The Q.C.B. Italia Management System Registration Program

Revision ITA6 – May 2014

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Contents

This program shall apply to the assessment of compliance and certification of management systems, in accordance with the requirements of ISO 9001, ISO 14001 and OHSAS 18001 specification in the applicable editions, in Italy and in foreign countries where certification activities are performed by Q.C.B. Italia.

This program is supplemented by the attachments 1-2-3-4, and is an integral part of the assessment conformity contract and certification signed by Q.C.B. Italia.

The Program may be amended at any time by Q.C.B. Italia in accordance with the requirements of applicable international rules and regulations of Accreditation Bodies. The changes will not affect the status of certification until changes and time allowed to adapt to changes are formally communicated to the organization being assessed or certified.

Part 1 – General Information

For the purposes of this program the following definitions apply:

Audit: The audit can be: initial audit (divided into two phases: "Stage 1" and "Stage 2"), surveillance, renewal, additional, adjustment (extension or reduction), transfer, update.

Auditor - a qualified individual who performs any portion of an initial or surveillance audit under the supervision of the Lead Auditor.

Audit Team – group of people, consisting of a Lead Auditor, auditors, technical experts and observers in the conduct of the audit.

Certificate of Conformity - a certificate issued by Quality Certification Bureau which recognizes that the MS operated by a client meets the requirements of Q.C.B. Italia and the applicable System Standards.

Certification (registration) – effect of the application of certification system which consists in inscription/registration in the list of certified organizations.

Cliente - a firm that contracts with Q.C.B. Italia for Registration.

Committee for the Protection of impartiality - A group of independent and representative of stakeholders in the process of certification to which is assigned the responsibility to review the entire certification process and guarantee impartiality, consistency and objectivity of the process itself

Registration Committee – Committee composed of the Director of Certification and technical experts, empowered to deliberate on the grant, renewal, extension, reduction, adjustment, suspension, withdrawal and cancellation of certification.

Audit Conclusions – Audit results

Appeals Group – a group established for hearing appeals relating to the registration process.

Lead Auditor - a person who is qualified to organize and direct audits, report their results, review corrective action and make recommendation regarding issuance whether or not of the certification.

System Standard refers to the applicable Standard (e.g. ISO 9001)

Organization - legal entity (e. society, company, consortium, etc.) requesting conformity assessment and certification.

Certified Organization – organization that complies with the requirements of the applicable standard of MS, which Q.C.B. Italia has granted the certification / registration and issued the certificate of conformity.

Q.C.B. Italia - Quality Certification Bureau Italia S.r.l.

Requirements (System) Certification - set of rules and requirements of the applicable rules to the MS, standards and contractual requirements, rules and requirements of this Regulation, mandatory requirements, rules and requirements provided by accreditation and technical documents of Accredia applicable to the organization.

Audits results –abnormal situations (or potentially differing) to certification requirements.

Certification System –system with its own rules of procedures and management performed by a certification body that allows (if the Customer's MS complies with the applicable standard) the registration in a publicly available list.

Management System – System which directs and controls an organization; includes the organizational structure, planning activities, responsibilities, practices, procedures, processes and resources; according to the applicable standard it may be related to quality, environment or safety.

Evaluation of Conformity – demonstration, with objective evidence, that the requirements relating to a product, a process, a management system are met.

Emergency Situation – dangerous situation for users of the product, the environment, workers, both actual and potential.

A Q.C.B. Italia Registered Firm shall:

1. Comply with these Registration Program requirements.
2. Do not believe Q.C.B. Italia responsible for judgments or sanctions affecting the organization as a result of potential or actual violations of law.
3. Maintain and document a MS in accordance with the applicable System Standard.
4. Not make significant changes to the MS which has been granted Registration unless it has given Q.C.B. Italia notice in writing of its intention to do so, and has received written confirmation from Q.C.B. Italia that the proposed changes do not affect the firm's Registration or will proceed with the evaluation performing an adjustment or additional audit (e.g. changes where the certification issued is no longer adequate in relation to the organization; changes that differ from the statements made during the contract and checked during the last audit).
5. Communicate promptly to Q.C.B. Italia crime investigations conducted by the organs and/or the competent authority and/or convictions for crimes that affect the compliance of the MS with the reference standard.
6. Provide full cooperation and give access to Q.C.B. Italia and to the accreditation body staff, upon notice and during normal business hours, to sites and information to be certified for the conduct of audits and possibly to outside suppliers with relevant processes covered by the scope of certification, as well as prepare all the measures of protection and prevention of occupational hazards that affect the activities of auditors at the sites of the organization. It must also make available staff (guidance) for each auditor involved in the evaluation process that enables the auditor to interface with the organization and allow a smooth conduction of audit activities.
7. Appoint a management representative to be responsible for all matters relating to the requirements for Registration.
8. Use the Q.C.B. Italia Symbols and the accreditation symbols, publicize and disseminate the certification in accordance with conditions defined in Part 3.
9. Immediately discontinue any use of Q.C.B. Italia or accreditation Symbols when notified by Q.C.B. Italia.
10. Upon termination of the Certificate and Letter of Registration discontinue all use of Q.C.B. Italia and Accreditation Body Symbols (including all advertising, literature, or documents which contain any reference to the Q.C.B. Italia Symbol) and cease all advertising or claims as a Q.C.B. Italia Registered Firm.
11. Keep a record of all complaints and remedial action, administrative measures, violations and legal process (final and in progress) relative to the system and make these records available to Q.C.B. Italia when requested.
12. Communicate promptly to Q.C.B. Italia and provide updates regarding all abnormal situations detected by the monitoring authorities, and any suspension or revocation of licenses, concessions, etc., relating to production/distribution of products/services related to certification, as well as judicial and/or administrative proceedings .
13. Communicate promptly to Q.C.B. Italia and provide updates regarding all emergency situations encountered.
14. Indicate to Q.C.B. Italia that at least one complete internal audit and management review has been performed prior to the scheduling of the initial registration audit.
15. Provide truthful and non-misleading information about the Management System
16. Assess and ensure legislative compliance of the MS. Q.C.B. Italia is limited to perform random checks aimed at establishing the organization's ability to meet the requirements of the reference standard and mandatory.

