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REGULATION FOR THE ISSUE OF THE CERTIFICATE OF CONFORMITY OF THE AGRI-FOOD PRODUCT

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CHAPTER 1 – GENERAL

1.1 SCOPE

This Regulation defines the procedures applied by RINA for the certification of food products or packaging products for food and non-food use (where applicable). The procedures for requesting, obtaining, maintaining and using, as well as any suspension and revocation of this certification are also defined.

RINA currently offers:

1. **Certification according to BRC GS Standards** (Brand Reputation Compliance Global Standard) in current edition:
 - BRC GS Food (Global Standard for Food Safety),
 - BRC GS Packaging Materials (Global Standard for Packaging and packaging materials),
 - BRC GS GFCEP (GLUTEN FREE CERTIFICATION PROGRAM),
 - BRC GS PBGS (PLANT BASED GLOBAL STANDARD),
 - BRC GS Consumer Products,
 - BRC GS Agents and Brokers,
 - BRC GS Storage and Distribution,
 - BRC GS START Food
 - BRC GS ETRS;
2. **Certification according to IFS Standards** (International Featured Standard) in current edition:
 - IFS Food,
 - IFS Broker,
 - IFS Logistic,
 - IFS Wholesale/Cash&Carry and related documents,
 - IFS Global Markets Food;
3. **Certification according to GlobalG.A.P Standards.** (Global Standard for Good Agricultural Practice) and related documents, in current edition;
4. **Certification of Traceability in the feed and food chain according to the Standard ISO22005, in its current edition;**
5. **Certification of the Traceability of the Agrifood Supply Chain with product requirements (Controlled Supply Chain);**
6. **Voluntary product certification with non-GMO feature / requirement** (for the products specified in Accredia's RT-11 document, in the revision in use);
7. **Voluntary product certification, according to specific technical documents (DT)**, verified and approved by RINA and drafted by the Applicant according to the Guidelines for the drafting of the Technical Document;
8. **Voluntary certification of agri-food products according to other normative documents and / or technical reference specifications** in the case they are defined by special RINA Certification Guides.

The list of schemes for which RINA is accredited is available on the website www.rina.org.

Access to certification is open to all organisations and is not affected by their membership or lack thereof to any association or group.

For the certification activity, RINA applies its current tariffs, guaranteeing fairness and uniformity of application.

RINA can legitimately not accept certification requests concerning organisations subjected to, or whose production or activities are subjected, to restrictive, suspensive or interdictory measures by a public authority.



1.2 APPLICABILITY

RINA activities described in the present Regulation apply to agricultural products of animal and vegetable origin, products of the food industry, destined to various sectors of goods and / or consumption, as well as to some services belonging to the supply chain (See IFS Logistic and Broker; BRCGS Agents & Broker and BRCGS Storage & Distribution)

The only exception are:

- the International Standards BRC Packaging Materials which applies to the production of packaging and packaging materials used in packaging and filling operations for food and beverages, cosmetics, personal hygiene items and other products and consumables;
- the BRC GS GFCEP which in addition to food categories also applies to cosmetic products, pharmaceuticals and health-related natural products, food supplements and food packaging material products;
- the BRC GS Consumer Products Standard which applies to a wide range of products that can be purchased by the final consumer.
- The BRCGS ETRS standard applies to all types of companies in the food sector and not with the exclusion of those in the maritime field.

The certification issued by RINA refers exclusively to the single organisation, where an organisation means a group, company, subsidiary, factory, corporation or institution, or parts or combinations thereof, whether associated or not, public or private, that has its own functional and administrative structure.

As part of the application of these Regulations, RINA does not provide consulting services to the Organisations.

1.3 INTERVENTION OF ACCREDITATION BODIES

The body that guarantees the certifications issued by RINA (Accreditation Body) may request the participation of its observers in the audits carried out by RINA itself, in order to ascertain that the evaluation procedures adopted by RINA comply with the rules applicable to it, for the certifications subject to accreditation. The participation of these observers is previously agreed between RINA and the Organisation. If the Organisation does not grant its approval to the aforementioned participation, the validity of the certificate is suspended.

1.4 INTERVENTION OF PROPRIETARY ORGANISATIONS OF STANDARDS

For the certifications referred to in paragraph 1.1 SCOPE numbers 1), 2), 3), 4) the Organisation that owns / manages the Standard, in accordance with the stipulated contractual requirements¹, may:

- (a) request the participation of its observers in the audits carried out by RINA, in order to ascertain that the methods of evaluation adopted by RINA comply with the rules applicable to it and / or in the event of complaints / disputes, for the certifications subject to recognition. The participation of these observers and / or auditors is previously agreed between RINA and the Organisation. If the Organisation does not grant its approval to the aforementioned participation, the validity of the certificate is suspended.
- (b) to carry out audits directly (through its own qualified auditors), in order to ascertain that the evaluation procedures adopted by RINA comply with the rules applicable to it and / or in the event of complaints / disputes, for the certifications subject to recognition. The planning of these audits takes place with a maximum notice of 48-hours to the certified Organisation (same notice given to RINA), except in the case of unannounced audits. The audit carried out by independent auditors appointed by the Organisation that owns / manages the Standard may also take place in the absence of RINA representatives or without RINA being informed. If the

¹ available on the respective websites: www.brcglobalstandards.com and www.ifs-certification.com and www.globalgap.org



Organisation does not grant its approval to the aforementioned activity and / or the outcome of the evaluation is negative, the relative certificate will be revoked.

For the purposes of carrying out the aforementioned checks, the technicians appointed by the Organisation owner / manager of the Standard must be guaranteed free access, even without prior notice, during normal working hours, to the premises and to the archives of the site/s of production of the product/s subject of the certification. The status of the certification can be influenced in the event that access to any part of the site or process or the requests to these points specified above are unreasonably refused.

Furthermore, the Scheme Owner of the Standard reserves the right to contact the site directly in relation to its certification status or for feedback on the performance of RINA or an investigation into reported problems.

The formal agreement by the customer of the duration of the Scheme Owners audit, the dates of the audit, the assigned auditor and the costs of the audit must reach the certification office directly.

Finally the certified Organizations allows RINA to share information relating to the Organization's data, certification and audit process with the Scheme Owners, GFSI (Global Food Safety Initiative) and governmental authorities when required.

1.5 DEFINITIONS

Certification of a product: an act by which an independent third party declares (with the issue of a Certificate of Conformity) that, with reasonable reliability, a given product conforms to one or more normative documents and / or technical specifications.

Certificate of conformity: certification issued by an independent third party, which declares that, with reasonable reliability, a given product conforms to one or more regulatory documents and / or technical specifications.

Declaration of conformity is the declaration that the Organisation issues under its sole responsibility, in accordance with the provisions of these Regulations, which certifies that a given product conforms to a specific normative document and / or technical specification referenced in the Certificate of Conformity.

Regulatory document: the document that specifies the requirements to be met by a product, process or service; the document may be in various forms such as: rule, technical standard, law of the State, Ministerial circular, code of good practice, etc.

Technical document: It constitutes the voluntary normative reference (voluntary technical disciplinary) elaborated with the consent of all the interested parties and on procedures adapted to the characteristics of the object of the certification and to the expectations of the market. As a rule, they are drawn up by competent bodies and submitted for approval to the Certification Body which evaluates them, in consultation with the interested parties.

Agri-food chain: A defined set of organisations (or operators) with the relative material flows that contribute to the formation, distribution, marketing and supply of an agri-food product. The supply chain term identifies, in this context, all the activities and flows that have a critical importance for the characteristics of the product.

