

Appendix A

STR-Registrar LLC

Procedure for Registration

1.0 Scope

Registration is opened to all applicants: This procedure describes the events, which occur during the registration process. The purpose of the registration process is to assess the extent of any applicant's organizational conformance with the applicable Standards to which they are making application. All organizations that utilize STR-Registrar assessment services are guided by these procedures and are required to comply with all of the relevant provisions contained herein.

The organization shall make all necessary arrangements for the conduct of the assessment, including provisions for examining documentation and for providing access to all areas, records, and personnel for the purpose of audits, surveillance, re-registration, follow-up, special audits and resolution.

2.0 Application

Application for Management System registration (ISO 9001:2008, AS9100, SQF2000/1000 etc.) shall be on forms supplied by STR-R. All information requested on the application and questionnaire shall be in the English language.

An Application for Registration will be forwarded to the applicant upon request. Submitting the completed Application for Registration is the first step in the registration process. The Application for Registration may be filled out on behalf of an organization by an STR-R representative utilizing information provided by the organization to STR-R.

Submission of the completed Application for Registration form by the Organization and acceptance by STR-R of the completed form is not binding on the Organization or STR-R. The purpose of the form is simply to start the quotation process.

A simple pre-quotation (STR-R Web Based Instant Quotation request form) may be provided in advance of the Application being completed for comparing with other Certification Body quotations. However before the final quotation is submitted the formal Application for Registration will be completed.

STR-R will attempt to schedule pre-assessments and assessments on mutually acceptable dates with the Organization. If this is not possible, assessments will be scheduled at the earliest possible date acceptable to the organization that STR-R personnel are available.

If the Organization is currently registered with another registrar or is seeking a joint registration with another registration entity and wishes to coordinate registration activities with STR-R, the Application for Registration shall be completed. **Upon receipt of such application and request for transfer, STR-R will follow the guidelines of QSLP 3.6 Transfer of Accredited Certification/Registration prior to accepting Application for Registration in this case.**

For SQF Organizations, should the organization desire, in advance of their planned assessment activities, to evaluate their Management System on the basis of the checklist that will be utilized by STR-R's audit team, they may do so by: (a) purchasing a copy of the SQF2000 Document and Facility Review checklist at (www.sqfi.com/sqf_documents.htm).

3.0 Pre-Assessment (non-mandatory)

At the option of the Organization, a pre-assessment meeting may be scheduled at the Organization's location. The Organization may use this meeting to gather specific information on the registration process.

The pre-assessment will allow STR-R the opportunity to gain additional information about the Organization's size, nature of operations, and readiness for a final assessment and expertise. The size of the assessment team used for the final registration assessment may be determined at this time.

The pre-assessment may include the following activities:

- (a) an assessment of the requested scope of registration;
- (b) an on-site desk top review of the Organization's Manual;
- (c) a tour of the Organization's facility;
- (d) an on-site verification that the Organization's procedures exist and addresses the elements and activities described in the Management Systems Manual;
- (e) a written report to the Organization's management, when requested by the Organization.

The Organization's decision to request a pre-assessment depends upon the Organization's knowledge and experience with management systems.

The Organization's manual and implementing procedures should be as near complete as possible prior to the pre-assessment. A full system pre-assessment will be limited to two within a one-year period. There shall be at least six months between full system pre-assessments. STR-R will not perform any more than two complete and full system pre-assessments over the life of the contract. Phased or partial system pre-assessments may be conducted at the request of the Organization.

4.0 Stage 1 Pre-Audit Assessment Activity

ISO 17021:2011 and the Criteria of SQF CB requires that all **new initial certification audits** be conducted in two stages: Stage 1 and Stage 2.

The Stage 1 audit may be on-site or off-site and may include the following:

- a) an audit of the client's management system documentation;
- b) an evaluation of the client's location and site-specific conditions and to undertake discussions with the client's personnel to determine the preparedness for the stage 2 audit;
- c) to review the client's status and understanding regarding requirements of the management system standard under review, in particular with respect to the identification of key performance and/or significant aspects, processes, objectives and operation of the management system;
- d) to collect necessary information regarding the scope of the management system, processes and location(s) of the client, and related statutory and regulatory aspects and compliance (e.g. , environmental, legal aspects of the client's operation, associated risks, etc.);
- e) to conduct a review the allocation of resources for the Stage 2 audit and agree with the client on the details of the Stage 2 audit;
- f) to provide a focus for planning the stage 2 audit by gaining a sufficient understanding of the client's management system and site operations in the context of possible significant aspects;
- g) to evaluate if the internal audits and management review are being planned and performed, and that the level of

implementation of the management system substantiates that the client is ready for the stage 2 audit; and

- h) for SQF registration only, to ensure that SQF Plans have been derived as required in the relevant SQF Code and that they have been developed, validated, and verified by the SQF Practitioner; and there is substantiated evidence to show that Food Safety Plans were derived using the HACCP Method.

