

good on you®

The Good On You Sustainability Label Scheme Manual

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Key Terms

The following terms are used throughout this Manual with the meanings set out below. The Good On You Sustainability Label Scheme uses terminology that differs in places from the vocabulary of conventional certification schemes; the table below notes the equivalent concept where relevant.

Term	Meaning
Analyst Competence Framework	The internal document that sets out the competence requirements, training standards, and assessment procedures applicable to Good On You Rating Analysts and Reviewers. The Analyst Competence Framework is maintained by the Head of Ratings and is subject to review by the Independent Monitoring Body.
Annual Transparency Report	The report published by Good On You each year covering rating volumes, methodology changes, complaints outcomes, and the Independent Monitoring Body's monitoring statement, and forming part of Good On You's transparency obligations under the Scheme and under EmpCo.
Board	The Board of Directors of Good On You Pty Ltd, which is the ultimate decision-making body for all Scheme matters including approval of this Manual, appointment of the Independent Monitoring Body, and approval of new and revised methodologies.
Brand	The entity being rated — typically a consumer-facing company that designs, manufactures, sources, distributes, or sells consumer products under a named brand identity.
Chief Executive Officer (CEO)	The CEO of Good On You Pty Ltd.
Conflict of Interest (COI) Policy	Good On You's Conflict of Interest Policy, an annex to this Manual that sets out the rules governing the identification, disclosure, and management of conflicts of interest affecting Good On You personnel, governance participants, and the Independent Monitoring Body.
Conflict of Interest (COI) Register	The register maintained by Good On You recording declared conflicts of interest and the steps taken to manage them, as required by the COI Policy. The COI Register is reviewed by the Independent Monitoring Body as part of its monitoring activities.
EmpCo	Directive (EU) 2024/825 of the European Parliament and of the Council of 28 February 2024 amending Directives 2005/29/EC and 2011/83/EU as regards empowering consumers for the green transition through better protection against unfair practices and better information (the "Empowering Consumers for the Green Transition Directive"). EmpCo amends the Unfair Commercial Practices Directive (UCPD) to introduce specific requirements for sustainability labels and environmental claims directed at EU consumers.



Term	Meaning
Good Measures	Good On You's brand-facing platform, through which brands can view their current rating data, understand how their performance is assessed across the rating criteria, identify priority areas for improvement, submit evidence and updated information for Rating Analysts review, and engage with the methodology in relation to their own Rating. Available to brands on a commercial basis; brand participation is not a precondition for rating.
Good On You Directory	The public-facing listing of all brands rated under the Scheme, published on the Good On You website. The Directory shows each brand's current overall rating, Pillar scores, and last rated date. The Directory is the authoritative source of current rating status for the purposes of the Scheme's currency requirements.
Good On You Ratings API and Dashboard	The tools provided by Good On You to authorised enterprise customers to access, view, and integrate Good On You Ratings and related data via API or a secure web-based business Dashboard, subject to the Scheme Rules.
Good On You Mark / the Mark	The official Good On You Mark based on the Good On You logo. It may be made available to eligible brands to communicate their Good or Great Good On You Rating, or to Traders to make claims based on Good On You Ratings.
Good On You Rating(s) / Rating(s)	A Rating is Good On You's assessment of a brand's sustainability performance as a score out of 100 converted to a rating on a five-point scale. It is produced by qualified Rating Analysts and approved by a qualified Reviewer applying the published methodology for the relevant vertical.
Good On You Sustainability Label Scheme / Sustainability Label Scheme / the Scheme	The certification scheme owned and operated by Good On You Pty Ltd, under which Good On You Ratings may be used by eligible Traders to make sustainability claims. References to "the Scheme" throughout this Manual refer to the Good On You Sustainability Label Scheme.
Governance Charter	The internal governance document that sets out decision-making authority, conflict of interest rules, and independence protections applicable to Good On You's operation of the Scheme. The Governance Charter sits above the COI Policy and below the company constitution.
Head of Ratings	The senior Good On You staff member responsible for the operational management of the ratings function, including Rating Analysts oversight, rating quality, and methodology application. The Head of Ratings is the primary decision-maker for rating outcomes and escalation within the ratings team.
Independent Monitoring Body (IMB)	The independent legal entity (Odonata Certification Services GmbH) appointed to conduct scheme-level monitoring of Good On You's rating process. The IMB monitors the Scheme's processes; it does not certify or audit individual Brands.



Term	Meaning
IMB Competence and Independence Statement	The document maintained by the Independent Monitoring Body setting out its organisational structure, personnel competence, and the procedures it applies to identify and manage risks to independence and impartiality. The IMB Competence and Independence Statement is updated at least annually and is published on the Good On You website.
Large / Small Brand	Good On You operates separate assessment pathways for large Brands and small-to-medium enterprises (SMEs). The EU definition of SME applies: an enterprise employing fewer than 250 persons with annual turnover not exceeding EUR 50 million and/or an annual balance sheet total not exceeding EUR 43 million. Brands that do not meet the SME definition are assessed as Large Brands. The distinction affects the methodology applied.
Methodology	The documented set of criteria, weightings, and assessment procedures used by Good On You to evaluate Brands within a defined vertical and assign a Rating. Each vertical has its own methodology, developed and reviewed through the consultation process described in 4 Methodology Development and Review. For the terminology used to describe the structure of a methodology, see Rating Management System: Methodology Structure below.
Mark	See Good On You Mark.
Multi-Stakeholder Initiative (MSI)	An organisation or programme that brings together representatives from industry, civil society, and in some cases government to develop and oversee standards or practices in a defined area. Good On You's methodology recognises relevant credible MSI membership and certification as evidence sources in the assessment of brand performance.
Publisher	A person or entity that operates editorial, media, or content channels, including print, digital, and social media. A Publisher is a Trader for the purposes of the Scheme where it uses a Good On You Rating in a commercial context to promote a Brand or its products.
Quality Management Process	The integrated set of procedures through which Good On You maintains the consistency and integrity of its Ratings, comprising the competence and calibration arrangements set out in 10 Competence and Calibration and the controls, internal quality reviews, and monitoring and evaluation activities set out in 12 Scheme Integrity, Risk Management and Continuous Improvement.
Rating(s)	See Good On You Rating(s)
Rating Analyst	A qualified Good On You staff member who meets the competence and independence requirements set out in 10 Competence and Calibration and who conducts rating assessments in accordance with the published methodology.



Term	Meaning
Rating Management System	Good On You's proprietary internal platform in which Ratings are undertaken, evidence is documented, and Ratings are finalised.
Re-rating	An updated Rating conducted on a previously rated Brand, typically on an annual cycle, or where new information suggests the existing Rating may be materially incorrect.
Resource Centre	An area on the Good On You website that offers the public a series of articles on topics of interest in relation to Good On You Ratings including articles that describe elements of the Good On You Sustainability Label Scheme.
Reviewer	A trained Good On You team member who reviews the evidence and scoring decisions before approving the Rating for publication.
Rules	The binding requirements of the Scheme as set out in this Manual, including the conditions for label eligibility, the obligations of Traders, and the governance and operational standards Good On You must meet.
Scheme	See Good On You Sustainability Label Scheme.
Scheme Manual / the Manual	This public document, published on the Good On You website and reviewed and updated regularly.
Scheme Owner	Good On You Pty Ltd, the entity that owns, operates, and is accountable for the Scheme.
Terms of Reference (TOR)	The document setting out the mandate, scope, and obligations of the Independent Monitoring Body, including independence requirements, monitoring activities, reporting obligations, and escalation procedures. The Terms of Reference are Annexure 3 to this Manual.
Trader	Any person or entity that uses a Good On You Rating in a commercial context. This includes rated Brands, retailers, Publishers, and enterprise customers. Where that use is consumer-facing — for example, enterprise customers displaying a Rating on a product page, in a shopping interface, or in marketing communications — the Scheme's Rules on sustainability claims apply. See 13 Using Good On You Ratings to Make Sustainability Claims.
Usage Guidelines	The Good On You Rating Usage Guidelines , a public-facing document published in the Resource Centre that sets out practical guidance for Traders on compliant use of Good On You Ratings, the Good On You Mark, and other digital assets.
Vertical / Industry Vertical	A defined product or service category for which Good On You operates a distinct Methodology including Fashion, Beauty, Services, and Multi-Brand Retail.

Rating Management System: Rating Labels



Rating Label	Rating /5	Notes
Great	5	The highest Rating. May be used in consumer-facing communications as a sustainability label or to support a sustainability claim in compliance with the specified requirements. Brands with this Rating demonstrate a higher level of good practice across a wide range of sustainability issues.
Good	4	May be used in consumer-facing communications as a sustainability label or to support a sustainability claim in compliance with the specified requirements. Brands with this Rating demonstrate good practice across a wide range of sustainability issues.
It's a Start	3	May not be used to communicate superior sustainability performance. Not eligible for use as a sustainability label. Brands with this Rating demonstrate some practices across relevant issues but not at a level sufficient to score a higher Rating eligible to support a sustainability claim.
Not Good Enough	2	May not be used to communicate superior sustainability performance. Not eligible for use as a sustainability label. Brands with this Rating disclose some relevant information but do not sufficiently address key supply issues.
We Avoid	1	The lowest Rating. May not be used to communicate superior sustainability performance. Not eligible for use as a sustainability label. Brands with this Rating disclose little to no relevant or concrete information about their sustainability practices.

Rating Management System: Methodology Structure

Term	Meaning
Overall Rating	The overall rating assigned to a Brand, expressed as a score out of 5 together with the corresponding rating label (e.g. 5 — Great). The overall rating is derived from the Brand's Pillar scores.
Pillar	One of three overarching sustainability domains assessed in each methodology: People (labour rights and supply chain conditions), Planet (environmental impact), and Animals (animal welfare). All Brands receive a score for People and Planet. A Brand may not receive an Animals score where the applicable methodology determines that the Brand's products do not typically involve animal-derived materials. Pillar scores and labels are published.
Area	A defined sub-domain within a Pillar. For example, Climate Change is an Area within the Planet Pillar; Living Wage is an



Term	Meaning
	Area within the People Pillar. Each Pillar comprises a number of Areas.
Issue	A specific topic assessed within an Area. Each Area comprises one or more Issues. Issue scores are not published but are made available to relevant partners.
Question / Question Option / Answer	The unit of assessment within an Issue. Each Issue has one or more Questions. Questions may be binary (yes/no), multi-option (three or more Question Options), or numeric/percentage. Answer refers to the Question Option selected for a Brand in the course of a Rating.



1. About the Good On You Sustainability Label Scheme

1.1 Introduction

Good On You is a sustainability ratings platform that assesses consumer brands on their social, environmental, and animal welfare performance as evidenced by publicly available disclosures. The Good On You Sustainability Label Scheme (the Scheme) is the framework under which Good On You Ratings may be used as sustainability labels or to support sustainability claims.

This Scheme Manual describes how the Good On You rating and assurance system works. It explains the purpose of the Scheme, who is responsible for running it, how Ratings are conducted, how their quality is assured, and under what conditions a Good On You Rating may be used in consumer-facing communications.

The Manual is intended to be read by anyone with an interest in how the Scheme operates and how the credibility of the Scheme is maintained including:

- consumers seeking to understand how the labels they encounter are produced
- Brands that have been rated or that use the label
- Good On You enterprise customers that access and use the ratings data
- other stakeholders, civil-society organisations and regulators.

1.2 Purpose of this Manual

This Manual serves three related purposes.

First, it sets out the Rules of the Scheme and explains how it operates. It is the authoritative public statement of Good On You's commitments as Scheme Owner: the standards applied to Ratings, the governance and independence controls, the processes for corrections and complaints, the conditions for label use, and the obligations of Traders who use Good On You Ratings in consumer-facing communications. Where this Manual states that something will be done, that is a binding commitment of the Scheme.

Second, it explains the Scheme in terms accessible to any interested reader. The credibility of a sustainability label depends on its transparency: if the public cannot understand how a label is produced, they cannot fairly assess whether to trust it. This Manual is intended to be read by consumers, Brands, Traders, enterprise customers, civil society organisations, and regulators, as well as by Good On You staff.

Third, it documents the design and operation of the Scheme by reference to the requirements of relevant legal and good-practice standards for sustainability labels, including the EU Unfair Commercial Practices Directive as amended by the Directive on Empowering Consumers for the Green Transition (EmpCo), and consumer protection laws in other jurisdictions. The EU requirements for a sustainability label include having a transparent methodology, a complaints mechanism, open and non-discriminatory access for Brands, and independent monitoring. How the Good On You Scheme addresses each of these requirements is explained in the relevant sections of this Manual.



The Manual also provides the documented process baseline that the Independent Monitoring Body requires in order to conduct its scheme-level assurance work.

Status of this document

This Manual is a controlled document maintained by Good On You. The version number, date of issue, and change log appear in 14 Document Governance. The current version is published on the Good On You website.

Relationship to other documents

This Manual does not stand alone. It should be read alongside the following documents, which together form the complete framework for the Scheme. In particular, where Resource Centre articles provide a fuller explanation of a topic, the section in the Manual introduces the topic and directs the reader to those articles.

- The Good On You Conflict of Interest Policy at Annexure 1
- The Good On You Methodology Consultation Policy at Annexure 2
- The Independent Monitoring Body Terms of Reference at Annexure 3
- Relevant articles in the [Good On You Resource Centre](#)
- The Methodology documents in the Resource Centre that describe the specific rating criteria, evidence requirements, and scoring logic for each industry vertical. The documents include detailed descriptions of the [Areas assessed across verticals](#), and information about the specific features of the methodologies for each vertical.

See [Areas assessed across verticals](#), and the descriptions of each Methodology in the [Resource Centre](#).

