

# DIST

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DOWN INTEGRITY SYSTEM  
& TRACEABILITY

DOWN INTEGRITY SYSTEM AND TRACEABILITY PROTOCOL

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<b>GLOSSARY .....</b>	<b>3</b>
<b>SECTION 1 - OVERVIEW.....</b>	<b>7</b>
<b>1.1 PROJECT DESCRIPTION.....</b>	<b>7</b>
1.1.1 Scope .....	7
<b>1.2 BASIC PRINCIPLES.....</b>	<b>8</b>
<b>1.3 MULTI-STAKEHOLDER FORUM.....</b>	<b>8</b>
<b>1.4 ROLES AND RESPONSIBILITIES.....</b>	<b>8</b>
1.4.1 Traceability, Animal Welfare, Social and Environmental Compliance Certification Body and Quality Certification Body .....	9
1.4.2 Control Service Certification Body .....	9
1.4.3 Auditee.....	10
1.4.4 Company .....	10
<b>1.5 PROTOCOL UPDATE AND REVIEW.....</b>	<b>10</b>
<b>1.6 REFERENCE STANDARDS AND GUIDELINES.....</b>	<b>11</b>
<b>SECTION 2 — TRACEABILITY AND ANIMAL WELFARE MODULE.....</b>	<b>12</b>
<b>2.1 OBJECTIVES .....</b>	<b>12</b>
<b>2.2 AUDIT SCOPE .....</b>	<b>12</b>
<b>2.3 APPROACH.....</b>	<b>12</b>
2.3.1 Animal-Based Measures.....	12
2.3.2 Auditor training and Technical Committee support.....	13
<b>2.4 AUDIT METHODOLOGY .....</b>	<b>13</b>
2.4.1 Audit planning .....	13
2.4.2 Audit sampling and execution .....	14
2.4.3 Certification process.....	16
2.4.4 Certification requirements.....	16
2.4.5 Transaction Document.....	17
<b>2.5 TRACEABILITY AND ANIMAL WELFARE REQUIREMENTS.....</b>	<b>18</b>
2.5.1 TR-F Checklist Industrialized Farm .....	18
2.5.2 TR-ICS Internal Control System .....	21
2.5.3 TR-RF Checklist Rural Farm .....	23
2.5.4 TR-S Checklist Slaughterhouse.....	25
2.5.5 TR-X Checklist Intermediaries (down collectors, traders, warehouses and processors)....	27
2.5.6 TR-PM Checklist Finished product suppliers .....	30
<b>SECTION 3 — SOCIAL AND ENVIRONMENTAL COMPLIANCE MODULE .....</b>	<b>31</b>
<b>3.1 OBJECTIVES .....</b>	<b>31</b>
<b>3.2 AUDIT SCOPE .....</b>	<b>31</b>
<b>3.3 AUDIT METHODOLOGY .....</b>	<b>31</b>

3.3.1 Audit planning and sampling ..... 32

3.3.2 Audit execution ..... 32

3.3.3 Certification process..... 34

3.3.4 Certification requirements..... 35

**SECTION 4 – QUALITY MODULE ..... 36**

**4.1 OBJECTIVES ..... 36**

**4.2 AUDIT METHODOLOGY ..... 36**

4.2.1 Sample Collection ..... 37

**4.3 ANNUAL QUALITY CERTIFICATION PROCESS ..... 38**

**SECTION 5 – R-DIST MODULE..... 41**

**5.1 OBJECTIVES ..... 41**

**5.2 AUDIT SCOPE ..... 41**

**5.3 AUDIT METHODOLOGY ..... 41**

5.3.1 Audit planning ..... 42

5.3.2 Audit sampling and execution ..... 42

5.3.3 Certification process..... 42

5.3.4 Certification requirements..... 43

**5.4 R-DIST REQUIREMENTS ..... 44**

5.4.1 TR-X1R Checklist Recycler..... 44

5.4.2 TR-X checklist Intermediaries (i.e. down collectors, traders, warehouses and processors)..... 46

5.4.3 TR-PM: checklist Finished product suppliers ..... 48

## GLOSSARY

**Animal-Based Measure (ABM):** With reference to the animal welfare assessment, a measure that is taken directly from the animals (Welfare Quality®).

**Audit:** A means to verify compliance with a standard.

**Auditor:** An authorized person carrying out audits at entities according to the DIST Protocol on behalf of the Certification Body. In relation to the application of Animal-Based Measures, the auditors are trained by a Department of Veterinary Science of a University Institute.

**Auditee:** An entity that is audited. Entities can include Tier 1 Down suppliers, Intermediaries - i.e. down collectors, traders, warehouses and processors - Slaughterhouses, industrialized farms and rural farms, Tier 1 Finished product suppliers and their sub-contractors, and Tier 1 Recyclers.

**Cage:** A boxlike enclosure with wires or bars. It is a system operated from outside where keepers do not enter (EFSA, 2005). The cage isolates one animal from another or keeps them in small groups. Cages do not allow geese to meet their behavioral and physiological needs.

**Certificate:** A document issued by the Certification Body stating that a site in a determined rearing year or the down of certain lots complies with DIST standards and requirements or with a specific DIST module.

**Certification Body:** An authorized third party carrying out audits and issuing a certificate in accordance with the provisions set out in the DIST Protocol.

**Certified products /geese:** Down/feathers/geese which originate from a process/entity that is certified in accordance with the DIST Protocol.

**Certifier:** A person who evaluates the findings of the auditors and the related conclusions reached in forming the overall evaluation on the auditing activities in regards to DIST requirements.

**Collector:** A person or company that receives down and feathers from household collectors and trades them.

**Company:** Any company that purchases down as a raw material to produce finished products.

**Control Service Certification Body:** An authorized third party issuing a certificate in accordance with the requirements of the customized Control Service Certification scheme based on ISO/IEC 17065 standard.

**Down Cluster:** The group of components: down, nestling down, and plumule (down fiber and other components are specifically excluded) (IDFB Definition).

**Down-grading:** Specific abnormalities which are found during post mortem inspection indicating that the carcass, or part of it, is unfit for human consumption. The reason for down-grading might reflect welfare problems (e.g. inflammatory process; cellulitis due to scratches to skin; hock marking due to burns related to wet litter and extended resting times; broken bones due to trauma during growing, catching, transportation or incorrect handling at processing, etc).

**Entity:** Every subject part of the down supply chain.

**Farm:** An entity raising white geese.

**Fill-power:** A volumetric measurement which is used to determine the approximate insulation value of down and feather fillings. It measures the volume that a specific amount of down occupies under specific conditions.

**Finished product:** Item which contains DIST down as a component and is ready for the sale to the end-consumer.

**Finished product supplier:** Tier 1 Finished product supplier and its Sub-contractors which produce Finished products.

**Force-feeding:** Any form of feeding through manual intervention or mechanical equipment (tubes) to fatten geese livers for the production of foie gras.

**Goose/Geese:** In the DIST Protocol the term "geese" always refers to white geese that are reared only for meat production and not for eggs or down production purposes.

**Household collector:** A person who collects down and feathers from households and trades them. A household collector can work independently or under contract to other collectors.

**Human-Animal Relationship (HAR):** Human-Animal interactions defined as the degree of relatedness or distance between animal and humans. A relationship develops between the stockperson and an animal in his/her care and requires mutual individual recognition (Estep and Hetts, 1992).

**Human Rights:** Human rights, as defined by the United Nations, are rights inherent to all human beings, regardless of race, sex, nationality, ethnicity, language, religion, or any other status. Human rights include the right to life and liberty, freedom from slavery and torture, freedom of opinion and expression, the right to work and education, and many more. Everyone is entitled to these rights, without discrimination.

**High risk countries:** countries where animal welfare legislation is absent, limited, or not effectively enforced.

**Low risk countries:** countries where animal welfare legislation is effectively enforced.

**Indoor housing:** An enclosed building to house animals with continuous walls, roof and floor.

**Outdoor housing:** Any outside uncovered field to house animals, often closed off with fences or natural boundaries.

**Industrialized farm:** A farm that rears and manages a large number of geese for the food industry and is usually linked to a Slaughterhouse.

**Intermediaries:** An entity involved with processing and trading down and feathers as part of the supply chain of the Company but that is not involved in goose management. It includes down collectors, traders, warehouses and processors.

**Internal Control System (ICS):** Within this Protocol, it refers to policies, procedures and internal audit programs that an entity implements to ensure that DIST requirements are met within a group of farms.

**Live plucking:** Any form of removing down and feathers from live geese including gathering during molting.

**Non-compliance:** A failure to act in accordance with the DIST Protocol.

**Oxigen number:** Indicator for the amount of organic foreign matter on the surface of the plumage.

**Parallel production:** A facility that simultaneously practices live plucking and/or force-feeding for certain flocks and for others not.

**Parent farm:** An entity raising white geese for egg production. In the DIST Protocol, anytime a parent farm is located in the same site of rearing geese, the entire site is subject to an audit.

**Processor:** A facility where down and feathers are processed, i.e. separation, washing, drying, sorting, blending, any other activity that is required to use the down/feathers for garment production.

**Reclaimed Finished Product:** Finished Product that would have otherwise been disposed of as waste, but has instead been collected and reclaimed as a material input for a recycling process.

**Recycled down:** Down that has been extracted from Reclaimed Finished Products, and then reprocessed using identical washing and processing, similar to virgin down, including washing, drying and hygienic treatments, then reused to fill finished products.

**Recycler:** A person or company that extracts down from Reclaimed Finished Products filled with DIST down, which will be reprocessed by an Intermediary before it may be used again.

**Region:** A territory that is a part of a country usually referred to as a province, district, county, etc.

**Rural farm:** A household or small farm keeping waterfowl for private consumption or direct sale and that uses non-intensive production methods. In most cases, geese are slaughtered by the farmer himself or by the local butcher. Down is collected by household collectors visiting the region periodically.

**Shall:** Within the DIST Protocol it means that the requirement is compulsory and it is not optional.

**Shelter:** Natural (trees, etc.) or artificial (roof, barn etc.) protection from adverse weather conditions.

**Site:** Farm or facility belonging to an entity.

**Slatted floor:** Plastic, concrete or metal floors with gaps between slats to permit discharge of faeces and urine to the external environment or into a cesspit.

**Slaughterhouse:** Any place where the waterfowl are slaughtered for the meat industry and the down and feathers are removed from the carcass.

**Sub-contractor:** A supplier who is involved in any level of the Tier 1 supplier supply chain.

**Tier 1 supplier:** A supplier which provides down (Tier 1 down supplier) or finished product (Tier 1 Finished product supplier) directly to the Company.

**Traceability:** The ability to trace down material through all the stages of its production from animal rearing at the farm to processing and delivery.

**Trader:** An individual who is engaged in the transfer of down and feathers in the market either for himself or on behalf of someone else.

**Transaction Document (TD):** A document issued by the Traceability, Animal Welfare, Social and Environmental Compliance Certification Body. The TD shall be filled and continuously updated by processors/Slaughterhouses/recyclers with incoming and outgoing certified products transactions data and provided to the Traceability, Animal Welfare, Social and Environmental Compliance Certification Body upon request.

**Warehouse:** Location/facility where down and feather are stored.

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# SECTION 1 - OVERVIEW

## 1.1 Project description

The concept of quality is no more restricted to technical parameters; quality is increasingly holistic and extends to the respect for standards of sustainability.

A quality product is a product that has been designed, produced and distributed while taking into consideration both high technical standards as well as social, animal welfare and environmental aspects, with a focus on circularity.

Accountability must be end-to-end. Consumers and the broader public want to be assured that all along the supply chain practices that they consider unacceptable do not occur.

### 1.1.1 Scope

DIST Protocol focuses on traceability, respect of animal welfare as well as social and environmental compliance standards, recycling and technical quality of down.

DIST Protocol requirements have been designed for white geese and their down.

It is possible to apply for the Annual Quality Certificate only after having obtained the Traceability and Animal Welfare Certificate and the Social and Environmental Compliance Certificate or, in case of Recycled Down, the R-DIST Certificate.

Traceability and Animal Welfare related requirements are presented in Section 2 of this Protocol, Social and Environmental Compliance requirements in section 3, Quality requirements in Section 4, and R-DIST requirements in Section 5.



## 1.2 Basic principles

At the core of the DIST Protocol lie the fundamental principles that all activities must comply with all applicable legal framework, that workers' human rights are respected as well as safety conditions, that animals are treated humanely, that activities are conducted in compliance with all environmental regulations and that the down must respect the highest quality standards.

Accordingly:

- **Down shall be a by-product of the food production.**  
Down must come from white geese slaughtered for the only purpose of meat production and not for down production.
- **Down shall come from farmed geese and not from wild geese.**
- **Down shall not be from geese subject to force-feeding practices.**
- **Down shall not be from any form of live plucking practices including gathering during moulting.**
- **Down shall be traceable along the entire supply chain till the Finished Product.**
- **Entities shall comply with applicable laws and regulations ruling animal welfare and all their specific activities.**  
Should applicable laws and regulations be less stringent with reference to animal welfare than DIST Protocol requirements, the latter shall prevail and apply unless those requirements are in conflict with mandatory provisions.
- **Entities shall comply with the technical quality standards provided in this Protocol.**
- **Entities shall comply with applicable international standards and local regulations in the areas of human rights, health and safety and decent work.**  
Should applicable laws and regulations be less stringent with reference to human rights, health and safety and decent work standards than DIST Protocol requirements, the latter shall prevail and apply unless those requirements are in conflict with mandatory provisions.
- **Entities shall comply with applicable international standards and local regulations in the areas of environmental compliance.**  
Should applicable laws and regulations be less stringent with reference to environmental compliance than DIST Protocol requirements, the latter shall prevail and apply unless those requirements are in conflict with mandatory provisions.
- **Recycled down must be collected from the Company's Reclaimed Finished Products**
- **Down Inside the Reclaimed Finished Products must come from DIST certified garments.**

## 1.3 Multi-stakeholder forum

In order to define the DIST Protocol, a multi-stakeholder forum was created, comprising representatives identified among the most prominent universities, research institutes, certification bodies, experts in animal welfare and in social and environmental compliance international standards, qualified independent auditors and civil society representatives.

The aim of the Forum is to promote a debate on animal welfare, social and environmental compliance standards, and quality, in order to take into consideration stakeholder expectations and suggestions and design a comprehensive protocol for the management of down responsible sourcing and quality.

## 1.4 Roles and responsibilities

Proper and effective adoption of the DIST Protocol depends on the appropriate definition of the roles and the responsibilities of the parties involved in the process as defined below.

### **1.4.1 Traceability, Animal Welfare, Social and Environmental Compliance Certification Body and Quality Certification Body**

The Traceability, Animal Welfare, Social and Environmental Compliance Certification Body and the Quality Certification Body are responsible for audit planning, risk assessment, audit sampling, execution and certification.

The Traceability, Animal Welfare, Social and Environmental Compliance Certification Body is also responsible for verifying if the quantities delivered to the Company are consistent with the quantities certified under the Protocol.

The Certification Body shall perform the audit program in accordance with the criteria established in this Protocol; to this end, it must have the necessary professional expertise/knowledge and suitable organizational structure.

Methods and procedures by which the auditor operates shall be ethical and non-discriminatory; audit procedures should not be used to prevent or inhibit the activities of the entities.

While auditing, the auditors shall limit their activity to the requirements and the principles contained in this Protocol (Section 2 – Traceability and Animal Welfare Module, Section 3 - Social and Environmental Compliance Module, Section 4 – Quality Module and Section 5 - R-DIST Module). Auditors are not allowed to handle the animals and they have to take biosecurity measures to prevent disease-causing agents entering or leaving any place where farm animals are present.

In the fulfillment of their duties and responsibilities, auditors are compliant with International Standards defined in ISO/IEC 17065 for Traceability and Animal Welfare Module and laboratories are compliant with ISO/IEC 17025 for the competence to carry out tests and/or calibrations including sampling.

In particular, the Traceability, Animal Welfare, Social and Environmental Compliance Certification Body is responsible for issuing the Traceability and Animal Welfare certificate and the Social and Environmental Compliance certificate. The Quality Certification Body, on the other hand, is responsible for issuing the Annual Quality Certificate. Finally, once the three certificates have been collected, the Traceability, Animal Welfare, Social and Environmental Compliance Certification Body is responsible for issuing the final DIST Certification.

For the down recycling process, the Traceability, Animal Welfare, Social and Environmental Compliance Certification Body is responsible for issuing the R-DIST Certificate (only previously DIST-certified down enters this process, therefore down already certified under the Traceability and Animal Welfare modules). The Quality Certification Body, on the other hand, is responsible for issuing the Annual Quality Certificate. Finally, once the two certificates have been collected, the Traceability, Animal Welfare, Social and Environmental Compliance Certification Body is responsible for issuing the final R-DIST Certification.

### **1.4.2 Control Service Certification Body**

In order to ensure to stakeholders that the DIST Protocol is effectively implemented, an independent third party (Control Service Certification Body) will certify the correct execution of the Traceability and Animal Welfare, Social and Environmental Compliance, Quality control and R-DIST verification processes.

The dedicated Control Service Certification scheme aims to certify, in accordance with the requirements of the UNI CEI EN ISO / IEC 17065 standards, that control processes are carried out in full compliance with DIST requirements.

The Control Service Certification Body's verification activities will be performed on the basis of the Traceability, Animal Welfare, Social and Environmental Compliance and Quality Certification Bodies' risk analysis and control plans.

The dedicated control service certification scheme comprises:

- Inspection of audit and laboratory test results and related certification decisions; and
- Audit supervision/witnessing during the execution of DIST Protocol control activities (announced and unannounced).

The Control Service Certification Body is not involved in the direct execution of traceability/animal welfare, social/environmental compliance, quality and R-DIST audits defined in the DIST Protocol.

The Control Service Certificate is issued or renewed when process control results are positive or there are no major non-conformities.

When process control results report non-conformities, the issue or renewal of any Control Service Certificate is suspended until non-conformities are corrected in the timeframe defined by the Control Service Certification Body.

When improvement actions are suggested, the Control Service Certificate is issued or renewed and their effective implementation is verified during the follow-up audit.

### **1.4.3 Auditee**

The Tier 1 down supply chain, the Tier 1 Recyclers used to source the down to be delivered to the Company and the Tier 1 Finished Product supply chain that manufactures down apparels shall be compliant with the DIST Protocol whose general requirements are a binding part of the purchase agreement.

The Tier 1 down suppliers shall provide the Animal Welfare, Traceability, Social and Environmental Compliance Certification Body with the full list of entities involved in the supply chain used to source DIST material and shall ensure free access to its own sites as well as all sites of the listed entities. In the same way, the Tier 1 Finished product suppliers should provide the list of entities involved in the manufacture of apparels.

The Auditee (Tier 1 Down suppliers, Intermediaries - i.e. down collectors, traders, warehouses and processors - Slaughterhouses, industrialized farms and rural farms, Tier 1 Finished product suppliers and their sub-contractors, and Tier 1 Recyclers) shall facilitate the verification activities providing truthful, complete and reliable information and access to the relevant documentation and reports.

### **1.4.4 Company**

The Company that purchases down as a raw material to produce its products or that commissions the recycling of the down and the manufacture of finished products, requires its supply chain to be compliant with the DIST Protocol and commits to informing its Tier 1 suppliers about DIST requirements and will make its best effort to support the Tier 1 supplier in training each entity belonging to the chain about DIST requirements through the provision of training material.

## **1.5 Protocol update and review**

The DIST Protocol is not a static document. In order to remain a high reference standard, it will be periodically revised according to new traceability, social, environmental and animal welfare indicators, regulatory developments and quality requirements, best practices and stakeholder inputs. Suggestions, opinions and remarks about this Protocol are always welcome ([sustainability@moncler.com](mailto:sustainability@moncler.com)). The Company aims to promote a responsible business management throughout its supply chain not just imposing rules but engaging the entities in a joint and long-term effort for continuous improvement.

## 1.6 Reference standards and guidelines

The following standards have been a reference in the definition of the DIST Protocol:

- Council Directive 98/58/EC of 20 July 1998 concerning the protection of animals kept for farming purposes;
- Council Regulation (EC) n° 1099/2009 of 24 September 2009 on the protection of animals at the time of killing;
- Council Regulation (EC) n° 1/2005 of 22 December 2004 on the protection of animals during transport and related operations;
- The Textile Institute – Chemical testing of Textile;
- IDFB International Down and Feather Bureau Minimum sample size Norm IDFB - JIS1903: 2011;
- ISO/IEC 17065: 2012: Conformity assessment - Requirements for bodies certifying products, processes and services
- ISO 19011:2012: Audit principles procedures and techniques;
- ISO 9001: 20015: Quality management systems - Requirements;
- ISO/IEC 17020:2012: Conformity assessment - Requirements for the operation of various types of bodies performing inspection;
- ISO/IEC 17025:2005: General requirements for the competence of testing and calibration laboratories.
- European Food Safety Authority (EFSA), Statement on the use of animal-based measures to assess the welfare of animals - EFSA Journal 2012;10(6):2767
- International Bill of Human Rights of the United Nations
- Universal Declaration of Human Rights
- International Covenant on Civil and Political Rights
- International Covenant on Economic, Social and Cultural Rights
- Charter of Fundamental Rights of the European Union
- Decent work standards in ILO (International Labour Organization) conventions
- OECD (Organization for Economic Cooperation and Development) Guidelines for Multinational Enterprises
- United Nations Convention on the Rights of the Child
- United Nations Convention on the Elimination of All Forms of Discrimination Against Women
- United Nations Guiding Principles on Business and Human Rights
- Ten Principles of the United Nations Global Compact
- United Nations Sustainable Development Goals
- Modern Slavery Act
- California Transparency in Supply Chains Act
- Italian Legislative Decree No. 231/2001
- Directive 2014/95/EU on the disclosure of non-financial information
- ISO 14001:2015: Environmental management systems - Requirements.

## SECTION 2 — TRACEABILITY AND ANIMAL WELFARE MODULE

### 2.1 Objectives

The objectives of the DIST Protocol –Traceability and Animal Welfare Module are:

- To establish clear compliance requirements with reference to traceability and animal welfare; and
- To describe the audit process and methodology used to assess and certify compliance with the DIST Protocol.

### 2.2 Audit Scope

The DIST Protocol – Traceability and Animal Welfare Module shall apply to the supply chain of white geese and down from farm level to Slaughterhouses, to Intermediaries (i.e. down collectors, traders, warehouses and processors) to Tier 1 Down supplier and up to Tier 1 Finished product suppliers and their sub-contractors without geographical limitation.

The audit shall be carried out by an independent auditor that assesses implementation and effectiveness of DIST requirements at each site/entity as follows:

- TR-F checklist industrialized farm
- TR-ICS checklist Internal Control System
- TR-RF checklist rural farm
- TR-S checklist Slaughterhouse
- TR-X checklist Intermediaries (i.e. down collectors, traders, warehouses and processors); and
- TR-PM checklist Finished product suppliers

Moreover, whenever a parent farm is located in the same site of rearing geese an extension of the audit scope is required in order to assess the absence of a parallel production system in place.

### 2.3 Approach

#### 2.3.1 Animal-Based Measures

In line with the European Commission policies (as detailed in paragraph 1.6 Reference standards and guidelines), the DIST Protocol focuses on Animal-Based Measures (ABMs).

ABMs are measures detected from the animals themselves and allow the direct evaluation of animal welfare status.

This so-called "outcome based approach" evaluates how the animal responds to the environment while the traditional approach assesses the animal welfare through the evaluation of the environment in which the animal lives and is mainly focused on resources (e.g. feeding system, space availability and housing).

Animal-Based Measures are considered an effective way to assess animal welfare as they include the effects of different input factors and cannot be skewed or manipulated in view of a scheduled audit.

The set of the nine ABMs for geese used in the DIST Protocol includes, among others, feather pecking and twisted wings. Feather pecking is an abnormal behaviour of the geese linked to poor animal welfare and can be due to many different

factors such as high stocking density or inappropriate diet composition. Twisted wing is another ABM linked to several factors affecting the welfare of geese such as malnutrition, high stocking density, improper handling practices, inappropriate facility structures, etc.

Animal Based Measures are assessed starting from the 7-8 week of life of the geese.

### **2.3.2 Auditor training and Technical Committee support**

In order to assess the Animal-Based Measures (ABMs), the auditor shall be qualified and therefore shall attend a compulsory training course organised by a department of Veterinary Science of a University Institute.

At the end of the training activities, each auditor shall undergo a test to obtain the qualification of Traceability and Animal Welfare auditor. Each qualified auditor shall be periodically trained on ABMs.

Furthermore, a Technical Committee comprised of experts in veterinary science and animal welfare is available to support the Traceability, Animal Welfare, Social and Environmental Compliance Certification Body when the assessment of Animal-Based Measures is dubious and findings require a deeper analysis from specific experts to clearly identify non-compliances.

## **2.4 Audit Methodology**

This paragraph describes how the audit of the supply chain is carried out by the Traceability, Animal Welfare, Social and Environmental Compliance Certification Body, including audit planning, risk assessment, audit sampling, execution and certification.

The audit shall be performed by the auditor using the checklists provided in Paragraph 2.5 of this Section and shall involve different techniques to gather sufficient and reasonable evidence for each topic under examination.

The techniques applicable to the audits are:

- Document inspection;
- Interview;
- Site inspection; and
- Animal inspection.

Auditors shall be allowed to:

- Review all relevant documentation, such as animal welfare and legal compliance documents, veterinarian reports and other paperwork that prove the implementation of animal welfare practices, traceability management system, employee training if any and other requirements contained in the checklists;
- Conduct worker interviews in the local language at all levels of the supply chain to assess proper implementation of animal welfare and traceability policies and procedures; and
- Inspect the facility to assess the following:
  - Animal-Based Measures;
  - environment where animals are housed and managed;
  - labeling practices and procedures;
  - supply chain processes implementation; and
  - all other DIST requirements.

### **2.4.1 Audit planning**

During the planning phase, the following factors are taken into account:

- identification and selection of the entities to be audited;

- audit sampling methodology (as detailed in paragraph 2.4.2);
- seasonality; and
- specific risk factors.

Audits shall be carried out during periods with highest risk with regard to non-compliance with the DIST Protocol:

- farm audits shall be carried out when white geese are onsite and possibly when they are at risk of live plucking and force-feeding practices. Geese are usually slaughtered for food purpose between 9 and 16 weeks of age. Audits shall take place in the last 4-5 weeks of life and geese shall not be younger than 7 weeks. In exceptional cases, when geese are slaughtered after 16 weeks of age, the Traceability, Animal Welfare, Social and Environmental Compliance Certification Body shall carry out two unannounced audits:
  - first audit: between the 11th and 15th weeks of age
  - second audit: one week before geese are slaughtered.

To prevent the farmer to misuse the information related to audit methodology, a limited number of audits shall be carried out also at farms rearing geese younger than 7 weeks; and

- Slaughterhouses shall be audited when DIST geese are slaughtered;
- down processors shall be audited preferably when and where down to be certified is processed and traded;
- Finished product suppliers shall be audited during the period in which they are manufacturing apparel containing DIST down.

In exceptional cases, when it is not possible to perform the audit during high-risk periods as mentioned above, the Traceability, Animal Welfare, Social and Environmental Compliance Certification Body written justification is required.

### 2.4.2 Audit sampling and execution

The down supply chain shall be audited following the criteria below:

Auditee	Sampling criteria	Execution criteria
Industrialized farms	100%	Announced Semi-announced Unannounced
Industrialized farms under an effective ICS	High risk countries: 100% Low risk countries: Square root of farms number x 2	Announced Semi-announced Unannounced
Rural farms	Square root of farms number x 2 capped at 50 audited farms per regions	Announced Semi-announced Unannounced
Slaughterhouses	100%	Announced Semi-announced Unannounced
Intermediaries (i.e. down collectors, traders, warehouses and processors)	100%	Announced
Finished product suppliers	Square root of Tier 1 Finished product suppliers and sub-contractors number x 2	Announced

Industrialized farms are audited on a 100% basis except if the farms are under an effective Internal Control System (ICS) in a low risk country. In this case, a sample-based methodology applies.

Rural farms located in the same region and therefore supposed to have a homogenous rearing system, are audited on a sample-based methodology.

With a free reference to the application of IAF MD 1:2007 § 5.2 the sample-based methodology is the square root multiplied by a fixed corrective parameter (2).

For farms under ICS and rural farms, the number of entities to be audited is based on a risk assessment performed annually by the Traceability, Animal Welfare, Social and Environmental Compliance Certification Body and takes into consideration the following factors:

- results of previous audits;
- numbers of years under certification;
- level of applicable animal welfare legislation;
- cultural habits in the country including known cases of live plucking and force-feeding;
- any third party information/recommendation available including from animal welfare groups; and
- any valid certification received for traceability and animal welfare standards.

Intermediaries and Slaughterhouses are audited every year on a 100% basis.

Finished product suppliers are audited according to a sample based methodology.

When a sample-based methodology applies, the Traceability, Animal Welfare, Social and Environmental Compliance Certification Body selects the farms and the Finished Products Suppliers to be audited covering both new entities as well as entities already audited in the previous year so that the auditee.

In some cases it is necessary to have announced/semi-announced audit in order to:

- be compliant, where applicable, with bio-hazard/food and safety regulations that require clearance for auditors (Slaughterhouse);
- ensure that the person in charge of documentation/process is available and
- ensure that the activity to be checked is in process during the audit period.

At the farm level, 40% of audits are announced/semi-announced and 60% unannounced.

At the Slaughterhouses level, 50% of audits are announced/semi-announced and 50% unannounced.

At the Intermediary level (i.e. down collectors, traders, warehouses and processors) audits are focused on traceability and

are always announced. However, the Traceability, Animal Welfare, Social and Environmental Compliance Certification Body has the right to carry out extra unannounced audits.

At the Finished product suppliers level, all audits are announced. In any case, Traceability, Animal Welfare, Social and Environmental Compliance Certification Body has the right to carry out extra unannounced audits.

The audits are divided into three types as follows:

- **First audit:** an audit performed the first year of a certification process.
- **Renewal audit:** an audit performed for the renewal of the Certificate that allows the Traceability, Animal Welfare, Social and Environmental Compliance Certification Body to monitor if the supply chain is still compliant with the DIST Protocol – Traceability and Animal Welfare Module. In this case the audit shall take place before the expiry date of the previous year's certificate.
- **Follow-up audit:** an audit that might be required to check progress related to non-compliances found in the first/renewal audit to check the corrective actions put in place. Based on the type of non-compliance, corrective actions can be assessed through on site visits and/or analysis of documentary evidence (photo or documentation should be irrefutably linked to specific site).



### 2.4.3 Certification process

The Traceability and Animal Welfare Certificate is issued by the Traceability, Animal Welfare, Social and Environmental Compliance Certification Body when the supply chain of each Tier 1 supplier fulfils the requirements stated in the DIST Protocol (Paragraph 2.5).

The Certificate is valid for one year and refers to the down material linked to the specific supply chain in the rearing season subject to audit.

This means that not all the supply chains of the Tier 1 can be considered certified unless all these supply chains were subject and successfully passed the audit process.

Where, in exceptional circumstances such as avian flu, it is not allowed to perform audits an extension of the Certificate validity shall be evaluated by the Traceability, Animal Welfare, Social and Environmental Compliance Certification Body and shall be approved by the members of the Multi-stakeholder forum.

The renewal audit process has to be completed before the current certificate's expiry date.

The certification decision shall be made by the Traceability, Animal Welfare, Social and Environmental Compliance Certification Body certifier based on the findings of the auditor(s). The certifier has the responsibility to:

- perform judgments in the planning phase;
- carry out risk assessment;
- monitor the effective execution of the audit activities; and
- approve the audit results.

The audit results shall be recorded in an audit report that the Company has the right to obtain.

The Tier 1 suppliers shall receive a feed-back document to understand non-compliances to be addressed in order to be compliant with the DIST Protocol requirements and obtain the DIST certificate or the non-compliances for which the certificate has been denied, withdrawn or not renewed.

### 2.4.4 Certification requirements

DIST requirements are divided into categories that are determinant for the certification itself:

- Mandatory
- High priority
- Priority

**Mandatory:** those requirements that must be fully met at the moment of the audit to obtain and/or renew the certification. If non-compliance with any of the mandatory requirements is found, the Traceability and Animal Welfare Certificate is not issued for the related entire supply chain (in case of a first audit), is withdrawn or not renewed (in case of renewal audit).

**High priority:** those requirements that must be met in a percentage of at least 50% per checklist at the moment of the audit and fully met (100%) not later than the deadline indicated below to obtain and/or renew the certification. If non-compliance with any of the high priority requirements is found, the entity has 30 days from the receipt of the feed-back document mentioned at point 2.4.3 (for farms in any case before the audited flock is slaughtered) to implement corrective actions. If the entity fails to correct high priority non-compliances within the due date, the Traceability and Animal Welfare Certificate is not issued for the related entire supply chain (in case of a first audit), is withdrawn or it is not renewed (in case of renewal audit).

Improvement actions are assessed through follow-up audits (documental or on site).

**Priority:** those requirements that must be met in a percentage of at least 75% per checklist. An entity that does not fulfil the minimum compliance ratio of priority requirements has 30 days from the receipt of the feed-back document mentioned at point 2.4.3 (for farm in any case before the audited flock is slaughtered) to implement corrective actions. If the entity fails to correct the minimum priority requirements within the due date, the Traceability and Animal Welfare Certificate is not issued for the related entire supply chain (in case of a first audit), is withdrawn or it is not renewed (in case of renewal audit).

Improvement actions are assessed through follow-up audits (documental or onsite).

Requirement type	% Compliance	Due date	Consequence for non-compliance not corrected within the due date
Mandatory	100%	Compliance is required at the moment of the audit and as long as the certificate is granted	The Traceability and Animal Welfare Certificate not issued, withdrawn or not renewed
High priority	100%	Non-compliances shall be effectively corrected within 30 days from the receipt of the feed-back document and at farm level in any case before the flock is slaughtered.	
Priority	75%	Non-compliances shall be effectively corrected within 30 days from the receipt of the feed-back document and at farm level in any case before the flock is slaughtered	

### 2.4.5 Transaction Document

Slaughterhouses and Intermediaries belonging to the same supply chain shall complete a transaction document (hereafter referred as "TD").

The TD tracks all geese and down products movements and transformation occurred along the relevant supply chain from Slaughterhouse to final delivery to the Company in order to ensure that quantities delivered to the Company are consistent with the quantities certified.

The TD shall be continuously updated and submitted immediately (within maximum of two weeks) to the Traceability, Animal Welfare, Social and Environmental Compliance Certification Body.

## 2.5 Traceability and Animal Welfare Requirements

### 2.5.1 TR-F Checklist Industrialized Farm

	Section	Category
<b>1</b>	<b>General</b>	
1.1	The entity shall give documentary evidence of the origin of the geese.	High priority
1.2	Force-feeding practices are not in use.	Mandatory
1.3	Any kind of live plucking practices are not in use including gathering during molting. Geese shall never have been live plucked in their life.	Mandatory
1.4	The geese are raised for the only purpose of meat production and not for down production purposes.	Mandatory
1.5	Parallel production is not permitted.	Mandatory
1.6	The farm complies with applicable animal welfare legislation.	High priority
<b>2</b>	<b>Animal-Based Measures</b>	
2.1	The animals do respond positively to the Human-Animal Relationship test performed to evaluate the interaction between the stockperson and the geese.	High priority
2.2	The geese are clean: the breast area is not covered by manure and it has no yellow/brown colour due to inadequate housing management (e.g. floor type, dirty or wet litter, internal air quality). The presence of mud shall not be considered as plumage dirtiness.	Priority
2.3	The geese do not present visible signs of: - skin injuries connect to forcible removal of feathers or - areas of feather irregularity that lead to doubts regarding possible live plucking practices.	Mandatory
2.4	The geese do not present broken wings that lead to doubts regarding possible poor handling procedures and/or inappropriate farming conditions.	High priority
2.5	The geese do not present twisted wings connected to valgus rotation of the distal wing that cast doubt on poor handling procedures, inappropriate housing conditions, inadequate diet, disease, incubation and hatching problems or genetic predisposition.	High priority
2.6	The geese do not present visible signs of feather pecking.	High priority
2.7	Geese in the flock are not immobile or reluctant to move. Immobile animals shall be moved immediately to the infirmary area. Difficulty in standing or walking is a critical welfare issue as a goose may suffer from pain and discomfort and may be unable to reach watering and feeding facilities.	High priority
2.8	The bill does not present any colour abnormalities. Straw-yellow colour as well as several areas of depigmentation that lead to doubts regarding possible inadequate feed quality and lack of access to outdoor area, shall not be present.	Priority
2.9	Geese shall not be subject to any mutilations such as: - bill trimming (de-beaking); - de-clawing, - wing clipping/trimming of feathers, - hole punching.	Mandatory
<b>3</b>	<b>Animal Care</b>	
<b>3.1</b>	<b>Code of Conduct</b>	
3.1.1	The entity has a Code of Conduct//targeted policy/Rearing Manual that specifically addresses animal welfare.	Priority
<b>3.2</b>	<b>Handling practices</b>	
3.2.1	The personnel received instructions about adequate geese management practices according to the DIST Protocol as well as applicable animal welfare legislation.	Priority

<b>3.3</b>	<b>Indoor and outdoor housing</b>	
3.3.1	Cages and slatted floors are not in use.	High priority
3.3.2	Geese are not overcrowded and have sufficient space to express and accommodate their species-specific behaviour and postural adjustments (to stand, lie down, turn around, spread their wings, rest comfortably, etc.).	High priority
3.3.3	[In case of a parent farm in the same site] Nesting area is adequate to reduce competition and aggressiveness. At least one nest every four mother geese is required.	Priority
3.3.4	[In case of a parent farm in the same site] Nesting area is located in a quiet and dimly light spot provided with soft and dry nesting material, protected for egg-laying.	Priority
3.3.5	Indoor housing shall have solid floor with dry and clean litter.	Priority
3.3.6	Litter shall be completely removed at least at the end of each production cycle.	Priority
3.3.7	Indoor housing allows natural light to enter or is provided with artificial lighting to ensure sufficient and adequate light during the day.	Priority
3.3.8	Indoor housing is well ventilated in order to prevent excessive heat, moisture, dust and to reduce the concentration of carbon dioxide, ammonia and other harmful gases in the building.	Priority
3.3.9	The geese have free access to the outdoors as early as possible in their life (according to weather conditions and always after 7 weeks of age).	High priority
3.3.10	The indoor and outdoor housing do not present facilities or structures (e.g. fences with inappropriate mesh sizes, too narrow gates) that can accidentally injure geese.	Priority
3.3.11	Shelters, either naturals (trees, etc.) or artificial (roof, barn, etc.), shall be available to ensure temporary protection during extreme weather conditions.	Priority
<b>3.4</b>	<b>Hygiene &amp; Pest control</b>	
3.4.1	Indoor housing shall be kept clean.	Priority
3.4.2	Indoor housing shall be disinfected at least at the end of each production cycle.	Priority
3.4.3	Pest control is in place.	Priority
3.4.4	Predator control is in place.	Priority
<b>3.5</b>	<b>Feeding &amp; Watering</b>	
3.5.1	Geese have access to adequate quantity of feed. Feed is continuously available (feed or natural pasture or vegetables or green grass) either through an automatic refill system or through a regular check by personnel.	High priority
3.5.2	Feeding facilities give enough space for animals to eat without competition.	High priority
3.5.3	Geese have the possibility to graze or they are provided with green grass or fresh vegetables.	Priority
3.5.4	Geese have continuous access to clean water. Water is always available either through an automatic refill system or regular manual refills of drinkers or natural sources of water.	High priority
3.5.5	Drinking facilities should be designed to allow water to cover the head of the geese and to be taken up with the beak so that geese can groom	Priority
<b>4</b>	<b>Animal Health</b>	
<b>4.1</b>	<b>Veterinary Plan &amp; Records</b>	
4.1.1	A check is performed at least once a day by the stockman or by an experienced farm person.	Priority
4.1.2	Records related to the veterinarian visits to the farm are kept as well as results and actions required to preserve animal health and welfare.	Priority
4.1.3	Mortality rate is recorded in order to monitor it and, if necessary, implement solutions to reduce it.	Priority

<b>4.2</b>	<b>Health status</b>	
4.2.1	The geese that are injured or sick are separated from the flock and treated.	High priority
4.2.2	An "infirmary" is present: a separated area, provided with bedding, water and feed where sick animals can recover without competition.	High priority
4.2.3	If located outside, the infirmary shall be provided with a shelter. If the infirmary is indoor, it shall be provided with adequate light and ventilation.	Priority
4.2.4	Sick birds, which are unlikely to recover, shall be humanely euthanized	Priority
<b>4.3</b>	<b>Transport</b>	
4.3.1	Transport complies with applicable legislation on animal welfare.	High priority
4.3.2	Transport without cages is not permitted. Legs shall not be bound.	High priority
4.3.3	Transport vehicles and cages guarantee sufficient ventilation and protection from thermal discomfort (excessive heat or cold). Birds are not overcrowded and not too loose (minimum cage floor area: 180 cm <sup>2</sup> /kg of live weight).	High priority
4.3.4	Vehicles and cages are clean.	Priority
4.3.5	Geese reach the Slaughterhouse within a maximum of 6 hours (with loading and unloading times kept to a minimum) unless the applicable law or regulations set forth a shorter time for transportation. .	High priority
4.3.6	Mortality-rate linked to transport is kept for each shipment to Slaughterhouse.	Priority
<b>5</b>	<b>Records</b>	
<b>5.1</b>	<b>Record keeping</b>	
5.1.1	Records on incoming and outgoing geese are kept and maintained for the length of their validity. Records shall include at least: number of geese that arrived and left the facility, date of transport, sender and receiver.	High priority
5.1.2	Procedures shall be in place with reference to reception and inspection of geese including identification of senders, responsible person, etc.	Priority
<b>5.2</b>	<b>Reception and traceability of geese</b>	
5.2.1	The geese arriving at the farm originate from certified sources or come directly from the hatchery.	High priority

### 2.5.2 TR-ICS Internal Control System

Suppliers having a number of goose farms (group of farms) in their supply chain may implement an Internal Control System (hereinafter referred as “ICS”) with the aim to give instructions, ensure a consistent rearing method among all farms and control the farms rearing activities.

The group of farmers under an ICS shall have a homogenous production system and supply the same Slaughterhouse.

In case an ICS is in place and it is assessed as effective, the Traceability, Animal Welfare, Social and Environmental Compliance Certification Body might adopt a sampling methodology to plan audits of farms under ICS. In this case, the assessment of ICS effectiveness shall be planned prior to the farm audits. The sampled farms are subject to the check list used for Industrialized Farm (TR-F Checklist Industrialized Farm).

An effective ICS is composed of:

- Permanent File with the following updated documents:
  - Records of farms under ICS with a unique identification code for each farm and the exact address.
  - Signed contract with each farm that includes (i) criteria for evaluation and acceptance of new farms, (ii) obligation to operate according to ICS Rearing Manual, (iii) consequences for non-compliances including farm discharge, (iv) express consent to internal/third party audit.
  - Organizational chart of the ICS functions with roles and responsibilities addressing who is responsible for maintaining the ICS Rearing Manual up to date and monitoring status of compliance (so called the “internal auditor”). Internal auditors must be trained and qualified and possess a solid knowledge of the DIST Protocol.
  - ICS Rearing Manual (with version number and date) issued in local language and that includes rearing rules addressing both local regulations and management and animal welfare requirements comparable to DIST requirements also with reference to priority level.
  - Audit manual that includes the formalization of (i) audit methodology (on-site visit, document inspection, interviews, etc.), (ii) standard checklists with priority levels comparable to the DIST Protocol, (iii) audit execution (at least one internal audit per year per farm during rearing period when the flock is on-site), (iv) training material for internal auditors aligned to the DIST Protocol, (v) delivery of ICS Rearing Manual to farmers, (vi) conflict of interest management to ensure the internal auditor is independent from the farm under audit.
  
- Annual File with the following updated documents:
  - Record of operations referring to each single farm and actual rearing year. The details shall include number of geese, date of reception at the farm, estimated date of slaughtering, planned and/or actual internal audit date.
  - Audit checklists completed for each farm by the internal auditor. Non-compliances shall be addressed in the audit checklist with an agreed remediation plan and deadline for implementation of corrective actions.
  - Where applicable, records of follow-up audits that might be carried out to close non-compliances through on-site visit (preferred method) or analysis of documentary evidences (photo or other written documents irrefutably linked to the farm under remediation) ensuring that the root cause has been eliminated.

	<b>Requirements for industrial farms with an Internal Control System (ICS)</b>	<b>Category</b>
1	An Internal Control System (ICS) shall be already in place to ensure compliance of the farms to the DIST Protocol.	Mandatory
2	The farmers under an ICS shall have a homogenous production system and supply the same Slaughterhouse.	High priority
3	Farmer shall be knowledgeable about DIST Protocol requirements.	High priority
4	The ICS shall have signed contract with each farm that includes (i) criteria for evaluation and acceptance of new farms, (ii) obligation to operate according to ICS Rearing Manual, (iii) consequences for non-compliances including farm discharge, (iv) express consent to internal/third party audit.	High priority

5	The ICS shall have organizational chart of the ICS functions with roles and responsibilities addressing who is responsible for maintaining the ICS Rearing Manual up to date and monitoring status of compliance (so called the “internal auditor”).	High priority
6	Internal auditors must be trained and qualified and possess a solid knowledge on DIST.	High priority
7	The ICS shall have a Rearing Manual (with version number and date) issued in local language and that includes rearing rules addressing both local regulations and management and animal welfare requirements comparable to DIST requirements also with reference to priority level.	High priority
8	The ICS shall have an audit manual that includes the formalization of (i) audit methodology (on-site visit, document inspection, interview etc.), (ii) standard checklists with priority level comparable to DIST, (iii) audit execution (at least one internal audit per year per farm during rearing period when the flock is on-site), (iv) training material for internal auditors aligned to DIST, (v) delivery of ICS Rearing Manual to farmers, (vi) conflict of interest management to ascertain internal auditor is independent from farm under audit.	High priority
9	The ICS shall physically audit each farm each year to verify compliance to DIST Protocol.	High priority
10	The ICS shall have audit checklists completed for each farm by the internal auditor. Non-compliances shall be addressed in the audit checklist with an agreed remediation plan and deadline for implementation of corrective actions.	High priority
11	The ICS shall have records of operations referring to each single farm and actual rearing year. The details shall include number of geese, date of reception at the farm, estimated date of slaughtering, planned and/or actual internal audit date.	High priority
12	The ICS shall have, where applicable, records of follow-up audits that might be carried out to close non-compliances through on-site visit (preferred method) or analysis of documentary evidences (photo or other written documents irrefutably linked to the farm being under remediation) ensuring that the root cause has been eliminated.	High priority
13	Records shall be maintained for at least three years.	High priority
14	Findings or eventual remedial actions required by the internal auditor shall be consistent with Certification Body findings	Mandatory

### 2.5.3 TR-RF Checklist Rural Farm

	Section	Category
<b>1</b>	<b>General</b>	
1.1	Force-feeding practices are not in use.	Mandatory
1.2	Any kind of live plucking practices are not in use including gathering during molting. Geese shall never have been live plucked in their life.	Mandatory
1.3	The geese are raised for the only purpose of meat production and not for down production purposes.	Mandatory
1.4	Parallel production is not permitted.	Mandatory
1.5	The entity complies with applicable legislation on animal welfare.	High priority
1.6	The farm geese shall originate from the same farm or from a site under DIST certification. Geese received directly from a hatchery shall be considered as compliant.	High priority
<b>2</b>	<b>Animal-Based Measures</b>	
2.1	The animals do respond positively to the Human-Animal Relationship test performed to evaluate the interaction between the stockperson and the geese.	High priority
2.2	The geese are clean: the breast area is not covered by manure or it has no yellow/brown colour due to inadequate housing management (e.g. floor type, dirty or wet litter, internal air quality). The presence of mud shall not be considered as plumage dirtiness.	Priority
2.3	The geese do not present visible signs of: - skin injuries connected to forcible removal of feathers or - areas of feather irregularity that lead to doubts concerning possible live plucking practices.	Mandatory
2.4	The geese do not present broken wings that lead to doubts concerning poor handling procedures and/or inappropriate farming conditions.	High priority
2.5	The geese do not present twisted wings connected to valgus rotation of the distal wing that lead to doubts concerning poor handling procedures, inappropriate housing conditions, inadequate diet, incubation and hatching problems or genetic predisposition.	High priority
2.6	The geese do not present visible signs of feather pecking.	High priority
2.7	Geese in the flock are not immobile or reluctant to move. Immobile animals should be moved immediately to the infirmary area. Difficulty in standing or walking is a critical welfare issue as a goose may suffer from pain and discomfort and may be unable to reach watering and feeding facilities.	High priority
2.8	Geese are not subject to any mutilations such as: - bill trimming (de-beaking) - de-clawing - wing clipping/trimming of feathers - hole punching.	Mandatory
2.9	The bill does not present any colour abnormalities. Straw-yellow colour as well as several areas of depigmentation that lead to doubts regarding possible inadequate feed quality and lack of access to outdoor area, shall not be present.	Priority
<b>3</b>	<b>Housing, Hygiene &amp; Pest control</b>	
3.1	Cages and slatted floors are not in use.	High priority
3.2	Geese are not overcrowded and have sufficient space to express and accommodate their species-specific behaviour and postural adjustments (to stand, lie down, turn around, spread their wings, rest comfortably etc.).	High priority



3.3	Indoor housing allows natural light to enter or it is provided with artificial lighting to ensure sufficient and adequate light during the day.	Priority
3.4	Indoor housing is well ventilated in order to prevent excessive heat, moisture, dust and to reduce the concentration of carbon dioxide, ammonia and other harmful gases in the building.	Priority
3.5	The geese have free access to the outdoors as early as possible in their life (according to weather conditions) and always after 7 weeks of age.	High priority
3.6	Shelters, either natural (trees, etc.) or artificial (roof, barn, etc.), shall be available to ensure temporarily protection during extreme weather conditions.	Priority
3.7	Pest control in place.	Priority
3.8	Predator control is in place.	Priority
<b>4</b>	<b>Feeding &amp; Watering</b>	
4.1	Geese have access to adequate quantity of feed. Feed is continuously available (feed or natural pasture or vegetables or green grass) either through an automatic refill system or through a regular check by personnel.	High priority
4.2	Geese have continuous access to clean water. Water is always available either through an automatic refill system or regular manual refills of drinkers or natural sources of water.	High priority
<b>5</b>	<b>Health</b>	
5.1	The geese that are injured or sick are separated from the flock and treated.	High priority
5.2	Sick birds which are unlikely to recover shall be humanely euthanized.	Priority
5.3	The geese shall be slaughtered humanely.	Priority
<b>6</b>	<b>Record Keeping</b>	
6.1	Records on incoming and outgoing geese are kept and maintained for the length of their validity. Records shall include at least number of geese that arrived and left the facility, date of transport, sender and receiver.	High priority

## 2.5.4 TR-S Checklist Slaughterhouse

	Section	Category
<b>1</b>	<b>General</b>	
1.1	Geese arriving at the Slaughterhouse come from certified sources.	Mandatory
1.2	Incoming geese and accompanying documents shall be inspected by responsible personnel to confirm that records (see 3.1) match with the geese supplies received.	High priority
1.3	The Slaughterhouse complies with applicable animal welfare legislation.	High priority
1.4	The geese are slaughtered for the only purpose of meat production and not for down production purpose.	Mandatory
1.5	For each ingoing geese shipment a Transaction Document shall be maintained and sent to the Certification Body upon request within maximum of two weeks.	High priority
<b>2</b>	<b>Animal-Based Measures</b>	
<b>2.1</b>	The geese do not present visible signs of: - skin injuries connect to forcible removal of feathers or - areas of feather irregularity that lead to doubts regarding possible live plucking practices.	Mandatory
<b>3</b>	<b>Animal Care</b>	
<b>3.1</b>	<b>Code of Conduct</b>	
3.1.1	The entity has a Code of Conduct/targeted policy/Rearing Manual that specifically addresses animal welfare.	Priority
<b>3.2</b>	<b>Handling practices</b>	
3.2.1	The personnel involved in unloading, stunning and killing procedures received instructions about geese management practices required.	High priority
3.2.2	Training can be either on-the-job (i.e. experienced workers taking care of less experienced ones in the daily activities) or in classroom. Training records shall be kept for at least three years.	Priority
<b>3.3</b>	<b>Hygiene control</b>	
3.3.1	The lairage/waiting area is kept clean according to an internal policy.	Priority
<b>3.4</b>	<b>Slaughtering procedure</b>	
3.4.1	Geese shall be slaughtered within two hours of arrival unless an appropriate waiting area with water is available.	High priority
3.4.2	An effective stunning method shall be used to render geese unconscious before death.	High priority
3.4.3	Stunning equipment shall be periodically inspected according to the manufacturer's instructions.	Priority
3.4.4	There is a system of visual impediment to prevent a goose seeing another goose being slaughtered.	Priority
3.4.5	Records of "down-grading" are kept for each farm for at least three years.	Priority
<b>3.5</b>	<b>Separation and traceability</b>	
3.5.1	Geese and down under the DIST Protocol shall be slaughtered/processed in time and /or in place separated from non-DIST geese/down.	High priority
3.5.2	Down under the DIST Protocol shall be stored physically separated from non-certified down. Storage areas for DIST products shall be clearly identified.	High priority
3.5.3	Unique identification number (lot number) shall be used to identify certified and non-certified down during storage and as they move through production. Identification number shall enable an outsider to trace any lot back to the incoming goods.	High priority
<b>3.6</b>	<b>Traceability of outgoing down and feather products</b>	
3.6.1	Packaging and containers shall be sealed in a manner that prevents substitution of the content.	High priority
3.6.2	Each outgoing lot shall have a label and accompanying document with the following information: - receiver identification by name/address	High priority

	<ul style="list-style-type: none"> <li>- quantity (weight) and description of the goods (type of down material, down and feather content, colour)</li> <li>- date of shipment</li> <li>- unique identification code of the batch</li> <li>- transport document</li> <li>- reference to certified status</li> </ul> <p>Label/accompanying documents shall be linked to packaging/container of each shipping.</p>	
3.6.3	<p>Records for outgoing DIST products are kept and maintained updated:</p> <ul style="list-style-type: none"> <li>- receiver identification by name/address</li> <li>- quantity and description of the goods (type of down material, down and feather content, colour)</li> <li>- date of shipment</li> <li>- unique identification code of the batch</li> <li>- transport document</li> <li>- invoice number</li> <li>- reference to certified status.</li> </ul>	High priority
3.6.4	For each outgoing DIST shipment a Transaction Document (TD) shall be maintained and sent to the Certification Body upon request within maximum of two weeks.	High priority
<b>3.7</b>	<b>Transport</b>	
3.7.1	Transport complies with applicable legislation on animal welfare.	High priority
3.7.2	Transport without cages is not permitted	High priority
3.7.3	Transport vehicles and cages guarantee sufficient ventilation and protection from thermal discomfort (excessive heat or cold). Birds are not overcrowded and not too loose (minimum cage floor area: 180 cm <sup>2</sup> /kg of live weight). Legs shall not be bound.	High priority
3.7.4	Vehicles and cages are clean.	Priority
3.7.5	Geese reach the Slaughterhouse within a maximum of 6 hours transport (with loading and unloading times kept to a minimum) unless the applicable law or regulations set forth a shorter time for transportation.	High priority
3.7.6	Mortality-rate linked to transport is kept for each shipment for at least three years.	Priority
<b>4</b>	<b>Record keeping</b>	
4.1	Records on incoming geese are kept and maintained for the length of their validity, or at least for three years, and shall include number of geese received, sender, date of transport, geese age and DIST certified status.	High priority
4.2	<p>Updated procedure is in place and includes at least:</p> <ul style="list-style-type: none"> <li>- responsible personnel</li> <li>- reception and inspection of geese</li> <li>- handling of geese according to DIST Protocol</li> <li>- transport requirements</li> <li>- qualification requirements of personnel</li> <li>- method of identification, separation and labelling throughout the production process and storage including identification of designated storage area for DIST products</li> <li>- TD maintenance</li> <li>- record-keeping</li> <li>- date of procedure and version number</li> </ul>	High priority
<b>5</b>	<b>Management</b>	
5.1	All procedures shall be known by the responsible personnel before they start working with DIST products. Training records shall be kept.	High priority
5.2	Records and procedures are kept and maintained for the length of their validity, but at least for three years.	High priority

### 2.5.5 TR-X Checklist Intermediaries (down collectors, traders, warehouses and processors)

	Section	Category
<b>1</b>	<b>General</b>	
1.1	The entity has a system to trace 100% of its suppliers. Incoming down products arrive from certified sources.	Mandatory
<b>2</b>	<b>Incoming products</b>	
2.1	The entity has an updated procedure in place to ensure the integrity of incoming down supplies under the DIST Protocol. The procedure shall include at least: <ul style="list-style-type: none"> <li>- personnel responsible for reception check and record keeping</li> <li>- control activities at reception (i.e. inspection of Transaction Document (TD) and/or other delivery documents, labels and merchandise)</li> <li>- TD maintenance</li> <li>- date of procedure</li> <li>- version number</li> </ul>	High priority
2.2	Incoming goods, labelling of goods and accompanying documents shall be inspected by responsible personnel to confirm that records (see 2.4) match with the down supplies received.	High priority
2.3	Inspections are properly recorded in a specific register or otherwise the result of the control is highlighted in the supporting documentation itself (e.g. company stamp, date and signature of the person performing the control).	High priority
2.4	Records for DIST down materials acquired from the supply chain are retained and updated: <ul style="list-style-type: none"> <li>- supplier identification by name/address (even when goods are coming from a supplier that is a related party of the Intermediary)</li> <li>- quantity and type of down material</li> <li>- date of reception</li> <li>- identification code of the batch</li> <li>- transport document</li> <li>- invoice</li> <li>- reference to certified status</li> </ul>	High priority
2.5	Damage of the packaging and/or seals shall be monitored, recorded and followed up to assure minimal occurrence.	High priority
2.6	For each ingoing DIST shipment a Transaction Document shall be maintained and sent to the Certification Body upon request within maximum of two weeks.	High priority
<b>3</b>	<b>Processes and storage</b>	
3.1	The entity has an updated procedure in place to ensure the integrity of each production batch processed and/or stored under the DIST protocol in the facility. The procedure shall include at least: <ul style="list-style-type: none"> <li>- responsible personnel for process and record keeping</li> <li>- method of identification, separation and labelling throughout the production and storage (see 3.2-3.5) including identification of designated storage areas</li> <li>- date of procedure</li> <li>- version number</li> </ul>	High priority
3.2	Down under the DIST Protocol is stored physically separated from other non-certified products. Storage areas for DIST products shall be clearly identified.	High priority
3.3	Down under the DIST Protocol is processed separately from other non-certified products and clearly distinguished with a DIST label.	High priority
3.4	Unique identification numbers (lot numbers) are used to identify certified (with also DIST label) and non-certified products during storage and as they move through production. Identification numbers shall enable an outsider to trace any lot back to the incoming goods.	High priority

3.5	<p>The following records shall be maintained updated and accurate:</p> <ul style="list-style-type: none"> <li>- storage records highlighting certified and non-certified down stock</li> <li>- for each processing steps (e.g. washing, sorting, blending) <ul style="list-style-type: none"> <li>• quantity and quality of incoming down products</li> <li>• quantity and quality of outgoing down products (including processing losses)</li> </ul> </li> <li>- composition included in the blended material in order to verify the certified content.</li> </ul>	High priority
<b>4</b>	<b>Out-going products</b>	
4.1	<p>The entity has an updated procedure to ensure the integrity of outgoing products under DIST Protocol. The procedure shall include at least:</p> <ul style="list-style-type: none"> <li>- responsible personnel for shipping</li> <li>- TD maintenance</li> <li>- date of procedure</li> <li>- version number.</li> </ul>	High priority
4.2	<p>Packaging and containers shall be closed in a manner that prevents substitution of the content.</p>	High priority
4.3	<p>Each outgoing lot shall have a label and an accompanying document with the following information:</p> <ul style="list-style-type: none"> <li>- date of shipment</li> <li>- unique identification code</li> <li>- name of product</li> <li>- quantity (weight) of product</li> <li>- reference to DIST certified status</li> </ul> <p>Accompanying documents shall be linked to the packaging, container and vehicle of each shipping.</p>	High priority
4.4	<p>Records for outgoing products under the DIST Protocol are kept and maintained updated:</p> <ul style="list-style-type: none"> <li>- receiver identification by name/address</li> <li>- quantity and type of down material</li> <li>- date of shipment</li> <li>- identification code of the batch</li> <li>- transport document</li> <li>- invoice</li> <li>- reference to DIST certified status.</li> </ul>	High priority
4.5	<p>For each outgoing DIST shipment a Transaction Document shall be maintained and sent to the Certification Body upon request within maximum of two weeks.</p>	High priority
<b>5</b>	<b>Management</b>	
5.1	<p>All procedures shall be known by responsible personnel before they start handling/working with DIST products. Training records shall be kept.</p>	High priority
5.2	<p>Records and procedures are kept and maintained for the length of their validity, but at least for three years.</p>	High priority
<b>6</b>	<b>Collection &amp; Transport (only for collectors)</b>	
6.1	<p>Collector shall have an update procedure including at least:</p> <ul style="list-style-type: none"> <li>- DIST requirements on rural farm certification (see TR-RF)</li> <li>- responsible personnel</li> <li>- action taken in the instance of noncompliance with the DIST</li> <li>- date of procedure</li> <li>- version number</li> </ul>	High priority
6.2	<p>Collectors buying from household collectors shall provide information on:</p> <ul style="list-style-type: none"> <li>- number of household collectors</li> <li>- exact description of collecting "Regions"</li> <li>- estimated volume of certified down</li> </ul>	High priority
6.3	<p>Household collectors shall sign a declaration stating that they received instructions on the respective parts of the DIST protocol and will collect DIST material accordingly. The</p>	High priority

	declaration shall be dated before they start collecting down and feather under DIST Protocol.	
6.4	<p>Instructions given to household collectors shall cover:</p> <ul style="list-style-type: none"> <li>- exact description of regions from where DIST material can be collected</li> <li>- the obligation of the household collector to inform the collector in case he observes deviation from the DIST.</li> <li>- method of separation of DIST material</li> <li>- indication on bags of DIST material</li> <li>- prohibition of collecting recycled materials as DIST</li> </ul>	High priority
6.5	The result of auditors' visits at households shall not significantly differ from the statements and documentation of (household) collectors	Mandatory

**2.5.6 TR-PM Checklist Finished product suppliers**

	<b>Section</b>	<b>Category</b>
<b>1</b>	<b>General</b>	
1.1	The entity traces 100% of the incoming down. Incoming DIST and R-DIST down arrive from certified sources and/or Company's warehouse.	Mandatory
<b>2</b>	<b>Incoming products</b>	
2.1	Incoming goods, labelling of goods and accompanying documents shall be inspected by responsible personnel to confirm that records (see 2.2) match with the down supplies received.	High Priority
2.2	Records for DIST and R-DIST down materials received are retained and updated (packing lists and transport documents). Each of the two categories must be treated separately and relative documents/records must include: - supplier identification by name/address - quantity and type of down material - date of reception - lot numbers - invoice	High Priority
2.3	Damage of the packaging and/or seals shall be monitored and followed up to assure minimal occurrence.	High Priority
<b>3</b>	<b>Processes and storage</b>	
3.1	Finished Products must be filled only with DIST or R-DIST down.	Mandatory
3.2	Down and Finished Products certified DIST and R-DIST are stored separated from non-certified products. Storage areas for DIST and R-DIST products shall be clearly identified and separated between each other.	High Priority
3.3	Down and Finished Products certified DIST and R-DIST are processed separately from non-certified products.	High Priority
3.4	Records with the link between DIST or R-DIST down lot number and Finished Products job order filled are maintained updated.	High Priority
3.5	Unique identification numbers (down's lot numbers / finished products' job orders) are used to identify products during storage and as they move through production.	High Priority
3.6	The actual stocks of DIST or R-DIST down products (raw material and Finished Products) are recorded and maintained updated.	High Priority
<b>4</b>	<b>Outgoing products</b>	
4.1	Each outgoing lot shall have a label and/or accompanying document with the following information: - date of shipment - unique identification code (job order) - name of products - quantity of products - DIST or R-DIST label on the Finished Products Accompanying documents shall be linked to the packaging, container and vehicle of each shipping.	Priority
4.2	Records for outgoing products certified DIST or R-DIST are kept and maintained updated: - receiver identification by name/address - date of shipment - identification code of the batch (job order) - transport document - invoice	Priority
<b>5</b>	<b>Management</b>	
5.1	All procedures shall be known by responsible personnel before they start handling/working with DIST or R-DIST products.	Priority

## SECTION 3 — SOCIAL AND ENVIRONMENTAL COMPLIANCE MODULE

### 3.1 Objectives

The objectives of the DIST Protocol – Social and Environmental Compliance Module are:

- To establish clear requirements with reference to human rights, working conditions, health and safety and environmental management;
- To describe the audit process and methodology used to assess and certify compliance with the DIST Protocol.

### 3.2 Audit Scope

The DIST Protocol – Social and Environmental Compliance Module shall apply to the supply chain of white geese and down from farm level to Slaughterhouses, to Intermediaries (i.e. down collectors, traders, warehouses and processors) to Tier 1 Down suppliers, to Tier 1 Recyclers and Tier 1 Finished product suppliers and their sub-contractors without geographical limitations.

The audit shall be carried out by an independent auditor that assesses implementation and effectiveness of DIST requirements at each site/entity according to the following checklists:

- SE-HR checklist on human rights standards for all entities;
- SE-WC checklist on working conditions standards for all entities;
- SE-H&S checklist on health and safety standards for all entities;
- SE-EC checklist on environmental compliance standards for all entities.

These checklists are the ones used by the Company when it performs social and environmental audits along its supply chain. The checklists are exclusive property of Industry SpA.

### 3.3 Audit Methodology

This paragraph describes how the audit of the supply chain is carried out by the Traceability, Animal Welfare, Social and Environmental Compliance Certification Body, including audit planning, risk assessment, audit sampling, execution and certification.

In case of Tier 1 Finished product suppliers and their sub-contractors, audits can also be conducted by external, independent and qualified providers (commissioned by the Company and not by the audited entity) others than the Traceability, Animal Welfare, Social and Environmental Compliance Certification Body, which in any case will be responsible to issue the final certificate. The audit shall be performed by the auditor using the checklists provided and shall involve different techniques to gather sufficient and reasonable evidence for each topic under examination.

The techniques applicable to the audits are:

- Document inspection;
- Interviews;
- Site inspection.



Auditors shall be allowed to:

- Review all relevant documentation, such as handbooks, employee files, payroll, time records, health and safety documentation, environmental procedures, certificates, documentation and permits and other requirements contained in the checklists;
- Conduct worker interviews in the local language at all levels of the supply chain to assess proper implementation of social and environmental policies and procedures; and
- Inspect the facility to observe physical conditions and current practices in all areas of the employment site, and to form a view of how they compare with the applicable standards and codes. As a general principle, the auditor should be able to visit all the areas of the employment site and should set the pace of the tour.

### **3.3.1 Audit planning and sampling**

Audit planning and sampling should follow the same criteria applied for audits on the Traceability and Animal Welfare Module.

### **3.3.2 Audit execution**

The audit should include the following:

- Opening meeting;
- Site Inspection;
- Management and worker interviews;
- Document review;
- Closing meeting and summary of findings.

Please also refer to paragraph 2.4.2 for more details.

#### **Opening meeting**

The management should take an active part in the audit process to ensure the success of the activity.

The opening meeting should be held in the language spoken by the site representatives. The purpose of meeting is to ensure that the site representatives understand the purpose of the activity. The audit team should describe the requirements against which their site is being assessed and provide details about the whole audit process, timescales and activities.

The opening meeting should be attended by:

- Senior management;
- Managers who are responsible for key functions e.g. HR and production;
- Worker representatives (if present at the site).

#### **Site inspection**

The audit team should utilize the site inspection to observe physical conditions and current practices in all areas of the site, and to verify their alignment with the applicable standards and the checklist requirements.

The audit team should be able to visit all the areas of the site. If the site prohibit visitors from accessing some areas or forbid photography for reasons of safety or commercial confidentiality, these reasons should be assessed and, if

reasonable, should be notified in writing the audit team in the Audit Report. If the reasons are not considered reasonable, the audit team should stop the audit activity and consider it incomplete.

The audit team should set the pace and guide the site inspection tour, and do not let this be done by management.

Identified issues/non compliances should be presented to management as they arise, giving managers the opportunity to seek clarification, respond and provide explanations or further evidence.

### **Management and worker interviews**

The audit team should constantly work with the site management during the audit activity, combining interviews with them and document review. The audit team should challenge the management to obtain genuine information about practices but should remain courteous and cooperative.

With regards to workers interviews, their main purpose is to raise new issues, confirm compliance of practices or confirm suspected non-compliances. The audit team should interview workers both individually and in groups, avoiding the presence of the management and preferably in the language spoken by the interviewees. Where necessary, an independent, qualified translator (under no circumstances should it be the management) should be used.

The audit team should conduct interviews in a site area where the workers feel comfortable and where a relaxed and informal setting can be created. The audit team should select workers to take part in interviews independently. Ideally, worker selection should be diversified and balanced, taking account of the types of workers, such as local and migrant, agency workers, workers provided by service providers etc.

The audit team should keep the identities of interviewees confidential.

### **Document review**

The audit team ask the management to provide the following list of documents: facility floor plan; labor contracts/written employment agreements; employee handbook (terms and conditions of employment); Collective Bargaining Agreements (CBA); list of all the chemicals and solvents used on the site; training records; permits, operating licenses, certificates of operations, etc.; government inspection reports e.g. sanitation, fire safety, structural safety, environmental compliance, etc.; machinery inspection/service logs; accident and injury log; emergency action procedures; evacuation plan; time records for the past 12 months; payroll records for past 12 months; piece rate records for the past 12 months (if applicable); insurance, tax and other required receipts (if applicable); minutes of joint committees on Occupational Health and Safety e.g. disciplinary matters; previous social or environmental audit reports/corrective action logs (if applicable); any appropriate certifications e.g. OSHAS 18000, ISO 9000, ISO 14001, Chain of Custody etc.; facility policies (e.g. Wage and hours of work, Disciplinary, Health and Safety, Human rights, Environment, etc.).

The audit team should always follow all applicable laws regarding data protection requirements of the countries where the audit activity is carried out; where local data protection requirements are more restrictive, the audit team can obtain permission to view personnel files, e.g. via the use of data consent forms.

Once all necessary documentation has been gathered, the audit team verifies that the documents are in compliance with the applicable laws and standards/codes. Identified issues/non compliances should be presented to management as they arise, giving managers the opportunity to seek clarification, respond and provide explanations or further evidence.

### **Closing meeting and summary of findings**

The audit team should then prepare for the closing meeting by filling in the audit checklist and the Audit Report and reviewing the evidence presented and then identifying and agreeing:

- Non-compliances;
- Specific evidence;
- Timeframe to resolve non-compliances;
- Systematic problems and issues;
- Any requests for additional information or evidence.

For each non-compliance reported in the checklist the auditor should provide:

- A description of the non-compliance, its frequency and the number of people concerned;
- Whether it is an isolated incident or a more systemic problem;
- Evidence to substantiate findings;
- Reference and details of the relevant area of the code and/or local law;
- Timeframe to resolve the non-compliance.

It is essential that sufficient time is allowed for a full discussion at the closing meeting.

Close attention should be paid to whether the suggestions are practical and whether the site is certain they can be completed within the agreed time frame.

The purpose of the closing meeting is to inform and agree the findings of the audit with the employment site's management, and to verify their confirmation of the findings through the signing off of the Non-Conformities Report and agreed timescales. Most of these findings should have been communicated as soon as possible throughout the audit.

This meeting should involve all those attending the opening meeting, ideally including a worker representative. The final Non-Conformities Report must be available and left with the site.

Specific timeframes for resolution are provided for all non-compliances found during the audit activity and reported in the Non-Conformities Report; implementation of the mitigation actions required to resolve each non-compliance is monitored through follow-up audits, documental or on-site.

### **3.3.3 Certification process**

The Social and Environmental compliance Certificate is issued by the Traceability, Animal Welfare, Social and Environmental Compliance Certification Body when the supply chain of each Tier 1 supplier fulfils the social and environmental compliance Company's requirements.

The Certificate is valid for one year and refers to the down material linked to the specific supply chain in the rearing season subject to audit.

This means that not all the supply chains of the Tier 1 can be considered certified unless all these supply chains were subject and successfully passed the audit process.

The renewal audit process has to be completed before the current certificate's expiry date.

The certification decision shall be made by the Traceability, Animal Welfare, Social and Environmental Compliance Certification Body certifier based on the findings of the auditor(s). The certifier has the responsibility to:

- perform judgments in the planning phase;
- carry out risk assessment;
- monitor the effective execution of the audit activities; and
- approve the audit results.

The audit results shall be recorded in an Audit Report that the Company has the right to obtain.

The Tier 1 suppliers shall receive a feed-back document to understand non-compliances to be addressed in order to be compliant with the DIST Protocol requirements and obtain the DIST certificate or the non-compliances for which the certificate has been denied, withdrawn or not renewed.

### 3.3.4 Certification requirements

DIST requirements are listed in the standard checklist used by Industry SpA to perform ethical, social and environmental audits on all its suppliers. The checklists have been prepared with technical inputs provided by the International Labour Organization (ILO) and are exclusive property of Industry SpA.

These requirements are divided into categories that are determinant for the certification itself:

- CRITICAL Zero Tolerance (ZT);
- CRITICAL;
- HIGH;
- INTERMEDIATE;
- LOW.

CRITICAL ZT requirements must be fully met at the moment of the audit to obtain and/or renew the certification (scope limited to the requirements applicable to each facility). If non-compliance with any of these requirements is found, the Social and Environmental Compliance Certificate is not issued for the related entire supply chain (in case of a first audit), is withdrawn or not renewed (in case of renewal audit).

Each requirement, if not met, is associated with a penalty score to be assigned, as follows:

REQUIREMENT TYPE	PENALTY SCORE
CRITICAL	50
HIGH	10
INTERMEDIATE	4
LOW	1

The sum of the penalty scores related to each non-compliance found during the audit activity constitutes the overall Audit score.

In order to obtain the Social and Environmental Compliance Certificate, the facility has to achieve a score of less than 50 before the due date. If the company fails to achieve an Audit score of less than 50 before the due date, the Social and Environmental Compliance Certificate is not issued for the related entire supply chain (in case of a first audit), is withdrawn or it is not renewed (in case of renewal audit). Therefore, if the facility has even one CRITICAL non-compliance still open at the deadline indicated in the Audit Report, the Social and Environmental Compliance Certificate is not issued.

Non-compliances shall be effectively corrected within a timeframe which can vary from 15 to 60 days according to the severity of the non-compliance and to the technical or organizational issues that could be necessary to address to solve it. Moreover, in case of partial mitigating actions put in place within the due date, the Traceability, Animal Welfare, Social and Environmental Compliance Certification Body can reassess the severity level of non-compliances originally defined by the category of each requirement.

Improvement actions are assessed through follow-up audits (documental or onsite).

## SECTION 4 – QUALITY MODULE

### 4.1 Objectives

The objectives of the DIST Protocol - Quality Module are:

- To establish clear compliance requirements with reference to quality control; and
- To describe the quality control process and methodology to assess and certify compliance.

With the Quality Certificate, the Company guarantees the quality level of its products to the final consumer.

The Traceability and Animal Welfare Module and the Social and Environmental Compliance Module are an integral and compulsory part of the Quality Module.

Only if the down has been certified according to the Traceability and Animal Welfare Module and the Social and Environmental Compliance Module the Quality Module can be applied. No Traceability / Animal Welfare Certificate and Social / Environmental Compliance Certificate, No Quality Certificate.

In the same way, for Recycled Down, only if the material has been certified according to the R-DIST Module the Quality Module can be applied.

### 4.2 Audit Methodology

Quality control shall be completed by an independent laboratory (Quality Certification Body) using the parameters provided in Paragraph 4.3 of this Section that refers to the rules set out by International Down and Feather Bureau - IDFB (Norm IDFB - JIS1903: 2011) and related to:

- Down Cluster - JIS L 1903:2011 8.2  
Down Cluster is an indicator of the purity of the filling, which determines warmth, fluffiness and moisture control.
- Species - JDPCA Testing Method  
Goose down grants high-level quality as a filling material.
- Fill Power - IDFB Testing Regulation Part 10-B  
High fill power indicates higher insulation value and better moisture management with lighter weight.
- Oxygen Number - JIS L 1903:2011 8.7  
Oxygen Number indicates product cleanliness by providing a measurement of organic material coating the fill material.

The Quality Certification Body must:

- Have a valid IDFB certification;
- Be independent from any parts involved in the supply chain under DIST Certification; and
- Have passed successfully the IDFB Round Robin test for two years in a row before issuing any DIST Certification.

Quality certification process (overall Tier 1 yearly supply) shall be carried out according to:

- Overall quantities of down supplied by each Tier 1 Down supplier;
- Number of lots composing the quantities;
- Number of bales composing each lot.

The above parameters shall determine how many samples must be extracted and tested from the down of Tier 1 Down supplier under certification.  
 Quality control shall be carried out on 100% of the purchased lots.

### 4.2.1 Sample Collection

In order to guarantee a more independent quality evaluation of the DIST down, the quality tests shall be performed on samples collected directly at the Tier 1 Down supplier’s facilities.

The sample collection shall be carried out by the Quality Certification Body upon request of the Company.

With the sample collection the Quality Certification Body collects the down for quality testing from the down ready for the shipment to the Company. The samples are collected according to IDFB Testing Regulation Part 2 collection guidelines and selected randomly, following the scheme:

Extent of delivery	Number of bales or bags from each of which at least three individual samples shall be taken	Weight (mass) of each of the three individual samples to be taken from each bag or bale	Total sample quantity (mass) to be removed from the lot or batch
Pieces	Pieces	g.	g.
1	1	135	405
2-15	2	70	420
16-25	3	45	405
26-50	4	35	420
51-90	5	30	450
91-150	7	20	420
151-280	10	20	600
281-500	15	15	675
501-1200	20	15	900
Over 1200	25	15	1125

Sample collections are conducted at the processing factory of the Tier 1 Down supplier before shipments of DIST material. The Quality Certification Body has to verify that the entire quantity is present for proper sampling.

Quality Certification Body performs the quality tests on the samples collected, informing the Company about the results and issuing the DIST Medals to each test report.

If the quality is compliant with the requirements, the Company gives the approval of shipment to the Tier 1 Down supplier.

For the collection of the material by the Quality Certification Body, a sample-based methodology applies:

Auditee	Sampling criteria	Execution criteria
DIST certified lots ready for the delivery at Tier 1 Down supplier's warehouse	Lots covering the 10% of the amount purchased from each supplier in the year (rounded up to the closest integer)	Announced

For the remaining DIST material not sampled by the Quality Certification Body, tests shall be performed on a sample extracted according to IDFB Testing Regulation Part 2 by the Tier 1 Down supplier from each purchased lot that is ready for the delivery to the Company.

### 4.3 Annual Quality Certification Process

The Annual Quality Certificate (AQC) shall give the assurance that the down delivered by the Tier 1 Down supplier meets DIST requirements as follows:

- Down Cluster (%) Minimum 89.0
- Species Contents (%) Minimum White Goose Down 90.0
- Fill Power (Cubic Inches) Minimum 650
- Oxygen Number (mg) Maximum 6.4
- Other quality parameters must reach the requirements set by applicable laws and rules.

All the above listed requirements are mandatory, therefore they shall all be met to achieve the Annual quality Certificate. No compliance, no certification.

The AQC shall be issued to the Tier 1 Down supplier that complies with the requirements stated above in all the down delivered. One supplier, one certificate.

The award of the AQC to the Tier 1 Down supplier is based on the quality of the down delivered by the Tier 1 Down supplier during the year referred in the certificate.

While the AQC is annual, each Test Report by the Quality Certification Body assigns a DIST Quality Medal to the tested lot according to the following three levels of quality, based on the test results of the four quality parameters:

GOLD				
	CLUSTER CONTENTS	SPECIES	FILL POWER	OXYGEN NUMBER
	92.8% CLUSTERS	95% WHITE GOOSE	730 CUBIC INCHES	3.2 mg
SILVER				
	CLUSTER CONTENTS	SPECIES	FILL POWER	OXYGEN NUMBER
	91% CLUSTERS	93.5% WHITE GOOSE	710 CUBIC INCHES	4.8 mg
BRONZE				
	CLUSTER CONTENTS	SPECIES	FILL POWER	OXYGEN NUMBER
	89% CLUSTERS	90% WHITE GOOSE	650 CUBIC INCHES	6.4 mg

The Medal for each Test Report is assigned by the Quality Certification Body according to the following rules:

- Gold Medal if all quality parameters are Gold or three are Gold and the other one is Silver;
- Silver Medal if all quality parameters are Silver or at least two are Silver and the others are Gold;
- Bronze Medal if all quality parameters are Bronze or at least one is Bronze and the others are Silver and/or Gold.

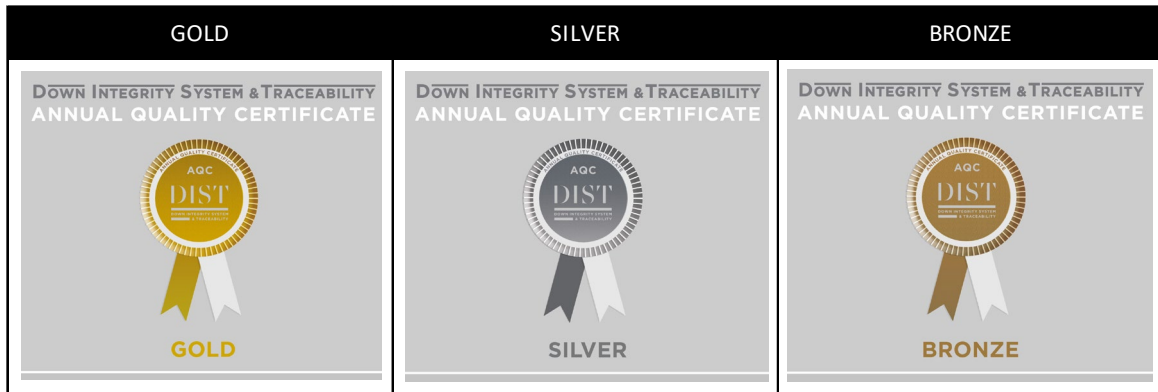
At the end of the year, the Quality Certification Body prepares a Final Report assigning the relevant Annual Quality Certificate (AQC) to each Tier 1 supplier according to the following rules:

- To be eligible for the AQC a Tier 1 Down supplier must have supplied at least 10% of the total down quantity purchased by the Company during the year;
- Gold AQC if the Tier 1 Down supplier has delivered 70% or more lots with Gold Medal Test Report;
- Silver AQC if the Tier 1 Down supplier has delivered less than 70% lots with Gold Medal Test Report and less than 30% lots with Bronze Medal Test Report;
- Bronze AQC if the Tier 1 Down supplier has delivered more than 30% lots with Bronze Medal Test Report.

According to the Final Report, the Quality Certification Body issues the Annual Quality Certificate to the eligible Tier 1 Down supplier under the supervision of the Control Service Certification Body that validates the process.

The Annual Quality Certificate is valid only for the year in which it has been achieved.

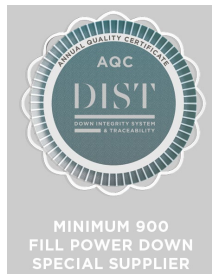




In addition, a Certificate of Merit is assigned to each Tier 1 Down supplier that has delivered Minimum 900 Fill Power down of the following quality:

- Down Cluster (%) Minimum 92.0
- Species Contents (%) Minimum White Goose Down 95.0
- Fill Power (Cubic Inches) Minimum 900
- Oxygen Number (mg) Maximum 4.8

To obtain the Certificate of Merit the Tier 1 Down supplier must have delivered at least 100 Kg of Minimum 900 Fill Power down and the Certificate of Merit is applied to the Annual Quality Certificate assigned for the year.



Annual Quality DIST ratings are designed to benchmark the performance of Tier 1 Down suppliers and to systematically improve the quality of the down.

## SECTION 5 – R-DIST MODULE

### 5.1 Objectives

The objectives of the R-DIST Module are:

- To establish clear compliance requirements with reference to traceability of recycled down;
- To describe the audit process and methodology used to assess and certify compliance with the R-DIST Module.

### 5.2 Audit Scope

The R-DIST Module shall apply to the supply chain of finished products produced with DIST recycled down from Recycler level to Intermediaries (i.e. traders, warehouses and processors) and up to Finished product suppliers and their sub-contractors without geographical limitation.

The audit shall be carried out by an independent auditor that assesses implementation and effectiveness of R-DIST requirements at each site/entity as follows:

- TR-X1R checklist Recycler
- TR-X checklist Intermediaries (i.e. down collectors, traders, warehouses and processors)
- TR-PM checklist Finished product suppliers

### 5.3 Audit Methodology

This paragraph describes how the audit of the supply chain is carried out by the Traceability, Animal Welfare, Social and Environmental Compliance Certification Body, including audit planning, risk assessment, audit sampling, execution and certification.

The audit shall be performed by the auditor using the checklists provided in Paragraph 5.4 of this Section and shall involve different techniques to gather sufficient and reasonable evidence for each topic under examination.

The techniques applicable to the audits are:

- Document inspection;
- Interview;
- Site inspection.

Auditors shall be allowed to:

- Review all relevant documentation, such as legal compliance documents, traceability management system, employee training if any and other requirements contained in the checklists;
- Conduct interviews in the local language at all levels of the supply chain to assess proper implementation of traceability policies and procedures; and
- Inspect the facility to assess the following:
  - labeling practices and procedures;
  - supply chain processes implementation; and
  - all other R-DIST requirements.

### 5.3.1 Audit planning

During the planning phase, the following factors are taken into account:

- identification and selection of the entities to be audited;
- audit sampling methodology (as detailed in paragraph 5.3.2);
- seasonality; and
- specific risk factors.

Audits shall be carried out during periods with highest risk with regard to non-compliance with the R-DIST Module:

- Down Recycler and Intermediaries shall be audited preferably when and where down to be certified is processed and traded;
- Finished product suppliers shall be audited during the period in which they are manufacturing apparel containing DIST recycled down.

In exceptional cases, when it is not possible to perform the audit during high-risk periods as mentioned above, the Traceability, Animal Welfare, Social and Environmental Compliance Certification Body is required to provide written justification.

### 5.3.2 Audit sampling and execution

The down supply chain shall be audited following the criteria below:

Auditee	Sampling criteria	Execution criteria
Recycler	100%	Announced
Intermediaries (i.e., traders, warehouses and processors)	100%	Announced

Recyclers and Intermediaries are audited every year on a 100% basis.

At the Recycler and Intermediary level (i.e. down collectors, traders, warehouses and processors) audits are focused on traceability and are always announced. However, the Traceability, Animal Welfare, Social and Environmental Compliance Certification Body has the right to carry out extra unannounced audits.

The audits are divided into three types as follows:

- **First audit:** an audit performed the first year of a certification process.
- **Renewal audit:** an audit performed for the renewal of the Certificate that allows the Traceability, Animal Welfare, Social and Environmental Compliance Certification Body to monitor if the supply chain is still compliant with the R-DIST Module. In this case the audit shall take place before the expiry date of the previous year's certificate.
- **Follow-up audit:** an audit that might be required to check progress related to non-compliances found in the first/renewal audit to check the corrective actions put in place. Based on the type of non-compliance, corrective actions can be assessed through on-site visits and/or analysis of documentary evidence (photo or documentation should be irrefutably linked to specific site).

### 5.3.3 Certification process

The R-DIST Certificate is issued by the Traceability, Animal Welfare, Social and Environmental Compliance Certification Body when the Recycler and the Tier 1 Finished product supplier fulfil the requirements stated in the R-DIST Module (Paragraph 5.4).

The Certificate is valid for one year. The renewal audit process has to be completed before the current certificate's expiry date.

The certification decision shall be made by the Traceability, Animal Welfare, Social and Environmental Compliance Certification Body certifier based on the findings of the auditor(s). The certifier has the responsibility to:

- perform judgments in the planning phase;
- carry out risk assessment;
- monitor the effective execution of the audit activities; and
- approve the audit results.

The audit results shall be recorded in an audit report that the Company has the right to obtain.

The Auditees shall receive a feed-back document to understand non-compliances to be addressed in order to be compliant with the R-DIST Module requirements.

### 5.3.4 Certification requirements

R-DIST requirements are divided into categories that are determinant for the certification itself:

- Mandatory
- High priority
- Priority

**Mandatory:** those requirements that must be fully met at the moment of the audit to obtain and/or renew the certification. If non-compliance with any of the mandatory requirements is found, the R-DIST Certificate is not issued for the related entire supply chain (in case of a first audit), is withdrawn or not renewed (in case of renewal audit).

**High priority:** those requirements that must be met in a percentage of at least 50% per checklist at the moment of the audit and fully met (100%) not later than the deadline indicated below to obtain and/or renew the certification. If non-compliance with any of the high priority requirements is found, the entity has 30 days from the receipt of the feed-back document mentioned at point 2.4.3 to implement corrective actions. If the entity fails to correct high priority non-compliances within the due date, the R-DIST Certificate is not issued for the related entire supply chain (in case of a first audit), is withdrawn or it is not renewed (in case of renewal audit).

Improvement actions are assessed through follow-up audits.

**Priority:** those requirements that must be met in a percentage of at least 75% per checklist. An entity that does not fulfil the minimum compliance ratio of priority requirements has 30 days from the receipt of the feed-back document mentioned at point 2.4.3 to implement corrective actions. If the entity fails to correct the minimum priority requirements within the due date, the R-DIST Certificate is not issued for the related entire supply chain (in case of a first audit), is withdrawn or it is not renewed (in case of renewal audit).

Improvement actions are assessed through follow-up audits.

Requirement type	% Compliance	Due date	Consequence for non-compliance not corrected within the due date
Mandatory	100%	Compliance is required at the moment of the audit and as long as the certificate is granted	R-DIST Certificate not issued, withdrawn or not renewed
High priority	100%	Non-compliances shall be effectively corrected within 30 days from the receipt of the feed-back document	
Priority	75%	Non-compliances shall be effectively corrected within 30 days from the receipt of the feed-back document	

## 5.4 R-DIST Requirements

### 5.4.1 TR-X1R Checklist Recycler

	Section	Category
<b>1</b>	<b>General</b>	
1.1	The entity has a system to trace 100% of its suppliers. Incoming down products arrive from the Company or delegated unit.	Mandatory
<b>2</b>	<b>Incoming products</b>	
2.1	The entity shall check the Transaction Document (TD) received by the Company, or their delegates, reporting: number of pieces, down weight/pc. Such document shall be archived together with the related transport documents. The presence/absence of DIST label of each piece must be checked and recorded.	Mandatory
2.2	The entity shall check the average weight of down/type of incoming garments on a 10% representative sample. A sampling procedure shall be available and appropriate training records for the operators. Average weight recording is to be archived.	Mandatory
2.3	The entity has an updated procedure in place to ensure the integrity of incoming down supplies under the R-DIST Module. The procedure shall include at least: - personnel responsible for reception check and record keeping - control activities at reception (i.e. inspection of Transaction Document (TD) and/or other delivery documents, labels and merchandise) - TD maintenance - date of procedure - version number	High priority
2.4	Incoming goods, labelling of goods and accompanying documents shall be inspected by responsible personnel to confirm that records (see 2.6) match with the down supplies received.	High priority
2.5	Inspections are properly recorded in a specific register or otherwise the result of the control is highlighted in the supporting documentation itself (e.g. company stamp, date and signature of the person performing the control).	High priority
2.6	Records for R-DIST down materials acquired from the supply chain are retained and updated: - supplier identification by name/address (even when goods are coming from a supplier that is a related party of the Intermediary) - quantity and type of down material - date of reception - identification code of the batch - transport document - invoice - reference to certified status	High priority
2.7	Damage of the packaging and/or seals shall be monitored, recorded and followed up to assure minimal occurrence.	High priority
2.8	For each ingoing R-DIST shipment a Transaction Document shall be maintained and sent to the Certification Body upon request within maximum of two weeks.	High priority
<b>3</b>	<b>Processes and storage</b>	
3.1	The entity has an updated procedure in place to ensure the integrity of each production batch processed and/or stored under the DIST protocol in the facility. The procedure shall include at least: - responsible personnel for process and record keeping - method of identification, separation and labelling throughout the production and storage (see 3.2-3.5) including identification of designated storage areas - date of procedure - version number	High priority

3.2	Down under the R-DIST Module is stored physically separated from other non-certified products or from DIST certified one. Storage areas for DIST products shall be clearly identified.	High priority
3.3	Down under the R-DIST Module is processed separately from other non-certified products or from DIST certified one.	High priority
3.4	Unique identification numbers (lot numbers) are used to identify certified (with also RE-DIST label) and non-certified products during storage and as they move through production. Identification numbers shall enable an outsider to trace any lot back to the incoming goods.	High priority
3.5	The following records shall be maintained updated and accurate: - storage records highlighting DIST and R-DIST down stock - for each processing steps (e.g. washing, sorting, blending) * quantity and quality of incoming down products * quantity and quality of outgoing down products (including processing losses) - composition included in the blended material in order to verify the certified content.	High priority
<b>4</b>	<b>Out-going products</b>	
4.1	The entity has an updated procedure to ensure the integrity of outgoing products under R-DIST Module. The procedure shall include at least: - responsible personnel for shipping - TD maintenance - date of procedure - version number.	High priority
4.2	Packaging and containers shall be closed in a manner that prevents substitution of the content.	High priority
4.3	Each outgoing lot shall have a label or accompanying document with the following information: - date of shipment - unique identification code - name of product - quantity (weight) of product - reference to R-DIST certified status Accompanying documents shall be linked to the packaging, container and vehicle of each shipping.	High priority
4.4	Records for outgoing products under the R-DIST Module are kept and maintained updated: - receiver identification by name/address - quantity and type of down material - date of shipment - identification code of the batch - transport document - invoice - reference to R-DIST ) certified status.	High priority
4.5	For each outgoing R-DIST shipment a Transaction Document shall be maintained and sent to the Certification Body upon request within maximum of two weeks.	High priority
<b>5</b>	<b>Management</b>	
5.1	All procedures shall be known by responsible personnel before they start handling/working with R-DIST products. Training records shall be kept.	High priority
5.2	Records and procedures are kept and maintained for the length of their validity, but at least for three years.	High priority

**5.4.2 TR-X checklist Intermediaries (i.e. down collectors, traders, warehouses and processors)**

	<b>Section</b>	<b>Category</b>
<b>1</b>	<b>General</b>	
1.1	The entity has a system to trace 100% of its suppliers. Incoming down products arrive from certified sources.	Mandatory
<b>2</b>	<b>Incoming products</b>	
2.1	The entity has an updated procedure in place to ensure the integrity of incoming down supplies under the R-DIST Module. The procedure shall include at least: <ul style="list-style-type: none"> <li>- personnel responsible for reception check and record keeping</li> <li>- control activities at reception (i.e. inspection of Transaction Document (TD) and/or other delivery documents, labels and merchandise)</li> <li>- TD maintenance</li> <li>- date of procedure</li> <li>- version number</li> </ul>	High priority
2.2	Incoming goods, labelling of goods and accompanying documents shall be inspected by responsible personnel to confirm that records (see 2.6) match with the down supplies received.	High priority
2.3	Inspections are properly recorded in a specific register or otherwise the result of the control is highlighted in the supporting documentation itself (e.g. company stamp, date and signature of the person performing the control).	High priority
2.4	Records for R-DIST down materials acquired from the supply chain are retained and updated: <ul style="list-style-type: none"> <li>- supplier identification by name/address (even when goods are coming from a supplier that is a related party of the Intermediary)</li> <li>- quantity and type of down material</li> <li>- date of reception</li> <li>- identification code of the batch</li> <li>- transport document</li> <li>- invoice</li> <li>- reference to certified status</li> </ul>	High priority
2.5	Damage of the packaging and/or seals shall be monitored, recorded and followed up to assure minimal occurrence.	High priority
2.6	For each ingoing R-DIST shipment a Transaction Document shall be maintained and sent to the Certification Body upon request within maximum of two weeks.	High priority
<b>3</b>	<b>Processes and storage</b>	
3.1	The entity has an updated procedure in place to ensure the integrity of each production batch processed and/or stored under the DIST protocol in the facility. The procedure shall include at least: <ul style="list-style-type: none"> <li>- responsible personnel for process and record keeping</li> <li>- method of identification, separation and labelling throughout the production and storage (see 3.2-3.5) including identification of designated storage areas</li> <li>- date of procedure</li> <li>- version number</li> </ul>	High priority
3.2	Down under the R-DIST Module is stored physically separated from other non-certified products or from DIST certified one. Storage areas for DIST products shall be clearly identified.	High priority
3.3	Down under the R-DIST Protocol is processed separately from other non-certified products or from DIST certified one.	High priority
3.4	Unique identification numbers (lot numbers) are used to identify certified (with also R-DIST label) and non-certified products during storage and as they move through production. Identification numbers shall enable an outsider to trace any lot back to the incoming goods.	High priority

3.5	<p>The following records shall be maintained updated and accurate:</p> <ul style="list-style-type: none"> <li>- storage records highlighting certified and non-certified down stock</li> <li>- for each processing steps (e.g. washing, sorting, blending)                             <ul style="list-style-type: none"> <li>* quantity and quality of incoming down products</li> <li>* quantity and quality of outgoing down products (including processing losses)</li> </ul> </li> <li>- composition included in the blended material in order to verify the certified content.</li> </ul>	High priority
<b>4</b>	<b>Out-going products</b>	
4.1	<p>The entity has an updated procedure to ensure the integrity of outgoing products under R-DIST Module. The procedure shall include at least:</p> <ul style="list-style-type: none"> <li>- responsible personnel for shipping</li> <li>- TD maintenance</li> <li>- date of procedure</li> <li>- version number.</li> </ul>	High priority
4.2	<p>Packaging and containers shall be closed in a manner that prevents substitution of the content.</p>	High priority
4.3	<p>Each outgoing lot shall have a label or accompanying document with the following information:</p> <ul style="list-style-type: none"> <li>- date of shipment</li> <li>- unique identification code</li> <li>- name of product</li> <li>- quantity (weight) of product</li> <li>- reference to R-DIST certified status</li> </ul> <p>Accompanying documents shall be linked to the packaging, container and vehicle of each shipping.</p>	High priority
4.4	<p>Records for outgoing products under the R-DIST Module are kept and maintained updated:</p> <ul style="list-style-type: none"> <li>- receiver identification by name/address</li> <li>- quantity and type of down material</li> <li>- date of shipment</li> <li>- identification code of the batch</li> <li>- transport document</li> <li>- invoice</li> <li>- reference to R-DIST certified status.</li> </ul>	High priority
4.5	<p>For each outgoing R-DIST shipment a Transaction Document shall be maintained and sent to the Certification Body upon request within maximum of two weeks.</p>	High priority
<b>5</b>	<b>Management</b>	
5.1	<p>All procedures shall be known by responsible personnel before they start handling/working with R-DIST products. Training records shall be kept.</p>	High priority
5.2	<p>Records and procedures are kept and maintained for the length of their validity, but at least for three years.</p>	High priority



**5.4.3 TR-PM: checklist Finished product suppliers**

	<b>Section</b>	<b>Category</b>
<b>1</b>	<b>General</b>	
1.1	The entity traces 100% of the incoming down. Incoming DIST and R-DIST down arrive from certified sources and/or Company's warehouse.	Mandatory
<b>2</b>	<b>Incoming products</b>	
2.1	Incoming goods, labelling of goods and accompanying documents shall be inspected by responsible personnel to confirm that records (see 2.2) match with the down supplies received.	High priority
2.2	Records for DIST and R-DIST down materials received are retained and updated (e.g. packing lists, transport documents, etc). Each of the two categories must be treated separately and relative documents/records must include: - supplier identification by name/address - quantity and type of down material - date of reception - lot numbers - invoice	High priority
2.3	Damage of the packaging and/or seals shall be monitored and followed up to assure minimal occurrence.	High priority
<b>3</b>	<b>Processes and storage</b>	
3.1	Finished Products must be filled only with DIST or R-DIST Down.	Mandatory
3.2	Down and Finished Products certified DIST and R-DIST are stored separated from non-certified products. Storage areas for DIST and R-DIST products shall be clearly identified and separated between each other.	High priority
3.3	Down and Finished Products certified DIST or R-DIST are processed separately from non-certified products.	High priority
3.4	Records with the link between DIST or R-DIST Down lot number and Finished Products job order filled are maintained updated.	High priority
3.5	Unique identification numbers (down's lot numbers / finished products' job orders) are used to identify products during storage and as they move through production.	High priority
3.6	The actual stocks of DIST or R-DIST down products (raw material and Finished Products) are recorded and maintained updated.	High priority
<b>4</b>	<b>Outgoing products</b>	
4.1	Each outgoing lot shall have a label and/or accompanying document with the following information: - date of shipment - unique identification code (job order) - name of products - quantity of products - DIST or R-DIST label on the Finished Products Accompanying documents shall be linked to the packaging, container and vehicle of each shipping.	Priority
4.2	Records for outgoing products certified DIST or R-DIST are kept and maintained updated: - receiver identification by name/address - date of shipment - identification code of the batch (job order) - transport document - invoice	Priority
<b>5</b>	<b>Management</b>	
5.1	All procedures shall be known by responsible personnel before they start handling/working with DIST or R-DIST products.	High priority