Q.C.B. Italia shall:

1. Grant free access to its services to the organizations applying for the certification without any discrimination.
2. Do not apply as a consultant for the design and development of management systems, either through subcontracts or assignments to its suppliers
3. Ensure that the auditors who performed evaluation activities have not had a counseling contractual relationship (even by other companies) with organizations to assess in the previous two years of assumption and for following two years.
4. Schedule Audits.
5. Notify a Registered Firm of any changes in the Q.C.B. Italia Registration Program and requirements imposed by accreditation bodies and give a realistic period of time to adjust their MS to meet the revised requirements.
6. Not disclose any information concerning the Registered Firm, other than information that is public knowledge, except to accreditation agencies that shall not disclose the information.
7. Notify the Registered Firm of complaints relating to their MS.
8. Remain impartial and independent during provision of registration services. Q.C.B. Italia has a system to protect against any conflict of interests. In addition, Q.C.B. Italia is funded through ongoing audit activity and not by any outside organization (except authorized credit institutions)
9. Make available a list of all Q.C.B. Italia certified organizations. This list will be forwarded to the Accreditation Bodies.
10. Promptly inform the client of any withdrawal/suspension/ revocation of accreditation in the schema/EA sector credit which falls the certification of the organization.

Part 2 - The Registration Procedure

Request for conformity assessment and certification

In order to receive the quotation for the conformity assessment and certification by Q.C.B. Italia, an authorized representative of the organization must submit a Request for a quote using the appropriate form or equivalent form. This application must include:

- the fiscal data of the applicant organization (company name, registered office address, address of additional sites to be certified, telephone contacts and internet references, referents);
- the description of the activities for which certification is requested (scope or purpose of certification);
- the total number of staff (direct employees, contractors, part-time, seasonal, temporary, etc.) involved in activities subject to certification for each site and, where appropriate, the inter-relational and functional relationships with other organizations belonging to the same group (es. multinationals);
- the type of certification required and the reference standard;
- any external resources (consultant and consulting firm) who provided advice on the design and implementation of the management system;
- the legal requirements relevant to the organization and / or authorizations required;
- information concerning all outsourced processes (outsourcing) of the organization that affect the compliance of the management system;

For requests coming from consortia will also be given the associated organizations.

For inquiries from organizations that are part of consortiums and cooperatives should also be indicated the name of the consortium membership and / or other relations to corporate groups.

Q.C.B. Italia quotes the offer on the basis of information provided and it is therefore the responsibility of the organization to declare truthful information.

If a request for conformity assessment and certification is received in a language other than Italian or English, it is the responsibility of the applicant to provide the necessary translation services for all activities related to the certification process (eg. Documentation, audits).

Quotation/Contract

The applicant shall submit a Request for Quotation - MS Registration form or equivalent to Q.C.B. Italia. Q.C.B. Italia will then submit a quotation for Registration Fees based on information provided in accordance with all relevant accreditation criteria.
The prices for certification activities are defined according to the current price list and formulated on the basis of the size of the organization, the complexity of production processes involved in certification and specific characteristics of the organization. The offer will also indicate an estimated time (expressed in man / days lasting 8 hours) for the evaluation activities

The offer shall indicate prices relating to the activities of the initial assessment and surveillance activities expected in the period of certification. Q.C.B. Italia will contact the registered company before the expiry of the certificate of conformity, to have data-information in order to issue a renewal offer, renewal of the conformity certificate and surveillance activities expected in the next three-year period of certification.

If the quotation is acceptable by the client, Q.C.B. Italia reserves the right to modify prices and man working days of assessment indicated in the offer; Examples of changes that may affect prices: changes due to substantial changes to the organization, its processes or the number of employees, changes in the reference standard, the requirements for accreditation. Q.C.B. Italia reserves the right to change prices and payment conditions if the organization will not respect the signed contract terms.

Quotation Approval

If the applicant organization accepts the quotation, the legal representative or a representative of the organization with the necessary powers to sign, will formally sign it, thus accepting all conditions stated in the offer and also all the requirements of this Regulation and in the Annexes.

The subscription of the conformity assessment quotation and certification of management system constitutes a legally valid contract and is a condition for the continuation of the certification process.

Gap Analysis

Following customer's request a preliminary check can be performed in order to verify the preparation of Customer's MS. The gap analysis is optional, not included in the initial and the results will not be assessed for certification purposes and will not affect any subsequent evaluation activities. The gap analysis can be performed only once and has a duration of less than 50% from initial audit to avoid that such activities can be considered as support to the implementation of the MS.

Q.C.B. Italia will issue a report on the status of the MS and will identify issues for full compliance with the reference standard to the customer.

The gap analysis is optional, and its price is stated separately in the offer.

Planning of the initial assessment, surveillance and renewal.

The certification system provides an initial assessment and, if it is granted the certification, surveillance activities, and any renewal activity during the period of validity of the certificate.

The audit program includes an initial audit (Stage 1 and Stage 2), surveillance audits in the first and second year and renewal audit in the third year before the date required for renewal of certification. The three-year certification cycle begins with the decision to certification or renewal thereof. In determining the audit program and any subsequent modification, it is considered the size of the client organization, the scope and complexity of its management system, products and processes, as well as the level of effectiveness demonstrated by the management system and the results of previous audits.
Each audit activity at the organization will be agreed with the customer and will be sent in advance by Q.C.B. Italia, a plan and a schedule of audits indicating the audit Team, the sites to verify the documents / rules, processes, requesting authorization for access from any external sites, the timing for each process or element of the verified standard. The organization may accept or request any changes within the working days specified in the document with which it is communicated programming. Failing that, the plan and the audit program shall be deemed confirmed.

