ANNEX 16

CU Inspections & Certifications India Pvt Ltd- Audit Regulation

This Regulation applies to all programs where reference is made to this Regulation in the contract, but at least for the following:

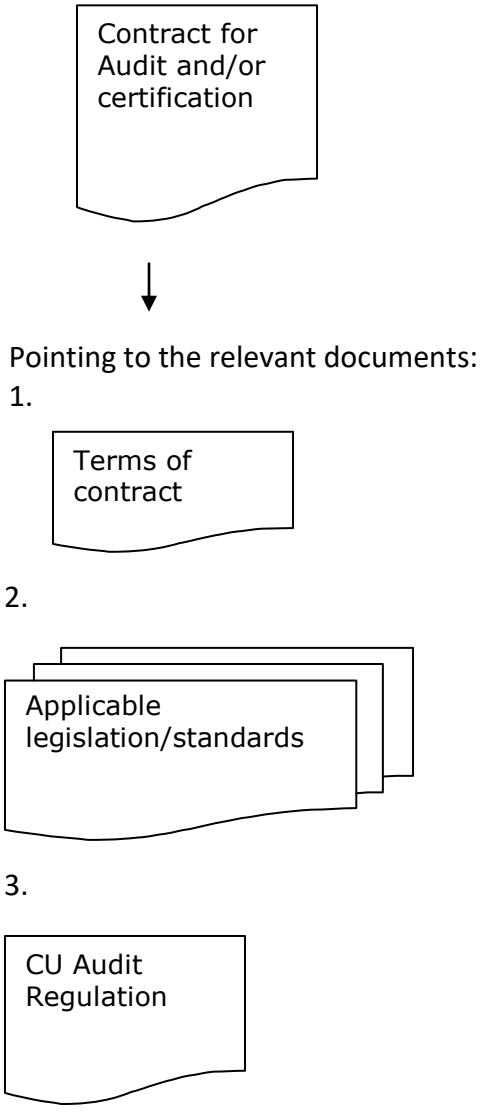
- ISO 22000:2005 Food Safety Management System

CU Inspections & Certifications India Pvt Ltd
Plot No C-113, TTC Industrial Area, Pawane MIDC
Navi Mumbai 400709
Maharashtra India

CU Audit Regulation

Introduction and Scope

This Audit Regulation contains regulation regarding the policy of CU Inspections & Certifications India Pvt Ltd (CU) on Audit and certification. It mentions what your rights and obligations are, as well as those of CU. It also mentions additional rules for specific programs. It contains contract related regulation as well. In this sense the Audit Regulation is complementary to the applicable standards, the offer letter, as well as the Terms of Contract. Please refer to the structure diagram below.



The Audit Regulation contains general rules that are applicable for all clients concerned and contains the following paragraphs:

1. Applicability
2. Definitions
3. Audit
4. Audit report
5. Certification
6. Certificates
7. Use of indications and symbols
8. Appeals and complaints
9. Final provisions
10. Policy of taking over projects certified by other certification bodies.

In every sentence where the singular form is in a context, the plural form should be supposed. This is also the case for male and female word expressions.

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1 Requirements for Audit and Certification

1.1 Applicability

Article 1 Applicability

1. This Regulation has been adopted by the Managing Director of the CU Inspections & Certifications India Pvt Ltd (CU) on 1 May 2017, and can be referred to as **CU Audit Regulation**.
2. The Managing Director CU has the right to change or extend this regulation by amendments. The amendments shall be highlighted in italics.
3. The CU Audit Regulation and the amendments shall be published within one month after the Managing Director CU has adopted them.
4. For any change or extension of this Regulation, a transition period is given. In all cases where no transition period for the individual amendment is given, a transition period of three months after the adoption will apply.
5. The CU Audit Regulation is applicable for all programs mentioned in "Introduction and Scope".
6. In any case where conflicting rules in both the client contract and the CU Audit Regulation are encountered, the client contract shall overrule the CU Audit Regulation.
7. CU commits itself to conduct its activities impartially and in a professional manner. CU understands the importance of impartiality in carrying out its certification activities, managing conflicts of interest and ensuring the objectivity of its management system certification activities.