Stage 1 Audit Findings

Stage 1 audit findings are documented and communicated to the client, including identification of any areas of concern that could or may be classified as nonconformity during the Stage 2 audit. SQF findings are uploaded into the SQFI Quickfire database at which point the Applicant is required to respond with Root Cause Analysis and Corrective Action plan and Evidence sufficient to accept Corrective Action plan.

In determining the interval between stage 1 and stage 2 audits, consideration will be given to the needs of the client to resolve areas of concern identified during the stage 1 audit. STR-Registrar, LLC may also need to revise its arrangements for stage 2.

The applicable Management System Standards require the Organization to document and maintain a management system; therefore a management systems manual is required for registration.

An on-site documentation review will be conducted to appraise the Organization's management system manual and management system procedures to determine conformance with applicable standards. In some cases and for SQF only, off-site documentation review may be conducted to appraise the Organization's management system manual and management system procedures to determine conformance with applicable standards.

Pending no significant omissions or deviations from the requirements, a detailed documentation review will be completed. After the Stage 1 review, a final assessment will be scheduled. The on-site assessment will include the review of results of one complete internal audit and management review cycle.

Regardless of whether the Stage 1 assessment reveals significant omissions or deviations, STR-R will notify the Organization in writing of the results of the assessment in order to allow them time to make necessary

corrections and implement those changes prior to the Stage 2 Assessment Process described in paragraph 5.0 below.

5.0 Stage 2 Assessment Process

The purpose of the Stage 2 assessment is to determine that the Organization has implemented an **effective** management system, which meets the applicable Standard. In order to ensure a successful outcome to the assessment, the Organization shall:

- (a) have completely implemented the entire documented management system;
- (b) **have established and ensured the effective interaction between all elements of the management system;**
- (c) have completed one complete cycle of management reviews;
- (d) have completed one complete round of internal audits (all processes, all management system requirements)
- (e) have appointed a management representative who is responsible for ensuring complete implementation of the system and who will assist the team during the assessment process;
- (f) have arranged to see that the assessment team has access to all parts of the Organization's facility, subcontractor's facilities, relevant documentation, and personnel for which the scope of registration is being sought;
- (g) **have the ability to demonstrate a commitment to maintaining the effectiveness of the management system and to meeting regulatory and customer requirements;**
- (h) ensure phased assessment may be carried out over a specified time frame as agreed upon in the contract.

Prior to commencing the Stage 2 assessment, the audit team will meet with the Organization's Management to conduct an opening meeting. This is the first stage in the on-site assessment process.

The opening meeting ensures that:

- (a) the Organization has a clear understanding of the assessment process;
- (b) the scope of activity for which application has been made is confirmed;
- (c) an official link between the assessment team and the Organization is established;
- (d) points of any misunderstanding are clarified, areas which are sensitive in nature are defined and procedures regarding the registrar's process of confidentiality are reinforced;

- (e) the Organization's management is clearly committed to the assessment process.

Upon completion of the opening meeting, an in depth appraisal of the management system will be conducted by the assessment team in order to determine the adequacy of the Organization's program implementation. An assessment that has already commenced may be aborted when, for example:

- The safety of the audit team is in question,
- The Organization refuses to cooperate during the audit process,
- The Organization requests that the audit be stopped,
- The Lead Auditor determines that the Organization's system has not been fully implemented.

After completion of the assessment, the assessment team will identify deficient areas of the management system including implementation, which require Organization corrective action.

The closing meeting is conducted to:

- (a) present a summary of the assessment team's activities to the Organization's management;
- (b) present the assessment team's objective evidence, if any;
- (c) review and agree upon corrective actions which may be taken, if any;
- (d) present the assessment team's scoring as appropriate and recommendation concerning the issuance of the Certification of Conformity;
- (e) answer any questions concerning the assessment team's findings and recommendation(s) to be made to the Certification Committee;
- (f) request the Organization to make any written comments or observations to the General Manager of STR-R for consideration on improving the registration process.