Critical nonconformity: Deviation of critical importance with respect to safety standards and legal requirements.

KO (Knock out): Specific Requirements of the IFS Standard (excluded the Global Markets) where, if during the audit the auditor establishes that these requirements are not fulfilled by the Organization, this results in non-certification.

Major non-conformity:

- the total absence of consideration of one or more requirements of the normative documents and / or technical specifications of reference,
- the lack of conformity of the results of the tests / assessments with the criteria established by the normative documents and / or technical specifications of reference,



- a situation that could result in the delivery of a non-compliant product or non-compliant with the applicable laws in force,
- a situation such as to cause a serious deficiency in the applicable Management System, or to reduce its ability to ensure control of the process or product / service,
- failure to comply with one or more requirements of these Regulations.

Minor non-conformity:

- a situation that could lead to a reduction in the delivery capacity of a compliant product,
- a situation that causes a non-serious deficiency of the applicable Management System,
- a situation that causes a non-serious deficiency that does not however reduce the ability to ensure control of the process and/or the product.

Deviation:

Non-compliance with a requirement but there is no impact on food safety related to products and processes (term used by IFS).

GMOs: Organism whose genetic material has been modified differently from what occurs in nature by crossbreeding or natural genetic recombination.

Organisation: company, operator, factory, firm, body or association, legally recognised or not, public or private, which has its own functions and administration.

Organisation owner / manager of the Standard: company owner of the applicable Standard and signee of the contract with RINA for the provision of the certification service (BRC: Brand Reputation Compliance), IFS: IFS Management GmbH e GLOBALGAP: Food PLUS GmbH)

Agri-food product: any substance or product transformed, partially transformed or unprocessed, intended to be eaten, or reasonably expected to be ingested, by humans. This includes drinks, chewing gum and any substance, including water, intentionally incorporated into food during production, preparation or treatment. Feed, live animals (unless prepared for placing on the market for human consumption), plants before harvesting, medicinal products and cosmetics, tobacco and tobacco products, narcotics are not included or psychotropic, residues and contaminants.

Applicant: the Organisation that requires RINA to issue the Certificate of Conformity.

RINA: RINA Services S.p.A.

Traceability of supply chain: Ability to reconstruct the history and to follow the use of a product through documented identifications (regarding material flows and supply chain operators).

Technical specification: voluntary document that specifies the requirements to be met by a product, process or service; the document may be in various forms such as: a specification drawn up by the manufacturer which describes the characteristics of his product, a specification drawn up by a consortium or a cooperative of producers, etc.

For any other term used in these Regulations, the definitions of the Standards ISO 9000, UNI CEI EN ISO / IEC 17000 and of the applicable Standards apply, in the current editions.

CHAPTER 2 – CONTRACT REVIEW

2.1 REQUEST

Organisations wishing to obtain a Certificate of Conformity of an agri-food product for one or more specific products / sites must provide RINA with the essential data of their Organisation and related activities and the location of the Site(s), by sending the appropriate form "Informative Questionnaire" compiled in its entirety, available on the website www.rina.org on the basis of which an economic offer is formulated by RINA.

In particular, the Organisation must communicate to RINA:

- a description of the product/s or services subject to certification, highlighting possible exclusions of specific lines and/or productions, clearly indicating the reasons;



- extensions of the production site, number and type of production lines, number of employees, number and type of HACCP studies and any other information required in the applicable Standards (where relevant: e.g. for the certifications referred to in paragraph 1.1 SCOPE number 1),2) and 3));
- information concerning all processes outsourced by the Organisation that influence compliance with the requirements;
- number of sites subject to certification and the related activities carried out;
- extension, depth and objectives of the traceability system, in the case of supply chain certification, highlighting the number, type and geographical location of any sites of the other organisations involved.

This information is requested in order to verify, in advance, the application of some requirements of the regulatory document and/or the specific technical reference and to prepare an appropriate economic offer.

During the initial audit or recertification, the correctness of the information provided by the Organisation will be verified through an informative questionnaire.

In case of differences between the data initially provided and the data verified in the field during the audit by the verification group, the duration of the verification will be reviewed and possibly modified.

In case the duration of the verification, resulting from the new review, is greater than the previously defined duration, specific communication will be given via e-mail to the customer with indication of the correct new duration of verification.

If the Organisation does not want to accept the new duration, it must correspond to RINA as previously agreed for the audit, provide adequate justification within ten (10) working days of receipt of the communication and accept the interruption of the certification process.

In the absence of a response from the Organisation to the specific communication, the new duration is tacitly accepted because it is based on data verified by the audit team and transparently presented and discussed during the final audit meeting.

2.2 CONTRACT

The Organisations, in case of acceptance of the economic offer, formalize the certification request by sending to RINA the specific form attached to the offer, indicating the normative document and / or the specific technical reference and, if necessary, another normative document of reference, according to which certification is required.

Upon receipt of the certification request and the relative attachments, and after their preliminary examination to verify completeness of the documentation, RINA sends to the Organisation in writing confirmation of acceptance of the request.

The Organisation's request, in which the present Regulation is explicitly referred to, and the relative acceptance by RINA contractually formalize the relationship between RINA and the Organisation and the applicability of these Regulations.

The contract stipulated between RINA and the Organisation includes:

- the initial audit and the issue of the certificate;
- subsequent surveillance and/or recertification audits;
- any additional services specified in the offer, including pre-audit, if requested by the Organisation.

CHAPTER 3 - SELECTION AND COMMUNICATION OF THE TEAM

RINA selects the team that performs the activities and the personnel who will carry out the independent technical review, based on the knowledge, skills and competences necessary, taking

into account the criteria/requirements of the agreed scheme and each additional element indicated by the supervisory body of the scheme, by the accreditation body/the Competent Authority.

The team is completely independent of all aspects concerning the verification and has not participated in any way to the design of any part of it, in accordance with the procedures approved by the Committee for the Safeguarding of Impartiality.

RINA communicates to the Organisation the name of the technical staff responsible for carrying out the necessary checks for the issue of the Certificate of Conformity of the agri-food product; the Organisation can object to the appointment of such technicians, justifying the reasons.

CHAPTER 4 – TYPES OF CERTIFICATION

4.1 INITIAL CERTIFICATION

4.1.1 GENERAL

To obtain certification from RINA, the product/s service/s and the related management system, as applicable, must meet initially and in time, the requirements of the normative document and / or technical specification of reference and those indicated to in the following points of this Chapter, in addition to any additional elements provided by the Accreditation and/or Recognition Bodies, and or by Scheme Owners (Examples: Accredia Document "RT-17" concerning the requirements for the accreditation of the certifications of "traceability systems in agro-food supply chains", BRC Position Statements, IFS Doctrine, etc.).

4.1.2 EXAMINATION OF DOCUMENTS

The Organisation must make available to RINA:

- Descriptive technical documentation (depending on the requests of the reference document), for the examination, drafted, where applicable, according to the procedures indicated in the Guidelines for the drafting of the Technical Document (available on the website www.rina.org);
- List of internal procedures relevant for the correct application of the reference standard;
- Sampling plan and product tests, where applicable.

In the case of voluntary Product Certification, according to specific Technical Documents (DT) (see paragraph 1.1 SCOPE, the technical documentation received must include the specific Technical Document (DT) drawn up by the Organisation, and submitted for verification and approval to RINA before being able to proceed with the certification process.

