify all authorised certification bodies and currently certified organisations through the designated contact channels at the time of publication.

10.5 Applicability of criteria by SME status

The set of assessment criteria in PL-BM-CRT-001 that is applicable to a given organisation is determined solely by reference to its SME status (as defined below). The scheme owner defines, in PL-BM-CRT-001, the applicable criteria set for SME organisations and the applicable criteria set for non-SME organisations; within criteria that apply to both, the scheme owner defines the threshold applicable to each. The set is tailored so that the requirements imposed on a given organisation are proportionate to its scale, while ensuring that every certified organisation – irrespective of the premium or luxury sub-sector or sub-sectors in which it operates (Clause 2.2) – has been assessed against a defined and consistent set of mandatory requirements. Sector is not a factor in determining the applicable criteria set; the same SME or non-SME criteria set applies to an eligible organisation regardless of which of the sub-sectors listed in Clause 2.2 it operates in. All criteria within the applicable set are mandatory for the organisation. There are no “optional”, “recommended” or “best-practice” criteria; a criterion is either within the applicable set (in which case it must be met, subject to the treatment of non-conformities in Clause 8.10) or outside the applicable set (in which case it is not assessed).

SME status is determined in accordance with the European Union’s definition of a small and medium-sized enterprise (Commission Recommendation 2003/361/EC and its successor instruments). An organisation is an SME if it has fewer than 250 employees, and either an annual turnover not exceeding €50 million or an annual balance sheet total not exceeding €43 million. An organisation that does not meet both the employee-count threshold and at least one of the financial thresholds is a non-SME for the purposes of this scheme. Where an applicant is part of a larger group, the EU definition’s linked- and partner-enterprise aggregation rules apply: employee count and financial data are aggregated across linked and (proportionately) partner enterprises in accordance with those rules, so that an applicant cannot achieve SME status solely by virtue of its own legal entity’s figures where it forms part of a larger group for the purposes of that definition. The applicant shall declare the data necessary to determine SME status (employee count, turnover, balance sheet total, and group/linked/partner enterprise structure) at the application stage (Clause 8.2.3). On the basis of that declaration, the scheme owner sets the applicant’s SME or non-SME classification in the ESG+ 2.1 portal in accordance with the EU SME definition above. The certification body shall verify and accept this classification during application review (Clause 8.3) – checking that the declared data supports the classification set by the scheme owner, using the evidence hierarchy set out in the Audit Manual – rather than independently re-determining SME status from first principles. Where the certification body's verification indicates that the classification set by the scheme owner does not match the declared (or, where the certification body identifies a discrepancy, the corrected) data, the certification body shall refer the matter to the scheme owner for correction before proceeding with the assessment. SME status, once verified and accepted, determines which criteria in PL-BM-CRT-001 are applicable to the organisation and, where a criterion applies to both SME and non-SME organisations, which threshold within that criterion applies.

Where a criterion specifies a minimum qualifying count that increases at recertification, the applicable count shall be determined by reference to whether the assessment is an initial certification assessment or a recertification assessment. The counts themselves are set out in PL-BM-CRT-001 and are not restated in this scheme document.

SME status, as defined above, is also the sole basis for the operational purposes referred to elsewhere in this document, including the minimum audit duration guidance in the Audit Manual and the sampling intensity referred to in Clause 8.4.5. There is no separate, more granular size categorisation (such as a micro/small/medium/large/extra-large scale based on employee count alone): an organisation is, for every purpose under this Scheme Document and the Audit Manual, either an SME or a non-SME as determined by the full EU SME definition above, and nothing else. The table below sets out the minimum audit duration basis for each:

SME status	Operational basis (audit duration, sampling intensity)
SME	Lower minimum audit duration and reduced sampling intensity, reflecting the smaller scale of operations typically associated with SME status; the precise minimum duration is set out in PL-BM-AUD-001.
Non-SME	Higher minimum audit duration and increased sampling intensity, reflecting the larger and typically more complex scale of operations associated with non-SME status; the precise minimum duration is set out in PL-BM-AUD-001. Where a non-SME applicant has material physical operations (Audit Manual Section 12), a further duration uplift applies as set out there.

The applicant shall declare, at the application stage (Clause 8.2.3): its total employee count, annual turnover, annual balance sheet total, and group/linked/partner enterprise structure (for SME status determination), and the sub-sector(s) in which it operates (Clause 2.2), for scope and eligibility purposes **–** the sub-sector(s) do not affect which criteria are applicable. On the basis of this declaration, the scheme owner sets the applicant's SME or non-SME classification in the ESG+ 2.1 portal in accordance with the EU SME definition. The certification body shall verify and accept the SME status and the declared sub-sector(s) during application review (Clause 8.3) and shall record the resulting applicable criteria set, the resulting SME or non-SME threshold within each criterion that applies to both, and the resulting minimum audit duration, in the assessment plan (Clause 8.4.1). Where an organisation's SME status is finely balanced (for example, where employee count and financial data point in different directions before aggregation rules are applied), the applicable criteria set and audit duration basis shall be determined in accordance with the rules set out in PL-BM-CRT-001 and PL-BM-AUD-001 respectively. Revisions to the applicable criteria sets or to the audit duration basis (whether by changes to the EU SME thresholds upon which this Clause relies or otherwise) are treated as material revisions of PL-BM-CRT-001 or PL-BM-AUD-001 (as applicable) and are subject to the arrangements set out in Clause 10**.4.**

Annex A – Assessment report template

This annex provides the minimum structure for the assessment report referenced in Clause 8.4.4. Certification bodies may extend the template, but shall not omit any of the sections set out below.

