DESCRIPTION OF THE TÜV NORD CERT CERTIFICATION PROCEDURE

BRCGS – GLOBAL STANDARDS

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If you should require any further information then please do not hesitate to contact us. We will be please to help you.

Please contact us via mail to <u>info.tncert@tuev-nord.de</u> or by telephone 0800 245 74 57 (Free-phone from within Germany) or +49 511 9986-1222 from abroad.

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Description of the TÜV NORD CERT Certification Procedure BRCGS – Global Standards

The rules and descriptions of service and performance regarding certification according to the BRCGS Global Standards (hereinafter referred to as BRCGS) apply alongside our offer. They are valid alongside the general Conditions of Certification.

This performance description covers the following certification systems:

- BRCGS Food Safety Issue 9
- BRCGS Agents & Brokers Version 3
- BRCGS Packaging Materials Version 6 & 7
- BRCGS Consumer Products Version 4 (General Merchandise / Personal Care & Household)
- BRCGS Storage and Distribution Version 4
- BRCGS START! Issue 2
- BRCGS Gluten Free Certification Programme Issue 4

The standards and other relevant applicable documents, rules and regulations can be found on the BRCGS website (<u>https://www.brcgs.com</u>)

The auditors are selected by TÜV NORD CERT based on their approval and qualification for the sector in question.

1. CERTIFICATION PROCEDURE

1.1. Audit preparation

The audit preparation serves to establish if the customer is ready for certification. The audit preparation can be performed by means of a preliminary audit. This is divided into the following stages:

- Extract from a commercial register (or comparable evidence, if applicable),
- Overview of management system documentation (e.g.: Table of contents or presentation of the structure of the management system documentation, process map),
- management review (e.g.: cover sheet or table of contents with date and signature),
- current annual planning of internal audits and evidence of audit report(s) (e.g.: cover sheet with date and signature),
- Company organisation chart or other documents which show the organisational structure.
- HACCP Plans inclusive the determined CCPs/CPs
- Documentation of Quality Management
- Summary of Products / Product groups

A detailed document review can be performed before the certification assessment but it will not influence the assessment time on site. Any deviations or non-conformities will be included in the overall assessment evaluation, i.e. any deviations and non-conformities that are identified must be counted as such in the certification assessment; it is not possible to carry out corrections before the assessment.

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1.2. Certification audit

An essentional part of the Assessment is the interview of individual employees at their workstations and evaluation of applicable documents, records, orders, standards, guidelines etc..

The task of the company during the audit is to demonstrate the application of its documented procedures in practice. For this purpose, all product groups and processes which are to be included in the scope of the certification must be running at the time of the audit. If this is not the case, additional auditing of these product groups/processes will be necessary at extra cost. Following completion of the audit, the customer is informed of the results of the audit in a final meeting. The auditor can give an estimate regarding the result of the audit in this meeting, but cannot give the final result. The result of the audit is documented in a report, the nonconformities are documented in an action plan. An assessment is a procedure based on the principle of random sampling. Therefore non-conformities or weaknesses may still exist but were not subject of the final meeting or in the assessment report.

The audit can always only cover one operating/production site.

Further rules regarding the certification procedure for surveillance audits, re-audits and extension audits, announced and unannounced audit options and blended audits are described in the respective BRCGS standards and related documents. These are binding and mandatory.

1.3. Announced Recertification

The recertification audit is due on a specific date and depends on the date of the initial (first) certification. The audit can be brought forward by a maximum of 28 days. A postponement of 7 days is possible in case of natural or unnatural disaster. If the postponement lasts for more than 7 days, a major non conformity will be raised. This also applies in case of a transfer audit. Where certificates have lapsed for more than 6 months re-entry to the BRCGS Certification scheme will be considered as a new application and a major non-conformity will not be raised.

The company data is updated before the recertification audit, in order to take changes which have a significant influence on the area of activity or way of working of the customer into consideration. All the requirements of the BRCGS standard are completely audited during the recertification audits, along with the corrective actions from the previous audit. The audit procedure is the same as for the certification audit.