The evaluation of the DT consists of the verification of the completeness of the information reported, also according to the Guidelines (available on the website www.rina.org), in respect to the applicable binding rules and of the requirements of certification (the defining characteristics/components of the product/s subject to certification, which make it certifiable²).

Any changes to be made must be made by the Organisation to allow approval by RINA.

The approval by RINA of the Technical Document presented by the Organisation is the acceptance by the Certification Body and allows its publication in its offices and in the manner appropriate for its dissemination.

RINA may request, at its discretion, for examinations and other documents, in support of the information previously received, considered important for the certification of the product in question.

² If the characteristics defined voluntarily by the Applicant to characterize the product/s subject of the certification are already regulated by binding regulations and/or do not show a clear and measurable added value obtainable from certification, it will not be possible to proceed with the evaluation procedure.



RINA communicates to the Organisation the names of the technicians in charge of the documentary examination; the Organisation can object to the appointment of such technicians, justifying the reasons.

The documentation attached to the application is examined to verify compliance with the provisions of this Regulation, the normative documents and/or technical reference specifications, as well as any additional elements envisaged by the Accreditation and/or Recognition Bodies (where provided) and the appropriate Guide for Certification (where present).

In the event that the documentation is incomplete or not compliant in some part or its attachment, the Organisation is informed and the certification practice is suspended until the deficiencies found are eliminated.

Following specific agreements with the Organisation, the verification of the above documentation can be carried out at the same (with the sole exclusion of the DT).

4.1.3 AUDIT ACTIVITY

The verifications of initial certification by RINA consist of:

- a) assessment of the applicable Standard at the Organisation, and/or the production site(s) involved and/or any other sites involved, including transport and distribution activities (paragraphs 4.1.3.1 - EVALUATION OF THE APPLICABLE STANDARD and 4.4 - UNANNOUNCED AUDITS);
- b) sampling, verification and testing of the product for which voluntary conformity certification is required and the production and control methods, where necessary (paragraph 4.1.3.2 - CHECKS AND TESTS ON THE PRODUCT AND PRODUCTION AND CONTROL PROCEDURES).

The above checks are carried out in accordance with the various regulatory documents and/or technical specifications and/or special Certification Guides (where present), as well as any additional elements required by the Accreditation and/or Recognition Bodies.

4.1.3.1 - EVALUATION OF THE APPLICABLE STANDARD

The Organisation must adopt in the site/s of production and, where applicable, at any other sites involved a system, in compliance with the provisions of the normative documents and/or technical specifications of reference and, as applicable, any additional elements envisaged by the Recognition Organisations and the Guidelines for the drafting of the Technical Document (available on the website www.rina.org).

In the relevant Certification Guides, where present, any additional requirements of this system are defined, where not specified by the reference standards.

During the initial audit the Organisation must demonstrate, with significant evidences, that the applicable Standard has been fully operative for at least three months and that it effectively applies the system itself and the related documented procedures for the products/product lines subject to certification.

The audit is based on a process of sampling the available information, verifying the processes / aspects defined by the organisation and the requirements of the reference standards. The absence of findings does not guarantee the total absence of anomalies in the areas verified and / or in other areas.

4.1.3.2 - CHECKS AND TESTS ON THE PRODUCT AND PRODUCTION AND CONTROL PROCEDURES

For the certifications referred to in paragraph 1.1 SCOPE numbers 6), 7), 8) of the specifications and, if necessary, the product production specification must be submitted to the prior examination of RINA, for the verification of compliance with the normative document and / or technical reference specification.

4.1.3.3 Documents

In general, and as applicable, the documents listed below must be made available to RINA, in the detail required for each individual case. The following list is given as an example and is finalised with the Organisation according to the specific agri-food product to be certified.

- (a) Production specifications;
- (b) Production regulations;
- (c) Recipes / formulations;
- (d) Production / processing / preparation plans;
- (e) Control and test plans;
- (f) Quality plans;
- (g) Any test reports made on the product or its components;

The correspondence of the product and the relative methods of realisation and control will be verified during a specific initial audit at the site/s.

4.1.3.4 Trial Schedule

A detailed program of the types of tests, if it is not already defined by the relevant legislation, must be prepared by the Organisation and submitted to the approval of RINA, as applicable.

4.1.3.5 Sampling

Samples of each product must be subjected to the tests and inspections, deemed necessary for the purpose of verifying the complete conformity of the product with the normative document and/or technical reference.

In particular, the samples and tests required by the normative document and/or technical specification of reference must be carried out on the samples, in the number and with the procedures established therein.

The samples to be submitted to the tests must, as a rule, be picked up, at RINA's choice, from normal production, where required.

Any samples, specially produced for the tests, must be obtained with the same means and made according to the same procedures as for normal production.

RINA reserves the right to carry out a surveillance during the realisation of said samples. Some tests, in the opinion of RINA, can subsequently be repeated on samples taken from normal production and/or trade for the purpose of confirming the results obtained on the prototype samples.

If certain products cannot be produced for the necessary tests, RINA may consider the possibility of assessing the conformity of the product, as regards the aspects related to the tests themselves, through objective documented assessments (e.g. other representative laboratory tests, repeatable, reproducible and appropriately validated).

4.1.3.6 Execution of the Tests

The tests must be performed (at the expense of the Organisation) in an independent laboratory accredited according to the UNI CEI EN ISO/IEC 17025 for the type of tests in question and/or at the laboratory of the same Organisation, subject to verification, by RINA, that the latter acts in accordance with the aforementioned law and is suitable for carrying out the required tests.

The tests at the Organisation's laboratory will be carried out in the presence of RINA technicians.

In the case of tests carried out at an accredited laboratory, RINA reserves the right to participate in the preparation and/or execution of the tests.

For each identified feature, the requirements that must be met, the test methods to be adopted (including the evaluation of measurement uncertainty associated with the result), the sampling criteria of the products and the criteria of acceptability of the results must be indicated.



4.1.4 AUDIT REPORT

With the exception of the BRCGS - IFS schemes, at the end of the checks referred to in paragraphs 4.1.3.1, 4.1.3.2, a copy of the audit report is delivered to the Organisation, on which they are 'other, report any non-compliance and / or recommendations found. The Organisation may note any reservations or observations regarding the non-conformities or findings expressed by the RINA technicians.

The content of this report is subsequently confirmed by RINA through a written communication.

In the absence of written communication from RINA, the report is confirmed to be confirmed after three working days from its delivery to the Organisation.

For the BRCGS and IFS schemes, the audit report and the deviations found are discussed at the closing meeting with the Organisation. The final audit report and the certificate will be available and downloadable from the portals owned by the various Scheme Owners of the Standard.

For the GlobalGAP standards, the content of the audit report and the deviations found are discussed during the closing meeting with the Organization. The specific format in which the deviations / non-conformities are reported must be signed by the Organization and the RINA Team Leader. The certificates will be available and downloadable from the portals owned by the Organization that owns the Standards, while a copy of the audit report will be issued to the company at the end of the audit. If the company specifically requests it, RINA will also send a copy of the official checklist required by the Standard.

4.1.5 MANAGEMENT OF NON-CONFORMITIES

After analysing the causes of any non-conformities reported on the aforementioned report, the Organisation must propose to RINA, within the date indicated on the report itself (where present), the necessary corrective actions of the non-conformities (and/or deviations, where foreseen) as well as the necessary corrective actions and the expected times for their implementation.

The acceptance of these proposals and of the time required for implementation is communicated in writing by RINA to the Organisation.