Section 1 – Identification

- Assessment report reference number.
- Name and address of the certification body.
- Name of the audit team leader; names and roles of all audit team members.
- Name and address of the assessed organisation; brand(s) within scope.
- Sub-sector(s) within scope.
- Type of assessment (initial, surveillance, recertification, or transitional — see PL-BM-TR_AUD-001.
- Date(s) of assessment activity.
- Version of PL-BM-CRT-001 used.
- Version of this Scheme Document used.

Section 2 – Assessment scope and method

- Description of the agreed scope of assessment.
- Locations assessed (on-site, virtual, sample).
- Sampling approach applied (risk-based), with justification of sites, brands or entities included and excluded (see Clause 8.4.5).
- Audit duration (actual man-days used)
- Documents reviewed.
- Personnel interviewed, by role.
- Any limitations on the assessment and the reasons.
- Cross-checks conducted against publicly available information about the organisation (company website, published sustainability reports, media coverage, regulatory filings), with any discrepancies identified and followed up (see Clause 8.4.2).

Section 3 – Findings by criterion

For each assessment criterion in PL-BM-CRT-001 within the scope of the assessment, the report shall record:

- Criterion identifier and short title.
- Determination of conformity (met / not met).
- Reference to the evidence reviewed (document name, version, page or section reference).
- Any non-conformity identified, with classification (major or minor) and supporting reasoning.

Section 4 – Conformity summary by pillar

Tabulated presentation, for each pillar (Environmental, Social, Governance), of: the number of applicable criteria within that pillar; the number of applicable criteria met; the number of applicable criteria not met; and the number of major and minor non-conformities raised. The summary shall provide a clear indication of whether all applicable criteria within each pillar are met, in accordance with Clauses 10.2.2 and 8.6.2. No percentages, weighted scores or pass-mark thresholds are calculated or reported.

Section 4A – Changes affecting certification (surveillance and recertification reports only)

For surveillance and recertification reports, the report shall document:

- any material changes affecting the certified organisation since the previous assessment (legal entity, ownership, scope of operations, sustainability practices);
- the certification body's assessment of whether the changes affect continued conformity with the requirements of the scheme;
- the decision taken under Clause 8.9.4 (confirm continuation, require corrective action, vary scope, or suspend/withdraw certification).

Section 5 – Non-conformity summary

Tabulated list of all non-conformities raised, classified as major or minor, with the proposed corrective action timeline.

Section 6 – Audit team recommendation

The recommendation of the audit team leader on the certification decision (grant, conditional pending closure of major non-conformities, refuse), with reasons.

Section 7 – Sign-off

- Signature of the audit team leader and date.
- Confirmation of receipt by the assessed organisation (acknowledgement of the findings, distinct from acceptance).

Annex B – Specimen certification documentation

This annex sets out the minimum content for the formal certification documentation referenced in Clause 8.7. The visual layout is at the discretion of the certification body, subject to the brand guidelines for the Butterfly Mark issued by the scheme owner.

BUTTERFLY MARK CERTIFICATION

issued under the Butterfly Mark Certification Scheme

owned by Positive Luxury Ltd.

Certificate reference: [unique certificate number]

Issuing certification body: [name and address]

Accreditation reference (where applicable): [accreditation body and number]

Certified organisation: [legal name and address]

Brand(s) covered: [brand list]

Sub-sector(s): [sub-sector list]

Geographical scope: [scope]

Digital Butterfly Passport: [URL or QR code linking to the Digital Butterfly Passport for this certification]

Verification (QR / URL): [QR code or direct URL to verification page for this specific certification]

Date of grant: [date]

Date of expiry: [date — three years after grant]

Reference to Scheme Document: PL-BM-SCH-001 v[x.y]

Reference to Criteria Catalogue: PL-BM-CRT-001 v[x.y]

Signature on behalf of the certification body:

Name, title, date.

This certification is valid only while the certified organisation continues to meet the requirements of the Butterfly Mark Certification Scheme. The current status of this certification can be verified in the directory maintained at www.positiveluxury.com.

This certification has been issued under a certification scheme aligned with Directive (EU) 2024/825 (the ECGT Directive), following assessment carried out in accordance with ISO/IEC 17065:2012 by a certification body accredited to that standard.

End of document

This is the end of the Butterfly Mark Certification Scheme Document, version 1.0.

For questions about this document, contact the scheme owner:

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