Once confirmed the date of the audit, changes of dates must be requested and justified by the organization and approved by Q.C.B. Italia; changes of the audit date and cancellations are subject to penalty specified in the contract and the customer must reimburse Q.C.B. Italia also any costs sustained up to that time.

The Customer may require more information on the auditors in charge (eg. Staff profile), or may object the allocation of the proposed auditors justifying the reasons. Q.C.B. Italia will propose to the customer another audit team if the reasons are acceptable.

The Customer must activate the process of assessment by requiring the programming of the initial audit. Such audit shall be made within six months of the offer approval. If the customer can not meet this deadline, he must confirm the details of the organization and activities subject to certification prior to the execution of the initial audit (stage 1).

The maximum period of time between the conclusion of the Stage 1 (pre-audit) and the start of stage 2 can not exceed 6 months; for periods of time in excess of this limit Q.C.B. Italia reserves the right to repeat stage 1 and the cost shall be charged to the customer.

Stage 2 will be programmed according to the necessary requirements for the organization to resolve issues identified during Stage 1 and in accordance with the needs of Q.C.B. Italia for the organization and provision of adequate resources to the conduct of Stage 2.

The maintenance of the certification requires surveillance activities which include surveillance audits; the number of surveillance audits is defined contractually with a minimum of two audits during the period of validity of the certification. The first surveillance audit shall be made no later than 12 months from the last day of the initial audit (stage 2). The second surveillance audit must be made within 24 months from the last day of the initial audit; any extensions, which can not exceed 6 months, they will be motivated and requested in writing by the organization and accepted by Q.C.B. Italia on the basis of their relevance (e.g. corporate reorganizations, transfers, natural disasters, layoffs, economic hardship, etc.). The surveillance audits will be planned ensuring that all processes, the requirements of the reference standard and all parts of the management system of the certified organization, are evaluated at least once during the period of validity of the certification. The surveillance audits will be planned and made in different periods of the year in order to ensure that any seasonal activities or important activities made only at certain times of the year are assessed.

The certification may be renewed before the mandatory date for renewal specified in the certificate; renewal activities include:

- An evaluation of the performance of MS during the period of validity of the certificate (including any complaints and other information received in Q.C.B. Italia);
- The reviews of the previous audit reports made during the period of validity of the certificate;
- audit for renewal of certification required to be made by the due date of renewal shown in the certificate; audit planning renewal will allow the organization to resolve any non-compliance detected, and Q.C.B. Italia to make the resolution by the date required for renewal; if the renewal audit at the request of the certified organization, is not planned and performed with the necessary advance, it can not be ensured continuity in the certification by Q.C.B. Italia.

The audits are conducted and based on the requirements of applicable regulations and any guidelines/business specifications, using checklists that allow you to collect objective evidence to support the evaluation of the level of compliance with these requirements of the customer.

During the audits, external consultants of the organization must adhere strictly to the role of observer and shall not interfere with the activities.

Q.C.B. Italia reserves the right to make part of the audit at any supplier of the organization that have relevant processes within the scope of certification; this audit will be made only on the processes assigned to the supplier. If it is not possible to make such audits during the initial audit, it may be scheduled during the period of validity of the certification.

Initial Audit

The initial audit consists of two stages: stage 1 (or pre-audit); stage2.

Stage 1 (pre-audit)

The Stage 1 (pre-audit) consists of a conformity check of the documentation of customer's Management System with the reference standard and in a general examination of the System; generally this examination includes a visit to the site / s to be certified as well as interviews with staff from the audit team.

The audit team, may request to the Customer the necessary documentation to verify compliance and to collect useful information. Such documentation may include (the next list is not to be considered exhaustive, but specific documents may be required depending on the management system and characteristics of the organization):

- policies, manuals and procedures of the management system;
- a description of the company and its processes;
- information on licenses / permissions / approvals;
- registration documents (e.g. Records relating to: Internal audit reports, management reviews, corrective and preventive actions, Non-Conformities, complaints);
- the list of standards and applicable laws (including licenses / permits) and any agreements with the Authority;
- programs and reports of internal audits;
- Detailed documentation of non-conformities found internally and corrective actions taken in the preceding 12 months (or since the beginning of the implementation of the Management System
- records of management review;
- specific documents relating to the management system under evaluation (e.g. Initial environmental analysis, the description of the environmental aspects and impacts associated with the determination of significant environmental aspects; documents, risk analysis etc.);
- any reports of complaints received from interested parties and / or sanctions issued by a public authority or a judicial
- results of audits made by organizations or bodies of Public Administration

In order to achieve the goal of Stage 1 (pre-audit) Q.C.B. Italia shall:

- check the documentation of customer's management system, ensuring that it is able to meet all requirements of the applicable standard and that it conforms to it;
- evaluate the location and the specific conditions of the customer's site and undertake an exchange of information with customer's staff in order to establish the degree of preparation for Stage 2;
- verify that the Management System is designed to achieve the organization's policy and objectives;
- reviewing the status and understanding of the customer regarding the requirements of the standard, with particular reference to identification of key performance aspects, processes, objectives and operation of the management system;
- verify that the Management System includes an appropriate method for identifying processes and/or critical aspects of the organization;
- collect the necessary information regarding the scope of management system, processes and location/s of the customer, including related legal and regulatory aspects and compliance with them (e.g.: environment, legal aspects relating to the activity of the customer, associated risks, etc.).
- review the allocation of resources for stage 2 and agree with the customer the details of the audit;
- to focus on the planning of the audit stage 2, acquiring sufficient knowledge of Management System and activities of Customer's site, with reference to possible significant aspects;
- evaluate if the internal audits and Management review have been planned and executed and that the level of implementation of the management system provides evidence that the customer is ready for stage 2.

At the end of stage 1 (pre-audit), the organization will be issued a report that will identify issues that in the next phase of Stage 2 could be classified as Non-Conformity and define the timing for the execution of stage 2.

Stage 2

Stage 2 will be planned and made after the conclusion of Stage 1 which consists in checking the conformity of customer's management system with the reference standard at the site/s subject to certification.