Normative and good-practice references

The following documents and frameworks have informed the design and operation of the Scheme. Where this Manual is silent or ambiguous, the documents listed below should be consulted.

Reference	Full title / Description	Role in this Manual
UCPD (as amended) or EmpCo	EU Unfair Commercial Practices Directive 2005/29/EC, as amended by the Directive on Empowering Consumers for the Green Transition 2024/825	EU law that establishes requirements relevant to the use of sustainability labels, including the conditions under which sustainability labels may rely on a certification scheme, including independent third-party monitoring, transparent methodology, open access, and a complaints process. Defines 'certification scheme' for the purposes of lawful use of a sustainability label. Governs Trader claims based on environmental or social characteristics.
Commission Q&A (Nov 2025)	European Commission Questions & Answers on EmpCo implementation	Non-binding interpretive guidance. Confirms flexibility in how third-party monitoring may be structured and the requirement for legal separation



		between the Scheme Owner and the IMB.
National consumer protection legislation	Including Australia — <i>Competition and Consumer Act 2010</i> (Cth), Schedule 2 (Australian Consumer Law), s.18; United Kingdom — <i>Digital Markets, Competition and Consumers Act 2024</i> ; United States — <i>Federal Trade Commission Act</i> , 15 U.S.C § 45. & relevant state law; Japan — <i>Act against Unjustifiable Premiums and Misleading Representations</i> (Act No. 134 of 1962, as amended).	In general national law proscribes misleading claims and in some cases misleading conduct. As EmpCo sets more precise rules designed to avoid misleading consumers in relation to sustainability labels, it will generally be the case that compliance with EmpCo ensures compliance with such non-EU national law. In the possible (but unusual) case that national law is more prescriptive than EmpCo, or proscriptive in an inconsistent way, this may or may not be the case.
Applicable regulator guidance on environmental and sustainability claims	Australia — ACCC, <i>Making Environmental Claims: A Guide for Business</i> (December 2023); United Kingdom — CMA, <i>Green Claims Code</i> (September 2021) and <i>Making Green Claims: Getting It Right, Across the Supply Chain</i> (January 2026); United States — FTC, <i>Guides for the Use of Environmental Marketing Claims</i> ("Green Guides") (1992, revised 2012); Japan — Consumer Affairs Agency, Fair Competition Codes (sector-specific) and Cabinet Office Notification No. 19 of 2023 (stealth marketing).	
ISO/IEC 17065:2012	Conformity assessment — Requirements for bodies certifying products, processes and services	Reference touchstone for scheme design, particularly governance, impartiality, and rating decision-making. Used as a design reference, not a certification framework.
ISO/IEC 17029:2019	Conformity assessment — General principles and requirements for validation and verification bodies	Reference standard for the assurance model, particularly relevant to claims-based monitoring that does not presuppose bilateral engagement with assessed entities.
ISO/IEC 17021-1:2015	Conformity assessment — Requirements for bodies providing audit and certification of management systems	Reference standard for the management systems audit dimension of the assurance model, particularly relevant to the annual management systems review conducted by the IMB covering Good On You's quality management, competence management, and complaints handling processes.
ISEAL Code of Good Practice for Sustainability Systems	ISEAL Alliance Code of Good Practice for Sustainability Systems	Good-practice reference for sustainability scheme design, covering governance, stakeholder engagement, data, assurance, claims and continuous improvement.



1.3 Purpose of the Scheme

Good On You exists to support informed consumer choice through sustainability ratings of consumer brands. The Good On You Sustainability Label Scheme governs how Good On You ratings are produced, monitored, and used as sustainability labels or to support sustainability claims.

The purpose of the Scheme is to give consumers reliable, independently assured information about the sustainability practices of the brands they buy from. Meaningful consumer choice requires that consumers have access to easy to use information that is consistent, evidence-based, and credible.

Good On You's core rating principles, which underpin all Ratings conducted under the Scheme, are:

1. **Transparency comes first.** Brands should publish information about their supply chain to increase accountability and drive improved outcomes for the planet, people, and animals. They should report the extent to which they adopt known good practices designed to address critical sustainability issues. Consumers have a right to know how a brand impacts the issues they care about. Where brands do not disclose, this is reflected in their Rating — the Scheme assesses what brands choose to make publicly available, not what they may do in practice.
2. **Consider lifecycle impacts.** Companies should be held responsible for their impacts at each stage of the value chain, from how products are produced and distributed, to how they are used, reused, reinvested in regenerative and circular systems, and ultimately disposed of.
3. **Be comprehensive.** The rating system considers a broad range of sustainability issues to give a comprehensive view of a brand's overall performance on issues impacting the planet, people, and animals. It is designed to be applicable to all brands in the market, regardless of size or origin.
4. **Be consumer-centric.** The rating system provides consumers with data that is accessible, comparable, and easy to use. It informs consumer shopping decisions, provides useful feedback to brands, and enables businesses to assess and improve the sustainability performance of portfolio brands.
5. **Consider issues in proportion to their materiality.** Ratings place appropriate weight on each issue according to the scale and severity of its impact on the environment, workers, and animals.
6. **Ensure an evidence-based approach.** The rating system and its application are transparent, based on robust research, and underpinned by good governance processes. Ratings are grounded in publicly available disclosures assessed against transparent criteria.
7. **Engage and collaborate widely.** Good On You is part of a global movement for change and works collaboratively with civil society, consumer organisations, and sustainability-focused industry leaders to understand, reflect, and drive industry best practices and leadership.



1.4 Intended sustainability outcomes

The Scheme is designed to contribute to three types of sustainability outcomes. For consumers, the Scheme aims to make it easier to identify Brands that are genuinely doing more on sustainability, and to avoid Brands whose claims are misleading or unsupported. Consumers who use Good On You Ratings can make more informed choices without needing to conduct their own research across dozens of separate disclosure sources. Good On You's theory of change is that by empowering consumers to more often prefer Brands with higher sustainability standards Brands will be incentivised to improve their production practices and thus improve working conditions and reduce negative impacts on the environment and animals.

For Brands, the Scheme creates an incentive to improve sustainability performance over time. Because Ratings are updated periodically and reflect current performance, Brands that transparently invest in genuine improvement can expect that to be reflected in their score. For Traders, the Scheme provides a source of independent, objective information that can credibly empower them to highlight more sustainable options to their customers.

1.5 How the Scheme supports credible consumer information

Good On You's approach to sustainability assessment rests on several features that distinguish it from self-declared sustainability claims:

Transparent methodology

The criteria and scoring logic used to assess Brands are published for each product vertical. Any person can examine the methodology, understand what is being assessed, and identify the basis on which a score has been awarded. Methodology documents are publicly available on the Good On You website. See 4 Methodology Development and Review.

Evidence-based assessment

Good On You's Rating Analysts assess Brands against published criteria based on publicly available disclosures. A Brand's choice to engage with Good On You's tools or provide additional information does not determine the outcome of its Rating: Analysts assess all submitted information against the same standards applied to non-participating Brands. See 5 Evidence; 6 Rating Process; 7 Review and Finalisation.

Independent monitoring

The Scheme is independently monitored by Odonata Certification Services (the Independent Monitoring Body/IMB), a legally separate and fully independent assurance organisation. The Independent Monitoring Body monitors whether Good On You applies the Rules set out in this Scheme Manual, rating methodologies, assurance procedures, and usage requirements consistently and without material commercial bias. It reviews rating processes on a sampling basis, conducts an annual management systems review, and acts as independent reviewer for complaints referred on grounds of scheme integrity and for procedural reviews where a complainant is dissatisfied with Good On You's handling of a complaint. This monitoring function is distinct from Good On You's commercial activities and is governed by a formal Terms of Reference. See 9 Independent Monitoring of the Scheme.

Non-discriminatory access



Any Brand within scope of the Scheme may be rated. Good On You does not restrict Ratings to Brands that pay for its services or participate in its commercial programmes. The quality and consistency standards applied to Ratings do not vary based on whether a Brand is a paying customer. See 2.6 Non-discriminatory access and treatment of Brands for the Scheme's non-discrimination commitments and 2.5 Conflict of interest management in relation to management of conflict of interest in the rating process.

Open complaints mechanism

Any person, consumer, Brand, or third party, who believes that a Rating has been conducted incorrectly or that the label has been used in a misleading way may raise a complaint. The complaints process is set out in 8 Corrections, Updates, Complaints and Appeals.

A defining feature of Good On You's system, which distinguishes it from conventional certification schemes, is that Brands do not decide if or when they are rated, and do not have input on their own Ratings beyond publicly disclosing information about their practices. Good On You initiates Ratings based on consumer interest, commercial demand, or customer requests. This means that Brands cannot prevent themselves from being rated simply by declining to participate, and that the Scheme's non-discrimination commitments are built into the structure of the system rather than being merely aspirational.

Only higher Ratings are eligible

A Good On You Rating may only be used by a Trader as a sustainability label where it meets the requirements set out in 13 Using Good On You Ratings to Make Sustainability Claims, in brief that:

- the Brand achieves an overall score at or above the minimum eligibility threshold, and
- The requirements as to accuracy, currency and communication integrity are met.

Ratings assigned to Brands that do not meet the above conditions remain subject to the same quality and consistency standards. They cannot, however, be used to make a sustainability claim for the purposes of EU law.



2. Governance, Independence and Impartiality

2.1 Scheme ownership and structure

The Good On You Sustainability Label Scheme (the Scheme) is owned and operated by Good On You Pty Ltd (ABN 75 608 419 085), a company incorporated in Australia (the Scheme Owner).

Good On You is responsible for establishing and maintaining the Rules of the Scheme including this Manual, rating methodologies, and operational procedures that govern the assessment of Brands and the use of Good On You Ratings to make sustainability claims. See 2.2 Governance structure for a description of the Scheme roles and decision-makers including for decisions to adopt or amend the Rules set out in this Manual, appoint the Independent Monitoring Body, approve new and revised rating methodologies, and determine individual Ratings.

Good On You operates as a single legal entity. An Independent Monitoring Body (IMB) provides independent external monitoring. The Scheme Owner and the rating function are not structurally separated at the corporate level. The integrity of the Scheme therefore rests on documented operational procedures and governance controls, and on independent external monitoring. These procedures and governance controls are described in 2.4 Independence safeguards and 2.5 Conflict of interest management while the provision of independent monitoring by the IMB is described in 9 Independent monitoring of the Scheme.

2.2 Governance structure

The Board of Good On You is the ultimate decision-making body for all Scheme matters. Key governance decisions including material changes to the methodology, amendments to the Rules as set out in this Manual, and appointment of the IMB require Board approval. See 4 Methodology Development and Review; 9 Independent Monitoring of the Scheme.

Day-to-day operational responsibility for the Scheme is delegated to the CEO.

The Head of Ratings is accountable for the integrity of the rating function. The rating function is made up of the Head of Ratings, Rating Analysts and Reviewers. It operates separately from the commercial and partnerships function with separate reporting lines. The commercial function has no authority over rating outcomes.

Ratings methodologies are developed by a team accountable to the Head of Ratings, following a detailed research and consultation process. See 4 Methodology Development and Review. Methodologies are approved by the Board on the recommendation of the Head of Ratings.

Rather than relying on a standing multi-stakeholder committee, the Scheme obtains stakeholder input through a structured consultation process designed to support methodology development and review. See 4.4 Consultation and Methodology development; Annexure 2: Methodology Consultation Policy.



The Scheme is subject to independent monitoring by the IMB and publishes the Annual Transparency Report.

The governance structure is documented in the internal Governance Charter. Governance is reviewed annually as part of the periodic scheme review described in 12.6 Periodic review of the Scheme.

2.3 Roles and responsibilities

The roles and decision-making authority of Scheme participants are set out below.

Role	Responsibilities	Decision-making authority	Recommendation role
Scheme Owner (Good On You)	Establishes and maintains the Rules set out in this Manual, methodologies, and operational procedures; selects Brands for rating; conducts ratings; manages complaints; publishes results; manages the assurance relationship.	See Board, CEO, and Head of Ratings below.	
Board	Ultimate governance of all Scheme matters; oversight of integrity and regulatory compliance; appointment of the IMB.	Ultimate authority over all Scheme matters. Approves methodology changes, amendments to the Rules set out in this Manual, and IMB appointment.	
CEO	Overall operation of the Scheme; accountable to the Board; approves significant operational decisions within delegated authority.	Day-to-day operational decisions within Board-delegated scope.	
Head of Ratings	Accountable for quality, consistency, and integrity of all Ratings; owns the Analyst Competence Framework; responsible for analyst competence and calibration; oversees methodology development.	Signs off individual Ratings (or delegates to a Reviewer).	Recommends methodology changes to the Board.
Rating Analysts	Conduct ratings in accordance with published methodology and internal procedures; document evidence; have no commercial targets relating to Brands they assess.	None — individual rating outcomes are recommendations.	Recommend individual brand rating outcomes to the Reviewer or Head of Ratings.
Reviewers	Review rating recommendations from the primary assigned Rating Analysts before publication. The function may be performed by the Head of Ratings or a delegated senior analyst who is not the primary analyst on the rating.	Approves individual rating recommendations for publication.	
Independent Monitoring Body (IMB)	Independently monitors Scheme rating processes and procedures; conducts case-file reviews, witness reviews, and management systems	Determines the content of its monitoring reports and public monitoring statement	May recommend changes to Scheme processes, governance



Role	Responsibilities	Decision-making authority	Recommendation role
	assessments; issues annual public monitoring statement. Does not make or approve individual rating decisions. Does not assess individual brands directly. Acts as independent reviewer for complaints referred directly on grounds of Scheme integrity; conducts procedural reviews where a complainant is dissatisfied with Good On You's handling of a complaint.	independently of Good On You. Does not make or approve individual rating decisions or substitute its judgment for Good On You's rating outcomes.	arrangements, or related practices arising from its monitoring activities. Recommendations are reported to Good On You and summarised in the annual public monitoring statement
Methodology Consultees	External experts from civil society, industry, academia, and regulatory sectors consulted during methodology development and review. No formal ongoing governance role.	NA	Provide input into methodology development and review through the structured consultation process described in 4 Methodology Development and Review.