A final assessment team report will be issued to the Organization within a reasonable amount of time, not exceeding five business days after the closing meeting. A copy of the report is issued to the Certification Committee along with other appropriate documents in order to make a decision whether to grant the requested registration to the Organization. The Organization shall not use the report nor any part thereof in a misleading manner. The Organization may communicate to interested parties that they have been recommended for registration at this time if that is the conclusion of the audit team.

6.0 The Registration/Certification Decision Process

The purpose of STR-R Certification Committee is to review the assessment team's recommendation(s) concerning the issuance of the STR-R Certificate of Conformity and render a decision regarding whether a Certificate of Conformity is warranted. The assessment team's report is a recommendation only and it is the responsibility of the Certification Committee to grant or withhold issuance of the certificate.

If registration is granted and all fees have been paid, STR-R will:

- (a) notify the Organization that a registration has been granted for a one (1) year period for SQF and three (3) year period for Quality Management Systems provided the Organization continues to comply with this Procedure For Registration;
- (b) provide the Organization with a Certificate of Conformity;
- (c) include the Organization's registration status in the STR-R Registered Company Listing database.
- (d) authorize the Organization to use the STR-R Mark, subject to the provisions stated for its use in paragraph 14.0 and (e). below
- (e) grant use of the STR-R mark and provide the Certificate of Conformity only after the Organization signs an agreement governing the use of the Mark (s) and Certificate.
- (f) For SQF, Certificates are granted or denied through SQFI Quickfire Database.

If the Certification Committee denies granting of registration, the Organization shall be notified of the findings on which that decision was based and will provide information relating to reconsideration or appeal of the decision in accordance with paragraph 15.0.

7.0 Ongoing Surveillance & Maintenance Of Registration

After a registration has been granted, the Organization is subject to surveillance audits annually to assure continued conformance with their documented system.

Surveillance audits shall be conducted at least semi-annually or annually at the Organization's location. These audits shall be conducted only after the Organization has been notified of the pending audit. Each applicable element of applicable standard (ISO 9001:2008, AS9100, etc.) will be assessed during the three-year cycle of surveillance assessments except for SQF2000 or SQF1000 Registrations. This also applies to multi-site situations.

For SQF2000 or SQF1000 Registrations, audits are conducted at predetermined intervals. After the first or main certification audit for SQF2000 or SQF1000 systems, surveillance audits are conducted every six months. Audit frequency may be reduced after three years if the supplier demonstrates a good audit history. Recertification audits are conducted annually.

The Surveillance audits shall be scheduled and conducted no later than one year from the anniversary date of the initial Stage 2 audit activity or six months from the anniversary date of the initial Stage 2 for SQF2000 or SQF1000 Registration.

Surveillance audits cannot be extended unless there are extreme extenuating circumstances. Any registered organization may request an extension by completing the Extension Form QF 2.1.9 no later than 30 days before the scheduled date of the audit. There is a nonrefundable application fee of \$250.00 associated with such an extension request.

The surveillance audit program will include, at least:

- a) internal audits and management review,
- b) a review of actions taken on nonconformities identified during the previous audit,
- c) treatment of complaints,
- d) effectiveness of the management system with regard to achieving the certified client's objectives,
- e) progress of planned activities aimed at continual improvement,
- f) continuing operational control,
- g) review of any changes, and
- h) use of marks and/or any other reference to certification.

STR-R requires that SQF Certified Organizations must notify STR-R in writing in the event of a food safety incident (recall) by the Supplier at anytime during their certification in a timely manner.

8.0 Renewal Of Registrations

The Certificate of Conformity is valid for a three-year period after which time the Certificate will expire except for SQF2000 or SQF1000 registrations. For SQF2000 or SQF1000, the Certificate of Registration is

valid for a one-year period after which time the Certificate will expire. Contracts automatically renew unless otherwise specified by the client.

STR-R will notify the Organization approximately three (3) to six (6) months prior to the expiration of the Certificate of Conformity that their recertification audit must be scheduled.