1.2 Definitions & Management systems

Article 2.1 Definitions

This document adopts all definitions as defined by:

- General requirements for bodies operating product certification systems
- ISO17021-1:2015
- ISO 22000:2005,
- ISO 22003:2013

This document uses the following additional definitions:

Audit	Systematic, independent, documented process for obtaining records, statements, of fact or other relevant information and assessing them objectively to determine the extent to which specified requirements are fulfilled in a management system
Audit Time	Time needed to plan and accomplish a complete and effective audit of the client organization's management system
Auditor	Person who conducts an audit
Appeal	Formal notification of disagreement with a certification decision, or request by the provider of the item of Audit to the CU Inspections & Certifications India Pvt Ltd for reconsideration by that body of a decision it has made relating to that item
Appointment	Appointment of functionaries for a specific program and/or role based on competence/qualification criteria
Certification	Action to confirm by a party (in this case CU) there is satisfactory confidence that a sufficiently identified product, process, system or activity is in conformity with a standard, regulation or rule
Certifier	Responsible for the marketing of programs, instructions to the (Lead)

	Auditor(s), certification, reporting to the client, issuance of certificates, customer relations and post certification activities
Claim	Request for Financial settlement
Clarification for clients	Detailed interpretation of standards, regulations or rules by CU for a certification program being part of the Criteria
Clarification for Relations	Short interpretation of standards, regulations or rules by CU Inspections & certifications India Pvt Ltd for a certification program to be sent to relations with a quotation
Complaint	A formal expression of dissatisfaction by any person or organization regarding a CU employee's behaviour, CU methodology, or work executed under contractual responsibility of a critical office
Correction	An action which takes away the result of a non-compliance
Corrective actions	Corrective actions are actions taking away the root cause of a non-compliance found during internal or external audits
Competence	Ability to apply knowledge and skills to achieve intended results
Client File	A file of all documents related to the certification of a specific client, which includes the digitally stored documents in CUSI
Criteria	Document with standards, regulations, rules and the Clarification for clients by CU for each (combination of) certification program(s) to be distributed to clients
Critical office	A location where the following activities are conducted or controlled: • the process for initial qualification, training and ongoing monitoring of auditors and assessment personnel records; or • the application review, the assignment of assessment personnel, and/or review of the final report; or • the certification/registration decision based on the final review of the assessment report
Certification body	A body that conducts certification of conformity
Certification program	A system (or program) that has its own procedure and management for carrying out certification of conformity
Certification scheme	conformity assessment system related to management systems to which the same specified requirements, specific rules and procedures apply
Client	A contract partner of CU for Audit and certification programs, with the aim of being audited and certified
Client contract	A written agreement between CU and the client concerning all rights and duties concerning a CU certification program. The client contract does not indicate that the client is certified
Client number	A unique number that CU provides the client to identify himself as a CU client. The client number does not indicate that the client is certified
CU branch office	CU office that is legally entitled to represent CU
CU office	CU office situated Navi Mumbai, India , where development and maintenance of Audit and certification programs takes place
CUSI	Database of Control Union
MDc	Managing director of a critical office
Duration of Management system certification audits	Part of audit time spent conducting audit activities from the opening to closing meeting
Evaluation	A systematic assessment of the extent to which a system, product, process or service fulfils a specific requirement
Guide	Person appointed by the client to assist the audit team

HACCP	Hazard Analysis and Critical Control Points
Improvement	Complaint, corrective and preventive measure
Inspection	Examination of a product design, product, process or installation and determination of its conformity with specific requirements or, on the basis of professional judgement, with general requirements. Inspection of a process may include inspection of persons, facilities, technology and methodology
Inspector	Person who conducts an inspection
Instruction	Prescription for the execution of activities, there are instructions for the program manager, Certifiers , Auditors and assistants
Inventory	See Inspection
ISO 22000	ISO22000:2005 Food Safety Management System
KPI	Key Performance Indicator
Lead Auditor	A person who has completed a recognised lead auditor course, responsible for the, leading the audit team, execution of audits and completion of audit reports.
Licensee	Client, contract partner for certification program(s)
Non-conformity	non-fulfilment of a requirement • Major Non-conformity: Non-fulfilment of a requirement that affects the capability of the management system to achieve the intended results. • Minor Non-conformity: Non-fulfilment of a requirement that does not affect the capability of the management system to achieve a intended results
Observer	Person who accompanies the audit team. But, does not perform audit
Preventive action	A preventive action is the action that takes away the root cause of a situation that could lead to a non-compliance
Procedures	Description of a process with all necessary activities (what), when these must be done and who is responsible for the execution of these activities. There may be instructions for the execution of the activity
Procedure Manual	Set of documents with the combination of the Quality Handbook and the Procedures
Process	Collection of related means and activities, which transfer input into output
Program Manual	Set of documents with criteria, instructions and checklists for each (combination of) certification program(s)
Processing unit	Factory unit
Production unit	Agricultural units or farmers units
Qualification	To determine the compliance with a qualification-item, or set of qualification-items resulting from a role subprogram combination; a person can qualify him/herself by complying to the defined requirements (e.g. exam, shadow audit, training)
Qualification-approval	Decision on release of a person on a set of qualification-items, resulting from a role subprogram combination
Quality Management System	Quality management system must be defined as management system
Re-qualification	Re-confirmation that a person complies to the defined requirements set for a role, subprogram or role subprogram combination