2.4 Independence safeguards

As a commercial entity, Good On You is subject to potential conflicts of interest that are addressed through documented controls. Good On You generates revenue from data licensing, affiliate marketing, and the Good Measures platform. Some of the brands it rates are commercial partners. The Scheme addresses this directly through a set of functional, structural, and externally monitored safeguards, described below.

Good On You ensures that decisions about brand ratings are independent from the rated brand, from any Trader that wishes to use brand ratings, and from Good On You's own commercial interests.

The Scheme's independence framework has been designed with reference to the impartiality principles of the ISEAL Code of Good Practice for Sustainability Systems (2021) and the governance and impartiality requirements of ISO/IEC 17065, that is:

- Impartial governance
- Impartial assurance function
- Management of conflicts of interest
- Independence from commercial bias, including avoidance of incentives that may distort ratings outcomes
- Transparency on governance arrangements

The specific independent safeguards adopted by Good On You include:

- Transparent processes and methodologies
- Functional separation of the ratings and commercial elements
- Analyst independence



- Oversight by an independent monitoring body, with a focus on commercial bias testing and regular reports on that body's findings
- The inherent independence of an “involuntary” ratings model

Transparent processes and methodology. Information about Good On You’s governance, ratings methodologies and operating procedures are published and regularly reviewed and updated. Good On You is held to account against these documents as part of the annual monitoring programme conducted by the IMB.

Functional separation. While the Scheme Owner and the rating body are not corporately separated, the ratings function is separate from the commercial function. The commercial and partnerships function has no authority over rating outcomes, methodology determinations, or monitoring conclusions. Information barriers restrict commercial teams' access to brand rating files. These controls are documented in the internal Governance Charter. Compliance with these controls is specifically reviewed as part of the IMB's annual monitoring activities.

Analyst independence. Rating Analysts have no commercial relationships with the brands they assess. Any analyst with a personal or professional connection to a brand is required to recuse themselves before the rating commences. Analysts are subject to a documented Conflict of Interest policy. See 2.5 Conflict of interest management.

Rating reviews. Ratings are approved after an independent internal review process. See 7.1 Rating review.

IMB independence. The IMB is a legally separate entity from Good On You. The IMB is engaged under a formal Terms of Reference that specifies independence requirements. The IMB has no commercial relationship with any rated brand. Its competence and independence are documented in the IMB Competence and Independence Statement, published on the Good On You website. The IMB conducts an annual review that assesses the degree to which Good On You has complied with the Rules that govern the Scheme set out in this Manual and its key operating procedures. In particular the review assesses any risk of commercial bias. The IMB acts as independent reviewer for complaints referred directly on grounds of scheme integrity, and conducts procedural reviews where a complainant is dissatisfied with Good On You's handling of a complaint. See 9 Independent Monitoring of the Scheme.

Any advisory support provided by the IMB in relation to the design of the assurance scheme is limited to assurance and monitoring system design and does not extend to Good On You's Methodology, rating criteria, or individual rating decisions. This separation is maintained as a condition of the appointment.

Commercial bias testing. The IMB is required to test for evidence of commercial bias as part of its annual monitoring activities — specifically, whether ratings of brands participating in the affiliate programme, brands that have subscribed to Good Measures, or enterprise customer-requested brands, differ systematically from ratings of brands with no commercial relationship with Good On You. This is a mandatory component of the annual monitoring programme.



Remuneration principles. Neither Good On You Rating Analysts nor the IMB are remunerated in a way that creates incentives to rate brands favourably. Analyst salaries and IMB fees are not contingent on rating outcomes or on the commercial performance of rated brands.

Involuntary assessments. Good On You's "involuntary" model is itself an inherent structural independence safeguard. Good On You's approach to ratings is somewhat different to a typical sustainability label in that ratings are initiated by Good On You, not the owner of the brand (or product) seeking assessment by other certification schemes such as Fairtrade or B Corp. Because ratings are initiated unilaterally, no brand can prevent itself from being assessed.

2.5 Conflict of interest management

Good On You's commercial model generates revenue from three sources that create potential conflicts of interest in relation to its rating function: data licensing to enterprise customers (who may request that specific brands be rated); affiliate marketing (where brand eligibility depends on maintaining a 4 or 5 rating); and Good Measures subscriptions (where brands pay for access to a platform that can influence their rating readiness).

The Scheme manages these conflicts of interest through application of the Good On You Scheme Conflict of Interest Policy (COI Policy) at Annexure 1. The COI Policy draws on accepted best practice including the ISEAL Code of Good Practice 2024.

The COI Policy covers all persons involved in Scheme activities, including Board members, the CEO, Rating Analysts, Reviewers, methodology contributors, and external advisers. It sets out the conflicts that must be declared, the process for managing and recording declarations, recusal and reassignment procedures, and the structural controls, including separation of the ratings and commercial functions and rotation of analysts for large brands, that apply regardless of individual declarations.

The COI Register. Good On You maintains a Register of Conflicts of Interest. It covers the following identified conflicts: financial interests in rated brands; employment or advisory roles with rated brands, competitors or enterprise customers; the general commercial advantage to Good On You of higher ratings; enterprise customer direction of rating priorities; affiliate programme and Good Measures commercial relationships. A summary of the number and nature of conflicts is published as part of the Annual Transparency Report.

The IMB is required to maintain its own impartiality programme; this is documented in the IMB Terms of Reference and the IMB Competence and Independence Statement.

2.6 Non-discriminatory access and treatment of brands

The Scheme is open on fair and non-discriminatory terms to any brand within scope. The Scheme's "involuntary" rating model reflects Good On You's founding principle that consumers have a right to independent information about brand sustainability performance. No brand is excluded from being rated on the basis of its commercial relationship with Good On You, its size, its country of incorporation, or its choice not to engage with Good On You's commercial services.



Payment does not affect assessment. Being rated does not require payment. A brand's decision to subscribe to Good Measures, join the affiliate programme, or become an enterprise data customer has no bearing on its rating outcome. Analysts apply the same methodology and standards regardless of whether a brand has a commercial relationship with Good On You. Commercial bias testing by the IMB is specifically designed to verify this in practice. See also 2.5 Conflict of interest management.

Rating initiation. Good On You selects brands for rating based on consumer interest, market relevance and commercial demand. Brands may also request a rating or submit updated evidence via Good Measures. Brand selection and prioritisation is conducted on a non-discriminatory basis.

Proportionate methodology. Good On You operates separate methodologies for large brands and SMEs within each vertical, reflecting differences in typical disclosure capacity. This proportionality is a non-discrimination measure, not a lower standard: both size-based methodologies assess the same sustainability themes and are subject to the same evidence requirements and quality controls.

No opt-out. Consistent with the involuntary model, and consumers' right to know how the brands they may consider buying from impact the issues they care about, brands cannot elect not to be rated. Good On You will consider exclusion requests by very small brands in exceptional circumstances.

2.7 Public transparency commitments

Good On You is committed to operating the Scheme transparently. The following information is published and kept current on the Good On You website. All published documents carry a version number, effective date, and change log. Prior versions are archived and accessible.

Scheme documentation. The Scheme Manual (this document) and key supporting documents referred to in this Manual including details of the Independent Monitoring Body are published on the Good On You website.

Ratings methodologies. Brands are rated against the methodology relevant to the consumer Vertical in which they operate (Fashion, Beauty, Services, Multi-Brand Retail and so on). Detailed summaries of the methodology for each vertical are published in the [Resource Centre](#).

Governance and ownership. Good On You publishes a description of its governance structure including the roles of the Board, CEO, and Head of Ratings in this Manual (this Section). Shareholder and governance interest disclosures, and the controls that apply to ownership of Good On You by persons with commercial interests in rated industries, are set out in Annexure 1, 8: Structural Conflicts: Shareholder and Investor Disclosure.

Conflicts of interest. The COI Policy is published as Annexure 1 of this Manual. A COI Register is maintained and updated at least annually. See 2.5 Conflict of interest management.



Annual Transparency Report. Good On You publishes an Annual Transparency Report that provides data on the performance of the Scheme. The detail of the report is set out at 12.5 Annual Transparency Report.

Complaints. The complaints mechanism and how to use it are publicly available. See 8 Corrections, Updates, Complaints and Appeals.

2.8 Parties to the Scheme

The Scheme involves the following parties. Their roles are described briefly here; fuller treatment appears in the sections indicated.

Good On You acts as both the Scheme Owner and rating body. It sets the Rules and methodology, selects brands for rating, conducts assessments, and publishes results. The governance and independence controls governing this dual role are described in Sections 2.1 to 2.5 below. Good On You is solely responsible for determining rating outcomes in accordance with the rules. None of the other parties have any influence or authority over rating outcomes or the methodology

Brands are the primary subjects of the Scheme. They are assessed whether or not they have a commercial relationship with Good On You. Whether or not a brand has a commercial relationship (for example as a member of Good On You's affiliate programme or a Good Measures user) does not affect the standards applied to their rating. See 2.6 Non-discriminatory access and treatment of brands, 5 Evidence, and 6 Rating Process.

Traders may display or reference a rating in connection with the promotion or sale of products provided they align with the Scheme's Rules. See 13 Using Good On You Ratings to Make Sustainability Claims.

Enterprise customers are Traders that access and use Ratings data and may request that specific brands be assessed.

Publishers direct consumers to rated brands via Good On You's affiliate programme. See 13 Using Good On You Ratings to Make Sustainability Claims.

Consumers interact with Ratings directly through the Good On You Directory and app, and indirectly through Trader communications. See 1.3 How the Scheme supports credible consumer information.

The Independent Monitoring Body monitors Good On You's rating processes independently. It does not rate brands or make individual rating decisions. See 9 Independent Monitoring of the Scheme.

Methodology consultees are external experts invited to review and comment on draft methodologies. They have no formal ongoing governance role. See 4.4 Consultation in methodology development.



3. Scope of Ratings

3.1 Rated entities: Brands

Good On You rates consumer-facing Brands at the brand level across a number of industry verticals including Fashion, Beauty, Services and Multi-Brand Retail. Ratings are assigned to the primary consumer-facing entity, not to parent companies, individual products, or supply chain entities. Within each vertical, separate methodologies apply to large Brands and small-to-medium enterprises.

Good On You's model is involuntary — Brands are assessed on Good On You's own initiative, without requiring the Brand's involvement or consent. Full details of the entities and categories covered, the vertical scope of each rating, the distinction between small and large Brands, and the treatment of parent companies, sub-brands and licensed entities under the Scheme are set out in [Brand types rated by Good On You](#).

3.2 Geographic scope

Good On You ratings are applied to Brands that operate globally, across all jurisdictions. The Scheme is designed to be applicable regardless of where a Brand is incorporated or where its primary markets are located. The EU regulatory framework (the UCPD as amended by EmpCo) governs the use of Ratings as sustainability labels by Brands and Traders making claims to EU consumers. As noted in 1.2 Purpose of this Manual, the national consumer protection laws of other jurisdictions also apply where Traders make claims to consumers in those markets.

3.3 Based on public disclosures

Ratings reflect a Brand's performance as evidenced by its public disclosures at the time of assessment. They do not constitute verification of actual practice. A Brand whose actual practices exceed its public disclosures will not receive credit for undisclosed performance. This approach is deliberate: transparency is treated as a sustainability obligation in its own right, consistent with the Rating Principle “Transparency Comes First”. See 1.3 Purpose of the Scheme.

Ratings are assigned at the brand level and at a point in time. The "last rated" date published with each rating indicates when the assessment was completed; material changes occurring after that date will not be reflected until the Brand is re-rated.

For further detail on what is and is not assessed within each vertical, including product-type conditionality and the treatment of specific materials and supply chain stages, see [Brand types rated by Good On You](#) and the published methodology document for the relevant vertical.



4. Methodology Development and Review

Good On You's rating methodologies are developed through a structured process that draws on scientific evidence and the input of independent and industry experts. They are reviewed on a defined cycle and updated when evidence, regulation, or best practice requires it. This section describes how methodologies are built and kept current, and the role of the Independent Monitoring Body in overseeing that process.

4.1 Overview of the rating approach

Good On You creates ratings of the sustainability performance of Brands, not ratings of the individual products a Brand offers. A rating reflects a Brand's overall performance across its operations, value chain, and public commitments on sustainability issues that are material for its industry vertical.

Ratings are conducted by qualified Rating Analysts using publicly available information. Each rating assesses performance across three Pillars: People (labour and supply chain), Planet (environmental performance), and Animals (animal welfare). Within each Pillar, a structured set of Areas and Issues is evaluated. Where Animals is not a material consideration for a Brand's product range, the overall score is derived from People and Planet only. [See Key Factors Affecting Relevant Issues and Scoring.](#)

Pillar scores are aggregated to produce an overall rating on a five-point scale, from “We Avoid” (1) to “Great” (5). A rating on the same scale is also produced for each Pillar. Ratings are updated on a regular basis, at least every 12 months. Ratings may be updated more frequently if Good On You becomes aware of material changes to a Brand's practices or disclosures.

See [The Good On You rating process](#), [Data sources informing Good On You ratings](#), [Scoring Explanation and published rating outputs](#)

4.2 Rating criteria framework

The criteria applied in each rating are set out in the published methodology for the relevant vertical and brand size class.