1.4. Unannounced Recertification

In general, the regulations for the unannounced audit programme apply as described in the respective standard. Registration for participation in the unannounced audit programme can be made no later than 3 months after the last audit. After this date, only an announced audit can be carried out.

For certifications according to BRCGS Food Safety, BRCGS Packaging Materials and BRCGS Storage & Distribution, an unannounced audit is mandatory every 3 years. For BRCG GFCP where the Global Standard Gluten-Free audit is combined with a GFSI benchmarked scheme audit, the audit will be unannounced as well every 3 years.

TÜV NORD CERT will discuss with the client at the latest 3 months after the last audit whether the next audit will be an unannounced audit.

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Where a site fails to have an unannounced audit within the 3 year period, it may result in the final audit being refused by BRCGS and the site becoming uncertificated until such a time as an unannounced audit is completed.

1.5. Issuance of certificate

1.5.1. Issuing a Certificate

The certificate is awarded following positive review of the audit report by the certification body. A certificate can only be issued if all nonconformities have been closed through provision of corresponding evidence or a re-audit, and if corrective actions which have been verified and accepted by the auditor are provided for all deviations.

The certificate is valid for 1 year or 6 months (depending on the result of the audit), calculated from the day of the first audit plus 6 weeks.

The audit report and the certificate are placed in <u>BRCGS Directory</u> and supplied to the Accreditation Body on request. All Audit documents must be made available for BRCGS and other relevant stakeholders such as GFSI and government bodies upon request. For registration in BRCGSDirectory BRCGS charges for each operating/production site 860 GBP ¹ (BRCGS START!: 250 GBP / BRCGS Consumer Products: 400 GBP/ BRCGS Gluten Free Certification Programme*: 150 GBP / . This fee is paid to BRCGS via TÜV NORD CERT.

For BRCG GFCP where the Global Standard Gluten-Free audit is combined with a GFSI benchmarked scheme audit, the audit will be unannounced as well every 3 years.

1.5.2. Certificate suspension and withdrawal

TÜV NORD CERT is the owner of the BRCGS certificates and can suspend or withdraw them at any time. A certificate can be suspended for a maximum of 6 months. After this, the certificate is either activated or withdrawn, if it has not expired up to that time. The company receives a letter describing the reasons for the suspension and the measures that are necessary, with deadlines, in order to cancel said suspension. During the suspension, the client may not advertise with the BRCGS certificate. Use of the BRCGS logo must cease within 48 hours of suspension of the certificate and the status of the operating/production site is changed in the BRCDirectory. The operating/production site is no longer included in the public list of certified companies. Information regarding the changed status is sent automatically to the clients of the company for whom the warning function was established. In such circumstances the company shall immediately inform its customers and make them fully aware of the circumstances. Information on the corrective actions to be taken in order to address the non-conformities will also be provided to customers where required.

1.5.3. Notification of Incidents

The client informs TÜV NORD CERT within 3 Working days about minimum:

¹ This amount is adapted to the current fees of BRCGS Global Standards and to the current exchange rates.

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- any impending prosecution or enforcement with respect to product safety or legality
- all product recalls or withdrawals
- adverse media or regulatory authority interest
- evidence of a significant public safety issue (e.g. food poisoning outbreak or customer injury)
- evidence of significant failings at the certificated site (e.g. fraud, corruption or significant malpractice)
- adverse public statements by a regulatory authority, NGO or major retailer
- significant public safety concerns bringing BRCGS into disrepute

If product recall or withdrawal is related to gluten-free product notification to BRCGS shall be within 24 hours from the date of release of the official recall or withdrawal notice via email to <u>brcgs.integrity@lgcgroup.com</u>. The company shall then provide sufficient information to enable the certification body to assess any effects of the incident on the ongoing validity of the current certificate within 21 calendar days. As a minimum, this shall include corrective action, root cause analysis and a preventive action plan.