The purpose of Stage 2 is to assess the implementation and effectiveness of the management system considering:

- the information and evidence about conformity to the standard requirements or other normative applicable document;
- monitoring, measurement, reporting and review of performance, with reference to the objectives and key performance targets themselves (in line with the expectations of the management system standard or other normative document applicable);
- Management System and Customer's performance with respect to compliance with legal requirements;
- control the processes of the customer;
- internal audits and Management review;
- Management's responsibility for the policies of the Customer
- the links between regulatory requirements, policy, objectives and targets of performances (in line with the expectations of standards of the applicable management system or other normative document), all applicable legal requirements, responsibilities, competence of personnel, activities, procedures, performance data and the findings and conclusions of the internal audit.

Findings and conclusions of the Audit

At the end of the audit, the Lead Auditor will present the findings and conclusions of the audit to the management representative of the customer. Any situations that are different than the certification requirements will be classified as follows:

Nonconformity/Major Findings: partial or total lack compared to a regulatory requirement, such a contractual requirement, a requirement of this regulation or a mandatory requirement that undermines the effectiveness and performance of the system, customer satisfaction, compliance with the mandatory standards and does not allow organization to ensure process control or the suitability of the products or is due to a significant impact / risk to the product / environment / safety and health of workers; the presence of one or more non-compliance prevents the release or confirmation of certification until steps are taken by the organization applying for certification or certified, treatment and corrective actions in the resolution of such Non-Compliance and effectiveness of these actions are verified by Q.C.B. Italia (by documents or, if necessary, through subsequent additional audit).

Minor Findings: Partial lack or non-systematic with respect to a regulatory requirement, such as contractual requirement or a requirement of this regulation does not affect the effectiveness, system performance, customer satisfaction, the ability to ensure process control and it is not because of the risk to the product/environment/safety and health of workers; the presence of one or more minor findings prevents the release or confirmation of certification until they are planned by the organization, treatment and corrective actions to resolve these findings and that these planned actions are approved by Q.C.B. Italia. If the organization modifies the treatment and corrective actions already sent to Q.C.B. Italia, it will have to communicate and send to Q.C.B. Italia updated documentation. In the subsequent audit, Q.C.B. Italia will monitor the effectiveness of treatment and corrective actions.

Opportunity for Improvement :

There are potential NonConformities/ minor findings or aspects of the system that may be susceptible to improvement; opportunities for improvement have no impact on the decision and certification are not required treatments and corrective actions to follow.

During the closing meeting of the audit, the findings will be presented clearly (any non-compliance, findings and opportunities for improvement) in such a way that they are known and understood by the client. The results of the audit will be formalized and communicated to the client before the official closing of the audit.

The client has the right to express their comments on the findings and conclusions that will be formalized by the Lead Auditor in the audit documentation and put to the attention of deliberation.

Audit confirmation

After the audit, Q.C.B. Italia will review the information gathered by the audit team and the client will confirm the findings of the audit and its own findings. With the confirmation of the audit Q.C.B. Italia will send to the client the audit report.

In the presence of only opportunities for improvement the whole procedure will be submitted to the Registration Committee for resolution, without any further requests to the organization.

In case of the presence of one or more reliefs/minor findings, Q.C.B. Italia will require the client to submit:

- dealing with situations that have generated the minor findings;
- appropriate corrective actions; in case of minor findings may be filed only the planning of corrective actions being undertaken;

The Lead Auditor will assess the completeness and adequacy of the documentary evidence provided by the client and the proposed corrective actions; If the corrective actions are acceptable, the practice may be subjected to the same Certification Commission for resolution of the certification. If the organization modifies treatments and corrective actions, it will have to communicate and send to Q.C.B. Italia updated documentation. The Effectiveness of the corrective actions will be verified by Q.C.B. Italia in the next audit.

In case of one or more Non-Conformities Q.C.B. Italia will require to the organization to submit:

- treatment of situations that have caused the Non-Conformity
- appropriate corrective actions, accompanied by evidence of their implementation and verification of their effectiveness.

The Lead Auditor will assess the completeness and adequacy of the documents provided by the organization and verify the effectiveness of corrective actions; An additional audit to the organization may be planned in order to verify the effectiveness of such actions (to be scheduled within 30 days of receipt of documentation). If the treatment and corrective actions are acceptable and effective, the practice will be submitted to the Certification Commission for resolution of the certification.

The documentation requested by Q.C.B. Italia must be submitted by the organization within the timeframe specified in the audit's confirmation document (generally not more than ninety (90) days) both in the case of minor findings and non-conformities. If, after the first presentation, the lead auditor does not consider acceptable the documentary evidence proposed by the organization, or if as a result of the additional audit the treatment and proposed corrective actions do not result still acceptable and effective, the Customer can proceed with a second submission.

If, even after the second submission, the lead auditor considers the treatment and corrective actions proposed by the organization still not acceptable and/or effective, Q.C.B. Italia will not be able to provide more information to the customer, as this may result in the involuntary involvement of Q.C.B. Italia in the process of improvement. The practice will still be sent to the Certification Committee which will determine further actions, such as an additional audit, revaluation or partial repetition of the audit with respect to all the requirements of the standard. Additional audits will be scheduled within ninety (90) days of the resolution of the Certification Commission. The cost of the audits shall be at the Customer's expense and the prices are indicated in the offer.

Registration Decision

The Registration Committee of Q.C.B. Italia shall review all relevant information regarding a client, including the audit teams recommendation and other information concerning the customer (for example, information in the public domain, comments on the audit report by the Customer, approval of corrective action plans, verifying the effectiveness of corrective actions), and determine whether registration may be granted within 15 working days from the date of receipt of the practice.

The decisions are summarized in the following three categories:

a) Issue of certificate without conditions.

b) Conditional Issue of certificate that will be subject to the implementation of the specified conditions (such as may be required a surveillance audit in advance).

c) Failure to issue the certificate; in this case it can be shown how to repeat the certification process.