For the certification referred to in paragraph 1.1 number 4) it is possible to use the "Member Area" on the www.rina.org website to send the corrective action proposals and corrective action with subsequent acceptance by RINA. The organisation, in fact, can propose any treatments and corrective actions by filling in the appropriate forms directly in the "Member Area" on the website www.rina.org³.

In the event of major non-conformities, the certification process is suspended; in the case of other findings, the number of which, in the opinion of the assessment team, is such as to cause the delivery of a non-compliant product or non-compliant with the laws in force, the certification process is also suspended.

In such cases, within three (3) months, RINA may carry out a supplementary audit aimed at ascertaining the correct application of the corrective actions proposed; at the end of this verification, the certification process is resumed.

If the aforementioned deadline is exceeded, the checks referred to in paragraphs 4.1.3.1 and/or 4.1.3.2 must be carried out again within a period of six months from the date of the survey.

The aforementioned time limits may in particular cases be changed at the motivated/justifiable request of the Organisation, in the opinion of RINA.

For BRCGS schemes, the corrective actions based on the root cause analysis with relative closure evidence must be submitted to RINA within twenty-eight (28) days from the date of closure of the audit (ninety (90) days if in first certification for the Storage and Distribution, Agents and Brokers and Packaging Materials Standards; 90 days for first certification and recertification for the ETRS Standard). Depending on the grade obtained by the organisation following the audit and the type of

³ In the case that the Organisation does not have access to the Internet, the Organisation may fill in a paper copy of the forms used and send it to the pertinent RINA Office.



nonconformity, evidence of correction may be verified documentally or by a follow up audit at the site within twenty-eight (28) days from the end of the audit (ninety (90) days if in first certification). For the ETRS Standard, corrective actions with related evidence must be submitted within 90 days for both certification and recertification.

For BRCGS Storage and Distribution, Option 2 of announced and unannounced programs, the non-conformities identified during the Part 1 audit should have been corrected before the Part 2 audit.

For IFS schemes, corrective actions must be submitted to RINA within 14 days of receiving the preliminary report (usually delivered at the end of the audit and equivalent to the corrective action plan countersigned by Team Leader and Organization). For IFS Food, IFS Broker and IFS Logistics, the corrective actions with the relative evidences of closure must be submitted to RINA within four (4) weeks of receiving the preliminary report (usually delivered at the end of the audit and equivalent to the corrective action plan countersigned by Team Leader and Organization). In the event of a score greater than or equal to 75% but with 1 major non-compliance emerged, verified through follow-up audits within six (6) months of the closing date of the audit for the IFS Food, Logistic, Broker and Wholesale Cash and Carry Standards; or provisionally approved at a basic level provided that further actions are undertaken and validated by RINA for the IFS GLOBAL MARKETS FOOD PROGRAM.

For the GlobalGAP Standards, the corrective actions based on the analysis of the causes with the related evidence of closure must be submitted to RINA within a maximum of twenty-eight (28) days from the date of closure of the audit (three (3) months if in the first certification).

Once the above periods have elapsed without a positive conclusion of the evaluation, RINA can consider the certification file closed, charging the time and expenses incurred up to that time without issuing a certificate or withdrawing the current one. In such cases the organization that wishes to continue with the RINA certification must present a new request and repeat the certification process.

All costs relating to any additional audits resulting from deficiencies of the System / Process / Product covered by the certification are to be considered at the expense of the Organization.

4.1.6 INDEPENDENT TECHNICAL REVIEW

In case of positive outcome of the verification, the documentation produced by the audit team is subjected to an independent technical verification. The technician in charge of carrying out this final check on the documentation prepared by the verification group may raise further requests for clarification or modify the classification of one or more surveys identified by the auditors.

The certificate of conformity is issued by RINA following the positive outcome of the examination of the aforementioned proposal of the Organisation.

The confirmation of the approval by RINA of the certification with consequent issue of the certificate is sent in writing to the Organisation.

For details on the management and validity of the certificates of conformity issued by RINA, see the following CHAPTER 7 – MANAGEMENT OF CERTIFICATES.

In the event of any decision not to issue the certificate, RINA shall notify the organisation in writing and indicate the reasons for this. The organisation is required to pay for the verification activities foreseen by the accepted offer, even in the event of a negative outcome of the certification process.

4.2 - MAINTENANCE OF CERTIFICATION

4.2.1 GENERAL

In the event that the certification obtained is valid for three years, during the validity period of the Certificate of Conformity, the Organisation must maintain unchanged the conditions that allowed the granting of the certification itself.

For the purposes of carrying out the checks described below, RINA technicians must be guaranteed free access, even without notice, during normal working hours, to the premises and to the archives of the production site/s of the certified product.

The names of the qualified technicians appointed to carry out the audit are previously communicated by RINA to the Organisation, which may object to their appointment, justifying the reasons.

4.2.2 MAINTENANCE AUDIT

Maintenance audits must be carried out according to the times and methods indicated in the normative documents and/or technical specifications of reference, as well as any additional elements envisaged by the Accreditation and/or Recognition Bodies (where provided) and the appropriate Certification Guide (where present), and taking due account of the seasonality of the products/processes covered by certification (where present and relevant).

The dates of execution of the maintenance audits are agreed with the Organisation with adequate advance and officially confirmed by a written communication.

The periodicity of the maintenance audits at the Organisation must not exceed twelve (12) months and the date by which the audits must be carried out is reported on the three-year audit program held by the Organisation (where applicable). This program can be modified by RINA on the basis of previous maintenance audits.

Any deviations of the maintenance audits beyond these limits (only where provided), due to justified reasons (e.g. seasonality of the products/processes covered by certification), must be agreed in advance with RINA and must in any case be recovered at the first subsequent audit.

In any case, the date of the first maintenance audit, following initial certification, must be set within twelve (12) months from the final date of the certification audit (unless otherwise indicated in the normative document and/or applicable technical specification).

For BRCGS schemes, the audit must be conducted within the specific time interval defined in the certificate. Since the Organization is responsible for maintaining the validity of the certification (except for the unannounced audit),, in case of delay in the execution of the audit without a justified justification communicated to the Certification Body, RINA reserves the right to assign a major non-conformity, unless six (6) months have passed since the expiry of the certificate, for which the Organization will start a new certification process.

For IFS schemes, the audit must be conducted within the specific time interval defined in the certificate. In the event that this interval is not respected, the Organization will start a new certification process.

4.2.3 - SYSTEM CONFORMITY

During the maintenance audits the following aspects will be taken into consideration:

- (a) internal audits and reviews by management, where and to what extent;
- (b) a review of the actions taken following the non-conformities identified during the previous audit;
- (c) the handling of complaints;
- (d) the effectiveness of the management system regarding the achievement of the objectives, where and to what extent applicable;
- (e) the progress of planned activities aimed at continuous improvement, where and for what is applicable;
- (f) continuous operational control;
- (g) review of any change;
- (h) any other element provided for in this Regulation, in the normative documents and/or technical reference specifications, as well as any additional elements envisaged by the Accreditation and/or Recognition Bodies (where provided) and the specific Certification Guide (if any);
- (i) for the BRCGS and IFS Schemes, all the requirements of the single Standard will be taken into consideration, operating as for recertification audits.

4.2.4 - EXECUTION OF TESTS

For the certifications referred to in paragraph 1.1 numbers 6), 7), 8) production controls are occasionally made, according to RINA, by means of tests on samples of the product taken from the production line, both in the finished and semi-finished state, from the warehouse or, where applicable,



from trade, as far as and wherever applicable; for this purpose, the organisation must authorize RINA to collect the samples necessary for carrying out the aforementioned surveillance.