The Methodology is structured as follows:

- Pillars: People, Planet, and Animals
- Areas: thematic groupings within each Pillar (e.g. Climate Change, Supply Chain Risk, Animal Welfare)
- Issues: specific topics assessed within each Area (e.g. Materials, Supply Chain Transparency, Animal welfare certifications)
- Questions: one or more individual assessment questions for each Issue
- Question Options: the available answers for each Question
- Answer: the Question Option selected for a Brand in the course of a rating.



Criteria are weighted by materiality. Weighting reflects the relative significance of each issue for the relevant vertical, informed by research, credible external standards, and stakeholder consultation. The Methodology sets out the weighting rationale and approach for each Pillar.

See the descriptions of each Methodology in the [Resource Centre](#), including Resource Centre articles about each Area under the People, Planet and Animals Pillars.

4.3 How methodologies are developed

Good On You develops new methodologies and material revisions through a structured process. Methodology development is led by the Head of Ratings, drawing on the team's specialist expertise in sustainability standards, supply chain accountability, and consumer-facing assessment design, and informed by external expert and public consultation. The process covers issue scoping, criteria drafting, expert and public consultation, revision in light of feedback, pilot testing, and publication with a version number, effective date, and change log. The consultation stage is described in 4.4 Consultation and Methodology development.

4.4 Consultation in Methodology development

Good On You conducts structured consultation on each new Methodology and each material revision. Consultation serves to bring independent technical expertise to bear on methodology design and to create an auditable record that the Methodology was not developed unilaterally.

For each consultation round, Good On You identifies and invites organisations and individuals with relevant expertise to review and comment on the draft Methodology. In addition, the draft is published for a 45-day public comment period during which any person or organisation may submit comments. Beyond this, comment on the Methodology is welcome at any time. See 4.6 Periodic review and continuous improvement.

Every consultation round produces a documented record covering who was invited to comment, who submitted comments, and how each substantive point was addressed, with reasons given where input was not accepted. A summary of this record is published alongside the finalised Methodology. The full record is available to the Independent Monitoring Body as part of its Scheme monitoring activities. See 4.7 Role of the IMB in methodology governance.

See Annexure 2: Methodology Consultation Policy; Resource Centre: [Methodology development and consultation](#).

4.5 Scoring logic and consistency controls

Each question option in the Methodology carries a defined score. Scores are aggregated within Issues, Areas, and Pillars using weighting that reflects the materiality of each element. The overall rating is derived from the aggregated score across all Pillars. Separate question sets and weightings apply to large and small Brands, reflecting differences in their operational footprints and supply chain influence.



The scoring system is designed to ensure that Brands cannot achieve a high rating by accumulating a large number of low-bar options. Significant weight is placed on the most material practices, so that a strong rating requires substantive performance on the issues that matter most. The Methodology is reviewed to identify and address any pathways where a combination of low-weight options could produce a misleadingly high score.

The scoring logic and data collection instrument are versioned as part of Good On You's Rating Management System. Once approved no further changes can be made without following the procedures specified in this Manual. This ensures that the same methodology version is applied consistently across all ratings in a given cycle, and that any changes to scoring logic are version-controlled and documented.

See [Key factors affecting relevant issues and scoring](#), 7 Review and Finalisation; 9 Independent Monitoring; 10 Competence and Calibration; 12 Scheme Integrity, Risk Management and Continuous Improvement.

4.6 Periodic review and continuous improvement

Each methodology is reviewed at least every three years, more frequently if needed based on advances in expert consensus on material issues and best practices. Each review assesses whether any criteria, weightings, or scoring rules require amendment in light of developments since the previous version.

In addition to the periodic cycle, a methodology review may be triggered at any time by: material regulatory or scientific developments; complaints that identify methodology ambiguities or gaps; or recommendations arising from the IMB's annual monitoring activities.

Material changes, including revisions to scoring logic, weighting changes above defined thresholds, introduction or removal of criteria, and changes to label eligibility conditions, are subject to the full expert and public consultation process described in 4.4 Consultation in methodology development and must be approved by the Board. Minor clarifications that do not alter scope, criteria, or scoring may be published through a streamlined process with a shorter documented review and may be approved by the CEO. In both cases approval is based on the recommendation of the Head of Ratings.

A methodology review register is maintained to log emerging issues and the rationale for whether each requires a methodology change. Good On You welcomes comment on the Methodology from members of the public, Brands, civil society organisations, and any other stakeholders at any time. Comments are considered when received and triaged into issues to be considered at the next review or issues that require further research in the short term with the potential to trigger a methodology review.

Each published Methodology version carries a version number, effective date, and change log. Major changes carry a transition period of 90 days before they take effect. Prior versions are archived and publicly accessible.

See [Methodology changelog](#); [Methodology development and consultation](#).



4.7 Role of the IMB in Methodology governance

The Independent Monitoring Body's role in methodology governance is procedural, not substantive. It does not assess whether the Methodology is the right methodology — that is the responsibility of Good On You, informed by expert input and stakeholder consultation. Its role is to confirm that the documented development process was followed: that the required expert engagement was conducted, that the public comment period was open for the required duration, that all substantive submissions were logged and dispositioned with reasons, and that the change log accurately reflects what was changed and why.

Where the IMB finds that the records are materially incomplete — for example, that consultation was not conducted or that submissions were not dispositioned — it issues a process non-conformance. Where the IMB identifies a process non-conformance, Good On You is responsible for remedying the deficiency within a time agreed with the IMB. The IMB's written confirmation of methodology process integrity is included in its annual monitoring statement, which is published.

See 9 Independent Monitoring of the Scheme.



5. Evidence

This section describes the evidence Good On You relies on in conducting ratings: what sources are used, how brand-submitted information is handled, how third-party certifications and external data are treated, and how the Scheme approaches data gaps and uncertainty.

5.1 Evidence sources

Good On You Ratings consider only publicly available information. This is a founding principle of the Scheme. Transparency by Brands is treated as both a condition of meaningful assessment and a signal of accountability in its own right.

The primary evidence sources are:

- Public disclosures published by Brands and their parent companies, including websites, sustainability reports, annual reports, and other corporate reporting relevant to sustainability performance
- Publicly disclosed certification and standards data where they map to issues covered in the Methodology. See 5.3 Use of third-party certifications and external data.
- Credible third-party indices, multi-stakeholder initiatives and other data where they map to issues covered in the Methodology (e.g. CDP Climate Change and Water Security questionnaires, GOTS and PETA brand listings; MSIs including those promoted by international labour unions IndustriALL and UNI, Cascale, and Textile Exchange)
- Reports and investigations by credible civil society organisations (e.g. Clean Clothes Campaign, Transparentum, Solidaridad, International Labour Rights Forum, Greenpeace and PETA).

To be considered, a brand statement or claim must be specific, precise, and material to the issue being assessed. The Methodology favours factual, past-facing statements about current practices or actions already taken. Generic or non-material claims are discounted. In a small number of cases, aspirational or forward-looking statements are considered but only where they pass the tiered framework described in 5.4 Future commitments.

Good On You recognises that reliability of evidence varies by type. Some claims, such as the use of certified materials or participation in recognised sustainability initiatives, can be corroborated against third-party databases or public registries. Others are verifiable from observable brand characteristics. Where a Brand makes a quantitative claim, such as a percentage of materials meeting a standard, the Methodology assesses the specificity and relevance of the claim even where the precise figure cannot be independently confirmed. Good On You cannot guarantee the accuracy of every brand statement. Responsibility for the truthfulness of public disclosures rests with Brands under applicable consumer protection law. The Methodology provides a rigorous and consistent framework for selecting and evaluating the most meaningful sustainability indicators, so that ratings reflect publicly demonstrated performance rather than unfiltered brand claims.



Analysts are supported by technology tools that assist in identifying and collating relevant disclosures, including AI-assisted scanning of brand websites. All evidence is recorded in the rating file against the relevant question, with a URL reference to the source, with an annotation where interpretation was required.

See [Data sources informing Good On You ratings](#).

5.2 Brand-submitted information

Brands may submit information relevant to their rating through Good Measures, Good On You's brand-facing platform. The Good Measures platform allows Brands to view their existing rating data, update question responses, attach public URLs where supporting evidence is located, and submit for reassessment.

Brand submissions are reviewed by a Rating Analyst for accuracy and compliance with evidence requirements to the same standard as all other evidence.

As with other ratings, all evidence must be publicly available at the URL provided. Good On You does not accept confidential or non-public information as a basis for rating decisions.

See [Providing Evidence in Good Measures](#).

5.3 Use of third-party certifications and external data

Third-party certifications and standards are an important evidence source. Where a Brand holds a relevant certification in relation to its operations, its products or services, or the materials or ingredients used, this is taken into account in the rating for the issues to which that certification applies.

The Methodology for each vertical specifies which certifications are recognised and the rating weight they carry for each question to which they are relevant. Certifications are not treated as evidence of *overall* sustainability performance. Rather, their contribution is limited to the specific issues they address. As each methodology is developed, certifications relevant to a particular question are identified. Before a certification is recognised, Good On You assesses its scope, assurance mechanism, and evidence of impact.

To be accepted as evidence, a certification must be publicly disclosed by the Brand and/or verifiable through the certification body's public registry and within its validity period.

Similarly, external data sources (such as CDP scores or membership of an MSI) are used to satisfy specific questions in the Methodology. The Methodology sets out the acceptance criteria and any limitations on use, including recency and geographic scope requirements.

The list of recognised certifications and data sources may be updated between methodology revisions. Any additions are documented and published in the methodology changelog.

See [Certifications and Standards Systems](#), [Fashion methodology: Initiatives with broad impact](#), [Beauty methodology: Initiatives with broad impact](#).



5.4 Future commitments

For certain questions the Methodology looks at a Brand's future commitments as an indication of good practice on an issue (for example, having an accepted Science Based Target with SBTi), or accepts a future commitment as a step towards good practice on a particular topic (commitment to paying a living wage). Good On You's approach to future commitments where accepted as relevant is designed to ensure Brands are not rewarded for greenwashing.

In some cases, the type of future commitments accepted is backed by an independent third-party verification mechanism to which the Brand has submitted, with periodic progress reporting.

In other cases, a commitment type supported by a detailed, time-bound public roadmap and regular progress reporting, is recognised, even without an independent third-party verifier. Such commitments are scored at a lower level to reflect the absence of external verification.

In no case is any credit given for stated intentions that are not supported by independent verification, a detailed roadmap, or public progress reporting.

See [Consideration of set targets, performance against targets, and other planned improvements](#).

5.5 Handling data gaps and uncertainty

Many Brands, particularly smaller ones, do not publicly disclose comprehensive sustainability information. Where evidence is absent or insufficient, this is reflected in the rating.

Good On You does not award credit for undisclosed practices. If a Brand does not publicly report on an issue, the relevant question is scored on the basis of what is known. Absence of disclosure results in no credit being awarded for that issue.

Where a Brand discloses that it undertakes a practice but does not state precisely the extent, the Methodology applies defined quantitative thresholds and qualitative ranges to categorise the disclosure consistently. Guidance on how to apply these ranges is documented in analyst guidance materials and reinforced through regular calibration exercises, in which analysts work through edge cases as a team. See 10.3 Calibration and consistency review.

Where evidence is ambiguous or conflicting, the analyst exercises judgement based on their expertise and the analyst guidance materials. The rating file records the analyst's reasoning. This record is available for review by the Reviewer and for inspection by the Independent Monitoring Body.

As with all elements of the rating process, the goal is that two analysts working independently, applying the same framework and guidance, should reach the same conclusion about how to categorise a given disclosure. See 10 Competence and Calibration.



6. Rating Process

This section describes how Good On You conducts ratings: how Brands are selected, how evidence is collected and recorded, how assessments are carried out by Rating Analysts, and how a completed assessment moves to the review stage.

6.1 How Brands are selected for rating

Good On You selects Brands for rating on its own initiative, without requiring the Brand's involvement or consent. Selection is guided by consumer interest, market relevance, and commercial demand including requests from enterprise data customers. Anyone (including a Trader or a consumer) may also request a Brand be rated directly and the volume of requests is taken into account. Full details of how Brands are selected and prioritised, how rating requests are made, and how the re-rating cycle works are set out in [The Good On You rating process](#).

6.2 Data collection and verification

Good On You conducts ratings in regular cycles. Analysts collect the evidence required for each rating from publicly available sources. Alternatively, Brands may submit a full data set via the Good Measures platform. See [Introduction to Good Measures](#).

Regardless of whether the brand rating is initiated by Good On You or triggered by a Brand submitting evidence for Good Measures, it is assessed in the same way. All evidence must be publicly accessible and each data point is recorded with a specific source reference. See 5.1 Evidence sources and 5.2 Brand submitted information.

Full details of the data sources used, the evidence standard applied, and the role of technology in the collection process are set out in [The Good On You rating process](#).

6.3 Brand engagement and correction opportunities

Brands can engage with Good On You at several points in the rating process. Full details of how Brands can submit evidence and interact with their rating through the Good Measures platform are set out in the Resource Centre article [Good Measures](#). How rating requests work and how Good On You handles brand communications more generally is covered in [The Good On You rating process](#). Good On You's process for raising a concern with a Rating is set out in 8 Corrections, Updates, Complaints and Appeals.

6.4 Rating assessment by Rating Analysts

Ratings are conducted by trained analysts who assess each Brand's publicly available disclosures against the published Methodology using Good On You's Rating Management System. Each assessment is approved using a process independent of the original Rating Analyst (see 7.1 Rating review). How the rating assessment works, what Rating Analysts look for, and how analytical judgements are made on issues such as conditionality, no info determinations, and core criteria are described in [The Good On You rating process](#) and



[Scoring explanation and publishing outputs](#). The data sources Rating Analysts draw on are described in [Data sources informing Good On You ratings](#).

6.5 Internal documentation, evidence trail and rating systems

Every Rating is supported by a complete evidence trail recorded at the time of assessment, including the specific source and location for each evidence item and written reasoning where analytical judgement is required.