Renewal or re-certification audits shall be scheduled and conducted no later than three years from the anniversary date of the initial audit activity or no more than one year from the anniversary date of the initial audit activity for SQF Code Registration. Re-certification/renewal audits cannot be extended unless there are extreme extenuating circumstances and these must be in writing. If the Certificate expires prior to the expiration date noted on the certificate, then a full initial certification audit will be required.

9.0 Modifications To The Registration Scope and Special Audits

A registered Organization may not revise the scope of its previously approved Registration scope without the written approval of STR-R. STR-R will consider requests for changes to the scope of the Certificate of Conformity and inform the Organization of its acceptance or rejection.

The Certificate of Conformity is only valid at the location(s) that appears on the Certificate or certification addendum. If the Organization changes locations, the Organization may be subject to a surveillance audit in order to maintain the validity of the Certificate. After all fees have been paid, a revised Certificate of Conformity will be issued to the Organization.

Special audits may be conducted. It may be necessary for STR-Registrar, LLC to conduct audits of certified clients at short notice to investigate complaints, in response to changes or as follow up on suspended clients.

In such cases:

- a) STR-Registrar, LLC will notify, describe and make known in advance to the certified clients the conditions under which these short notice visits are to be conducted, and
- b) STR-Registrar, LLC would exercise additional care in the assignment of the audit team because of the lack of opportunity for the client to object to audit team members.

10.0 Management System Revisions

All proposed revisions to the registered Organization's Management System or changes in ownership, key personnel, changes in facilities, or if analysis of a complaint or if any other information indicates that the registered Organization no longer complies with the Procedures for Registration, STR-R will determine if the proposed changes are acceptable, or require an additional surveillance audit to determine acceptability, or will deem the changes are found unacceptable and paragraph 12 of this document.

After changes are found acceptable, unacceptable, or audit required, STR-R will, within ten (10) working days from the date of written request for the change, notify the Organization that approval or disapproval to implement the changes has been granted or denied and that a surveillance audit may or may not be required.

11.0 Complaints

The Organization must maintain records of all complaints received from purchasers or other interested parties concerning its registered program. These records should be maintained in a separate file in order to review and evaluate the effectiveness of the Organization's registration system and to take corrective measures to preclude those problems from recurring in the future.

The Organization shall within fifteen (15) working days of receipt of such complaints notify STR-R of any irregularity in the Organization's registered program.

Where and to the extent that it is necessary, the Organization shall prepare a corrective action plan for evaluation and acceptance by STR-R.

12.0 Withdrawal, Maintaining, Extending, & Suspending Of a Registration

A registered Organization may at any time, terminate its certificate and responsibility with STR-R. If a company wishes to terminate its certification, the Organization shall notify STR-R in writing and return the Certificate of Conformity and applicable Mark(s) computer files and/or camera-ready copy.

The Organization's client file maintained by STR-R becomes the property of STR-R and may not be released to other parties unless otherwise agreed upon between the Organization and STR-R.

STR-R Certification Committee may at its discretion, withdraw, reduce, extend or suspend the registration of an Organization for cause, such as violating the terms of registration listed in this Procedure for Registration.

SQF Certification shall be suspended in any case where, but not limited to, a Critical Non-Conformity is detected or where an Organization fails to take Corrective Action within the time frame specified. In such a case, STR-R will provide written notification to the organization specifying the reasons for suspension, the effective date, and the requirement to provide STR-R a detailed Corrective Action Plan outlining the Corrective Action to be taken no later than forty-eight (48) hours of receiving the notification. Upon receipt of the detailed Corrective Action Plan, the organization will be subject to an on-site audit within thirty (30) days to verify that immediate Correction has been taken. No more than ninety days after suspension effective date, the Organization shall be subjected to another on-site audit to verify the effective implementation of the Corrective Action Plan and that the Organization's SQF System is achieving stated objectives. At no time during suspension may an Organization represent itself as holding an SQF Certificate of Registration nor use the SQF Certification Trade Mark in any way. Re-instatement of SQF Certification shall follow the process defined in QSLP 2.7 which shall be made available to any current applicant or registered Organization upon request.

STR-R maintains an impartial and nondiscriminatory appeals program to evaluate the consideration of appeals against its decision to terminate an Organization's registration. The STR-R disputes and appeals policy is available upon request.

STR-R may terminate its registration program at any time provided that all registered companies are notified **at least 60 days in advance** in order to transfer all of the registrations to another accredited registrar.