If the TÜV NORD CERT becomes aware of incidents that could have an impact on the safety or legality of the product, TÜV NORD CERT is entitled to perform announced and also unannounced audits at any time and, depending on its assessment of the situation and its impact, to withdraw the certificates. The information regarding the product recall must be sent to the following email address: <u>TNCert-Food-Recall@tuev-nord.de</u>.

2. EXTENSION AUDIT

Rules regarding extension audits are described in the respective standards.

3. TRANSFER OF CERTIFICATIONS FROM OTHER CERTIFICATION BODIES

In general, only certificates from accredited certification bodies can be taken over. Organisations with certificates issued by non-accredited certification bodies must be treated as new clients.

For the purposes of the transfer, the client presents the last audit report, the action plan and the certificate to the auditor before the audit. A transfer can only take place in association with a surveillance audit.

Before the transfer audit the client has selected TÜV NORD CERT as the desired certification body in BRCGSDirectory. This must be done after signing the contract, but at the latest 14 days before the audit.

4. CERTIFICATION OF COMPANIES WITH SEVERAL SITES (MULTI-SITE CERTIFICATION)

Rules regarding multi-site certifications can be found in the respective standards.

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5. MANAGEMENT OF DEVIATIONS AND NONCONFORMITIES

Deviations and nonconformities are documented in an action plan. The client receives the action plan at the latest 24 hours after the audit in order to specify corrective actions.

The client returns the action plan to the auditor within 28 days of receipt describing the corrective actions and providing suitable evidences of implementation. The auditor verifies the corrective actions based on the evidences described or by means of a new visit (re-audit), i.e. a new assessment on site, and notes this in the action plan. If the corrective actions were not verified by the auditor within 28 days or if the corrective actions are insufficient, the audit is assessed as not passed. The final report is only drawn up after a positive evaluation has been made by the auditor.

If a re-audit is carried out, the time is charged for in accordance with the fee schedule. Daily rates quoted in the offer, plus travel times and travel costs are applied.

If the number of nonconformities in the audit is greater than allowed in order to achieve certification or a critical or significant deviation with regard to a statement of intent of a fundamental requirement or a critical deviation to any requirement has been raised, the certificate shall be immediately withdrawn from BRCGSDirectory by TÜV NORD CERT.

The system will generate an email to the nominated contact of the client and any selected customers to alert them to a suspended certificate.

The client will also be removed from the public listing of certificated suppliers on

https://directory.brcgs.com/ A complete certification audit has then to be carried out. If the audit is aborted, this must be documented in the report.

The client has the right to appeal against a non-conformity. This must be submitted to the certification body no later than 7 days after the certification decision. Regardless of whether the client has appealed against the non-conformities, the audit protocol must be followed. If the appeal is upheld, the revised certificate and report will be uploaded to BRCGSDirectory.

6. OTHER RULES AND REGULATIONS

The client gives his agreement to the following:

- Participation of assessors from the accreditation organisations,
- Audit or visit by BRCGS in response to complaints or as part of the routine BRCGS compliance activity announced or unannounced.
- Witness audits by the BRCGS / certification body or by a specifier where a specifier specific additional audit module is included
- Participation of auditors in training.

Certification status may be affected in the event that access to any parts of the site or process or requests to these points above is unreasonably refused.

Within the framework of the quality assurance measures, the BRCGS can contact the client directly in order to gain information regarding the certification status of the company, the performance of TÜV NORD CERT or the content of their reports.



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BRCGS offers further audit modules which can be carried out in addition to a BRCGS audit and which are audited in accordance with the requirements of these modules. The information gained during the audit is handled with equal confidentiality by TÜV NORD CERT.

For registration in BRCGSDirectory, fees are charged per company/production site and additional audit module. The respective fees for the individual audit modules can be found in the currently valid BRCGS schedule of fees. These fees are invoiced via TÜV NORD CERT.