Good On You's rating process is supported by a set of integrated tools. Analysts conduct assessments using Good On You's Rating Management System structured around the published Methodology, ensuring every assessment follows the same framework regardless of which Rating Analysts conducts it. A versioned store of methodology scoring logic ensures the correct version of the Methodology is applied to each Rating and that historical Ratings can be referenced against the Methodology in force at the time. A dedicated ratings database stores all rating records, scores, and published outputs, and powers Good On You's consumer-facing products (the Good On You Directory and app), enterprise customer products (Ratings API and Dashboard), and brand platform Good Measures.

Good On You uses AI-assisted tools to help Rating Analysts scan and curate publicly available brand disclosures but they do not make rating determinations. All AI-assisted outputs are reviewed and verified by Rating Analysts before being recorded in the evidence trail.

Corrections and updates to rating data follow a defined amendment process specifying who conducts the review, how changes are recorded, and how they are attributed. See 8 Corrections, Updates, Complaints and Appeals.

Access restrictions, version control, and override logging prevent unauthorised changes to rating records and provide an auditable trail of any amendments.

Evidence records are maintained in the Rating Management System and are accessible to the Independent Monitoring Body as part of its monitoring activities.

6.6 Draft rating

When a Rating Analyst completes an assessment it moves to draft status and enters the Review stage. The draft contains a completed record of the data collected, the evidence sources, preliminary scores, and a generated rating summary. It is not visible to the Brand or published until the review and finalisation process described in 7 Review and Finalisation of Ratings is complete. The workflow from draft to publication is described in [The Good On You rating process](#).



7. Review and Finalisation of Ratings

This section describes how completed rating assessments are reviewed, approved, and published. The review and finalisation process is the mechanism by which Good On You ensures that Ratings are accurate, consistent, and properly authorised before they reach consumers and Traders.

7.1 Rating review

No Rating is published on the basis of a single Rating Analyst's work. Every Rating is subject to a review and approval process.

This independent approval ensures that the assessment and the approval decision are kept separate. The Rating Analyst who conducts the Rating does not have the authority to approve it for publication. This approach is aligned to the intent of ISO/IEC 17065 clause 7.5, which requires separation of evaluation and review functions.

This separation is a core integrity control. It ensures the Rating Analyst has followed the correct process, reduces the risk of individual error, guards against unconscious bias in scoring, and provides an independent check on both the evidence selected and the conclusions drawn from it.

Rating reviews are the responsibility of a qualified team member who was not involved in conducting the primary assessment (the Reviewer).

A Rating will be subject to a full review where:

- the draft rating is 4/5 “Good” or 5/5 “Great”
- the draft rating has a relatively high score, but not high enough for “Good”, or
- the draft rating falls into a specific category of risk. Risk categories are identified through regular audits of the expedited review process (described below). There may or may not be any risk categories active at any particular time. Examples include Ratings with a high level of disclosure but a low score, or a substantial change from a previous Rating.

Where the draft rating results in a score well below the threshold for use as a sustainability label, and the Rating does not fall into any specified risk category, it may be subject to an expedited review. Such a review may include automated quality control techniques and/or human review limited to the data points with the highest impact on the score. The effectiveness of such expedited reviews is subject to regular review.

The effectiveness of the review process is monitored by the IMB. See 9 Independent Monitoring of the Scheme.

7.2 Role of the Reviewer

The Reviewer that is responsible for approving the Rating is the Head of Ratings or a senior ratings manager not involved in the initial assessment.



In the case of a full review, the Reviewer's role is to review the answers and evidence recorded by the Rating Analyst, and the process they have adopted, and make the formal decision to authorise publication. The Reviewer does not re-conduct the assessment from scratch. Their task is to be satisfied that the evidence documented by the Rating Analyst adequately supports each scored answer before approving finalisation.

Specifically, the Reviewer checks that:

- the correct process has been followed (i.e. the process set out at 6 Rating Process)
- answers are consistent with the evidence cited
- evidence sources are correctly referenced and accessible
- the overall result is consistent with outcomes for comparable Brands, and
- any Rating Analysts' reasoning on ambiguous or borderline decisions is adequate and properly recorded.

Where the Reviewer is not satisfied, the Rating is returned to the Rating Analyst with documented reasons for revision. The Rating cannot proceed to finalisation until the Reviewer is satisfied.

Where the Reviewer identifies a minor issue or issues that do not materially impact the Rating, they may elect to correct those issues and approve the Rating. In all such cases the Rating Analyst is informed of the changes for both learning and accountability purposes, and may require the Reviewer to refer the Rating back to them if they disagree with the change.

Reviewers are subject to the same conflict of interest requirements as Rating Analysts. See 2.5 Conflict of interest management.

7.3 Quality and consistency checks

Beyond the independent approval process, Good On You operates broader quality and consistency controls across the ratings programme. See 10 Competence and Calibration; 9.5 Ratings case-file review.

7.4 Rating finalisation

Once the Reviewer is satisfied, the Rating moves to finalisation.

Finalisation is a formal step recorded in the Rating Management System, marking the point at which the Rating is complete. It records confirmation that the Rating has been conducted in accordance with correct procedures, that Rating Analyst answers are supported by the evidence, and that no relevant evidence is missing.

The date of finalisation is recorded as the 'last rated' date in the Good On You database; the month of finalisation is shown as the 'last rated' date in the published Good On You Directory entry.

A Rating can only be amended after finalisation through a new assessment following the standard process, which may be expedited depending on the materiality of the issue,



including in response to an external concern. See 8.1 Corrections and updates. Ad hoc changes to published rating data outside the standard workflow are not permitted.

See also: 11 Data Governance, Confidentiality and Records.

7.5 Publication of Ratings

After finalisation, the Rating is published across:

- the Good On You Directory, the primary public-facing listing of all Ratings
- the Good On You app
- the Ratings API and Dashboard, available to enterprise data customers

Ratings are published on a regular schedule. Changes at each publication date may include new Ratings, updated Ratings and deleted Ratings, for example where a Brand goes out of business or where a Rating is out of date and has not been updated.

Where a Brand has submitted a Good Measures update prior to the rating assessment, the Brand receives a notification on publication summarising any instances where the verified answer differed from the Brand's submission.



8. Corrections, Updates, Complaints and Appeals

This section covers two distinct processes. The first is the corrections and updates process, through which Good On You keeps Ratings current as new public information becomes available and through which Brands can submit factual corrections. The second is the complaints and appeals process, through which any party can raise a concern about a Rating or about the conduct of the Scheme, and through which affected parties can appeal a decision. Both processes are documented and subject to independent oversight.

8.1 Corrections and updates

Good On You reviews and updates published Ratings on a regular basis (re-ratings). Where new publicly available information is identified through monitoring, brand communications, media, or other sources, this is assessed for materiality and, where material, a rating review is scheduled.

Brands may also submit factual corrections or new public disclosures through the Good Measures platform.

A re-rating may be triggered by a scheduled update cycle, by a material correction, by a significant change in a Brand's publicly available information, or by a finding made through the complaints process described in 8.2 Raising a concern.

8.2 Raising a concern

Any party may raise a complaint about Good On You's Ratings or about the conduct of the Scheme. Good On You will consider all concerns, including those that fall into one of the following categories.

Concerns about the accuracy of a Rating: a concern that a published Rating does not accurately reflect the publicly available evidence, supported by specific public sources. These are reviewed by a member of the ratings team and, if a material discrepancy is found, a rating review is scheduled.

Concerns about correct application of the Methodology: a concern that the Methodology is being applied inconsistently or incorrectly to a Brand or across a group of Brands. These are investigated by the Head of Ratings and where appropriate, corrective action is taken. Good On You's Quality Management Process is invoked where a systemic issue is identified. See 10 Competence and Calibration.

Concerns about the integrity or independence of the Scheme: a concern that a Rating or group of Ratings has been influenced by commercial or other improper considerations. Concerns of this type may be referred directly to the Independent Monitoring Body without first going through Good On You's internal complaints process. How they are handled is described in 9.8 IMB review of complaint and appeal decisions.



Concerns about the content of the Methodology, including the design, scope, weighting, or the treatment of specific certifications or standards. These are not resolved through the complaints process. Good On You logs all such concerns and they are considered as part of the methodology review process described in 4 Methodology Development and Review.

Good On You may decline to investigate concerns that are manifestly frivolous, vexatious, or unsupported by any verifiable information.

The submission pathway, acknowledgement timelines, triage steps, and investigation procedures are described in [Raising a Concern About a Good On You Rating](#).

8.3 Appeals

Any party who has received a substantive decision on a complaint may appeal that decision. Appeals are handled by a Good On You team member who was not involved in the original complaint assessment. The appeal outcome is Good On You's final internal determination; no further internal review is available.

Where a complainant is dissatisfied with Good On You's handling of a complaint, they may request that the Independent Monitoring Body review Good On You's approach. The IMB will assess whether Good On You followed its published complaints procedure and will report its findings to both Good On You and the complainant. See 9.8 IMB review of complaint and appeal decisions.

8.4 Records and public reporting

All concerns and appeals are logged on receipt and tracked through to resolution. The log is reviewed by the IMB as part of its monitoring activities, as described in 9 Independent Monitoring of the Scheme.

Good On You publishes aggregate statistics on concerns and appeals in its Annual Transparency Report. The report covers the number of concerns received by category, the number upheld, and the number of appeals determined.



9. Independent Monitoring of the Scheme

Good On You is responsible for ensuring that its Ratings are conducted in accordance with its published Rules and Methodology. To provide independent oversight that this is the case, the Scheme appoints an Independent Monitoring Body (IMB) to monitor its operations. This section explains the IMB's role and qualifications, what it reviews, and how its findings are reported.

9.1 Purpose of independent monitoring

The IMB exists to provide independent monitoring that Good On You operates the Scheme in accordance with its published commitments. These include:

- transparency about the Methodology and how Ratings are determined
- independence of the rating process from commercial influence
- use of methodologies developed with relevant expert and stakeholder input, applying objective criteria
- non-discriminatory access to and treatment of Brands under the Scheme
- operation of procedures for non-compliance, including suspension or withdrawal of label eligibility where required. See 13.4 Misuse, misleading use and corrective action.

Independent monitoring is a mandatory requirement of the EU Empowering Consumers for the Green Transition Directive (EmpCo). The Scheme's appointed IMB must maintain competence and independence consistent with recognised international, EU, or national standards. An annual statement of the IMB's competence and independence is published on Good On You's website.

9.2 Appointment of the IMB

The IMB is appointed by the Board of Good On You on an ongoing basis, subject to periodic review and renewal. Appointment is confirmed in writing and governed by the Terms of Reference published as Annexure 3 to this Manual.

The appointment is reviewed annually. Where the IMB no longer satisfies the criteria set out in this section, Good On You must address this promptly and, if necessary, terminate the appointment and appoint a replacement body. Any replacement appointment requires Board approval.

The IMB must meet the following criteria:

Independence from the Scheme Owner. The IMB must be legally and operationally independent from Good On You. It must have no ownership relationship, shared governance, or financial dependency that could compromise its ability to make independent findings. Good On You must not have any authority to direct, influence, or veto the IMB's findings or conclusions.



Independence from rated Brands. The IMB must have no commercial relationship with Brands rated under the Scheme. It must operate and document an active conflict-of-interest management programme covering its personnel, including pre-assignment screening and reassignment procedures where a conflict is identified.

Competence. The IMB must demonstrate competence to carry out the monitoring activities described in this section. Competence encompasses knowledge of sustainability assessment methodologies and evidence standards, experience in conformity assessment or equivalent monitoring work, and the organisational capability to conduct structured sampling, case-file review, and management systems monitoring.

Objective procedure. The IMB must operate against documented audit protocols and defined assessment criteria. Its findings must be reproducible and traceable to the evidence reviewed. It must not exercise purely discretionary judgment without a documented basis.

Demonstrated compliance with a recognised standard. The IMB's competence and independence must be capable of demonstration by reference to a recognised international standard or equivalent framework. Good On You does not require the IMB to hold formal accreditation as a precondition of appointment, but the IMB must substantively align with the requirements of ISO/IEC 17065 or another relevant international benchmark, and must be able to demonstrate this to Good On You and to relevant authorities on request.

See Annexure 3: Terms of Reference for the Independent Monitoring Body.

9.3 Role of the Independent Monitoring Body

The IMB's role is to monitor whether Good On You's Scheme and Rating Management System operate as documented. It does not rate Brands, verify individual brand disclosures, or issue certificates to Brands. Its conclusions are observations about the system, not determinations about individual Ratings.

The IMB carries out two types of activity: sampling-based review of completed Ratings, and an annual review of management systems and processes. It also acts as independent reviewer for complaints referred directly on grounds of Scheme integrity, and conducts procedural reviews where a complainant is dissatisfied with Good On You's handling of a complaint. See 9.8 IMB review of complaint and appeal decisions.

The full Terms of Reference for the Independent Monitoring Body are set out in Annexure 3.

9.4 Scope of monitoring activities

The IMB's monitoring covers the following areas:

- whether rating assessments follow the published Methodology
- whether evidence is applied consistently across Ratings
- whether Rating Analysts apply scoring rules as documented
- whether analyst and review workflows effectively mitigate the potential for error or bias introduced by automated data collection or AI-assisted curation tools (in



accordance with the operational boundaries established in 6.5 Internal documentation, evidence trail and rating systems)

- whether the Good Measures brand submission process is handled correctly
- whether quality control processes function effectively
- whether commercial relationships with Brands introduce bias into rating outcomes.

Commercial bias testing is a mandatory element of the annual monitoring programme. The IMB undertakes testing designed to identify whether Brands with a commercial relationship with Good On You receive systematically different rating outcomes from comparable Brands without such a relationship.