Q.C.B. Italia will notify the client about the decision of the Registration Committee.

Clients who achieve registration will be granted a Certificate in Italian language. The Certificate remains the property of Q.C.B. Italia. Additional copies of the certificate or foreign language translations can be requested to Q.C.B. Italia. The validity period of certification is defined by the date of issuance/re-issuance of the Certificate of Conformity and the required renewal date; it starts from the date of the initial audit (final day of Stage 2). The validity of the certification is subject to the positive result of periodic surveillance audits. The issue date of the certificate can not be earlier than the date of approval of the Certification Commission.

All information/records/documents made available or reviewed by Q.C.B. Italia and by the audit team will be kept in strict confidence. Will be made public: the name of the certified organization, the location of the site, the scope of the certification, the EA of competence, the date of issue / reissue date and the required renewal of certification and the information on the validity of the certification .

Surveillance

Q.C.B. Italia will perform surveillance audits, including audits on site to assess the effectiveness of the MS during the validity of the certification. These activities may also include:

a) requests to the certified organization of information about issues relevant to certification requirements;

b) examination of customers communications regarding their activities (eg. promotional material, website);

c) the Customer requests for documents and recordings (on paper or electronic);

d) other means of monitoring the performance of the certified organization.

Surveillance audits

Q.C.B. Italia shall perform surveillance audits of all Registered Firms management systems in their site/s subject to certification.

Before conducting the surveillance audit, the certified organization will have to confirm to Q.C.B. Italia data relating to its business size, sites subject to certification and the purpose of certification.

Any substantial change to the management system must be reported by the customer to Q.C.B. Italia in the planning stage of the audit.

The time lag between surveillance audits may be changed depending on any conditions imposed by the Certification Commission in the resolution, or on the basis of specificity of the production cycle of the customer.

The purpose of the Surveillance audit is:

- to verify the MS continues to be implemented;
- to consider the implications of changes to the MS as a result of changes to the client's operations;
- confirm continued compliance of the MS with all standard requirements;
- follow-up of any corrective actions taken since the last audit.

During the surveillance audits will be verified (in addition to the processes and regulatory requirements set out in the planning phase): the use of the trademark and any other reference to certification, the management of complaints about products/services that fall within the certification, internal audits and reviews by the Management, the effectiveness of the management system in meeting objectives of the certified organization, the progress of the planned activities for continuous improvement, the continued tight control of activities.

Upon conclusion of the surveillance audit, during the closing meeting, the lead auditor will present the findings and conclusions of the audit representative Management of the Client; the findings of the audit will be classified and formalized as indicated above.

After the conclusion of the surveillance audit, Q.C.B. Italia shall review all relevant information regarding the client, and confirm the findings and conclusions of the audit with the following options:

a) Confirmation of the Certificate (in the presence of only opportunities for improvement);

b) Request for corrective actions

In case of the presence of one or more minor findings, Q.C.B. Italia will require the organization to submit:

- the treatment of the situations that generated the minor findings;
- the planning of corrective actions that will be implemented;

The Lead Auditor will assess the completeness and adequacy of the documentary evidences provided by the organization and the proposed corrective actions; If the corrective actions are acceptable, the certification will be confirmed. If the organization modifies corrective actions already sent to Q.C.B. Italia, it will have to communicate and send to Q.C.B. Italia updated documentation. The effectiveness of these corrective actions will be verified by Q.C.B. Italia in the next audit.

In the case of the presence of one or more Non-Conformities, Q.C.B. Italia will require the organization to submit:

- the treatment of the situations that generated the Nonconformity;
- appropriate corrective actions, accompanied by evidence of their implementation and the verification of their effectiveness

The Lead Auditor will assess the completeness and adequacy of the documentary evidences provided by the organization and verify the effectiveness of corrective actions taken; in order to verify the effectiveness of such actions may be necessary an additional audit at the organization (to be scheduled within 30 days of receipt of documentation). If the treatment and corrective actions are acceptable and effective, the certification will be confirmed.

The required evidences should be submitted by the organization within the timeframe established by Q.C.B. Italia, generally not more than ninety (90) days. If, after the first submission the lead auditor does not consider acceptable the documentary evidences proposed by the organization, or if as a result of an additional audit the proposed corrective actions do not result still acceptable and effective, the Customer can proceed with a second submission. If, even after the second submission, the lead auditor considers the corrective actions proposed by the organization still not acceptable and / or effective, Q.C.B. Italia will not be able to provide more information to the customer as this can result in involuntary involvement of Q.C.B. Italia in the process of improvement. The practice will still be sent to the Certification Committee that will determine further action, such as an additional audit of partial revaluation or repetition of the audit including all the requirements of the standard. Additional audits will be scheduled within ninety (90) days of the resolution of the Certification Commission. The cost of the audits shall be at Customer's expense and the prices are indicated in the offer.

c) Suspension of certification, indicating the time of suspension and the procedures for the removal of the suspension (e.g. additional audit of partial revaluation only on the requirements of the standard rejected that resulted the suspension or an additional audit of total revaluation for all elements of the standard applicable).

d) Cancellation of certification (indicating the start date)

Q.C.B. Italia will issue and send a copy of the audit report to the Customer with the confirmation of the findings and conclusions of the audit.

Renewal of certification

The renewal activity should be made in order to ensure that certification can be renewed. Renewal audit consists in evaluating the continued fulfillment of all the requirements of the applicable standard of the management system or other normative document. The activities for the renewal include an audit to be made at the customer's site.

In order to maintain the continuity of the certification, the client must allow the accomplishment of the renewal audit in advance of the required date of renewal; the advance will consider the time required for the resolution of any non-compliance and/or surveys that may arise in the process of renewal. Q.C.B. Italia will schedule the audit at least 90 days before the date required for renewal. If the Customer requests the renewal audit with less prior to the date required for renewal, Q.C.B. Italia will not insure the completion of the renewal process within the deadlines given and therefore does not ensure the continuity of certification. If the Customer requests the execution of the renewal audit with greater advance of the date required for renewal, Q.C.B. Italia will be able to perform a renewal audit with an advance of up to 6 months.