In the event of withdrawal (revocation) of STR-R's AS9100 qualification, QMS accreditation, or SQF Licensing Agreement, STR-R will assist its affected customers in the transfer of their registrations to another appropriately qualified QMS registrar and cooperate fully with that registrar in the transfer of the client's registration file information.

13.0 Registration Criteria Changes

If necessary, STR-R may revise this Procedure for Registration at any time. When substantive changes are made to the registration process, STR-R will notify those organizations of the change(s) and if necessary, of the effective date and allow them time to implement those change(s). Such changes will be issued as STR-R Advisories.

14.0 Use Of Certificates Of Conformity And Marks

The STR-R Certificate of Conformity and Mark are the sole property of STR-R and are on loan to the registered Organization for its use in accordance with this Procedure for Registration. STR-R requires that all Organizations which it registers, **maintain a procedure to control the use of the Certificate of Conformity and registration Mark.**

Use of the Mark and Certification will be allowed only after the Organization signs the agreement governing their use. An appropriate person, within the organization, shall be in control of the Certificate and the registration Mark.

The registration Mark is a registered trademark of STR-R and the ANAB both of which shall retain the exclusive rights therein. Permission to use the trademark(s) may be granted or withdrawn at the discretion of STR-R. Permission to use the Mark(s) is limited to announcements that accurately represent the scope for which registration has been granted.

The registration Mark(s) shall not be applied and/or displayed on any product or on product labels containers or packaging, calibration test certificates, certificates of analysis, etc and shall not be used in any way as to imply product certification. When applying and/or displaying the ANAB Mark, this Mark shall be applied and/or displayed alongside the STR-R mark.

Registration Marks are not provided for, nor authorized for use by any SQF registered Organization unless achieving the SQF2000 Level 3 Certification status.

The Organization may refer to their registration status in professional, technical, trade, or other business publications; however, such references must not imply product endorsement based on the STR-R registration process.

15.0 Disputes And Appeals

STR-R maintains disputes and appeals procedures describing due process whereby an applicant and/or registered Organization may dispute any, assessment, registration, or surveillance activity and may dispute any decision rendered by STR-R's Certification Committee and has the right to object to any Appeal Committee member with just cause.

16.0 Confidentiality

STR-R maintains confidentiality at the levels of its organization concerning information obtained in the course of its business. No information will be disclosed to any third party unless in response to legal process, in which

case the company will notify the client prior to disclosing the information. Notwithstanding the foregoing, the client authorizes STR-R to make records of its work available for review by the accreditation body during the course of their periodic surveillance.

17.0 Witnessed Audits

The ANSI-ASQ National Accreditation Board (ANAB) and/or American National Standards Institute (ANSI) and/or SQFI personnel may periodically monitor and evaluate STR-R's conformity to the accreditation criteria throughout the term of its accreditation cycle. This activity includes periodic witnessing of STR-R's audit team conducting management system registration audits/assessments at client locations.

Those organizations that are issued an ANAB or ANSI accredited registration certificate, or an organization being audited for the purpose of being issued an ANAB or ANSI accredited registration certificate, shall permit STR-R's audit team to be accompanied by ANAB and/or ANSI accreditation auditors for the purpose of witnessing STR-R's audit team.

Should an organization refuse to allow for an ANAB or ANSI and/or SQFI witnessed audit no certificate shall be issued by STR-R and the current certificate will be withdrawn. If the organization chooses to transfer to another registrar to avoid having its audit witnessed, an ANAB or ANSI accredited certificate may not be issued by any IAF member Certification Body. ANAB or ANSI will also notify IAF member accreditation bodies.

NOTE: ISO 9001:2008, AS9100 and SQF2000 / SQF1000 allows that, in some cases, certain management system requirements may be excluded or exempted due to the nature of the organization's product, customer requirements or the applicable regulatory requirements. While such exclusions or exemptions may reduce the complexity of the system and the resources required, they may not affect the organization's ability, or absolve it of its responsibility, to provide a product or service that meets customer and applicable regulatory requirements. Any such exclusion that is claimed must be clearly defined and justified in the Manual. At the time of audit, should any claimed exclusions be found inappropriate, additional time may be required on-site and/or the registration audit may be unsuccessful.

NOTE: All services are performed according to the General Terms and Conditions for Certification Services, STR-R Advisories and these Procedures for Registration