Responsible office	A location where activities within the certification-process are conducted, except for: • the process for initial qualification, training and ongoing monitoring of auditors and assessment personnel records; or • the application review, the assignment of assessment personnel, and/or review of the final report; or • the certification/registration decision based on the final review of the assessment report
Role	A role is the function of a person as defined in the Quality management system
Scheme	A system of rules, procedures and control aspects for conducting (parts of) the conformity-assessment of specific objects to which the same specific requirements apply
Program manager a.k.a Scheme coordinator	The official representative of CU to the scheme owner responsible for the scheme and the communications. The qualifications comply with the program's requirements. This function is executed by the auditor or the Certifier
Senior auditor/inspector	Auditor or inspector qualified for the assessment of auditing/inspection performance and competence of colleague auditors/inspectors
Scope Certificate	A document issued under the rules of a certification system, demonstrating that adequate confidence is provided that a duly identified product, process or service is in conformity with a specific standard or other normative document
Source	The location where the product comes from
Standard	A document established by CUS or any other body that provides rules and requirements for activities or their results
NABCB	National Accreditation Board for Certification Bodies
Supplier	The party that is responsible for ensuring that products meet and, if applicable, continue to meet, the requirements on which the certification is based
Surveillance	See Inspection
Technical area	Processes, categories of activities, products and/or services characterized by commonalities of processes relevant to a specific type of management system
Technical Expert	Person who provides specific knowledge or expertise to the audit team
Terms of Contract (ToC):	Trading conditions by CU Inspections & Certifications India Pvt Ltd

Article 2.2 Management systems

CU Inspections & certifications India Pvt Ltd, follows 17021-1.2015 type A management system for its audits and certification activities related to management system certification schemes.

1.3 Audit

Article 3 Conditions for Audit	
1	By accepting any offer made by CU inspections & certifications India Pvt Ltd (CU) the client enters into an agreement with CU on the terms and conditions as specified in such offer letter as well as in all other documents (including the terms of contract) which are and have been declared applicable to the Agreement.
2	In the event that it is not possible to carry out the Audit at a relevant time because of delayed payment, CU has the right to postpone or cancel the Audit and certification.
3	In the event that it is not possible to carry out the Audit due to safety issues (e.g. in the event of unforeseen natural disasters or political instability), CU has the right to postpone or cancel the Audit and certification. The decision is among others based on internationally (e.g. official statements of ministry foreign affairs) and locally available information. If the Audit is cancelled, CU shall inform the client as soon as possible. CU shall decide on a case-by-case basis whether the certification can take place on the basis of other information or the certification has to be cancelled.
4	If the objectivity of the Audit is compromised, the Auditor has the right to abort the Audit. Reasons can be for example the interference of accompanying persons or refusal to grant access as requested by the Auditor. All costs arising from this case are charged to the client.

Article 4 Auditor	
1	The CU Auditor shall be able to identify himself with a valid CU identification card.
2	The CU Auditor shall operate in conformity with the CU procedures.
3	The CU Auditor shall also respect the CU Code of Conduct, which is signed by him/her.
4	The CU auditor shall comply with all company rules and regulations (e.g. regarding health and safety and/or hygiene) insofar they are not an imposition on a correct and complete execution of the assessment.
5	CU may, at its discretion, where possible, in consultation with the Client, replace the person or persons charged with performing the assessment, if and in so far as CU believes that such replacement would benefit the performance of the assessment

Article 5 Audit	
1	CU has the right to carry out announced and unannounced Audits. CU has the right to carry out additional Audit activities for certification purposes and to charge the costs in addition to the fees as stated in the client contract.
2	CU has the right to request additional information whenever it believes this to be necessary to guarantee that the regulations are observed and are verifiable.
3	If requested by CU, translation services from the local language into a language chosen by CU staff shall be provided. CU shall decide whether CU or the client shall provide the Auditor translation services. The costs will be charged to the client.