The Organisation is fully responsible for the substantial correspondence of the product to the respective samples submitted to the tests referred to in paragraph 4.1.3.2, where and for what is applicable (including, obviously, any modifications made with the approval of RINA).

During the period of validity, the Organisation must perform on the production all the tests prescribed by the normative document and/or technical reference in accordance with modality and frequency previously agreed with RINA, where and for what is applicable.

During the aforementioned period, the Organisation must keep at the disposal of RINA technicians the sample or samples that have been tested, where and for what is applicable. RINA may authorize the sale of these samples if appropriate related documentation is kept, which is suitable to allow, in the opinion of RINA itself, at any time and circumstance, the verification of the conformity of the production to the sample or samples submitted to the tests.

4.2.5 AUDIT REPORT

For the methods of communicating the outcome of the audit, refer to the previous point 4.4.

The validity of the certificate is confirmed, following the positive result of the maintenance activity or reissued in the case of proprietary schemes with annual validity.

4.2.6 MANAGEMENT OF NON CONFORMITIES

For the methods for managing the findings, refer to the previous point 4.1.5 MANAGEMENT OF NON-CONFORMITIES.

4.3 RECERTIFICATION

4.3.1 GENERAL

On the occasion of the recertification audit (renewal), the Organisation must contact RINA in advance about three months from the date scheduled for the three-year audit program in its possession and send an updated and completed copy of all the parts of the Questionnaire. Informative (available on the website www.rina.org) in order to plan the activity and agree on the date of execution of the recertification audit.

The date of execution of the recertification audit, agreed with the Organisation with adequate advance, is officially confirmed by a written communication.

Recertification audits for the Standards referred to in paragraph 1.1 numbers 1), 2), 3) provide for the possibility of carrying out unannounced audits (see paragraph 4.3.2). In these cases, the audits are intended as substitutes for the announced checks and will therefore be carried out periodically with the same procedures and validity as an announced audit, always and in any case in accordance with the applicable reference standards.

The recertification process must necessarily end, with a positive result, before the expiry date indicated on the certificate, which cannot be extended by RINA.

Consequently, the recertification audit must be concluded in good time in order to allow RINA to approve the recertification proposal and to reissue the certificate by the aforementioned date (at least one month before the expiry date indicated on the certificate/or according to the indications of the normative document and/or applicable technical reference specification).

If an organisation does not comply with the aforementioned deadlines and therefore does not obtain the re-issuance of the certificate within the deadline, the certification must be considered expired starting from the day following the expiry date indicated on the certificate (unless otherwise indicated in the regulatory document and/or applicable technical reference specification).

After the expiry date of the certificate, if the organisation intends to achieve certification again, they must submit a new application following, as a rule, the entire procedure for the initial certification.

4.3.2 RECERTIFICATION AUDIT

The recertification audit aims to confirm the compliance of the product(s)/site(s) and the effectiveness of the applicable Standard as a whole and is mainly based on an on-site audit to be carried out, as a rule, with the same criteria as the certification audit.

The description of the activities and provisions for conducting the recertification audit at the site/s is reported, in detail, in the three-year audit program (in the case of three-year certificate validity) or in the recertification audit plan (in the case annual validity of the certificate) that RINA sends to the Organisation before the audit is carried out (where applicable).

The dates for the recertification audits are agreed with the Organisation in good time and officially confirmed by a written communication, unless otherwise foreseen for the adherence to the unannounced audit programs (see paragraph 4.3.2).

Following the positive outcome of the recertification audit, the audit team presents to RINA the recertification proposal of the Organisation for the purpose of re-issuing the certificate of conformity.

4.3.3 AUDIT REPORT

For the methods of communicating the outcome of the audit, refer to the previous point 4.1.4 AUDIT REPORT.

The validity of the certificate is confirmed, following the positive result of the recertification activity.

4.3.4 MANAGEMENT OF NON-CONFORMITIES

After analysing the causes of any non-conformities reported on the aforementioned report, the Organisation must propose to RINA, within the date indicated on the report itself (where present), the necessary treatments of the non-conformities (and/or deviations, where foreseen) as well as the necessary corrective actions and the expected times for their implementation.

The acceptance of these proposals and of the time required for implementation is communicated in writing by RINA to the Organisation.

For the certification referred to in paragraph 1.1 SCOPE number 4) it is possible to use the "Member Area" on the www.rina.org website to send the non-conformity management proposals and corrective action with subsequent acceptance by RINA. The organisation, in fact, can propose any treatments and corrective actions by filling in the appropriate forms directly in the "Member Area" on the website www.rina.org³.

In the event of major non-conformities, the recertification process is suspended; in the case of other findings, the number of which, in the opinion of the assessment team, is such as to cause the delivery of a non-compliant product or non-compliant with the laws in force, the certification process is also suspended.

In such cases, within three months, RINA may carry out a supplementary audit aimed at ascertaining the correct application of the corrective actions proposed; at the end of this verification, the recertification process is resumed.

For BRCGS schemes, the corrective actions based on the root cause analysis with relative closure evidence must be submitted to RINA within twenty-eight (28) days from the date of closure of the audit (ninety (90) days if in first certification for the Storage and Distribution, Agents and Brokers and Packaging Materials Standards; 90 days for first certification and recertification for the ETRS Standard). Depending on the grade obtained by the organisation following the audit and the type of nonconformity, evidence of correction may be verified documentally or by a follow up audit at the site within twenty-eight (28) days from the end of the audit (ninety (90) days if in first certification). For the ETRS Standard, corrective actions with related evidence must be submitted within 90 days for both certification and recertification.

For BRCGS Storage and Distribution in Option 2 of the announced and unannounced programme, non-conformities identified during Part 1 of the audit must be corrected before the start of Part 2.

For IFS schemes, corrective actions must be submitted to RINA within 14 days of receiving the preliminary report (usually delivered at the end of the audit and equivalent to the corrective action



plan countersigned by Team Leader and Organization). For IFS Food, IFS Broker and IFS Logistics, the corrective actions with the relative evidence of closure must be submitted to RINA within 4 weeks of receiving the preliminary report (usually delivered at the end of the audit and equivalent to the corrective action plan countersigned by Team Leader and Organization). In the event of a score greater than or equal to 75% but with 1 major non-compliance emerged, verified through follow-up audits within six months of the closing date of the audit for the IFS Food, Logistic, Broker and Wholesale Cash and Carry Standards; or provisionally approved at a basic level provided that further actions are undertaken and validated by RINA for the IFS GLOBAL MARKETS FOOD PROGRAM.

For the GlobalGAP Standards, the corrective actions based on the analysis of the causes with the related evidence of closure must be submitted to RINA within a maximum of twenty-eight (28) days from the date of closure of the audit (ninety (90) days if in the first certification).

Once the above periods have elapsed without a positive conclusion of the evaluation, RINA can consider the certification file closed, charging the time and expenses incurred up to that time without issuing a certificate or withdrawing the current one. In such cases the organization that wishes to continue with the RINA certification must present a new request and repeat the certification process. All costs relating to any additional audits resulting from deficiencies of the System / Process / Product covered by the certification are to be considered at the expense of the Organization.

4.3.5 INDEPENDENT TECHNICAL REVIEW

In case of positive outcome of the verification, the documentation produced by the verification group is subjected to an independent technical verification. The technician in charge of carrying out this final check on the documentation prepared by the verification group may raise further requests for clarification or modify the classification of one or more issues identified by the auditors.