The purpose of the renewal is to:

- confirm the continued conformity and effectiveness of the whole management system, taking into consideration internal and external changes;
- ensure the continued relevance and applicability to the scope of certification;

If there had been significant changes in the management system, of the organization, or in the context in which the management system operates (eg. Substantial changes in the legislation), the activities of the audit may also include renovation of the activities planned in stage 1 (pre-audit) of the initial audit.

The certified organization may not request the renewal of the certification.

At the end of the period of validity of the certification, organizations that have not completed the renewal, will no longer be entitled to use the symbol of Q.C.B. Italia and of accreditation bodies and to use the "status" of a registered company by Q.C.B. Italia.

Renewal Audit

Activities for the renewal of the certification include a renewal audit which consists in checking at the site/s to be certified in order to:

- ensure compliance with all requirements of the reference standard;
- evaluate the effectiveness of the whole Management System, taking into consideration internal and external changes, and its continued relevance and applicability to the scope of certification;
- verify the demonstrated commitment to maintain the effectiveness and improvement of the Management System in order to enhance overall performance;
- verify if the effectiveness of the certificated Management System contributes to the attainment of the objectives of the organization.

Before conducting the renovation, the certified organization will have to confirm to Q.C.B. Italia data relating to its business size and sites subject to certification and the purpose of certification.

Any substantial change to the management system must be reported by the customer to Q.C.B. Italia in the planning stage of the audit.

The procedures and the conduct of the next stages of renewal audit (findings and conclusions of the audit, confirmation and audit certification decision), are the same as those following the initial audit and described above. However, decisions about the renewal of the certification will be based on the results of the renewal audit, the review of the performance of the system over the period of certification (including the review of previous surveillance audit reports) and review of complaints received by users of the products and / or services of the certified organization.

Additional audit

Q.C.B. Italia will be able to perform additional audits at short notice at the site / s of organizations in the following cases:

- verify the effectiveness of corrective actions taken for resolution of Non-Conformities;
- to investigate complaints and their treatment;
- At the request of The Accreditation Body;
- as a result of provisions of the Public Administration, the Judicial Authority, lawsuits involving the organization and its management system;
- as a result of changes to the management system;
- as a subsequent action against customers whose certification has been suspended.

The cost of the audits shall be at the Customer's expense and the prices are indicated in the offer.

Changes to the Scope of Registration and the Client's MS

A Registered Firm shall be responsible to inform promptly Q.C.B. Italia about any significant changes to their MS or any other changes which may affect conformance to the requirements for registration.
Changes that must be reported include:

a) legal, commercial, organizational aspects or relating to the property;

b) organization and management (for example, managers with key roles, decision-making power staff or technical staff);

c) changes in address, in size or in number of sites subject to certification;

d) scope of the organization's activities included in the certified management system;

e) significant changes to the management system and processes.

Q.C.B. Italia will assess the reported changes and decide whether the changes can be accepted or whether it is necessary to perform an additional audit (at short notice) or to conduct further investigations. Q.C.B. Italia shall inform the certified organization the decisions relating to changes/amendments proposed within 30 days of receipt. Amendments of a minor size will still be examined by the audit team during the course of the subsequent audit.

A certified organization may request, in writing, changes to the scope of certification. Q.C.B. Italia will review the request and determine the necessary audit activities to evaluate the change. Such activities may be performed through an additional audit or as part of a surveillance audit /renewal.

Q.C.B. Italia can reduce the scope of certification of the certified organization where the management system is not in compliance with the requirements of the standard and certification requirements in relation to that part of the reduction object. This reduction is consistent with the requirements of the standard used for certification (Generally not applicable for Environmental Management Systems and Management Systems Occupational Health and Safety of Workers).

Q.C.B. Italia can reduce the number of sites to be certified of the organization where the management system is not fully compliant with the requirements of the standard and certification requirements related to those sites subject to reduction.

In the event that changes are considered significant, or those for which the certificate issued is no longer appropriate for the organization or changes that differ from the statements made during the contract and the last audit, or that relate to aspects of legal, or not being communicated, Q.C.B. Italia may issue a Non Conformity and / or suspend or withdraw / cancel the certificate in severe cases.

In case of emergency situations occur, the organization will have to communicate to Q.C.B. Italia the situation encountered and any actions taken. Q.C.B. Italia will find it necessary to conduct an audit or may issue an additional Non-Conformity and / or suspend or withdraw / cancel the certificate in severe cases.

Changes to Q.C.B. Italia's Requirements for Registration

Q.C.B. Italia agrees to communicate and update its customers about changes:

- their certification processes,
- regulatory requirements for the certification and accreditation,
- of this Regulation,
- the costs of the application for certification, initial and surveillance
- the requirements applied to potential customers
- regarding procedures for the management of complaints and appeals.

In case of changes to the requirements of the certification system, Q.C.B. Italia must:

1. submit to registered firms changes accompanied by explanations; will be referred to an appropriate period in which the certified organizations can express their opinions; Q.C.B. Italia will evaluate the comments and will be able to receive them before the date of entry into force of the changes.
2. communicate to registered firms the date from which the changes will be in force and any actions to be taken. If the Registered Firm fails to take the required action by the effective date, Q.C.B. Italia will decide on the action to be taken which may include suspension and/or withdrawal/cancellation of the registration.

If the registered firm does not consider worthwhile the adaption to the changes proposed by Q.C.B. Italia, it may withdraw from the contract with effect from the date of entry into force of the changes, without the application of any penalty.