Article 5a Subject of evaluation	
1	The scope of the assessment is stipulated in the applicable annex of the valid version of the contract of the applicable assessment
2	In case of an application for adding new products, processes or services to the scope certificate, the client shall apply in writing prior to producing/delivering, processing and/or selling the product, process or service with reference to the certification. An application shall be done by means of an application form.

3	CU shall add products, processes or services to scope certificates only after a positive evaluation of the product, process or service specification. In the event of initial certification, the first assessment has to be carried out before the products, process or service can be mentioned on the certificate
4	In case of an application for adding new units to the scope certificate, the client shall apply in writing prior the production and/or processing commences. An application shall be done by means of an application form.
5	CU shall add units to scope certificates only after a positive site evaluation of the production/processing unit.
6	CU shall evaluate the application- and or the specification forms within 10 (ten) working days after admission.
7	CU clients are obliged to inform CU in case the products, processes, services and/or units under the CU scope are also certified by another certification organisation against the same standard (or applied for certification to another certification organisation)
8	Where an operator and its subcontractors are assessed by different conformity assessment bodies, the operator and his subcontractors have to assent to the fact that the conformity assessment bodies can exchange information on the operations under their contract

Article 5b Method of evaluation/Audit	
Evaluation whether the applicable requirements are met can be performed by the following methods:	
1	Administrative evaluation at a CU Office;
2	Physical and administrative evaluation at the client's project or elsewhere;
3	Interviews;
4	Cross-checking information received from all of the above.

Article 5c Audit types:	
1	Initial audit: First ever audit of a client for the standard concerned. Initial audit is done if the client has never been certified for ISO22000, by CU or by any other company. The initial audit starts with a stage 1 'audit/document review' which is in principle done on-site and continues in a stage 2 'audit/site visit.' The stage 2 audit is always an on-site audit.
2	Re-certification audit (re-assessment or re-evaluation): Done every 3 years after the initial audit or the first time if the client has already been certified. The re-assessment consists of stage 1 'audit/document review' and a stage 2 'audit/site visit.' The stage 1 audit is in principle done on-site (but, based on the situation, SC/Certifier can decide whether stage 1 should be done off-site or on-site), but the stage 2 audit is always an on-site audit.
3	Surveillance audit: Yearly follow-up audits between the initial and re-assessment audits. The surveillance audit has no separate stage 1 and 2 part. The surveillance audit is always an on-site audit.
In addition the above audit CU can perform special audits.	
4	Extensions to scope CU will in response to an application for extension to the scope of a certification already granted and undertake a review of the application and determine any audit activities necessary to decide whether or not the extension may be granted. This may be conducted in conjunction with a surveillance audit.
5	Short-notice audits CU reserves the right to conduct short notice audit. These audits are announced to the client 1 day before the actual visit takes place. The client cannot object against the audit. The reasons for these short notice audits can be doubts derived from complaints, external notices or information, internal information gathered during previous audits or as follow-up on suspension.
6	Re-assessment of non-conformities Some non-conformity (or a group of non-conformities) may need to be re-assessed by an additional site visit. The auditor in consultation with the auditee decides when it is necessary. The certifier can overrule this decision but the client must be informed.

Article 5d Classification of non-conformities

The ISO22000, scheme has 2 NC types:

	NC-type	Description	Deadline
1	Major	Non-fulfilment of a requirement that affects the capability of the management system to achieve the intended results. (if there is a significant doubt that products or services will meet the specified requirements or effective process control is in place. A major non-conformity can also be a group of minor non-conformities associated with the same requirement or issue could demonstrate a systematic failure.	2 weeks ; verification necessary
2	Minor	Non-fulfilment of a requirement that does not affect the capability of the management system to achieve a intended results.	3 months; verification might be done during next audit.
3	Observations	Points not classified as non-conformity during the audit but will be assessed in the next audit and the aspects that improve the management system	