The certificate of conformity is re-issued by RINA following the positive outcome of the examination of the aforementioned proposal of the Organisation.

The confirmation of the approval by RINA of the recertification with consequent issue of the certificate is sent in writing to the Organisation.

For details on the management and validity of the certificates of conformity issued by RINA, see the following CHAPTER 8.

In the event of any decision not to issue the certificate, RINA shall notify the organisation in writing and indicate the reasons for this. The organisation is required to pay for the verification activities foreseen by the accepted offer, even in the event of a negative outcome of the certification process.

4.4 - UNANNOUNCED AUDITS

For some schemes (e.g. BRCGS and IFS), the unannounced audit option can be applied. This option is to be communicated to RINA within the terms defined by the individual standards.

In particular:

- for IFS Food, IFS Logistic and IFS Broker the unannounced audit option is applicable during the initial certification or renewal phase. If an already certified organization chooses this option, it must communicate it to RINA within the terms defined in the reference standards, together with any blackout periods (maximum ten (10) days which can be divided into no more than three (3) periods in addition to periods of inactivity). The audit will not be planned and will take place in the window between -sixteen (16) weeks + two (2) weeks from the anniversary of the original audit date

NOTE: From 1st January 2021, all Organizations that will undergo an IFS Food and IFS Logistic first certification or renewal audit will have to perform an unannounced audit every three (3) years in the manner described above, starting from 2021 (first mandatory unannounced audit in the three-year period 2021-2023). In the event that the certification cycle is interrupted, the subsequent audit must be conducted in an unannounced manner. Following a CB transfer, RINA reserves the right to request the company's certification history in order to identify in which year the mandatory unannounced audit should be carried out in the three-year period.

- for the BRC Standards the unannounced audit option is applicable during the first certification or renewal phase. During the initial certification phase, the Organization must be aware that the initial audit may not be conducted before twelve (12) months from the request. The audit will be unscheduled and may take place any time within the last four (4) months of the audit cycle, including twenty eight (28) calendar days prior to the audit due dates (i.e. any time within the four (4)) months before the audit two dates (for BRCGS Storage and Distribution if the *Unannounced audit protocol Option 2* is selected, the unannounced part 1 audit shall occur at any stage within four (4) months before the audit due date, while Part 2 (announced) after Part 1 but within the due date). There is a ten (10) day blackout period in the unannounced program in addition to any business downtime (or five (5) days in the case of six (6) month certificates for C or D grade or production seasonal) which must be communicated to RINA providing suitable reasons together with the request for an unannounced audit which must take place within three (3 months) from the date of the last audit.
- for the BRC Food, BRC Packaging Materials, BRC Agents and Brokers the unannounced audit option is applicable for all organizations that are not yet certified (for non-certificated sites which may opt into the unannounced audit program, the audit may not occur for up to twelve (12) months from the request) and for all organizations already certified (in this case, the organization must inform RINA within three (3) months from the date of the last audit).
- For BRC GS Consumer Products, BRCGS Storage and Distribution the unannounced program is only applicable for already certified Organizations (in this case the Organization must inform RINA within 3 months from the date of the last audit).
- For BRC GFCP Global Standard and BRC PB Global Standards the unannounced audit option is applicable not in the first certification phase. If during the audit there is no production of gluten free products, the audit can still be carried out as long as the auditor can verify the processes, flows and production areas dedicated to production. However, recordings of past productions must be available. In this case the subsequent GFCP Global Standard audit must be conducted during a gluten free production.
- For BRCGS ETRS, the annual audit is always carried out in mixed mode with a part of off-site desktop audit and a part of on-site audit compulsorily unannounced, the second part to be scheduled from 2 weeks up to 3 months after the off-site desktop part with a time window of 28 days.

NOTE: From 1st February 2021, all Organizations that will undergo a first certification or BRCGS Food, BRCGS Packaging Materials, BRGS Storage and Distribution renewal audit will have to carry out a mandatory unannounced audit in the manner described above every three (3) years, starting from 2022 (first mandatory unannounced audit in the three-year period 2022-2024)., with a window of four (4) months before the last date of the audit window. In the case of Organizations with a C or D score, the unannounced audit will still be carried out once every three (3) years. Following a CB transfer, RINA reserves the right to request the company's certification history in order to identify in which year the mandatory unannounced audit should be carried out in the three-year period.

In the case of a combined BRCGS and IFS audit, the mandatory unannounced audit rule of the Standard Owner is applied in a more restrictive manner.

It is RINA's responsibility to select and communicate to the Organization the mandatory unannounced audit year within the terms established by the Owners of the Standards.

- For GlobalG.A.P IFA and CoC standards is annually expected to carry out a certain number of unannounced audits (less than 48 hours notice) on a sample of Organizations certified according to the standard in compliance with the following specifications:
 - 10% of all Organizations certified in Option 1 and option 1 multisite without Quality System;
 - 10% of all certified Organizations in Option 2 and option 1 multisite with Quality System (the evaluation will concern only the Quality System);
 - 10% of CoC Certified Companies.



The organization must guarantee access to the auditor. If access is denied, the organization must bear at least the expenses incurred by the auditor and any existing certificate may be suspended or withdrawn.

4.5 – REMOTE AUDIT

RINA can evaluate the possibility of carrying out the audit remotely in part or totally (if applicable) only if the following prerequisites are met:

- is permitted by the Scheme and the specific prerequisites are met;
- the Organization communicates that it is interested in this audit method;
- the Organization has an Internet connection of adequate quality for the software/technology used to carry out remote audits;
- the documented information of the Organization is available in electronic format;

If the conditions are met, RINA reserves the right to identify if, and to what modality, remote assessment techniques can be used to optimize the effectiveness and efficiency of the audit based on the outcome of a risk assessment.

If one of the above prerequisites is not satisfied or, in RINA's opinion, is not proven an adequate effectiveness and efficiency of the assessment, the audit must be carried out with the traditional ways.

The remote audit is to be understood as part of the on-site audit and requires constant interaction with the responsible functions and the personnel of the organization involved in the processes/activities being assessed as indicated in the audit plan.

4.6 - ADDITIONAL AUDIT

RINA also reserves the right to carry out additional audits and/or checks, compared to those foreseen by the three-year program, announced or not announced, at the Organisation:

- in the event of major non-conformities or other findings, the number of which in the opinion of the assessment team is such as to cause the delivery of a non-conforming product or non-compliant with the laws in force in relation to the importance of non-conformities and in any case no later than three months after the end of the maintenance visit,
- in case the event RINA receives complaints or reports, deemed to be particularly significant, concerning the compliance of the certified product with the requirements of the reference standard and the present Regulations,
- in the event of criminal involvement or restrictions related to legal or food safety issues, reminders, product alerts, incidents that may compromise product safety, public statements involving the Organization issued by competent authorities, NGOs or retailers, significant public safety problems, etc.;
- in relation to changes occurred in the Organisation,
- to organisations that have had their certification suspended.

In case of refusal, without valid reasons, by the Organisation, RINA can start the process of suspension of certification.

If the complaints and reports are considered justified by RINA, the cost of carrying out the additional audit is borne by the Organisation.

The Organisation must keep records of any complaints concerning the products covered by the certification and the related corrective actions taken, and must make them available to RINA together with the corrective actions undertaken during the periodic audits, where and for what is applicable.



