LL-C (Certification)®

LL-C (Certification) Slovakia, s.r.o.
PROCEDURE FOR MANAGEMENT SYSTEMS CERTIFICATION
(RULE 03)

Revision 18/01/2022
Owner: LL-C (Certification) Slovakia, s. r. o. Issued: MUDr. Michal Krutský

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List List of Revisions and Changes

Revision	Date	Change Description	Isued	Verified by
1.	30/04/2019	Issue	J. Dynybyl	M. Krutský
2.	18/01/2022	FSMS requirements	I. Angelovski	M. Krutský

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I. Supporting Statement

Certification Body **LL-C (Certification) Slovakia, s. r. o**. (hereinafter referred to as LL-C) certifies the compliance of the anti-corruption management system with the requirements of the STN/ISO 37001 standard and in the field of food safety management according to ISO 22000.

The legal status of the organization is "s.r.o." *(a company with a limited liability of partners)* and it is registered in the Register of Companies of the District Court Bratislava 1, Insert no.: 36091/B. The company is part of the LL-C (Certfication) Group of organisations and was registered in the Slovak Republic in order to bring their service closer to the needs of domestic certification applicants and to understand the conditions and needs of those parties who use or rely on the results of certification activities.

Certification services are available to all interested parties who accept the rules set out in this Policy and apply for certification.

The declared policy of LL-C and its management is to certify systems only within its own certification system, with a high degree of neutrality and independence *vis-à-vis* the certified entity and with an emphasis on highly qualified auditors and technical experts. The participation of any other entity or other certification organisation, i.e. proxy certification, is not allowed.

Auditors, compliance assessors or technical experts involved in the certification process are obliged to perform their functions excluding any influence from third parties; external auditors, compliance assessors and experts are strictly bound by the rules of impartiality and independence of the certification system. They all operate on the basis of the following principles:

- maintaining equal access to all certified entities, excluding any discrimination against companies or persons;

- excluding persons from audit participation and decision-making on the award of a certificate to a particular client who are personally involved in management systems consulting activities as required by the above standards to ensure the impartiality and independence of the assessment with a particular client;

- the exclusion of persons from participation in compliance assessment/evaluation and decision-making on the award of a certificate to a particular client, the activity of whom could be considered as consultancy, design support, product operation, development of relevant inspection procedures, which violate the commitment to impartiality;

- rigorous separation of the audit/expert opinion and the decision to award a certificate;

- rigorous separation of the assessment/evaluation of the compliance and the decision to award a certificate;

- strict confidentiality of all persons involved in the certification process.

LL-C services are based on the following policies and principles:

- philosophy of promoting confidence in certification as an effective tool for improving the quality of products, services and a more environmentally friendly approach;

- improving the security of information systems;

- ensuring the maximum possible degree of integration in the assessment of management systems established under several standards and regulations;

- ensuring territorial and time availability of auditors and assessors (evaluators);
- consistent provision of qualified persons – auditors and assessors (evaluators) in terms of their expertise in the field of activity, their audit experience, their experience in compliance assessment and their ethical conduct;

- strict confidentiality;

- preference for expediency of the measures taken over the formality in meeting the requirements of the standards;
- the use of state-of-the-art examination procedures and the adoption of organisational measures to ensure that there is no conflict of interest and that the results of the examinations cannot be called into question.

II. Objectives and Scope

Objectives

This Policy defines the procedure used for the certification of management systems. It explains the nature and procedures of the certification process which are relevant to those interested in certification. It is based on the requirements of ISO/IEC 17021-1: 2015 a MSA-CS/01 valid MPAs, and ČSN EN ISO 19011: 2012 standard.

Scope

This instruction applies to the certification of management systems of entities operating in the manufacturing, non-manufacturing and governmental sectors in the fields of activity according to the scope of LL-C accreditation.

The company certifies anti-corruption management systems according to STN ISO 37001: 2019 and food safety management according to ISO 22000:2018 under the accreditation of the Slovak National Accreditation Service (SNAS). They use the accreditation of their affiliated company LL-C (Certification) Czech Republic, a. s. to certify other management system models.