Article 5e Sanction and condition of granting certification			
	Type of non-compliance	**Company action and corrective action**	**Action by CU**
1	Major NC	Undertake and confirm corrective action to CU within 2 weeks	If more Major NC's found making obvious the fundamental deficiencies of the system CU will revisit the company and carry out a full assessment. **Initial certification** Certificate cannot be granted unless compliance is demonstrated with or without a further revisit. If the corrections are submitted later than 3 months a complete new audit will take place. **Re-certification** New certification cannot be granted unless compliance is demonstrated with or without a further revisit. Undertake and confirm corrective action to CU within 2 weeks. Suspension of the certificate if NC is not closed within a month. **Surveillance audits** Undertake and confirm corrective action to the certification body within 1 month. Suspension of the certificate if NC is not closed within 2 weeks
2	Minor NC	Undertake and confirm corrective action to CU within 3 months,	**Initial certification** Certification cannot be granted unless compliance is demonstrated with or without a further revisit. If the corrections submitted later than 3 months a complete new audit will take place. **Re-certification** New certification cannot be granted unless compliance is demonstrated with or without a further revisit. Undertake and confirm corrective action to the certification body within 3 month. Suspension of the certificate if NC is not closed within 3 month. **Surveillance audits** Undertake and confirm corrective action to the certification body within 3 month. Suspension of the certificate if NC is not closed within 3 month. Absolute verification of corrective action can be carried out at subsequent evaluation.

Article 6	Register complaints and remedial actions
1	The client shall safeguard that all complaints received from: 1. Anyone at any stage of the project (production- and processing units), 2. Customers and/or 3. Other third parties are centrally registered. The client shall keep records of all received complaints concerning the certified production method or products and of all remedial actions that are taken to respond to the individual complaints. Clients must have on location and available on request a clearly identifiable document for customers complaints. There are documents of the actions taken with respect to such complaints and any deficiencies found in products or services. The complaints procedure must ensure that complaints are adequately recorded, studied and followed up, including a record of actions taken with respect to complaints and any deficiencies found in products or services.

Article 7	Responsibility and Liability
1	The client is responsible for all production and processing units, products and activities that are mentioned in the client contract to comply with the applicable standards.
2	The client shall, with regard to the Audit and certification activities of CU, be responsible for persons who work in or for his business.

1.4 Audit report

Article 8	Audit report
1	During the Audit, the Auditor shall record his findings on standardized Audit forms. These forms have to be signed by the client or the official representative of the client during the Audit visit to acknowledge the Auditor's findings. If the official representative signs, his/her signature is only valid if this person is officially registered as authorized to sign within the company.
2	The Auditor shall provide the certifier with all Audit forms with his findings as to the conformity with all the certification requirements.
3	The findings in the Audit forms shall be evaluated and signed by the certifier.
4	After an Audit has taken place CU shall send a summary of the evaluation to the client without undue delay, moreover conforming to any program specific requirements. The client has the right to react on the content of the report within a fixed (program specific) timeframe after sending by CU (date of postmark). If necessary, the client can ask CU for an extended period to react.
5	CU has the right to charge a fee for providing copies of the reports, as well as carry out other services if the client concerned permits this.

1.5 Certification

Article 9	Certification
1	Based on the certification decision, CU will issue, update or withdraw the Scope Certificate.
2	CU has the right to publish the list of its suspended clients.

1.6 Certificates

Article 10	Scope Certificate
1	The scope certificate is only valid if signed by the Managing Director of CU or a person who has been authorized for it by the managing director.
2	CU shall renew the scope certificate within the timeframe indicated in the applicable standards as long as the circumstances are not in conflict with the applicable regulations, the client contract is continued, and financial liabilities are fulfilled.
3	The client shall keep the valid certificate issued in his records.
4	CU has the right to request clients to return any certificates (e.g. scope certificates), as these are legally owned by CU.

5	CU shall keep a copy of the scope certificate for authenticity in its records.
6	The scope certificate shall contain an indication of: - the name and address of the client; - the client number; - the certified products and related units; - the applicable certification program; - the standards, regulation or other normative documents to which each product, production unit, or processing unit is certified; - the effective date of certification and / or place and date of issue of the certificate; - a hologram; - any program specific indications applicable.