9.5 Ratings case-file review

Good On You provides the IMB with the data and/or system access required to support sample design and case-file review. The IMB conducts a sampling-based review of completed Ratings at least annually, designed to ensure representative coverage across Rating Analysts, score bands, methodology verticals, brand size classes, and Ratings where a Good Measures submission was made.

All Ratings are considered for review. The sample design ensures that the majority of Ratings reviewed are higher-rated Brands, i.e. those meeting the minimum threshold for use as a sustainability label or to support a sustainability claim.

The IMB's annual management systems review includes verification that Good On You's reported data reconciles with the underlying system records.

For each sampled Rating, the IMB reviews the internal case file held in the Rating Management System, which includes the evidence log, Rating Analysts annotations, scoring decisions, approval records, and conflict of interest declarations. The IMB does not contact the rated Brand and does not re-conduct the assessment. Its review is based entirely on the documentation held in the Rating Management System.

As part of this review, the IMB conducts witness audits, observing Rating Analysts working through Ratings in real time.

Findings are recorded at the system level, not the brand level. For example, a finding may concern missing supporting URLs within a defined sample proportion, rather than the accuracy of individual Ratings.

9.6 Management systems and process review

Once per year the IMB conducts a desk-based review of Good On You's management systems and operational processes. This covers:

- methodology version control and change management in accordance with 4 Methodology Development and Review
- Rating Analysts training, competence records, and performance tracking profiles as maintained under 10 Competence and Calibration



- internal quality findings and process evaluations compiled under 12.3 Internal quality reviews
- evidence-handling protocols and record retention compliance under 11 Data Governance, Confidentiality and Records
- complaints and appeals historical tracking logs managed under 8 Corrections, Updates, Complaints and Appeals
- Rating Analysts review protocols and controls over AI-assisted processes as defined under 6.5 Internal documentation, evidence trail and rating systems

The annual systems and processes review also includes a review of the IT audit trail, confirming that the Rating Management System generates a complete, timestamped record of all rating events and that post-approval amendments are well documented.

9.7 Reporting

The IMB produces two outputs from its annual monitoring programme.

A public monitoring statement is published without modification on the Good On You website and included in Good On You's Annual Transparency Report. It covers the scope of monitoring activities conducted, the IMB's overall conclusion on Scheme compliance, and any material findings or recommendations for improvement.

A full audit report is provided to Good On You. This covers findings by category (compliant, minor finding, major non-conformance), the status of corrective actions from the prior year, and recommendations. Where the full report contains findings that cannot be made public for legitimate reasons, the public monitoring statement will note that a full report exists and has been provided to Good On You, without disclosing the confidential content.

Good On You is required to respond to IMB recommendations within a timeframe agreed with the IMB, and to publish its response alongside the monitoring statement. The status of corrective actions is reviewed at the next annual cycle.

9.8 IMB review of complaint and appeal decisions

Where a complainant is dissatisfied with Good On You's handling of a complaint, they may request that the IMB review Good On You's approach. The IMB will assess whether Good On You followed its published complaints procedure and will report its findings to both Good On You and the complainant. This is a procedural review. The IMB does not substitute its own judgment for Good On You's rating decision and does not act as an appeal body for individual rating outcomes.

Where a complaint raises potentially serious issues of Scheme integrity — including allegations of material commercial bias, systematic misapplication of the Methodology, serious claims misuse, or failure to follow published Scheme procedures — it may be referred directly to the IMB without first going through Good On You's internal complaints process. The IMB will either assess the concern independently and report its findings or oversee Good On You's internal investigation of the concern.



Systemic issues identified through the complaints process are incorporated into the IMB's annual monitoring findings and recommendations.

See 8 Corrections, Updates, Complaints and Appeals; Terms of Reference for the Independent Monitoring Body.

9.9 Limits of independent monitoring

The IMB's role is to monitor Good On You's Scheme. It does not certify individual Brands, and a positive monitoring conclusion from the IMB is not a statement that any particular Brand's Rating is correct. Brands and Traders should not represent IMB monitoring as brand-level certification.

The IMB's sampling-based approach means that not every Rating is reviewed in every cycle. The absence of a finding on a specific Rating in a given period does not mean that Rating has been individually verified.

As detailed in Section 4.7, the IMB's role in methodology governance is strictly procedural, not substantive. Its function is to confirm that the documented development, change management, and stakeholder consultation processes were executed in compliance with 4 Methodology Development and Review and 12 Scheme Integrity, Risk Management and Continuous Improvement.



10. Competence and Calibration

10.1 Core competence requirements

Good On You ensures all Rating Analysts and Reviewers meet defined competence baselines managed under the Analyst Competence Framework.

- **Analysts:** must demonstrate verified technical proficiency across the environmental, social, and animal welfare methodology criteria, research data-gathering pipelines, and evidence verification boundaries before undertaking independent assessments.
- **Reviewers:** must demonstrate a higher level of methodology interpretation proficiency, qualitative logic auditing, and conformity assessment oversight.

Competence criteria are formally evaluated at the recruitment stage and assessed on an ongoing basis.

10.2 Structured onboarding and technical training

All newly onboarded Rating Analysts complete a structured training programme before undertaking independent assessments. During this period, completed Ratings are subject to enhanced peer review and approval by the Head of Ratings. Analysts do not undertake independent ratings until they have demonstrated they meet the standards specified in the Analyst Competence Framework. Where technical knowledge gaps are identified during or after onboarding, targeted supplementary training is provided.

10.3 Calibration and consistency review

Consistent application of the Methodology across Rating Analysts is a core quality requirement of the Scheme. Good On You ensures consistency via ongoing calibration through:

- regular team review of emerging interpretation questions
- monitoring by the Head of Ratings and ratings managers of Rating Analyst-level consistency, to identify questions or areas where inter-analyst variation is higher than expected
- review of Ratings that fall close to the sustainability label eligibility threshold, to ensure the Reviewer process for these Ratings is appropriately rigorous
- documented analyst guidance materials that are updated when clarifications are made. Analysts have access to this guidance as part of their day-to-day work.

Where a systemic issue is identified, the relevant analyst guidance or analyst training is reviewed and updated. Material issues are reported to the Independent Monitoring Body as part of the annual review. See 9.6 Management systems and process review.

10.4 Performance monitoring

Analyst performance is monitored on an ongoing basis by the Head of Ratings. Where performance falls below the required standard, this is addressed directly with the Rating



Analyst and a supported improvement process is put in place. Persistent concerns are escalated within Good On You's management structure. The Independent Monitoring Body reviews Good On You's competence management arrangements as part of its annual assurance activities. The IMB has access to all necessary documents (including the Analyst Competence Framework), databases and systems. See 9 Independent Monitoring of the Scheme.



11. Data Governance, Confidentiality and Records

11.1 Rating Management System

Good On You maintains all rating data, evidence records, and Rating Analysts commentary and documentation in a custom-built Rating Management System. The Rating Management System supports the end-to-end rating process from data collection through to publication, and maintains a complete audit trail of rating activity including evidence logging, conflict of interest declarations, quality control approvals, and publication timestamps. Access to the Rating Management System is restricted to authorised Good On You personnel and, for monitoring purposes, to the Independent Monitoring Body.

11.2 Evidence records and audit trail

Analysts record the precise source URL(s) and, where required, an exact location descriptor for every methodology Issue. Where analytical interpretation is required, the Rating Analyst must log a written justification documenting the rationale behind the assessment.

As noted in 5.1 Evidence sources, Good On You Ratings rely exclusively on information in the public domain at the time of assessment. Private corporate communications, non-public data, and unverified claims are systematically rejected. Unpublicised data submitted by Brands via the Good Measures platform or otherwise is not accepted as rating evidence. In such instances, Good On You may encourage the Brand to publish the disclosures before rating resubmission. See 5.2 Brand-submitted information.

11.3 Information access and confidentiality

Published Ratings and summaries of the Methodologies are public documents. Internal rating records, including raw evidence logs, analyst annotations, granular scoring calculations, and quality control files, are not published, however these internal files are made fully available to the IMB to facilitate independent case-file reviews and systemic monitoring. See 9.5 Ratings case-file review.

11.4 Record retention

Rating outcomes, including question-level scores and overall Ratings, are retained indefinitely as part of Good On You's permanent rating history.

Supporting evidence records and analyst notes are retained for the duration of the Rating to which they relate and for six years from the date that Rating is superseded or withdrawn. This retention period reflects the need to support independent audit, respond to complaints and appeals, and maintain accountability for rating decisions. See 8 Corrections, Updates, Complaints and Appeals.



12. Scheme Integrity, Risk Management and Continuous Improvement

12.1 Scheme integrity risks

Good On You recognises that maintaining the integrity of its ratings requires active management of risks to consistency, independence, and credibility. These risks include the potential for the Methodology to become outdated relative to evolving best practice, inconsistent application of criteria across Rating Analysts or verticals, and commercial relationships influencing rating outcomes.

12.2 Controls and quality assurance

Good On You's Quality Management Process comprises the Competence and Calibration procedures set out in 10 Competence and Calibration, and the controls, reviews, monitoring and evaluation described in this section.

Good On You embeds controls across its governance, rating process, and competence framework to address the risks identified in 12.1. These controls include conflict of interest declarations at team member and Scheme level (see 2.5 Conflict of interest management), independent internal review of all ratings before publication (see 7 Review and Finalisation of Ratings), regular Methodology review and stakeholder consultation (see 4 Methodology Development and Review), and independent monitoring of the Scheme by the IMB. See 9 Independent Monitoring of the Scheme.

12.3 Internal quality reviews

Good On You conducts periodic internal reviews to verify that the rating process is being followed correctly across the team. These reviews are distinct from the quality checks applied to individual ratings before publication. They examine whether required process steps, including evidence logging, conflict of interest declarations, and pre-publication review and approval, are being completed systematically, and whether written analyst guidance is current and accessible to Rating Analysts.

Findings from internal quality reviews are documented and shared with the IMB as part of its annual monitoring activities.

12.4 Monitoring, evaluation and learning

Good On You monitors the performance of the Scheme — defined as the operational accuracy, inter-analyst consistency, and integrity of the rating framework — on an ongoing basis. Key indicators tracked include the rate at which published Ratings are subsequently corrected, patterns in ratings returned by Reviewers for revision, and divergence between analysts on comparable Brands identified through calibration. Good On You uses what it learns to improve the Methodology, analyst guidance, and operational processes.



The Head of Ratings is responsible for monitoring analyst performance and maintaining a record of findings and actions taken. This record is made available to the IMB as part of its annual monitoring activities. Broader inputs to this internal evaluation include aggregated outcomes from the complaints and appeals log, feedback from Brands and stakeholders, and emerging sustainability issues identified through scientific research and industry engagement.

Where monitoring identifies a methodology gap, this is assessed and addressed through the Scheme's methodology review described in 4 Methodology Development and Review.

Where monitoring identifies an operational process weakness, this is assessed and addressed through team calibration and management procedures defined under 10 Competence and Calibration.

12.5 Annual Transparency Report

Good On You publishes an Annual Transparency Report covering the preceding year. The report is a public document and is the primary vehicle through which the Scheme accounts to consumers, Brands, Traders, and other stakeholders for its operation and performance.

Each report covers:

- the number of Brands rated in the period, by vertical and score categories
- complaints received, classified by type and outcome
- changes to the Methodology made during the period, including a summary of any consultation carried out
- Scheme governance activities, including any changes to governance arrangements
- the IMB's public monitoring statement, published alongside this report within 30 days of receipt.

The report is published annually on the Good On You website.

12.6 Periodic review of the Scheme

The Scheme is subject to a comprehensive review at least every three years. The review covers governance arrangements, operational processes, and the ratings operation including the competence and calibration arrangements described in 10 Competence and Calibration and the quality assurance activities described in this section. Methodology reviews follow the separate cycle described in 4 Methodology Development and Review.

An out-of-cycle review may be initiated at any time by the Board or on the recommendation of the IMB. Good On You will initiate an out-of-cycle review where monitoring identifies a material integrity or operational issue that cannot be addressed within normal operational processes.

Outcomes of periodic reviews are considered in the IMB's annual monitoring statement, which is published on the Good On You website.



13. Using Good On You Ratings to Make Sustainability Claims

This section sets out the requirements for the use of Good On You Ratings and the Good On You Sustainability Label Scheme to make sustainability claims, including environmental claims, and the conditions under which such use is permitted.

Good On You's Ratings are designed to support informed consumer choice by providing independent, comparable assessments of brand sustainability performance under the Scheme. To preserve the meaning and integrity of these Ratings when used in commercial communications, their use is subject to the following requirements.

Practical implementation guidance for rated Brands, Publishers and enterprise customers (being Traders who integrate Ratings via the Ratings API and Dashboard licensing, affiliate, or other arrangements) is published in Good On You's [Ratings Usage Guidelines](#).

13.1 When a Rating may be used to support a sustainability claim

Good On You Ratings may only be used to promote a Brand, or products offered by that Brand, in ways that comply with consumer protection laws, including the EU's EmpCo Directive. This applies to all Traders (as defined in 2.8 Parties to the Scheme), including rated Brands, Publishers, and enterprise customers in a commercial setting.

To make a claim referencing Ratings the following eligibility conditions must be met:

- the Rating meets the minimum score threshold: a Rating of 4 ("Good") or 5 ("Great"), and
- use is in line with the requirements in this section.

A Rating that does not meet these conditions may not be presented or communicated as a sustainability label or form the basis of a sustainability claim.

The Rules of the Scheme are designed to align with EmpCo and other consumer protection legislation to support the Scheme's purpose of enabling informed consumer choice through fair, transparent, and consistent use of Ratings. However ensuring that a particular use complies with the applicable legal regulations remains the responsibility of the Trader making a claim.