For regulations or standards special to a particular domain not specifically named herein, the regulations of this Policy shall be applied appropriately in relation to such regulation or standard. Any non-compliances or deviations are then submitted to the entity on a case-by-case basis, according to specific requirements.

III. Definitions and Abbreviations

Definitions used in this Policy are from:
ISO 17021-1: 2015 – General requirements for bodies carrying out assessment and certification/registration of quality systems (including the documents MSA-CS/01, IAF MD, etc.).

Abbreviations used:

SNAS -– Slovak National Accreditation Service

CIA – Czech Accreditation Institute

CB – certification body

HCB – head of certification body/

DHCB – deputy head of certification body/

QO – quality officer

A – assessor for assessing the audit result

HA – head assessor of the audit evaluation

OP – the person authorised by the certification body to review and assess the results of the certification case evaluation. Decides on the issue of the certificate

TE - technical expert, a specialist who may be called upon when assessing in a domain outside the professional specialisation of the assessor

IV. Selection and Use of the Certification Standard

Anti-corruption Management System

The ISO 37001 standard in its current version is used for the certification of quality management systems. In addition to this standard, the quality management system must meet the expectations of the relevant field of activity and customers.

Food safety system

The ISO 22000 standard in the valid version is used for the certification of food safety management systems. Beyond this standard, the quality management system must meet the expectations of the industry and customers.

Other Management Systems

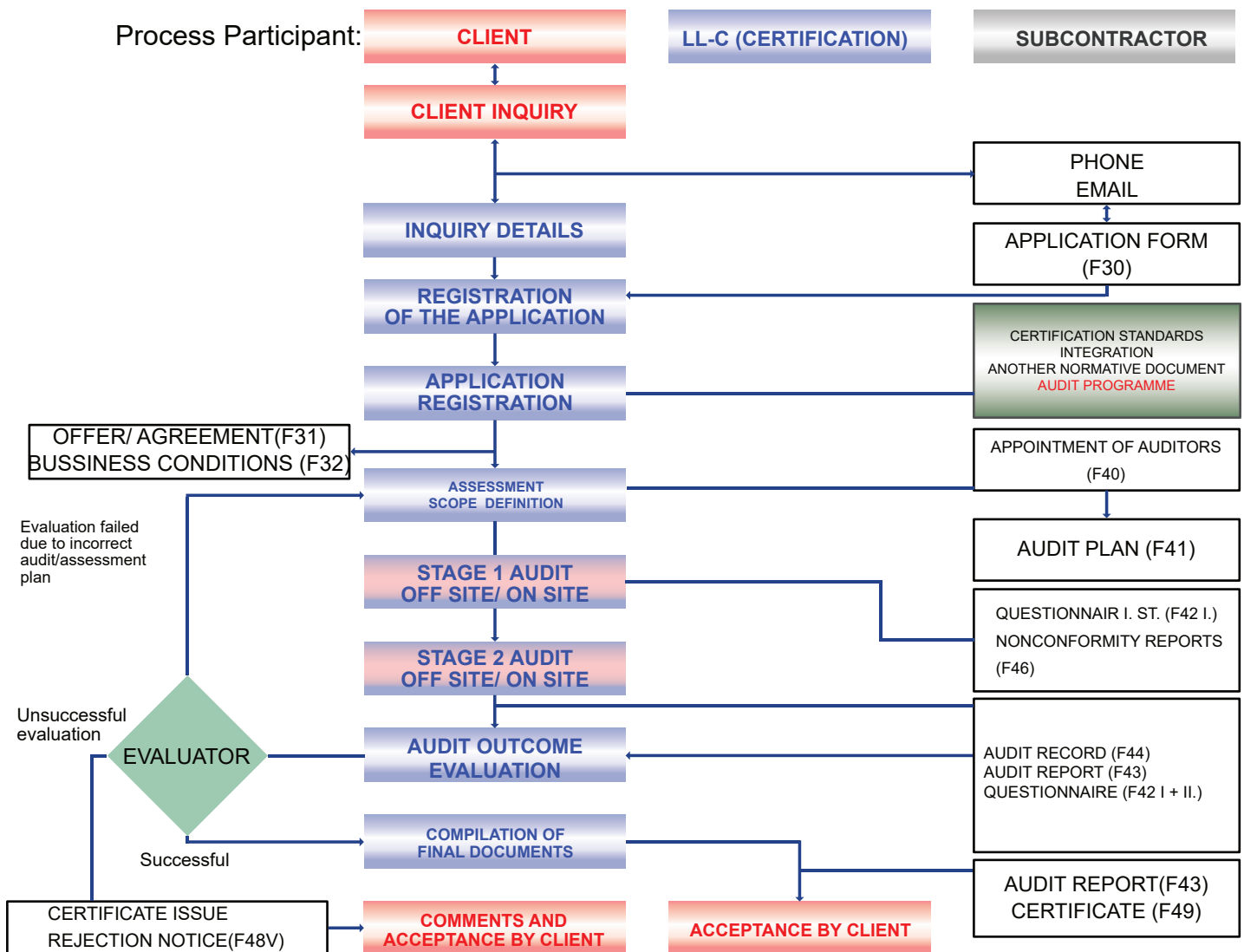When using other standards, LL-C (Certification) Slovakia, s. r. o. will use the accreditation scope of LL-C (Certification) Czech Republic, a. s., or the requirements of these standards may be supplemented by the requirements of the respective accreditation or contracting entity. These specific requirements will be made available to the applicant for certification in advance on a case-by-case basis.