Article 10.a Possible certification decisions of the certifier	
1	Initial certification Initial certification is when CU certifies the project for the first time. It can be the result of an initial audit (when the client has not been certified before) or of a re-certification audit (when the client has already been certified by some other CB). If the decision is positive a certificate is issued for 3 years. The certificate cannot be issued until it is demonstrated that the client satisfies all the requirements of the management system standard.
2	Re-certification After the 3 year audit program is over, there must be a re-certification audit done. Re-certification audit is a complete audit, which is reported in the Audit Report. The certifier shall make decisions on renewing certification based on the results of the re-certification audit, as well as the results of the review of the system over the period of certification and complaints received from users of products/services under the scope of certification. If the decision is positive a new certificate is issued for another 3 years.
3	Maintaining certification (continued certification) In the frame of the 3 year audit program, between the initial and the re-certification audit and certification CU must do annual surveillance audits. After each surveillance audit the auditor reports to the certifier. The certifier shall maintain certification based on demonstration that the client continues to satisfy the requirements of the management system standard.
4	Suspension The certification is suspended in cases when, for example: - the client's certified management system has persistently or seriously failed to meet certification requirements, including requirements for the effectiveness of the management system; - the certified client does not allow surveillance or re-certification audits to be conducted at the required frequencies; or - the certified client has voluntarily requested a suspension; - certification fee has not been paid; - non-conformities have not been closed before the deadline; failure to comply with other contractual requirements including using the CU certification marks e.g.: CU ISO22000 Under suspension, the client's management system certification is temporarily invalid. The suspended status of the certification shall be indicated on the publicly accessible client list. In that case, Client organization shall be informed through a suspension letter.
5	Withdrawal Suspension can be held for a maximum 6 months. Failure to resolve the issues that have resulted in the suspension within 6 months shall result in withdrawal or reduction of the scope of certification.
6	Extension / reduction of the scope of certification,

	The certifier shall, in response to an application for extension to the scope of a certification already granted, undertake a review of the application and determine any audit activities necessary to decide whether or not the extension may be granted. This may be conducted in conjunction with a surveillance audit. After the audit with positive result a new certificate -updated with the extended scope - should be issued, but the validity should be the same as on the original certificate. Reduction of the scope can be indicated by the client or can be a consequence of the audit result. For example, reduction of the scope can be applied if a non-conformity affecting only a clearly determined part of the scope cannot be solved by the company, but FSMS is functioning well for the rest of the scope. The certifier must consider whether the certificate needs to be suspended/cannot be granted or the scope of the certificate needs to be reduced.

Article 11	**Invalidity and duplicates of certificates**
1	The client is obliged to inform CU as soon as possible if any changes occur which interfere or might interfere with the requirements as mentioned in the concerned regulations or which indicate a change in the scope of the certificate. If these changes are not reported to CU, the scope certificate loses its validity.
2	From the moment of termination of the client contract, the scope certificate issued becomes invalid.
3	In the event of the certificate being lost by the client, the rights to be derived from the certificate shall cease to exist. In those cases, CU shall only issue a new copy of the certificate if the client concerned provides CU with a written declaration in which the client obliges himself to return the original certificate when it is found.
4	In the event of invalidity of a certificate, CU has the right to notify buyers concerned, Audit bodies' concerned, competent authorities and other third parties concerned.
5	CU has the right to confirm validity of certificates that are issued by CU on request of third parties, without prior permission of the client.

Article 12	**Accreditation**
1	CU obliges itself to be accredited or recognized by: - International Organic Accreditation Services (IOAS) for Global Organic Textile standards (GOTS) and TE standards (OCS) as per ISO 17065
2	CU shall give a copy of the accreditation certificates on request to the client.
3	CU has the right to grant the accreditation bodies insight into all records containing client information.
4	CU further offers the programs accredited through Control Union Certifications, The Netherlands; - the Dutch Accreditation Council RvA for the certification programs Organic Production according EU legislation 834/2007 and 889/2008.The RvA is member of EA (European co-operation for Accreditation) and IAF (International Accreditation Forum); - USA Ministry of Agriculture for requirements on organic products and agricultural processed food; - Japan Ministry of Agriculture for requirements on naturally grown chickens (jidoriniku), organic agricultural products, organic processed food and organic feed; - CU Inspections & Certifications India Pvt Ltd offers - Textile product certification schemes namely Global organic textile standards (GOTS), Textile exchange schemes - ISO 22000:2005 FSMS (unaccredited)

1.7 Use of indications and symbols

Article 13 Use of indications and symbols	
1	From the moment CU has issued the scope certificate, the client has the right to use indications, statements and symbols as referred to on the scope certificate on products or with regard to processing activities as mentioned on the scope certificate.

2	The use of indications that refer to the certified production method or to CU is only allowed after the concerned scope certificate has been issued.
3	Labels and logos shall be evaluated during the Audit.
4	Use of labels and logos must be according to the program specific requirements.
5	Certified clients are entitled to use the CU logo or CU logo along with accreditation logo according the requirements described in Annex 2.