CHAPTER 5 - EXTRAORDINARY INFORMATION FROM THE CERTIFIED COMPANY

The organization must promptly inform RINA about any change that may affect its ability to comply with certification requirements (e.g.: in the event of criminal involvement or restrictions related to legal or food safety issues, reminders, product alerts, incidents that may compromise product safety, public statements involving the Organization issued by competent authorities, NGOs or retailers, significant public safety problems, recalls, product alerts, incidents that may compromise product safety, etc.).

For BRCGS and IFS schemes this communication must take place within three working days.

For the GFCP Global Standard scheme in case of recall, this communication must take place within twenty-four (24) hours.

These communications must be formalized by sending an email to compliance.notification@rina.org with the subject INCIDENT NOTIFICATION-COUNTRY-COMPANY NAME-STANDARD with the following mail content: the type of incident, date of the incident, description, possible product / s involved, corrections, root causes analysis and any corrective actions undertaken by the Organization.

RINA reserves the right to request further information from the customer that can prove how the organization has reacted in relation to the above and any further additions that provide evidence of complete management of the problem.

If this information results to be insufficient or ambiguous, RINA can evaluate an extra audit or suspension of the certificate (see paragraph 8.4).

CHAPTER 6 - DECLARATION OF CONFORMITY

For the certifications referred to in paragraph 1.1 numbers 4), 5), 6), 7), 8) the Organisation may issue, for each product, or batch of products, homogeneous by characteristics and production period, a Declaration of Conformity to the reference document, based on the facsimile available on the www.rina.org website.

The Declaration of conformity must contain at least the following information.

- (a) Name and address of the Organisation;
- (b) Characteristic data of the product;
- (c) Certificate of Conformity Number;
- (d) Regulatory document and / or technical reference product reference;
- (e) Date of issue of the declaration;
- (f) Signature of the person authorised to issue.

From the data indicated on the Declaration of conformity it must be possible to trace the results of the tests on which the declaration is based.

RINA can request the Organisation to keep a register containing all the declarations of conformity issued. The aforementioned register will be examined by RINA technicians during the inspection.

Generally, the register will be required if there is a need to have clear traceability of the product.



CHAPTER 7 – MANAGEMENT OF CERTIFICATES

7.1 RELEASE OF THE CERTIFICATE

The certificate of conformity issued by RINA has a validity according to the normative document and/or applicable technical reference standard, normally starting from the date of approval of the initial certification proposal or recertification by RINA (unless otherwise indicated by the regulatory document and/or applicable technical specification reference - see above).

The Certificate of Conformity issued by RINA contains at least the following elements:

- (a) the unique identification number of the certificate;
- (b) the company name and address of the person receiving the certificate;
- (c) the field of application of the certificate consistent with the criteria defined in the reference standard;
- (d) the applicable certification standard
- (e) the date of first issue;
- (f) the current issue date;
- (g) the expiry date;
- (h) the signature of the authorised person,
- (i) data specifically requested by the Scheme Owners of the Standard (eg QR code, site code, COID, auditor number, Level and %/ Score, Option, packing code or sanitary legal authorisation if applicable, GS1 GLN if applicable, etc.)

From the moment the certificate is issued by RINA, the original copy of the certificate and the related three-year audit program, if the payment conditions are met, will be made available to the Organisation on the "Member Area" of the RINA website (www.rina.org). The Organisation, therefore, can access and download the document, directly from this area of the RINA site.

In case of inability to access the Internet, the Organisation may request a hard copy from the RINA Office of relevance.

For Organizations with sites located in the European Economic Area (EEA) and the United Kingdom certified IFS Food, it will be mandatory to have the Global Location Number of GS1 (GLN), the possession of which will be binding for the issue of the certificate.

For the certifications referred to in paragraph 1.1 numbers 1), 2), 3) and 4) in addition to the certification referred to in the previous point, the reports or certification documentation (e.g. BRCGS Report, IFS Report, IFS Action Plan, GGN GlobalGAP, Certificates) will be made available to the Organisation on the relevant databases of the applicable Standards, in the reserved areas of the respective sites⁴.

7.2 CHANGES TO THE CERTIFICATION

The Organisation in possession of the RINA certification can request a modification or extension of the same certification by presenting a new certification request, accompanied by the documentation referred to in point 2.1 duly updated. RINA reserves the right to examine the requests on a case-by-case basis and to decide the evaluation procedures for the issue of a new certification, in compliance with the "GENERAL CONDITIONS OF CONTRACT FOR THE CERTIFICATION OF SYSTEMS, PRODUCTS AND PERSONNEL" and to the regulatory document and/or applicable technical reference specification.

The Organisation must promptly notify RINA of any changes in aspects that may affect the conformity of the product, the process and/or the ability of the applicable Standard to continue to comply with the requirements of the applicable regulatory document and/or technical specification used for certification.

⁴ With the methods and according to the rules defined by the respective standards and available on the websites: www.brcglobalstandards.com and/or www.ifs-certification.com and/or www.database.globalgap.org

These provisions concern, for example, relative variations:

- to the legal, commercial, Organisational or property status;
- Organisation and management (e.g. key managers or technical personnel, decision-making process);
- contact addresses and sites;
- the scope of activities covered by the certified management system;
- significant changes to the management system and processes and products.

RINA reserves the right to carry out additional audits at the Organisation if the changes communicated are deemed to be particularly significant for the purposes of maintaining the conformity of the Product/Process and the MS applicable to the requirements of the reference standard and this regulation or to revise the economic conditions for any modification of the contract.

7.2.1 CHANGES TO PRODUCTS

The Organisation must promptly notify RINA of any significant changes it intends to make to a product for which it has obtained the Certificate of Conformity, to the production and control procedures or to the applicable Standard adopted.

Following the assessment of the influence that the proposed changes have on the conformity of the product to the normative document and/or technical reference, RINA may request the total or partial repetition of the initial certification referred to in CHAPTER 4.

Following the aforementioned investigations, RINA may extend the validity of the relevant certifications and authorisations to the modified products.

RINA undertakes to inform the Organisation in writing of its decisions within 30 days of notification of the proposed changes.

7.2.2 MODIFICATION OF THE NORMATIVE DOCUMENTS AND/OR REFERENCE TECHNICAL SPECIFICATIONS

RINA will notify the Organisation of any changes made to the normative documents and/or technical specifications and its own regulations that are applicable to the products subject of the certification.

Considering the implications of the changes, in particular those relating to safety and health and environmental protection aspects, and taking into account the need to avoid inadvertently favouring a particular Organisation or a specific product, RINA will establish the date by which products must be adapted to the new standards.

By the established date, the checks and tests deemed necessary by RINA must be carried out on a prototype of the product and/or samples taken from production, to verify the conformity of the product with the new applicable legislation, where and for what is applicable.

Upon successful completion of the investigations, RINA will issue a new Certificate of Conformity, modified as appropriate to cite the new standard.

If the Organisation does not provide evidence within the established deadline to adapt the affected products to the new reference standard or if the results of the tests are not satisfactory (where and for what is applicable), the Certificate of Conformity and related License will be revoked.

In the event that the Organisation intends to adopt new editions of normative documents and/or voluntary technical reference specifications, the Organisation must notify RINA prior to application to the manufacture of the products; the procedure described above will then be followed, but the date of adjustment to the new document may be chosen by the Organisation itself.

7.3 TRANSFER OF ACCREDITED CERTIFICATES

If an Organisation with certification currently in force issued by another certification body accredited by an Accreditation Body that adheres to the EA / IAF mutual recognition agreement, applies for certification, RINA carries out a check that includes:

- document analysis as reported in paragraph 2.1 and following of this Regulation;

- review of the reports of previous audits (including test reports on the product subject to certification, where applicable) conducted by the accredited body that issued the previous certification;
- assessment audit at the Organisation, whose extent of extension depends on the status of conformity and validity of the certification previously issued.