V. Certification Process – Procedure for Management System Certification

Certification Process Diagram – Management System Certification

Process Participant: **CLIENT** | **LL-C (CERTIFICATION)** | **SUBCONTRACTOR**

- CLIENT INQUIRY
- PHONE / EMAIL
- INQUIRY DETAILS
- APPLICATION FORM (F30)
- REGISTRATION OF THE APPLICATION
- APPLICATION REGISTRATION
- CERTIFICATION STANDARDS INTEGRATION ANOTHER NORMATIVE DOCUMENT AUDIT PROGRAMME
- OFFER/ AGREEMENT(F31) BUSSINESS CONDITIONS (F32)
- APPOINTMENT OF AUDITORS (F40)
- ASSESSMENT SCOPE DEFINITION
- AUDIT PLAN (F41)
- Evaluation failed due to incorrect audit/assessment plan
- STAGE 1 AUDIT OFF SITE/ ON SITE
- QUESTIONNAIR I. ST. (F42 I.) NONCONFORMITY REPORTS (F46)
- STAGE 2 AUDIT OFF SITE/ ON SITE
- Unsuccessful evaluation
- EVALUATOR
- AUDIT OUTCOME EVALUATION
- AUDIT RECORD (F44) AUDIT REPORT (F43) QUESTIONNAIRE (F42 I + II.)
- Successful
- COMPILATION OF FINAL DOCUMENTS
- AUDIT REPORT(F43) CERTIFICATE (F49)
- CERTIFICATE ISSUE REJECTION NOTICE(F48V)
- COMMENTS AND ACCEPTANCE BY CLIENT
- ACCEPTANCE BY CLIENT

The certification process generally consists of:

Stage 1 of the Initial Audit

- compliance assessment of the required documentation;
- familiarisation with the aspects and corruption risks from the subject of the activity;
- overall readiness for stage 2.

Stage 2 of the Audit

- assessment of the implementation and application of ISO 37001 requirements and documentation at the certification applicant's place of operation;
- evaluation of audit results;

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The different stages of the procedure during the period of validity of the certification contract are:
- initial two-stage audit and evaluation (certification audit);
- continuous surveillance (surveillance audit) in the second and third year;
- recertification audit (reassessment audit) at the end of the certificate validity period to maintain the validity of the certification.

The following articles describe each phase. Annexes 1, 2 and 3 show the general procedure.

Inquiry/application registration/ certification offer

The demand for a management system certification by any new applicant may be discussed verbally in a face-to-face meeting with an LL-C staff member. The applicant may submit their request in writing by a letter or e-mail to info@ll-c.sk. It can also be sent by means of an electronic form, which is located on the website www.ll-c.sk. Upon personal discussion or receipt of the written request for certification, the head of the LL-C (Certification), product manager (person responsible for the standard) or region coordinator body will verify the information provided in Application Form – F30 and verify whether the applicant's field of activity is covered by the accreditation and whether it is necessary to join the integrated certification together with LL-C (Certification) Czech Republic, a. s.
On the basis of the request, data from the Questionnaire and the current tariff, LL-C will issue an Offer for Management System Certification - F31 in writing and send it to the applicant's address. The Terms and Conditions – F32 are an integral part of the Offer.

The entity wishing to have the system certified by LL-C on the basis of the Offer sent shall confirm the Offer and the attached terms and conditions by signing the Offer. The signature of the authorized applicant on the sent Offer confirms the order for the audit of the management system, the signature of the attached terms and conditions concludes the Contract for the certification of the management system. In general, the Contract is governed by the provisions of Act No. 513/1991 of the Commercial Code. Furthermore, the information provided for its preparation is also confirmed.

After the confirmation of the order, the following process begins:
- a certification case, including details of the applicant, is registered in the internal system;
- a head auditor is appointed to initiate the audit planning (contact with the applicant's delegated person, completion of conditions, assembly of the audit team, date of the audit);
- the applicant is invited to submit to LL-C a manual or other document describing the management system at least 14 days before the envisaged audit.

Auditors
The head of the certification body, product manager (person responsible for the standard) or region coordinator appoints the head auditor, audit team members, technical experts and the audit assessor.

The criteria for the general qualifications of the auditors, including professional specialisation and experience, taking into account the applicant's field of activity and any special processes (e.g. welding), impartiality and independence must be met. The appointment of the head auditor must be communicated to the applicant well in advance.

Submitted Documentation

The documentation submitted for assessment must adequately define the applicant's organisational structure and a description of their activities. In addition to the manual, the documentation may include relevant procedures. The documentation takes into account both direct and indirect requirements based on the standard and the scope of the activity.

Assessment of the Documentation

LL-C considers all information and documents from the client to be confidential. The head auditor will assess the submitted documentation with respect to completeness and compliance with the requirements of the selected standard. In the case of serious incongruities, the applicant will receive a report in the <u>Form of a Non-Compliance Report – F46</u>, for which the corrective action must be taken and the date for completion indicated. These non-compliances must be resolved prior to the certification audit. Irrelevant non-compliances and ambiguities may be clarified during the audit. The assessment of the documentation is carried out by the head auditor outside the client's workplace. The assessment of the documentation takes place as part of the preparation for the certification audit. New issues and revisions of the documentation are, if necessary, reviewed during the surveillance audits.

Stage 1 of the Initial Audit

The 1st audit stage is mandatory and is carried out as part of the initial audit (Stage 1). The objective of Stage 1 of the audit is to determine the applicant's readiness to meet the essential and main conditions for Stage 2 of the audit.

The results from Stage 1 of the audit are submitted in the form of a <u>Non-Compliance Report – F46</u> and on specific forms.

In some cases, Stage 1 can be conducted outside the applicant's workplace using CAAT RAP questionnaires and telecommunications technology.

In the event of a positive result from Stage 1, it is possible to proceed to Stage 2. In the event of a negative result, time is given to the client to rectify inconsistencies from Stage 1.

Audit Preparation and Planning

The head auditor, in cooperation with the applicant, draws up an audit programme (plan) and inform the applicant in writing. The plan contains all the information

the applicant needs for the preparation of the audit. If necessary, the head auditor may visit the applicant in advance in order to prepare a plan.

In the case of an integrated audit, only one audit plan is drawn up. The head auditor draws up the audit plan so as to avoid repetitive verification of the common requirements of individual standards.

Stage 1 and 2 of the audit are separated in time to allow the client to apply corrective actions prior to Stage 2 and avoid interruption of the audit. Stage 1 and 2 can only be followed up without a time gap if the client is advised of the risk of audit interruption in the event of inconsistencies from Stage 1 - see Terms and Conditions F-32.

CAAT-RAT / ICT method (remote assessment methods and their approaches not only during the COVID 19 pandemic crisis)

As information and communication technologies become more sophisticated, it is important that CO staff are trained on how to use ICT assessment methods to increase audit efficiency and effectiveness and to support and maintain the integrity of the process. audit.

Remote assessment methods using ICT may include the following approaches: Teleconferencing, Web meetings, Interactive communication via the Internet, Electronic remote access to management system documentation and / or processes and other approaches.

The aim is to provide a sufficiently flexible and non-prescriptive methodology to meet the needs of industry by allowing client organizations to use ICT / CAAT-RAP to improve the traditional audit process.

AUDIT

Opening meeting

The opening meeting consists of an interview of the auditor(s) with the applicant's management and their quality management representative. The purpose of the initial negotiation is:

- to reach an agreement between both parties on the content and process of certification;
- to discuss the results of Stage 1 of the audit;
- to determine the way of formal communication between auditors and the management;
- to verify that the scope of the audit will provide the auditors with results suitable for system evaluation;
- declaration of confidentiality and impartiality of the audit team.

2ⁿᵈ stage of Audit

The auditors, assisted by a management representative or their representatives, will review the system in the applicant's organisational units as planned, including changes adopted at the initial meeting. During the audit, the auditors will use a questionnaire to verify that the management system is implemented and applied in compliance with the requirements of the relevant standard and the applicant's documentation. On completion of the audit, the head auditor will provide the applicant with a preliminary verbal report on the results. The audit team is not authorised to provide a final result. A written report containing the result of the audit and other relevant data will be sent to the applicant within 14 days. The applicant may comment on it within the following 14 days. Where deficiencies in the management system are identified, the applicant must propose appropriate corrective measures and a deadline for their implementation. Deadlines depend on the specific finding.

Evaluation of Audit Results

The head auditor will hand over the complete audit documentation to the assessor (e.g. the head of the certification body or their representative) for an impartial evaluation and certification decision.

The criteria for assessing the audit result are as follows:
- verification of compliance with LL-C's policies for certification;
- verification of compliance with the relevant standard;
- substantiation of audit results in the audit documentation (report, questionnaire, non-compliance reports).

Ambiguities shall be clarified by the assessor appointed for the case with the head auditor. Depending on the inconsistencies, an additional audit may be required to investigate corrective actions before issuing/agreeing to retain the certificate. The audit assessor will review the result of the additional audit.

Information to the Applicant

If the evaluating committee concludes that the results of the assessment justify the certification body to issue or retain the certificate, the applicant will receive a certificate (in case of an initial audit) and an audit report, or a report on what additional conditions are required for the certificate to be issued (retained).

In the event that the evaluating committee concludes that the results of the assessment do not justify the certification body to issue or retain the certificate, it will communicate this decision to the applicant through the HCB, including the reasons for it. The applicant may appeal to the head of the certification body and request, with appropriate justification, that the decision be reversed.

Certification Contract

A certification agreement must be concluded between the certification body and the organization applying for certification with a detailed description of the scope of the certificate and a reference to all relevant system requirements. This agreement must contain details or references to agreements between the CB and the organization, which include, but are not limited to:

- 1) Ownership of the certificate and the content of the audit report will be held by the CB;
- 2) Conditions under which the certification contract can be terminated;
- 3) The conditions under which the certificate may be used by a certified organization;
- 4) Conditions of confidentiality in relation to information collected by the CB during the certification process;
- 5) The certified organization allows the CB to share information regarding the certification and audit process with government authorities, if required;
- 6) Non-compliance management procedures;
- 7) Complaints and appeals procedures;
- 8) Inclusion of information on the certified status of the organization on the LL-C website;
- 9) Cooperation in enabling the evaluation of the auditor (monitoring - witness audit) by the Accreditation Body, if required;
- 10) Communication obligations of certified organizations towards the Certification Body (CO) within 3 working days concerning:

1. any significant changes that affect compliance with the system requirements and seek advice from the CO in cases where there are doubts about the significance of the change;
2. significant events affecting the management system (FSMS), legality and / or integrity of certification, including legal proceedings, prosecutions, situations that pose a serious threat to food safety, quality or integrity of certification due to natural or man-made disasters. (eg war, strike, terrorism, crime, flood, earthquake, electronic attack on computers, etc.);
3. public events related to food safety (eg public convening, disasters, food safety outbreaks, etc.);
4. changes in the name of the organization, contact address and details of the site;
5. changes in the organization (eg legal, business, organizational or ownership status) and management (eg key management, decision-making or technical staff);
6. changes in the management system, scope of operations and product categories covered by the certified management system;
7. any other change that makes the information on the certificate inaccurate

The management system certification contract, which addresses the rights and obligations of the applicant and the certification body, is concluded by the applicant's acknowledgement of the Terms and Conditions for a follow-up supervision of the maintenance of certification – F32 and the Management System Certification Offer – F31. The applicant must confirm these documents at the latest before the start of the initial audit. This Contract is binding for the issue and maintenance of the certificate.

Certification

Once the above requirements have been met, a certificate is issued to the applicant (2 originals in the official language of the applicant's place of residence and 2 originals in English). Additional fees may charged for additional copies or foreign language versions. The validity of the certificate is set at three years, provided that the conditions of the relevant standard(s) are continuously monitored and the contractual agreements are complied with.

Use of the LL-C Logo and marks

The use of the LL-C symbols is regulated within the Terms and Conditions for the follow-up supervision of the maintenance of certification – F32. The certified body must comply with these rules, including the use of the logo and marks referring to the certification on promotional items.

Maintenance of certification

In order to maintain the validity of the certificate, LL-C conducts surveillance audits to determine the effectiveness of the system. LL-C shall conduct these audits so that the 1st surveillance audit after the initial certification always commences on the anniversary date of the first certification audit with a minimum tolerance. In case of other audits, it is also appropriate to apply this rule, including the minimum tolerance.

If, during the course of a surveillance audit, the LL-C finds that the management system of the certified body does not comply with the requirements of the relevant standard, the entity will be given the opportunity to take corrective action within a specified period of time. The LL-C will evaluate and review whether the corrective actions initiated are adequate to maintain the certificate validity.

Prior to the expiration of the certificate, and assuming the certificate holder wishes to continue with the LL-C certified system, a recertification audit must by conducted by LL-C. Planning must take into account the time required for the audit and decision so that a new certificate can be issued preferably before the expiry of the old one.

Substantial changes to the organisation (e.g. change in the number of branches), scope of activities and master documentation must be submitted to LL-C at least 14 days before the start of the audit.

VI. Suspension and withdrawal of Certificate

Suspension of Certificate

In the event of a breach of the certification contract by the holder and following a thorough investigation into the seriousness of the breach, the certificate may be suspended for a period of time to be determined by LL-C. This may occur, for example, in the following cases:

- the surveillance carried out demonstrates that the client is not properly fulfilling the obligations arising from the approved anti-corruption management system and the agreed corrective measures have not been properly implemented within the agreed time period for the implementation of the corrective measures;
- the surveillance could not be carried out in due time (e.g. the certified entity refuses to carry out the surveillance);
- the certified entity is insolvent or in anticipation of insolvency;
- the certified entity has used the certificate in an unauthorised manner.

The suspension will be notified to the holder by a recorded delivery letter and published on the certification body's website. The holder may appeal within 30 days to the head of the LL-C certification body. The suspension will be lifted immediately by LL-C if the certified entity demonstrates that the breach of contract has been corrected by corrective action within the specified period of time.

Termination/ withdrawal of certification

If the holder fails to comply with obligations under the certification contract, e.g. fails to take or complete corrective action on the stated deficiencies, despite LL-C's instructions, LL-C will immediately revoke the certificate. It will then notify the holder, request the return of the original certificates by a recorder delivery letter and make this fact publicly accessible. Other reasons for certificate revocation may include:

- the surveillance audit demonstrates that the essential requirements for an anti-corruption management system are not met;
- despite repeated efforts, it has not been possible to carry out the surveillance activities within the agreed deadlines;
- the holder has applied for the revocation;
- the holder fails to meet financial and other obligations set by LL-C;
- other breach of the Terms and Conditions - F32 by the holder.

VII. Responsibility of the Certification Body

Confidentiality

LL-C considers all information and documentation of the certificate holder or applicant to be confidential.

Appointment and Qualifications of Auditors (management system certification)

For the certification of management systems, the head of the certification body, product manager (person responsible for the standard) or region coordinator will select auditors with appropriate qualifications and relevant professional experience. The expert knowledge of the auditors is continuously updated by internal and external training.

The auditors or persons appointed to issue the certification decision (assessor, head of the certification body or designated representative) in a particular certification case shall not be active participants in the consultation process of building the applicant's system or otherwise linked to the applicant in a way that does not guarantee impartiality in the decision-making process. The appointed auditors are proposed to the applicant for approval. The applicant has the option to reject individual auditors but must give reasons which the HCB will consider and accept as final. In the event of a customer complaint, the HCB will then follow the Quality Manual – Rule 01. The external experts and auditors are also bound by confidentiality under the LL-C contract.

Records

LL-C stores all certification records, documents and reports for 3 years after their expiry date for management system certification and stores all certification records, complete documentation and reports for product certification as required by the applicable guidelines.

Publication of Certification

LL-C publishes the certificate holder on the website www.ll-c.info at regular intervals. In the event of suspension and revocation of the certificate, this information is published immediately.

VIII. Responsibilities of the Certificate Holder

Certification the Management System

By certifying a management system, the certificate holder undertakes to review the effectiveness of that system through regular and documented internal audits. If non-compliance with the relevant standard is found, the holder must take corrective action on their own initiative. Further supervision by LL-C does not relieve the certificate holder of this obligation.

LL-C Auditor Assistance

The holder is obliged to allow the LL-C company to carry out an audit in due time and provide assistance during the audit. Furthermore, they must allow auditors access to all company premises encompassing the scope of the certification and allow the auditors to examine all relevant documents.

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Modification of the Certificate Holder's Management System

The holder is obliged to immediately inform LL-C of any changes or modifications to the management system that affect the scope of validity of the certificate, for example:

- in the event of organisational changes (change of name, place of operation, sale or purchase of the business or part of it, bankruptcy action, scope of certification, etc.);
- in the event of significant changes in main activities, service sector;
- in the event of substantial changes in documentation.

LL-C will examine the changes. Depending on their nature and extent, it may be decided to carry out an extraordinary audit.

IX. Application of Certification Rules modifications

The LL-C certification system is based on the requirements of applicable standards and accreditation requirements. All certificate holders must be informed in the event of changes when the certification system needs to be modified. This may occur in cases of:

- revisions and changes to certification standards;
- changes to accreditation rules (e.g. changes to surveillance periods, expenses related to accreditation, audits, etc.).

If the holder does not agree to the change, the certification contract is terminated when the change comes into effect.

X. Financing and certification fees

The fees for certification are set out in LL-C's fee schedule, which, in the case of management system certification, is based on the applicable requirements of the international certification documents. As part of the accreditation process, LL-C must meet the following requirements, primarily related to the time scope of the audit.

Certification fees or any additional extra costs are subject to the Offer. Prior to the start of the audit/assessment activities, an advance invoice must be paid by the applicant - an accreditation condition where payment must not be linked to the outcome of the certification process. See F32.

XI. Complaints and Appeal Procedure

Appeal

Clients may appeal against the LL-C's decision. They must file an appeal with the head of the certification body within 30 days. The latter must set up a 3-member committee of auditors or experts (including the HCB) who were not involved in the compliance audit/ assessment or certification decision. The committee shall evaluate the case and decide by a simple majority vote.

Complaints

Any third party may complain to LL-C about a certification decision. A similar procedure to that for appeals applies, depending on the type of the complaint.

If an extraordinary audit is ordered, the appeal committee is convened only after the outcome of the audit has been challenged.

The exact procedure for receiving complaints and appeals, evaluating them, and conducting evaluations is documented in Rule12 – Rules of Procedure of the Appeals Committee.