1.8 Appeals/Complaints

Article 14	Appeals/Complaints
	• For Appeals against certification decisions: See valid Terms of Contract art. 13.1. • If you wish to submit a complaint to CU, please use the form in Annex 1 • We kindly request you to specify your complaint as much as possible ("who, what, where, when") and provide any necessary documentation if applicable. • You can send this form with any attachments to our certification branch offices or to our office in Navi Mumbai, India (cuc@controlunion.in, fax: +91-22-61294217). • An appropriate member of staff (certifier / manager) will confirm receipt of your complaint, with a timeframe of handling the complaint, within two weeks if no improvement can be made before that time. • The quality manager, scheme coordinator or certifier will inform the complainant of the results in writing or verbally, depending on the size and nature of the complaint. • Incomplete complaints cannot be processed.

1.9 Final provisions

Article 15	Documents and publication
1	All documentation, regulations and communication shall take place is English, unless otherwise agreed or otherwise mentioned in an individual document.
2	CU shall have all normative documents as mentioned in this Regulation available at its web-site and (in hard-copy) at the CU office.
3	CU is entitled to modify the CU documents and regulations and shall publish them as amendments for existing clients.
4	In the event that changes are made to documents or regulations, CU shall inform the client concerned in writing about the changes and about the day they come into effect.
5	The client is unconditionally bound to the changed documents and regulations from the day they come into effect.
6	CU has the right to publish a list with clients' names and addresses, type of production/processing activities, products and scopes only. All other information considered as confidential.

Article 16	Cases not covered by this Regulation
1	The Managing Director of CU shall decide in all cases not covered by this Regulation or by any other applicable regulations or agreements.

1.10 Policy on taking over projects from other certification bodies

Article 17	Taking over projects from other certification bodies
1	This article describes the general policy of CU in case a project, which was already inspected and/or certified by another certification body, applies at Control Union. On the CU application form the operator needs to indicate that his project was already inspected earlier and/or certified by another certification body.

	If such information is indicated on the application form, the CU certifier and/or scheme coordinator contacts the previous certification body in writing: - informing that CU will evaluate the farmers/units; - asking for the last issued Certificates, reports, non-conformities and any other relevant information. When receiving the information, CU will evaluate them with special attention on any open non-conformities. CU will evaluate the received information with special attention to any open non-conformities. All open conditions or non-conformities given by the previous certification body shall be evaluated and closed before CU can make a positive certification decision. Regardless of the information received, Control Union will always carry out its own full physical audit against the applicable standard. The information received from the preceding certification body will never replace CU's own full evaluation of the project. The CU certifier will decide on the status of the project based on the findings of the CU auditor and according to the CU procedures. The certifier will never deviate from the CU procedures or change the type or the possible deadline of any non-conformity with the aim to bring his decision in line with the previous certification body's decision.

ANNEX 1 Complaint Form

- If you wish to submit a complaint to CU , please use this form.
- An appeal can only be made against a certification decision of CU as per procedures described in the terms of contract point 13. For that purpose this form can also be used.
- We kindly request you to specify your complaint as much as possible ("who, what, where, when") and provide any necessary documentation if applicable.
- You can send this form with any attachments to our certification branch offices or to our office in Navi Mumbai, India (cuc@controlunion.in, fax: +91-22-61294217).
- An appropriate member of staff (Certifier / Manager) will confirm receipt of your complaint, with a timeframe of handling the complaint, within two weeks if no improvement can be made before that time.
- We will inform you of the results in writing or verbally, depending on the size and nature of the complaint.
- In case this solution is unsatisfactory the dispute protocol as described in article 14 of the Terms of Contract comes in force.
- Incomplete complaints cannot be processed.

Attachments may be used

date	
Your company name	
Your personal name	
Your address	
Telephone	
Fax	
e-mail	
Complaint PLEASE SPECIFY YOUR COMPLAINT AS MUCH AS POSSIBLE ("WHO, WHAT, WHERE, WHEN") AND PROVIDE ANY NECESSARY DOCUMENTATION IF APPLICABLE.	

Underneath an abstract is given on the procedure for handling complaints as specified in the Quality Manual of CU Inspections & Certifications India Pvt Ltd.

Abstract of the procedure to handle complaints:

13.a Scope
Handling of complaints and improvements.

13.b Aim
Efficient registration, handling and evaluation of complaints and to prevent repetition of mistakes and if possible to satisfy the complainant. Implementation and follow-up of measures to improve the quality of the work and the organization (improvements).