Any person or organisation, for example a journalist, NGO or member of the public, may make a factual reference to a Brand's Rating without a relationship with Good On You.

A Trader may, with permission from Good On You:

- use Good On You's Ratings, the Good On You Mark, digital assets, Directory, or the text of rating summaries
- use phrases such as 'Rated "Good" by Good On You' or similar formulations to promote a Brand or its products in a commercial context



- publish a list, guide, directory or similar compilation that includes multiple Ratings to promote a Brand, Brands or their products.

The following requirements ensure that Ratings are not used in ways that misrepresent their scope, imply endorsement beyond what the Rating conveys, or commercially exploit the ratings database in ways inconsistent with consumer protection law and the Scheme's integrity.

13.2 Requirements for brand communications

Brands using Ratings to make a sustainability claim must include a prominent specification of what the Rating means on the same medium as the claim, and must ensure consumers can access detailed information about the Rating Management System and what underlies the Rating. The specification requirement cannot be satisfied by a link alone. Guidance on recommended disclosure is set out in the [Ratings Usage Guidelines](#).

Brand-level clarity. Any claim based on the Brand's Rating including any use of the Mark must make clear that the Rating applies to the Brand, not to a specific product. Where the claim, Mark or other information about or based on the Rating appears on product pages, product packaging, or product-adjacent communications, an explicit statement that the Rating is a brand-level Rating must be present.

Accuracy. Brands must not make claims that go beyond what the Rating conveys. This includes claims of product-level certification, superiority claims unsupported by the Rating, and selective use of Pillar scores (People, Planet, Animals) in a way that misrepresents overall performance. Claims implying absolute sustainability performance are likely to be misleading under consumer protection laws and should not be made without clear qualification.

Currency. The claim may be made, Rating communicated, or Mark displayed only where the underlying Rating is current. If a Rating is updated and the score changes, brand communications must be updated without undue delay. If a Rating lapses or is suspended, the claim, Rating or Mark use must cease immediately. Ratings are published in the [Good On You Directory](#) and made available via the Good On You Ratings API and Dashboard. These are updated on a regular schedule.

Communication integrity. Brands may enter into an agreement to use Ratings and/or copyright materials as supplied by Good On You. Where used, the Mark and other digital assets must not be altered, recoloured, distorted, or partially displayed. Brands may not use any alternative logo or mark.

13.3 Requirements for retailer and partner communications

Retailers and other enterprise customers who display Ratings in their own consumer-facing interfaces are subject to the same requirements as Brands, with the following additional requirements reflecting their role as intermediaries presenting Ratings for multiple Brands.

Filter and category terms used to surface Good On You-rated Brands must be precise and not misleading.



Enterprise customers integrating Ratings through the Ratings API must ensure their implementation keeps rating data and eligibility status current. Partners not using the API are responsible for monitoring and updating their communications promptly.

Displaying a stale or superseded Rating is a breach of these requirements and likely a misleading communication under consumer protection legislation.

13.4 Misuse, misleading use and corrective action

Misuse includes any claim based on a Rating or any use of the Mark or other digital assets contrary to this section and any other guidance issued by Good On You. Potential forms of misuse include:

- implying the Rating or other material is a product certification rather than a brand rating
- displaying an out-of-date or suspended Rating
- using modified or recoloured digital assets
- making claims about brand performance that go beyond what the Rating supports
- selective use of Pillar scores in a way that misrepresents overall performance
- continuing to display a Rating, the Mark or other Good On You material after a Rating has lapsed, been suspended, or been withdrawn or is otherwise no longer eligible.

Where misuse is identified, Good On You will notify the Trader and require corrective action. Major non-compliance — including making a claim or using the Mark where the underlying Rating is no longer current or eligible, or where there is a credible risk of consumer harm — triggers immediate suspension of use. Continued misuse after suspension may result in withdrawal of use rights and restrictions on future participation in the Scheme.

Non-compliance may be identified through Good On You's own monitoring, complaints from Brands, consumers or third parties, or partner notifications. See 8 Corrections, Updates, Complaints and Appeals.



14. Document Governance

This Scheme Manual is owned by Good On You and approved by the Board after consultation with the Independent Monitoring Body.

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Change Log

Version	Date	Changes	Approved by
Version 1	25 June 2026	NA	Board



Annexure 1: Scheme Conflict of Interest Policy

Version 1.0 | June 2026

This policy applies to everyone involved in the Good On You Sustainability Label Scheme. Each section is tagged to show who it is primarily relevant to. The four audiences are: (A) Analysts and Reviewers — staff who research, score, review, or approve ratings; (B) Methodology Contributors — staff, committee members, and external advisers involved in methodology development or review; (C) Governance — Board members and the CEO; (D) All Covered Persons — provisions that apply to everyone.

1. Purpose and Scope

Relevant to: All Covered Persons

Good On You's commercial model — data licensing, affiliate marketing, and Good Measures subscriptions — creates potential conflicts of interest with its rating and methodology functions. This policy sets out how those conflicts are identified, declared, and managed across all activities carried out under the Scheme.

This policy is the single conflict of interest instrument for the Good On You Sustainability Label Scheme. It takes precedence over any other Good On You COI documentation in relation to Scheme activities. It is maintained as Annexure 1 to the Good On You Scheme Manual.

Covered Persons

This policy applies to:

- all Good On You employees and contractors, including Rating Analysts, Reviewers, methodology staff, and commercial teams
- Board members and the CEO
- members of any general or methodology specific Consultation Committees that are established
- external experts or advisers engaged on any Scheme activity

The Independent Monitoring Body (IMB) is required to maintain its own impartiality programme consistent with recognised standards. This policy sets minimum expectations for the IMB's interaction with the Scheme; it does not govern the IMB's internal operations.

Key definitions

Conflict of interest (COI): a situation in which a Covered Person's personal, financial, or professional interests or relationships could improperly influence — or be reasonably perceived to influence — their work under the Scheme.

Related Person: a spouse or partner, dependent, close family member (generally living with or in a dependency relationship with the Covered Person), or anyone with whom the Covered Person has a fiduciary relationship such as a family trust.

Brand Entity: any brand, parent company, or related entity that is rated or queued for rating under the Scheme.



Material Financial Interest: a direct or indirect financial interest in a Brand Entity greater than EUR 5,000 or more in listed securities, or 1% or more equity interest, or a debt instrument greater than EUR 5,000.

Owner: any person or company holding controlling or significant ownership interest in a Brand Entity.

Large Brand: any brand not classified as an SME under Commission Recommendation 2003/361/EC as applied in the relevant vertical Methodology.

2. Core Principles

Relevant to: All Covered Persons

The core principles to be applied to manage COIs are:

- **Impartiality first.** Decisions must be based on published rules and methodologies, free of bias or undue influence.
- **Disclose early, manage promptly.** When in doubt, declare. It is better to declare a conflict that turns out to be manageable than to leave one undeclared.
- **Proportionate controls.** Management measures are matched to the nature and severity of the risk.
- **Separation of roles.** Rating and methodology judgements are organisationally separated from commercial decisions. Staff with commercial relationship responsibilities have no authority over rating outcomes or methodology decisions.
- **Transparency.** COIs and management actions are recorded in the COI Register. Summary disclosures are published as described in 7 of this policy.

3. Prohibited and Restricted Situations

Relevant to: All Covered Persons

3.1 Improper benefits

No Covered Person may solicit or accept cash, cash equivalents, kickbacks, loans, or any item of value intended to influence a Scheme decision.

3.2 Gifts and hospitality

Gifts, discounts or hospitality with a value of EUR 100 or less per source per calendar year may be accepted from a Brand Entity if they are not cash-like and are not likely to influence judgement. Any gift, discount or hospitality with a value above EUR 100 must be declared. Anything above EUR 100, or any travel or hospitality, requires pre-approval and must be recorded. All gifts must be declined where acceptance could undermine trust in the Scheme.

3.3 Financial interests in Covered Entities

No Covered Person may participate in any rating, methodology, or governance decision affecting a Brand Entity in which they or a Related Person holds a Material Financial Interest.

A holding in a broadly diversified investment fund such as an index fund does not require declaration. A fund with material concentration in a specific vertical covered by the Scheme should be declared; the Head of Ratings will assess whether recusal is warranted based on the degree of concentration and the matter in question.



3.4 Outside roles

Any employment, consultancy, board, or advisory role with a Brand Entity, an industry body, or a competitor must be disclosed. Recusal is mandatory for any matter affected by such a role.

3.5 Cooling-off period

Any Covered Person who has been employed by, or engaged as a consultant to, a Brand Entity within the past 24 months must be recused from any matter directly affecting that entity.

3.6 Influence over assurance

Good On You staff may not direct IMB findings, influence IMB personnel assignments, or enter into fee arrangements with the IMB that are contingent on outcomes.

4. Declaration Requirements

4.1 Annual declaration — all Covered Persons

Relevant to: All Covered Persons

All Covered Persons must maintain a written COI declaration annually. The declaration must cover financial interests in Covered Entities, employment and outside roles, close personal relationships with persons at Covered Entities, gifts and hospitality received or offered in the past 12 months, and any other circumstance a reasonable third party might consider relevant.

Declarations are stored in a central Register and reviewed promptly by the CEO or appropriate delegate.

4.2 Pre-rating declaration — Analysts and Reviewers

Relevant to: Analysts and Reviewers

Before commencing work on any rating, each Analyst and each Reviewer must confirm that they have no conflict of interest in relation to the Brand Entity. Where a potential or actual COI is identified, the Analyst or Reviewer must either not work on that Brand or declare it to the Head of Ratings before undertaking any work on that rating.

The declaration obligation is continuous. If a conflict of interest arises after work has commenced, the Rating Analyst or Reviewer must immediately suspend work, declare it to the Head of Ratings, and await a reassignment determination. If the Head of Ratings determines that the conflict compromises the integrity of the assessment, the work completed up to that point shall be discarded, and a newly assigned Rating Analyst will restart the rating process.

Analysts should declare they have a COI in relation to the Brand to be rated if:

- any Material Financial Interest in the Brand held directly or through a Related Person
- any current or recent employment (within the past 24 months) by or consultancy with the Brand



- any close personal relationship with an Owner, Board Director or senior employee of the Brand Entity
- any prior public advocacy or campaign activity specifically relating to the Brand Entity that could reasonably be perceived to bias the rating
- any other circumstance a reasonable third party might consider likely to affect impartiality

Reviewers who identify a COI in relation to a rating assigned to them for approval must declare it to the Head of Ratings before conducting any review of that rating.

4.3 Pre-project declaration — Methodology Contributors

Relevant to: Methodology Contributors

Before beginning work on any methodology development project or material methodology update, all participants must declare any conflicts of interest before or at the time they provide feedback. The following conflicts must be declared:

- any commercial relationship between Good On You and Brands the participant is aware of that could be materially affected by the Methodology under development
- any personal financial or employment interest relevant to the Methodology
- any shareholding or ownership interest held by a Good On You investor in Brands operating in the vertical covered by the Methodology
- any organisational affiliation that could give rise to a perceived conflict

Declarations are submitted before work begins and must be updated promptly if relevant circumstances change during the project.

4.4 Pre-appointment screening: governance and committee roles

Relevant to: Governance

Candidates for Board membership, CEO, Head of Ratings and any Consultation Committee roles must disclose conflicts of interest before appointment is confirmed. The report is to the CEO in the case of the Head of Ratings and the Chair of the Board in all other cases. The CEO or Board as appropriate must consider the disclosed conflicts before proceeding to appointment, and will not proceed with the appointment in the case of any conflict that cannot be managed in such a way that it does not undermine credibility of the Scheme.

4.5 Event-driven updates — all Covered Persons

Relevant to: All Covered Persons

Any new or changed interest that may constitute a COI must be reported, in the case of the Head of Ratings to the CEO, in the case of Board members and the CEO to the Chair of the Board, and in all other cases to the Head of Ratings within 14 days of the change arising. This obligation applies throughout the period of a person's involvement in Scheme activities.



5. Managing Declared Conflicts

Relevant to: All Covered Persons

On receipt of a declaration the Head of Ratings, CEO or Board as appropriate assesses the nature and severity of the conflict and assigns a risk rating: None, Low, Medium, or High. The outcome and any management action are recorded in the COI Register.

Available management actions:

- Recusal from specific decisions, meetings, or access to information
- Reassignment to a different Analyst, Reviewer, or contributor
- Independent review or IMB escalation
- Disclosure to relevant stakeholders

In the case of key roles (CEO, Owner, Board Director, Head of Ratings) where none of the above actions will resolve the COI, divestment or discontinuation of the outside interest may be required before the person can be offered or continue in their role. Such cases will be managed by the Board.

A recused person must not participate in deliberations, draft recommendations, or access non-public material related to the affected matter. Where recusals would impair quorum in a governance body, an alternate qualified member will be appointed.

Where the Head of Ratings has a COI in relation to a matter, decisions are escalated to the CEO.

6. Structural Controls

6.1 Separation of commercial and ratings functions

Relevant to: All Covered Persons

Staff responsible for commercial relationships — including Good Measures account management, affiliate partnerships, and enterprise data licensing — have no authority over rating outcomes, methodology decisions, or assurance conclusions. Performance incentives for Analysts and Reviewers must not include revenue targets.

Access to draft or unpublished rating data is restricted to members of the ratings team with no active commercial relationship role. System access controls enforce this separation.

6.2 Analyst rotation — Large Brands

Relevant to: Analysts and Reviewers

An Analyst may not conduct more than two consecutive 12 month rating cycles for the same Large Brand or other Brands owned by the same parent company. Following the second consecutive cycle, the Analyst must be rotated off that Brand for a minimum of one full rating cycle before being reassigned to it. The Head of Ratings is responsible for implementation of this requirement.



7. COI Registers and Transparency

Relevant to: Governance | All Covered Persons

COI Register

Good On You maintains an internal COI Register covering all Covered Persons. The Register is the primary record against which compliance with this policy is verified. Aggregate information about the number and types of conflicts declared and how they were managed is published in the Annual Transparency Report.

The IMB's annual management systems review and sampling-based case file reviews use the Register to confirm:

- that every completed rating has a corresponding pre-rating COI declaration from the Analyst and Reviewer assigned to it
- that the Rating Analyst and Reviewer rotation policy has been adhered to
- that external participants in every methodology project have made COI declarations
- that Board and CEO declarations are current
- that there is no evidence of any non-trivial breach of this COI policy

Where a gap is identified (a rating without a declaration, a methodology project with an incomplete declaration set, or an overdue Board or CEO declaration) it is treated as a process non-conformance and addressed before the next IMB review cycle.

Register entries are retained for a minimum of six years.

8. Structural Conflicts: Shareholder and Investor Disclosure

Relevant to: Governance

Good On You publicly discloses the identity of any person or entity that holds governance rights or a board-level relationship, and discloses any shareholder holding a stake sufficient to exercise meaningful influence over the Scheme Owner's governance. Where any such person or entity also has a commercial relationship with rated industries, that relationship is disclosed alongside their governance or ownership interest.

The Scheme does not allow an investor or shareholder to be given by contract or otherwise any right to determine Scheme decisions. Where a contractual consultation right or similar substantially exceeds the rights of other consultees, this must be disclosed.

These disclosures are published in the Annual Transparency Report and updated when material changes occur. The Board is responsible for ensuring that the COI implications of any new investment or governance relationship are assessed at the time they arise and reviewed annually.

9. Breaches and Sanctions

Relevant to: All Covered Persons



Failure to declare a known COI, failure to cease work following identification of a material COI, or circumvention of rotation requirements will be addressed under Good On You's internal employment procedures and reported to the IMB as a process non-conformance.

All breaches and remedial steps are recorded in the Internal COI Register. Material breaches are reported to the Board.

10. Governance and Review

Relevant to: Governance

The Head of Ratings is responsible for the operational implementation of this policy, including maintaining the COI Register and managing declarations, reassignments, and rotation obligations.

This policy is reviewed annually as part of the Scheme's governance review cycle. Material changes require Board approval and notification to the IMB. The policy will also be reviewed following any IMB finding or complaints outcome that identifies a COI management failure.

In the event of any inconsistency between this policy and other Good On You COI documentation, this policy prevails for all Scheme activities.



Annexure 2: Methodology Development Consultation Policy

Version 1.0 | January 2026

Developing and Updating Good On You Rating Criteria: Consultation with Stakeholders

This document describes how Good On You engages with stakeholders to develop robust and effective methodologies to rate brands for their impact on people, planet and animals.

Good On You's Methodology Development Consultation Policy is designed to ensure that:

- Good On You methodologies are scientifically rigorous and developed and updated in line with best practice including relevant international standards and legislative requirements based on expert input
- stakeholders, including consumer and environmental organisations, worker representatives, animal welfare experts and other civil society organisations are consulted in the development and review of the Scheme's requirements
- there is an opportunity for all interested stakeholders including consumers to have input
- a documented, auditable trail of how feedback is received, considered, and acted upon is created, and a comprehensive summary thereof is published
- the methodology is developed free from any commercial bias, and
- Good On You is fully transparent and accountable as each Methodology is developed.

Scope

Good On You seeks to ensure that it operates the Good On You Sustainability Label Scheme in accordance with recognised best practice and the requirements of consumer protection law in relevant jurisdictions including the EU Unfair Commercial Practices Directive (EmpCo).

In developing and reviewing methodologies, Good On You engages with relevant external stakeholders to ensure the accuracy, independence, credibility and utility of Good On You ratings.

Consultation with experts and with the public may relate to:

1. The structure, governance and operation of the Good On You Sustainability Label Scheme including procedures for compliance, monitoring, and dispute resolution, and/or
2. The structure, content of individual ratings methodologies, and the weighting of issues addressed.



Consultation Structure

Consultation is undertaken at three levels:

Historical process (2026)

- Methodology-Specific Sub-Committees
 - Convened on an ad hoc basis for specialised issues (e.g. raw material impacts, labour rights in high-risk geographies).
 - Provide targeted input to ensure technical completeness of sector-specific methodologies.
- Public Engagement
 - Conducted via an open online feedback mechanism, available throughout the year.
 - Ensures transparency and allows engagement from stakeholders beyond those formally represented on committees.

Proposed enhancement

Good On You is working to establish a standing Methodology Development Consultation Committee

- Consultation Committee
 - Composed of up to 10 experts (individuals or organisations) appointed by the Board for 3 year terms from relevant backgrounds with expertise in sustainability labelling/certification or in the key issues addressed by the methodologies
 - Backgrounds may include specific industries, civil society (NGOs, worker organisations), academia etc
 - All members must be independent of Good On You and free from significant commercial bias relevant to the subject matter of the Methodologies developed and operated by Good On You
 - Acts as a standing committee to provide input on the operation of the sustainability label (including consultation processes) and individual methodologies
 - A key focus is to provide ongoing review across all methodologies to ensure consistency, technical robustness, and alignment with best practice.

Principles

The Methodology development consultation process is governed by the following principles:

- **Independence:** Contributors participate in a personal or organisational capacity, act in the public interest, and declare conflicts of interest (see Annexure 1; Scheme Conflict of Interest Policy)
- **Inclusivity:** Representation is actively sought from diverse geographies and communities, including those directly affected by supply chain practices.



- **Transparency:** Draft revisions are published for consultation. Outcomes are documented in summary reports available to the public.

Methodology Review Process

Methodology development and revision follows a six-stage consultation cycle:

1. Creation of Draft Methodology (new or revised) by Good On You experts
2. Review by the Permanent Consultation Committee (when available)
3. Review by relevant Methodology Sub-Committee.
4. Public consultation
5. Compilation and publication of a Summary Feedback Report, detailing inputs received and how they were addressed.
6. Approval of the Methodology by the Board

Historical Consultation Processes 2018-2025

Prior to 2026 Good On You developed 4 methodologies: fashion, beauty, general services, and multi-brand retail. In each case a consistent consultation approach was applied to methodology development.

Key features of this process included:

- Identification of relevant external experts to review key subject matter.
- Rigorous testing of proposed indicators against expert feedback to ensure technical robustness, validity, and sectoral relevance.
- Consistency of application across all methodologies, ensuring comparability and reliability of ratings.

Consultation partners were selected for their recognised expertise, independence, and representativeness. Specifically, they typically demonstrated:

- Authority and credibility in their domain (e.g. environmental sustainability, labour rights, animal welfare).
- Independence from commercial interests and ability to act in the public interest.
- Established track records in applied research, standard-setting, advocacy, or industry engagement.
- Commitment to transparency and Good On You's mission
- Representation of perspectives from affected stakeholders, including workers and civil society.

Key experts were drawn from organisations such as Fairtrade, Fashion Revolution, Fashion For Good, Roundtable of Responsible Palm Oil, the Global Shea Alliance, among others. A number of independent experts were also consulted. An example of the consultation feedback and processes used in one Methodology development process can be found [here](#).



Annexure 3: Terms of Reference for the Independent Monitoring Body for the Good On You Sustainability Label Scheme

Version 1.0 | 30 June 2026

1. Purpose

These Terms of Reference define the mandate, scope, and obligations of the Independent Monitoring Body (IMB) appointed to provide independent monitoring of the Good On You Sustainability Label Scheme (the Scheme).

Good On You Pty Ltd is the Scheme Owner and is responsible for the specification of the Rules of the Scheme in the Scheme Manual, Methodology, rating operations, claims rules, and overall governance of the Scheme.

The IMB's role is to monitor whether Good On You applies its published Scheme Manual, Methodology, assurance procedures, complaints procedures, and claims rules consistently and without material commercial bias.

The role is intended to support Good On You's implementation of the requirements introduced by Directive (EU) 2024/825, including objective third-party monitoring of the Scheme.

The IMB does not audit or certify individual brands, does not issue brand-level certificates or compliance statements, and does not make, confirm, overturn, or substitute individual rating decisions.

2. Appointment

Good On You Pty Ltd (ABN 75 608 419 085), as Scheme Owner, has appointed Odonata Certification Services GmbH, Blumenstraße 19, 70182 Stuttgart, Germany, as IMB for the Scheme.

Odonata is legally and organisationally separate from Good On You and from all brands rated under the Scheme.

Odonata aligns its activities with the relevant principles of recognised conformity assessment and assurance practices, including ISO/IEC 17065 and, where relevant, ISO/IEC 17021-1. These standards are used as reference points for competence, impartiality, consistency, evidence-based assessment, and reporting.

Any advisory support provided by Odonata, Frank Brinkschneider, or related personnel in relation to the design of Good On You's assurance scheme or Odonata's monitoring scheme is limited to assurance and monitoring system design. It does not include the development of Good On You's Methodology, rating criteria, rating thresholds, or individual rating decisions. This separation is maintained as a condition of the appointment.



3. Scope of Monitoring

Odonata's monitoring activities cover three levels of the Scheme:

Rating operation level — annual review of a risk-based sample of individual rating files to confirm that ratings have been conducted in accordance with the published Methodology and Scheme Manual; witness review of Rating Analysts activities; and statistical analysis to assess whether any pattern of commercial bias is present in rating outcomes.

Management system level — annual audit of Good On You's quality management, competence management, complaints management, and triggered review processes, to confirm these operate consistently with the Scheme Manual.

Scheme owner level — annual review of Good On You's standard-setting processes (methodology development), scope management, and published claims, to confirm consistency with the Scheme's governance commitments and applicable requirements.

4. Complaints Escalation

Good On You remains responsible for operating the Scheme's complaints process.

Where a complainant is dissatisfied with Good On You's handling of a complaint under the Scheme's complaints process, the complainant may request that Odonata review Good On You's approach to that complaint. Odonata will assess whether Good On You followed its published complaints procedure and will report its findings to both Good On You and the complainant.

Odonata does not act as an appeal body for individual rating outcomes and does not substitute its own rating judgment for Good On You's rating decision.

Complaints that raise issues of scheme integrity including allegations of material commercial bias, systematic misapplication of the Methodology, serious claims misuse, or significant failure to follow published Scheme procedures, are referred directly to Odonata for investigation.

5. Independence and Impartiality

Odonata maintains documented procedures to identify and manage risks to independence and impartiality like conflicts of interests. Odonata personnel involved in monitoring activities under these Terms of Reference must have no financial or commercial interest in Good On You or in any brand rated under the Scheme. Good On You has no authority over Odonata's monitoring conclusions, findings, sampling decisions, reporting content or personnel assignments.

Odonata may decline, qualify, suspend, or limit monitoring activities where independence, impartiality, access to evidence, or the integrity of the monitoring process cannot be maintained.

6. Access to Information



Good On You provides Odonata with timely access to information reasonably necessary to perform the monitoring activities under these Terms of Reference.

This may include access to:

- Scheme Manual;
- published and internal methodology documents;
- rating files and supporting evidence for sampled ratings;
- Rating Analysts guidance, training records, and competence records;
- complaints, appeals, triggered reviews, and corrective action records;
- claims approvals and claims monitoring records;
- relevant IT systems, audit trails, and data integrity records;
- management review records and relevant internal reports.

If access to necessary information is restricted, delayed, or incomplete, Odonata may record this as a limitation in its monitoring report or public monitoring statement.

7. Access to IT Systems and Audit Trail

Good On You maintains a complete, timestamped audit trail of all rating activity in its Rating Management System, including evidence logging, conflict of interest declarations, rating approvals, and publication records. Odonata has access to this audit trail as part of its monitoring activities.

As part of its annual management systems review, Odonata may verify that the audit trail reconciles with Good On You's reported operational data and that post-approval amendments are documented with an authorised override reason.

Where Odonata identifies discrepancies between reported data and underlying system records, this is recorded as a finding in the annual monitoring report.

8. Reporting

Odonata produces an annual monitoring statement covering: the scope of monitoring activities conducted, an overall conclusion on Good On You's adherence to the Scheme Manual, and any material findings or recommendations. Good On You publishes this statement within 30 days of receipt.

Odonata notifies Good On You promptly of any material findings arising between annual reporting cycles that require corrective action.

9. Corrective Action and Escalation

Where Odonata identifies findings requiring corrective action, Good On You is responsible for defining and implementing appropriate corrective actions within a specified feasible time frame. The IMB will confirm that the proposed corrective action and time frame address the finding.



Odonata may review the adequacy and implementation of corrective actions as part of its monitoring activities.

Where a material finding is not adequately addressed, Odonata may escalate the matter to Good On You senior management or the Board of Directors. Odonata may also qualify its annual monitoring statement or describe unresolved material findings in that statement, subject to confidentiality and legal constraints.

10. What the Independent Monitoring Body Does Not Do

For the avoidance of doubt, Odonata:

- does not audit or certify individual brands;
- does not issue brand-level certificates or compliance statements;
- does not make, confirm, overturn, or substitute individual rating decisions;
- does not act as an appeal body for individual rating outcomes;
- does not develop Good On You's substantive rating methodology, rating criteria, scoring rules, or rating thresholds;
- does not provide legal advice to Good On You or to any rated brand;

and the provision of services by Odonata:

- do not constitute accreditation of Good On You or the Scheme under any accreditation scheme or recognised standard
- do not represent a determination that Good On You, the Scheme, any rated brand, or any Trader is in compliance with Directive (EU) 2024/825 or any other applicable law or regulatory requirement.

11. Review

These Terms of Reference are reviewed on a regular basis by Good On You and Odonata. Material changes require written agreement between both parties and are published as a revised version of this document.