Suspension of the certification

The certification may be suspended for a limited period (up to six months) at the discretion of Q.C.B. Italia

1. If any surveillance audits indicate nonconformance to the requirements but withdrawal is not considered necessary;
2. If as a result of an additional audit, corrective actions have not been approved by Q.C.B. Italia as a result of nonconformities previously reported;
3. If the customer does not implement effective corrective actions for the resolution of nonconformities and / or findings within the specified time;
4. If there are serious deficiencies of the management system based on all claims, lawsuits, administrative or judicial authority or public security, and other objective evidences also not derived from audits;
5. If the customer does not allow to make periodic surveillance audits within the expected time limits;
6. If the registered company does not allow the execution of audits and/or does not allow to Q.C.B. Italia's staff and the staff of the accreditation body access to all sites (or their information) subject to certification.
7. If the client makes improper use of the registration, registration certificate, or Q.C.B. Italia's symbol or the symbol of the certification body.
8. If there has been a violation of any of the requirements of the agreement between the Registered Firm and Q.C.B. Italia (eg. Failure to comply with the terms of payment)
9. If the client has not communicated promptly to Q.C.B. Italia changes to its management system;
10. If Q.C.B. Italia becomes aware of objective situations that would have prevented the grant of certification;
11. Following the verification of the causes of emergency situations (e.g. Failure to comply with regulatory requirements)
12. As a result of convictions for crimes that affect the compliance of the management system with the reference standard
13. If the organization does not make payment of fees due to Q.C.B. Italia in the terms established in the contract.

If the customer makes a voluntary and reasoned request, the certification may be suspended by Q.C.B. Italia for a period not to exceed six (6) months.

The period of suspension shall not extend the validity of the certificate.

During the period of suspension the certification of the management system is considered to be temporarily invalid.

Q.C.B. Italia will notify the customer in the order by registered mail (delivered by the Italian Post or PEC) which will indicate the effective date of the suspension, the conditions through which the suspension can be removed, the conditions for the use of the mark and the diffusion of the "status" of registered company during this period. When the registered company has adopted the conditions for the revocation of the suspension within the stipulated time period, Q.C.B. Italia will terminate the suspension and reconfirm the certification. If the registered company does not fulfill the required conditions, the certification may be canceled and the Certificate of Conformity may be withdrawn. The price for the management of the practice of suspension is indicated in the contract.

Q.C.B. Italia will have the right to make public the status of suspension of certification, but does not communicate the reasons for the suspension.

Cancellation of the certification

Q.C.B. Italia may cancel and withdraw the Certificate of Conformity for the following reasons:

1. When the conditions that led to the suspension have not been removed within the stipulated time period;
2. When a surveillance audit reveals a Non-Conformity with the requirements of certification such as to compromise the overall effectiveness of the system;
3. When formally required by the certified organization;
4. If the registered company can not ensure compliance with the new requirements and if the rules of the certification system are modified;
5. If the registered company no longer provides the product, process or service for which it has been certified;
6. If the management system is no longer applied in the site/s subject to certification;
7. If the registered company fails to meet any other contractual provision agreed between Q.C.B. Italia and the registered company;
8. If the client doesn't accept any changes to the certification rules or fail to adapt its system to the changes of the regulatory requirements and certification rules;
9. If the Customer, following the non-renewal of certification, does not give willingness to make the last surveillance audit scheduled before the required date for renewal of certification;
10. If the customer does not accept the offer revisions as a result of changes to the certification system, changes in the scope of certification, process changes and their organization, the end of the period of validity of previous quotations;
11. As a result of early contractual recission made by the customer;
12. If Q.C.B. Italia becomes aware of objective situations that prevent the granting of certification (e.g. Following convictions for crimes that affect the compliance of the management system with the reference standard)

Q.C.B. Italia will inform the registered company by registered mail (or PEC) about the decision of cancellation of certification.

The cancellation of the certification entails an obligation for the customer to return to Q.C.B. Italia the Certificates of Conformity and to cease the use of the Q.C.B. Italia symbol (and accreditation bodies) in any form and not to spread the "status" of registered company by Q.C.B. Italia.

Q.C.B. Italia may make public the decision to cancel the certification and withdraw of the Certificate of Conformity, but without communicating the reasons.

Claims

Q.C.B. Italia has a procedure for any received complaints.

All complaints received by Q.C.B. Italia (in any way) about the activities of certification, are registered and are examined; investigations will determine their foundation, actions to be undertaken, timing and will be verified the effectiveness of the actions taken. The examination of the complaint will consider the effectiveness of the Management System of the registered company. The person who made the complaint will receive an initial documented response within five (5) working days from receipt of the complaint and a response at the end of the procedure, which will highlight the results of the actions taken. Q.C.B. Italia will inform the registered company for each complaint concerning the registered company in the appropriate times. Complaints made anonymously are not taken into consideration. The Committee for the Safeguarding will be informed about the complaints and their management.

The information about the claims and parties are subject to confidentiality constraints. Q.C.B. Italia, in agreement with the certified organization and the person who made the complaint, may determine how the contents of the complaint and its resolution should be made public.

Appeals

In the event a Client/Registered Firm or any interested party wishes to appeal a decision made by Q.C.B. Italia based on this Registration Program, or on the conditions of the contract, they shall do so within (30) days of being notified of Q.C.B. Italia's decision.

Q.C.B. Italy will appoint an Appeals Committee which shall not include persons who made the audits and / or approved the decision.

The decision of Q.C.B. Italia shall stand until such time that the Appeals Group can meet and take a decision. The meeting of the Appeals Group must be made within 15 working days from the date of receipt of the request for appeal; the decision regarding the request for appeal must be submitted in writing to the concerned party within 5 working days. Q.C.B. Italia will provide to those who appealed, reports on the progress and final results.

If the concerned party does not accept the decision of the Appeal Group it can contact the Entity of Accreditation Body and in alternative the Jurisdiction.

During the appeal process, the interested party may request directly to the Group of Appeals to expose its arguments.

Disputes

Any dispute with an interested party (the applicant for certification, certified organization) that can not be resolved with the activities described in paragraphs (Complaints and appeals), will be settled by the competent court indicated in the quotation contract.