13.c Responsibilities

Managing Director (MD)	: (assistance with) handling of complaints, selection and implementation of improvements, evaluation with complainant;
Technical Manager (TM)	: Assistance with handling of complaints, implementation of improvements;
Quality Manager (QM)	: registration, investigation, handling and follow-up of complaints. Registration, selection, implementation and follow-up of improvements. Filing of Improvement Form;
Scheme Coordinator (SC)	: registration, investigation, handling and follow-up of complaints. Registration, selection, implementation and follow-up of improvements. Filing of Improvement Form;
Certifier	: registration, investigation, handling and follow-up of complaints. Registration, selection, implementation and follow-up of improvements. Filing of Improvement Form;
(Lead) Auditor	: assistance with handling of complaints, implementation of improvements.

13.d Execution

1. Complaints

1.1 Complaints can be received from clients, relations or employees in writing (e.g. by means of the Annex 1 complaint form from the Audit regulation which is available on the website) or verbally; if the complaint-form Annex 1 mentions incomplete complaints they cannot be processed. This is to receive as much information as possible.

1.2 The decision on acceptance of a complaint lies with the MD, in agreement with the QM, certifier or SC, depending on the nature of the complaint. The person who takes this decision must be independent in relation to the complaint;

1.3 After acceptance, the complaint handling is assigned by the MD, or QM;

1.4 Complaints in relation to methods are assigned to the SC,TM or QM;

1.5 Complaints in relation to employee's behaviour, and/or work execution are assigned to the MD;

1.6 Informal complaints are handled in work meetings (see c. Personnel and Organization);

1.7 The QM is informed about the complaint, by means of registration in CUSI as a specific action: " improvement/complaint" and a complaint number is given by the QM for reference, and decides if it is necessary to consult the Managing Director (MD);

1.8 The MD may decide to handle serious complaints;

1.9 The MD may decide to consult the advisory council in specific cases;

1.10 The assigned complaint handler sends a written confirmation of the complaint, with a timeframe for handling the complaint, within two weeks if no improvement can be made before that time;

1.11 The assigned complaint handler handles the complaint within the timeframe as communicated with the complainant. The handling is registered in CUSI;

1.12 The assigned complaint handler informs the complainant of the results, and registers this communication in CUSI.

ANNEX 2 Conditions for publication and use of the Certification Logo

Introduction:

This document describes the conditions concerning publication and use of certification logos by customers of CU Inspections & Certifications India Pvt Ltd (the Certificate-holder) with a valid Certificate.

Articles:

1. The Certificate-holder can only publish those certification-logos that are concerning the valid issued Certificate

2. The Certificate-holder can use the CUICIPL ISO22000 certification logo, to be requested at the local office

3. The certification logos can be used in full colour, as well as in black and white.

4. The Certificate-holder can use the certification logos on letterheads, brochures and other promotion material. It is not allowed to use the logo on products, packaging, samples or any other declarations concerning a product.

5. It is in no case allowed to use the logo on the product itself, or to suggest that the product is certified itself for clients that do not have a valid Product Certificate.

6. It is not permitted to apply the logo to laboratory tests, calibration or Audit reports, as such reports are deemed to be products in this context.

7. The certificate holder does not make or permit any misleading statement regarding its certification, nor imply that the certification applies to activities that are outside the scope of certification and shall not mention possession of ISO 22000 certificate on their products.

   It is allowed to reproduce the logo in any other size with the appropriate font, and size and the certificate-holder shall ensure that the design of logo is not distorted.

8. The certification logo may never be bigger than the size of the company logo on the same document.

9. The logo needs to be reproduced completely (in one piece) always.

10. The color-codes for the logo are the following:

Grey:	PMS 5497
Blue:	PMS 2985
Black:	PMS 295

11. When the Certificate-holder does not respect these conditions for use of certification logo and statement, the Certificate-holder will stop immediately, without delay, the use against which CUICIPL has objected.

12. Besides the actions mentioned in article 12, CUICIPL can take the following actions:

    - Suspension or withdrawal of the Certificate.
    - Publication of the non-compliance
    - Juridical procedures

    The action taken is depending on the severity of the non-compliance, the results of the non-compliance, and if the non-compliance was made intentionally.

13. Irrespective of the measures taken as per article 10, the decision of CU Inspections and Certifications India Pvt. Limited will in all cases be decisive.

14. In case the validity of the Certificate is ended, for whatever reason, the Certificate-holder has to stop immediately with the use and/or distribution of promotion material on which the certification logo is printed.

Logo examples: