

 ASSOCIATION POUR L'ASSURANCE QUALITÉ DES FABRICANTS DE BRACELETS CUIR		DOC nb PRO023_03
		Replace PRO023_02
BRACELET MANUFACTURERS - SPECIFICATION		
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Written by	Quality review (signature/date)	Process owner (signature/date)
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Change log

Version	Date	Change description
03	05Mar23	Revision – Technical Working Group validation 01Dec22 <ul style="list-style-type: none"> • 2.4.1 : error in English translation • 2.4.2 : Add of overtime compliance Board decision 24Aug22 – action CQI-22-042b • 2.4.5 : Add of incitation to act for Inclusion Board decision 24Aug22 & 28Sep22 – action CQI-22-044a • 3.1.1 : Add of Energy Management section with the incitation to use renewable energy Board decision 24Aug22 & 28Sep22 – action CQI-22-044a • 3.1.2.1 & 3.1.2.2: Add of new requirements for CO₂ footprint calculation and reduction plan Decision Board 05May22 – action CQI-22-038a • 3.1.3.3 : Add of the invitation to perform circularity in waste Management section. Decision Board 28Sep22 – action CQI-22-065b • 5.1 and 5.2.1 : withdraw of Quality documentation management and focus on customer complaint management (including corrective/preventive actions plans) Decision Board 28Aug22 – action CQI-22-066b

Associated document (level 1)

Document	Title
MAQ018	Credibility process

Associated document (level 2)

Document	Title
PRO029	Certification procedure

Associated document (level 3)

Document	Title
FOR017	Audit form for Bracelets Manufacturers certification

0. Scope

This specification defines the bracelet manufacturers' commitments for a bracelet with the highest level of safety and produced within responsible manufactures and supply chain.

The commitments of the present specification are the basis of the AQC certification for Bracelet Manufacturers.

1. Responsibilities

1.1 Competent person

- 1.1.1 A person from the management who has sufficient authority and full responsibility for the application of these specifications must be designated by the entity.
- 1.1.2 The entity shall define and implement communication and training measures for employees affected by this specification in order to keep them informed and competent with regard to their responsibilities.

1.2 Retention of documents

- 1.2.1 All documents referring to the application of this specification must be clearly legible, non-equivocal, understandable, available in their latest version and stored in one place (paper or electronic documentation system).
- 1.2.2 The entity must keep all documents proving its compliance with this specification for a minimum of 5 years.
- 1.2.3 The entity must have a system in place to respond to any reasonable request relating to the application of these specifications.

1.3 Updates

- 1.3.1 The entity's management must ensure that the specifications are properly applied if changes affect them.

2. General requirements

2.1 General policy and principles of the entity

- 2.1.1 The entity's management should design and implement a corporate social responsibility policy. This policy should be documented in the form of a Code of Conduct and take into account at least:
 - environmental responsibilities
 - sustainable development
 - ethical responsibilities
 - human resources management and respect for human rights
 - product characteristics (safety, quality, etc.)
- 2.1.2 This policy should take into account customer requirements and should be communicated to all employees, suppliers and subcontractors.

2.1.3 Organisation of the entity

2.1.3.1 An organisation chart should be available within the entity. It should highlight the responsibilities and competences of the department heads. Delegations of responsibility should be mentioned.

2.1.3.2 Job descriptions, clearly defining responsibilities, may exist and be applied by employees who have an impact on the characteristics of the product.

2.2 Human rights and fundamental freedoms

2.2.1 The entity should adopt and make public its commitments to respect human rights and fundamental freedoms.

2.2.2 Depending on the areas of supply, the entity will ensure that it assesses in advance the risk of human rights abuses.

2.3 Working conditions (Health and Safety)

2.3.1 The entity should provide staff facilities that are equipped and appropriate in size for the number of employees. They must be operational and designed to minimise occupational hazards. These facilities must be clean and in good working state.

2.3.2 The entity should ensure that occupational health and safety conditions comply with applicable law and professional standards for all its staff and external stakeholders.

2.3.3 The entity must assess the risk of workplace hazards and implement the necessary controls to minimise the risk of accidents and injuries to employees, as well as to external stakeholders.

2.3.4 The entity should ensure that personal protective equipment (PPE) is provided free of charge to employees and that it is used correctly.

2.3.5 The entity should keep a record of accidents and near misses. The results of the investigations and controls carried out should make it possible to identify prevention opportunities.

2.3.6 Evacuation plans and instructions are adequately displayed, and evacuation procedures (fire, emergency) are known to all employees. There are a sufficient number of clearly marked and unobstructed emergency exits. Evacuation drills are carried out regularly.

2.3.7 The entity shall ensure that appropriate and periodically tested fire extinguishers are located at sufficient points within the entity's premises and that they are properly used in the event of a fire.

2.4 Respect for workers' rights

2.4.1 General conditions of employment

Employment contracts have to be signed with all employees. They have to contain at least the position, working time and place, as well as the salary of the employee. The employee's salary is in accordance with national laws and the minimum wages of the branch

- 2.4.2 Overtime
The entity has a system to register overtime. The amount of overtime per employee is in compliance with the applicable law in force.
Likewise, overtime compensation (payments or recoveries) must be also made in accordance with the applicable laws.
- 2.4.3 Organisation of workers
The entity must respect the right to free association of workers, as well as the right to strike.
- 2.4.4 Non-discrimination
The entity does not base its decisions on personal characteristics (gender, race, nationality, ethnicity, social origin, religion or belief, disability, age or sexual orientation) unrelated to the requirements of the job.
- 2.4.5 Inclusion
The entity is invited to act for inclusion.
Inclusion should be understood as the practice or policy of providing equal access to opportunities for people who might otherwise be excluded or marginalized, such as those who have physical or mental disabilities and members of minority groups.
- 2.4.6 Child labour
The minimum age for non-hazardous work is 15 years, or higher in accordance with the minimum age provided for by the applicable law. For hazardous work, the minimum age is 18. Age verification is carried out at the time of hiring.
- 2.4.7 Disciplinary procedures and sanctions
The entity must ensure that employees are not subjected to physical punishment, degrading treatment, moral or sexual harassment, physical or verbal abuse, intimidation or threats to themselves, their family or colleagues.

2.5 Subcontracting

- 2.5.1 Identification of subcontractors
When the entity chooses to outsource - outside its group - a process that may have an impact on product quality and safety, the outsourced process must be identified and documented in the quality management system.
- 2.5.2 Audit of subcontractors
The entity undertakes to audit its subcontractors in accordance with the present specification.

2.6 Compliance with national laws and regulations

- 2.6.1 Supplier compliance
- 2.6.1.1 The entity should maintain a record of the identity, ownership and shareholding of the managers of its suppliers.
- 2.6.1.2 A procedure is in place to exclude a supplier if unusual or suspicious transactions, activities or associations are detected, which cannot be resolved after investigation.
- 2.6.2 Prevention of corruption

- 2.6.2.1 The entity should have a system in place to ensure compliance with applicable legislation.
- 2.6.2.2 The entity should have a system in place to prevent the risk of corruption in its organisation.
- 2.6.2.3 The entity should have a procedure in place to ensure that all business and personal information is treated with respect and confidentiality.
- 2.6.2.4 The entity should have a procedure in place that formally prohibits all staff from giving or promising anything of value to a government official, civil servant or employee with the intention of influencing that person or his or her decision and obtaining disloyal behaviour.

2.6.3 Accounting and finance
The entity must have an annual audit or financial review conducted by a qualified independent accountant.

2.6.4 Veille et surveillance
The entity should have a relevant monitoring system for applicable legislation and good industry practice.

3. Environmental policy

3.1 Responsible practises for the environment

3.1.1 Energy Management

The entity is invited to use renewable energy.
As a first step in this process, renewable energies are defined as originated from sunlight, wind, movement of water, and geothermal heat.
Nuclear energy is not considered as a renewable energy.

3.1.2 Emissions management

3.1.2.1 The entity must identify and measure its emissions of carbon dioxide (CO₂) and volatile organic compounds (VOCs) generated by its activity.

3.1.2.2 The entity must monitor its carbone dioxide and volatile organic compound emissions and have an established and documented plan to reduce the carbon footprint of its activities.

3.1.3 Waste management

3.1.3.1 The entity should identify and manage its waste generated by its activity.

3.1.3.2 The entity should monitor its waste trends and establish a waste reduction plan.

3.1.3.3 The entity is invited to take into consideration circularity.
Circular economy is a model of production and consumption, which involves product design, as well as using, and recycling existing materials and products as long as possible.

3.1.3.4 The entity distinguishes between hazardous and non-hazardous waste for storage, use and disposal. Hazardous chemical waste is disposed of by a qualified organisation.

3.1.4 Alternatives to hazardous

3.1.4.1 The entity must keep a written inventory of hazardous substances and mixtures with at least the identity of the substance and its CAS number.

3.1.4.2 Safety data sheets must be available whenever hazardous substances or mixtures are used.

3.1.4.3 The entity must follow the AQC control plan with all its suppliers (AQC and non-AQC).

3.1.4.4 The entity should implement alternatives to the regulated hazardous substances used in its business.

3.2 Protection of wild species and preservation of their natural environment

3.2.1.1 The entity should identify the natural resources used in its business and ensure their responsible use.

3.2.1.2 The entity complies with customs law and the obligations of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES).

3.2.1.3 The entity has a system in place for managing skins and articles subject to CITES.

3.2.1.4 The entity is engaged in a scientific or associative monitoring programme that provides the necessary information on animal welfare.

3.2.1.5 The entity should define a procedure for excluding a supplier when it does not obtain sufficient guarantees from the supplier on the origin of the animal species.

4. Traceability and AQC Label

4.1 Traceability system

4.1.1 A procedure is in place to ensure the traceability of incoming materials.

4.1.2 The traceability system in place makes it possible to identify the production batches and their relationship with the raw material deliveries.

4.1.3 The traceability system allows all stages of manufacture to be traced. This system includes key parameters and identification of all materials, as well as the production date.

4.1.4 The traceability system is tested regularly, at least once every two years. The results of these tests are archived.

4.1.5 The entity also has a documented traceability system to ensure traceability between incoming leather and finished bracelets. This system links the invoice number of the leather supplier to the invoice number of the bracelets.

- 4.1.6 The entity also has the ability in its traceability system to identify the different components used in the manufacture of a bracelet or series of bracelets. Partial traceability of batch numbers (or supplier invoice) exists for some components other than leather.

4.2 AQC labelling system

- 4.2.1 The entity commits to respect the AQC rules for the application of the label (PRO20).
- 4.2.2 Both the top leather (or upper leather) and the lining leather come from tanneries recognised by the AQC as compliant with the requirements of the label.
- 4.2.3 Materials used as insides are identified and tested according to the Restricted Substances Lists (RSL) corresponding to the nature of the material.
- 4.2.4 The glue(s) used in the production of the bracelet are identified and tested according to the AQC RS for glue.
- 4.2.5 Any edge tincture and threads used in the production of the bracelet are on the list of suppliers tested by the AQC according to the relevant RSL.
- 4.2.6 Failure to comply with any one of the above criteria (4.2.1 to 4.2.5) shall result in the failure to label a bracelet or a series of bracelets.

5. Quality Management

5.1 Gestion des non-conformités

- 5.1.1 A system exists to record and monitor the handling of customer complaints.
- 5.1.2 Action plan following customer complaints
- 5.1.2.1 The entity should put in place a procedure for recording, analysing, action plan or correction of non-compliances with the objective of preventing their recurrence.
- 5.1.2.2 Corrective actions must be clearly formulated, documented, and implemented as soon as possible to avoid a recurrence.

Glossary

The following definitions apply to the terms used in this document.

Corrective action	Action to eliminate the cause of a non-conformity.
Audit	A documented procedure for ascertaining the completeness, truthfulness and regularity of a company's practices, and for evaluating them objectively, in order to determine the extent to which the specifications are met.
Entity	Company being audited.
Safety Data Sheets (SDS)	Primarily intended for use by professional users, in particular to enable the necessary measures to be taken to protect health, safety and the environment in the workplace.
Non-compliance	Deviation from the requirements of the specification without critical impact on the safety of personnel or items.
Critical non-conformity	Deviation from the requirements of the specification with critical impact on the safety of personnel or items.
Control plan	Document containing all the checks to be carried out and their frequency.
Traceability	The ability to trace a product through all stages of production, processing and distribution.









PRO023_03 Cahier des Charges - Fabricants de Bracelets_ENG

Final Audit Report

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