Confidentiality of information

Q.C.B. Italia will disclose only the information about the name, address of the site/s, the purpose being certified, the standard of reference, the date of issue and the date required for renewal of certification and the information on the validity status (active, suspended, canceled) of the registered Firm.

In addition Q.C.B. Italia will provide in any manner, on request of any party, only information about the status of validity of a certificate issued. Any lists issued by Q.C.B. Italia regarding certified organizations will remain the property of Q.C.B. Italia.

Q.C.B. Italia has policies and procedures to protect the confidentiality and security of information.

All information acquired by Q.C.B. Italia, by its own staff, in any capacity and level, relative to the certified organization, are subject to the obligation of confidentiality and will not be disclosed outside unless:

- require their consultation by the accreditation body (which will take full responsibility for treatment),

- as otherwise required by law or ordered by the court,
- the disclosure is made on the explicit consent of the certified company

Information regarding the organization applying for certification or certified from different sources (for example from those making a complaint, authorities in the legislative sphere) will be treated as confidential information, in compliance with Q.C.B. Italia's policy.

The data (including personal data) collected during the audit activities and for the conduct of certification activities are treated according to Q.C.B. Italia's information provided before the signed contract and available at www.qcb.it.

All documentation prepared by Q.C.B. Italia at the purpose of executing and reporting of audits (eg. Audit plan, audit report, audit findings, etc.), remains the property of Q.C.B. Italia, which reserves the rights to use, reproduction and interior disclosure.

Limitation of responsability

The issuance and maintenance of certification Management System do not constitute by Q.C.B. Italia, the guarantee of the respect of the certified organization with legal obligations and mandatory requirements to which it is obliged to comply. The organization is solely responsible for, and towards itself and towards third parties, the proper conduct of its business and legislative compliance of the same, as well as the conformity of products / services provided to the applicable regulations and expectations of customers and third parties in general.

The organization is committed to ensuring the completeness and accuracy of the documents and information made available to the Auditors. Q.C.B. Italia is explicitly exempted from any liability in the event of missing or incomplete data reporting, as well as in case these do not correspond to the real situation.

Impartiality and ethics in the certification activities

Q.C.B. Italia's Management and all the staff involved in the certification activities is formally committed to ensure that assessment activities are fair, objective and non-discriminatory.

All Q.C.B. Italia's staff, both internal and external, that could have influence on the certification activities, shall act impartially and not allow commercial pressures, financial or otherwise that could compromise the impartiality.

Applicant or certified organizations must avoid to threaten the impartiality of the Q.C.B. Italia's staff (e.g. Using gifts, sums of money, etc.) and are invited to notify Q.C.B. Italia's management about any threat to impartiality of which they become aware.

Q.C.B. Italia has established formal procedures to prevent any conflict of interest or to resolve such conflicts when, for accidental reasons, there are situations that constitute a potential or actual conflict of interest. In the case where a relationship of any kind (e.g. Economic, family, business, etc.) constitutes an unacceptable threat to impartiality certification can not be issued.

Q.C.B. Italia and its staff do not offer or provide internal auditing services or MS consulting services to its certified customers.

Q.C.B. Italia does not certify the management system of an organization that has received consultancy services for the management system for internal audits or if the relationship between the consulting company and Q.C.B. Italia constitutes an unacceptable threat to the impartiality of the certification body itself.

Q.C.B. Italia agrees to not advertise and not offer its services in cooperation with consultants or consulting organizations, and pursue, even legally, anyone claiming that the certification issued by Q.C.B. Italia can be obtained in an easier way if certain consulting resources are used.

The information provided by Q.C.B. Italia to customers or the market, including promotional material, will be accurate and not misleading.

Part 3 - Guidelines on the Use of certification/accreditation Symbols, Proper Advertising and Registration Claims

Upon registration, the registered firm is entitled to use certification/accreditation symbols and advertise the registration.

For specific rules and examples, see Annex 4.

The registered firm should:

1. use the certification only to indicate that the MS conforms to the reference standard and should not use the certification to indicate that a product or service is / certified by Q.C.B. Italia;
2. claim to be certified only for activities or sites for which it has been granted certification and not imply that certification applies to activities that are outside the scope of the certification;
3. A Registered Firm shall not use its registration in such a manner as to bring Q.C.B. Italia into disrepute, and shall not make any statement regarding its registration which Q.C.B. Italia may consider misleading or unauthorized.
4. A Registered Firm shall not use its registration in such a manner as to damage the reputation of Q.C.B. Italia and / or the certification system and undermine the confidence of the public;
5. The Registered Firm shall immediately, upon written notification, cease and desist all use of Certification and Accreditation Symbol, that Q.C.B. Italia considers misleading. Any improper use of certification and /or accreditation symbols is cause for suspension or revocation of the firm's registration.
6. The Registered Firm shall immediately cease all use of the certification/accreditation Symbols and desist the status" of Registered Company upon suspension or cancellation of the firm's registration or upon expiration of the period of validity of the certificate (in case of non-renewal).
7. edit any advertising/informative material if the scope of the certification has been reduced.
8. The Registered Firm shall use the accreditation Symbols (according to the rules in Annex 4) only in the case of accredited and active certification, along with Q.C.B. Italia's Symbol.
9. The accreditation Symbol should not be used in such a manner as to suggest that the accreditation body has certified or approved the MS of the organization or otherwise used in any other misleading way.

When in doubt, contact Q.C.B. Italia for any clarification and /or submission of examples of the use of certification or accreditation symbols.

Please note that the accreditation body is a signatory to the agreements MLA (Multilateral Agreement) between Accreditation Bodies in the European and World level. This agreement allows the mutual recognition of credits and therefore the issued certificates by accredited bodies are signatories to this agreement and have the wider international recognition.

Q.C.B. Italia will exercise appropriate control over their property rights and will take action (e.g. Reminders, warnings, suspension or cancellation of certification and / or legal actions) to deal with incorrect references to certification status or misleading use of the documents certification, trademarks or audit reports.