4C Chain of Custody Certification  
– Step by Step

For Intermediary Buyers (IBs) and Final Buyers (FBs)

Step 1: Initial Analysis
- **IB/FB:** Study the 4C System requirements (1)
- **IB/FB:** Internally analyse the compliance level to the 4C requirements
- **IB/FB:** Implement the 4C requirements

Notes:  
* List of abbreviations is at the bottom of the document

(1) 4C Code of Conduct, 4C System Regulations, and 4C chain of custody (CoC) audit checklist

Step 2: Application for a 4C Audit
- **IB/FB:** Select and contract one of the CBs cooperating with 4C (2)
- **IB/FB:** Fill in the application document and send it to the selected CB (3)
- **CB:** Evaluate and approve the application documents
- **CB:** Register the application in the 4C portal
- **IB/FB:** Accept the most current version of the 4C ToU for IBs and confirm the application in the 4C portal
- **4C:** Validate the application in the 4C portal
- **CB:** Conduct a risk assessment and prepare the audit plan (4)
- **CB:** Register the audit plan in the 4C portal
- **4C:** Acknowledgement of reception of the audit plan

Notes:  
(2) A list of the CBs cooperating with 4C is available on the 4C website
(3) The application document includes the BPM for IBs/FBs. The template is available on the 4C website.
In case the on-site audit cannot be conducted due to force majeure, the remote audit procedure can be applied. For further details see the 4C requirements for remote audits.
(4) Additional risk indicators must be considered in case of remote audit. See also the 4C requirements for remote audits.

Step 3: Conduction of a 4C Audit
- **CB:** Audit the IB’s/FB’s compliance with the 4C requirements, using the latest version of the 4C CoC audit checklist
- **CB:** Prepare the audit report by inserting the results in the 4C CoC audit checklist and audit result page
- **CB:** Sign the audit result page
- **IB/FB:** Work on the elimination of any non-conformities revealed during the audit within the timeframe provided by the CB (5)
- **CB:** Conduct a desk-audit or further audit to confirm the compliance of the IB/FB and update the audit result page accordingly
- **CB:** Make a certification recommendation

Notes:  
(5) To confirm the elimination, IB/FB has to request an audit to have it verified and evaluated by the CB to get a positive certification decision. The certification decision, together with the uploading of all certification documents, must be done by the CB 60 calendar days after the last day of the audit the latest

Step 4: Audit Report Evaluation
- **CB:** Evaluate and approve the audit report (6)

Notes:  
(6) If necessary, the evaluator at the CB will contact the IB/FB to obtain further details or clarification
## 4C Chain of Custody Certification – Step by Step

For Intermediary Buyers (IBs) and Final Buyers (FBs)

<table>
<thead>
<tr>
<th>Step</th>
<th>Who</th>
<th>Certificate Decision</th>
</tr>
</thead>
<tbody>
<tr>
<td>5</td>
<td>CB</td>
<td>Make a certificate decision within the required timeframe of 60 days (7) and upload all pertinent documents and information to the 4C portal (8)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>- In case the decision is positive, issue a certificate to the IB/FB via the 4C portal</td>
</tr>
<tr>
<td></td>
<td></td>
<td>- In case the decision is negative, a full new audit must be conducted once the IB/FB is ready to comply with the 4C requirements</td>
</tr>
</tbody>
</table>

4C certificate confirms compliance of the certificate holder with the 4C requirements. It is valid for 3 years and is subject to annual surveillance audits (9)

4C Validate the certification documents internally

4C Publish the certificate on the 4C website

## MAINTENANCE OF THE CERTIFICATE

<table>
<thead>
<tr>
<th>Step</th>
<th>Who</th>
<th>Annual Surveillance Audits</th>
</tr>
</thead>
<tbody>
<tr>
<td>6</td>
<td>IB/FB</td>
<td>Repeat Step 1 - 4</td>
</tr>
<tr>
<td></td>
<td>CB</td>
<td>Make a decision on certificate maintenance and:</td>
</tr>
<tr>
<td></td>
<td></td>
<td>- If positive, upload the pertinent documents to the 4C portal</td>
</tr>
<tr>
<td></td>
<td></td>
<td>- If negative, upload the pertinent documents to the 4C portal and withdraw the certificate via the 4C portal immediately</td>
</tr>
</tbody>
</table>

## Application for Renewal of Certificate

<table>
<thead>
<tr>
<th>Step</th>
<th>Who</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>7</td>
<td>IB/FB</td>
<td>Restart from Step 1</td>
</tr>
</tbody>
</table>

(7) After the last day of the actual date of the audit
(8) The pertinent documents and information include the audit report, the signed audit result page, and BPM for IBs/FBs. Evaluator has the right to overwrite auditor’s recommendation on certification
(9) The CB which has issued the certificate is responsible for the compliance of the IB/FB with the 4C requirements during the validity period of the certificate unless the IB/FB decides to change the CB. If a remote audit has been conducted, a complementary on-site audit is required. For further details see the 4C requirements for remote audits

### ABBREVIATIONS

- **CB** Certification Body
- **CoC** Chain of Custody
- **FB** Final Buyer
- **IB** Intermediary Buyer
- **ToU** Terms of Use