The Organisation must also communicate to RINA:

- the reasons for the request for transfer of the certification;
- any comments or remarks received from the national or local authorities in charge;
- any complaints received and related actions taken,
- on site audit for specific schemes (Standard BRCGS and IFS).

For BRCGS, the Organization has the possibility to request a new audit, however this must be carried out by the certification body that issued the current certificate, if not previously authorized by BRCGS.

The contract between RINA and the applicant is managed in the same way as described in paragraph 4.1, depending on the extent of the verification activity.

Upon completion with a favourable outcome of the above mentioned activity, and after validation by the appropriate person in charge of the independent technical review, a Certificate of Conformity is issued for the Product in question which, as a rule, maintains the deadline already established by the Certification Body that issued the previous certification (unless otherwise indicated in the normative document and/or applicable technical specification).

In general, the planning already established by the Certification Body that issued the previous certification is also maintained for the maintenance and recertification audits.

7.4 SUSPENSION OF THE CERTIFICATE

The validity of the certification issued may be suspended in accordance with the "GENERAL CONDITIONS OF CONTRACT FOR THE CERTIFICATION OF SYSTEMS, PRODUCTS AND PERSONNEL" and in the following specific cases:

- (a) if the Organisation does not allow surveillance or recertification audits to be conducted at the required frequencies;
- (b) if the major non-resolved non-conformities are found for the Product and/or in the applicable MS within the time frame established by RINA;
- (c) if the Organisation has not complied with the deadlines set for the communication of corrective actions, following non-conformities reported on the audit report;
- (d) if the Organisation has carried out major internal restructuring of the Site(s), it moves to other site(s) without reporting such changes to RINA;
- (e) in the presence of significant changes to certified products and/or production and control methods and/or applicable MS that have not been communicated and accepted by RINA;
- (f) if the Organisation uses or advertises in an improper way the certification obtained;
- (g) for refusal or impediment to participation in the observer audits of an Accreditation Body;
- (h) confirmation of any justifications and serious complaints received by RINA;
- (i) in any other circumstance that RINA, in their opinion, believes has a negative influence on the conformity of certified products;
- (j) non-compliance with the specific audit protocol (BRCGS and IFS),
- (k) unresolved complaints or corrective actions not adequately implemented following withdrawals and / or product recalls from the market,
- (l) in any other circumstances that may be provided for by the normative documents and/or technical specifications and the specific Certification Guide (if any), as well as any additional elements envisaged by the Recognition Bodies (where provided) and/or on them reporting.

The Organisation may also request RINA, justifying the reasons, for the suspension of certification for a period generally not exceeding six months and, in any case, no later than the expiry date of the certificate, if applicable.

The suspension is notified in writing to the Organisation, specifying the conditions for the restoration of the certification and the deadline by which they must be implemented.



The suspension of the validity of the Certificate is made public by RINA directly on the website www.rina.org and on any databases of the Standards Owners.

During the suspension period the Organisation must comply with any other provisions established by RINA.

7.5 RESTORATION OF CERTIFICATION

The restoration of the certification is subject to the verification of the elimination of the deficiencies that had caused the suspension itself through an in-depth audit that verifies the compliance of the Product and the applicable Standard to all the requirements of the applicable regulatory document and/or technical specification.

The Organisation is notified in writing by registered letter to the Organisation and made public known by RINA through the website www.rina.org as provided for in point 8.1, as well as (where and to what extent) through the websites of the applicable Standards⁴.

7.6 REVOCATION OF THE CERTIFICATION

The revocation of the Certificate of Conformity can be decided in accordance with the provisions of the "GENERAL CONDITIONS OF CONTRACT FOR THE CERTIFICATION OF SYSTEMS, PRODUCTS AND PERSONNEL" and in the following specific cases:

- (a) when circumstances occur, such as those mentioned in 8.4 for suspension, which are considered to be particularly serious;
- (b) upon formal request of the Organisation (see point 8.6), including the case in which the Organisation itself does not want or cannot comply with the new provisions issued by RINA (see point 8.2.2);
- (c) if the Organisation suspends the supply of the certified product for a period generally exceeding six months;
- (d) if the Organisation has misused the RINA Certificate of Conformity and has not subsequently taken the measures requested by RINA;
- (e) in the case of findings concerning aspects related to product safety and non-compliance with binding rules relating to health and safety;
- (f) if the Organisation does not accept the new economic conditions established by RINA for any modification of the contract;
- (g) for any other serious reason, in the opinion of RINA;
- (h) in any other circumstances that may be provided for by the normative documents and/or technical specifications and the specific Certification Guide (if any), as well as any additional elements required by the Recognition Bodies (where provided) and/or on their reporting.

The revocation of the Certificate of Conformity is notified in writing to the Organisation, and is made public by RINA in accordance with the provisions of paragraph 8.1, as well as (where and to what extent) through the sites of the applicable Standards.

The revocation notification also includes, where appropriate, the actions that the Organisation must undertake for products already in stock or on the market.

The organisation to which the certification is revoked must return the relative certificate to RINA.

The Organisation that after the revocation intends to access certification again, must submit a new application following the whole process.

In the event of revocation, the Organisation must comply with any other measures established by RINA.

7.7 WITHDRAWAL OF CERTIFICATION

The Organisation may submit to RINA, a request to renounce certification for some or all the products for which it had obtained certification due to the termination of their production or for other reasons,



including the case in which the Organisation does not want or cannot adapt to the new instructions given by RINA.

RINA, upon receiving this communication, starts the process to make the certificate status invalid.

In the case of partial renunciation, RINA will update the issued certification excluding the products subject to the same renunciation, prescribing, if necessary, also any actions that the Organisation must undertake for the products already manufactured.

In case of renunciation extended to all the products covered by certification, the contents of the previous paragraph apply.

In general, within one (1) month from the date of the communication, RINA updates the validity status of the certificate.

7.8 APPEALS AND COMPLAINTS PROCEDURE

The Company has the right to appeal the certification decision made by RINA with this modality:

- For BRCGS, the Company could appeal the certification decision in writing to RINA within seven (7) calendar days of receipt of certification decision. RINA must make independent consideration and resolution of appeals against certification decision within thirty (30) calendar days of receipt. A full written response will be given after the completion of a full and thorough investigation into the appeal. In the event of an unsuccessful appeal, RINA has the right to charge the costs for conducting the appeal.
- For IFS, appeals will be finalized within twenty (20) working days of receiving information from the auditee.

The Company has the right to make a complaint to RINA with this specific modality for this Standards:

- For BRCGS, the Company can directly feedback to BRCGS on their audit experience through the survey invitation after their audit contacting BRCGS confidentially through: tell.brcgs.com. BRCGS has a target to action complaints within twenty-eight (28) calendar days, however complaints may take up ninety (90) days to conclude, particularly where sites visit need to be arranged.
- For IFS, an initial response will be given by RINA within ten (10) working days of receiving the complaint. A letter confirming receipt of the complaint will be issued within a maximum of five (5) working days. A full written response will be given after the completion of a full and thorough investigation into a complaint.

CHAPTER 8 – CONTRACTUAL CONDITIONS

For anything not provided for in this document, refer to the "GENERAL CONDITIONS OF CONTRACT FOR THE CERTIFICATION OF SYSTEMS, PRODUCTS AND PERSONNEL", available on the website www.rina.org.



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Technical Rules