UL-Registrar, LLC
4 Fork Street, Suite 1
Mount Pocono, PA 18344
800-903-5660

BRC/RILA Consumer Product
Procedure for Registration

1.0 Scope

Registration is open to all interested organizations or retailers. The purpose the BRC/RILA Consumer Product registration process is to assess the extent of the organization's conformance with the BRC/RILA Consumer Product Standard regarding the non-food, manufactured products placed on the consumer market being manufactured and to be able to consistently produce safe, legal consumer products to the quality required by its customers or demanded by consumers. The products may be retailer-branded (private label) or branded, or be unbranded products for use by other organizations. A business must have a full understanding of the products produced, manufactured and distributed and have systems in place to identify and control hazards significant to the safety and legality of the products. The BRC/RILA CP3 Certification Program is based on key components: senior management commitment, risk assessment of the product and the process, and a systematic approach to managing identified risks.

The manufacturer/packager (organization) shall make all necessary arrangements for UL-Registrar, LLC (UL-R) personnel to conduct the assessment with respect to examining documentation, access to all production areas, records and personnel associated with the initial Certification, annual surveillances and re-Certification audits.

2.0 Program Participation (New Applicants) – Application for Registration

Organizations to undergo assessment for the first time must provide UL-Registrar, LLC pre-audit information on forms (Application for Registration) supplied by UL-Registrar, LLC. It is the responsibility of the Company to ensure that adequate and accurate information is given to the UL-R detailing the products it manufactures and the process technologies it uses to enable UL-R to select an auditor with the required skills to undertake the audit. The Application for Registration supplied UL-R shall include but not be limited to the following:

- The size and location of the facility to undergo audit,
- the number of employees at the facility,
- which products they wish to have included within their certification,
- and the geographical locations where the products may be placed on the market

UL-R will be guided by the size and extent of operation to determine appropriate duration for each activity.

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Upon receipt of the Application for Registration, a Contract/Proposal (Agreement) will be forwarded to the applicant. This document will be used as a contractual agreement between UL-Registrar, LLC and the organization to carry out certification services.

Two copies of the Agreement will be provided to the manufacturer for the purpose of signing. One copy will be submitted to UL-Registrar, LLC and one copy will be retained by the organization. To the extent that there is any inconsistency between this “Procedure for Registration” document and the final contractual agreement (proposal), the terms of the final Agreement shall control.

The Agreement shall remain in effect for three years and shall automatically renew for subsequent three year terms until such time that UL-Registrar, LLC informs the organization or the organization informs UL-Registrar, LLC in writing of their intention cease participation in the BRC/RILA CP3 Certification Program upon thirty (30) days prior written notice to the other party. Cancellation of the Agreement causes the Certificate of Conformity to be withdrawn immediately. The Certificate of Conformity is the property of UL-Registrar, LLC and must be surrendered without delay. All Certification Marks provided for use by the organization shall be surrendered, as well and all advertising bearing the marks removed immediately from use.

Upon submission of a signed proposal, the organization will be contacted by UL-Registrar, LLC personnel to arrange for mutually acceptable dates during which to schedule audits. Audits will be conducted at the earliest possible date acceptable to the organization that UL-Registrar, LLC auditing personnel are available.

The Client’s Prerequisite Requirements

The registration process requires that an operational Management System be in place at the time of the audit. This means that at a minimum:

- The System is fully documented and has been implemented.
- The Organization has obtained a copy of the Standard.
- The Organization has assembled and trained a team of people to participate in risk assessment and other safety and quality matters.
- The Organization has identified the product scope and established the appropriate product group(s).
- The Organization has carried out or obtained risk assessments and ensure that control points in the process have been established.
- The Internal Audit system is fully implemented with one complete round of internal quality audits completed and the system demonstrates effectiveness.

- A complete Management Review cycle has been carried out.
- A Management Representative has been appointed who is responsible for ensuring complete implementation of the Management System and who will assist the audit team during the assessment process.

3.0 BRC Consumer Product Pre-Assessment

The opportunity for an optional Pre-assessment exists up until you undergo your Enrolment Visit or Full Onsite Audit. The benefits of the optional pre-assessment are that it provides you with a good indication of whether your system meets the prerequisite requirements listed above and that your system appears in compliance with the BRC/RILA Consumer Product Standard.

It further provides the opportunity for your organization to meet and work with your assigned lead auditor in advance of the enrollment or initial audit. It provides an opportunity to have a second set of eyes review your documentation, rather than having those familiar with the documentation review their own work. Pre-assessments may be tailored to meet your specific needs, including both audit content and duration. The typical pre-assessment usually entails a similar duration as an On-Site Audit, however additional or reduction in days can be provided at your request.

The Pre-assessment visit is concluded with a verbal summary of findings and if desired, a brief written summary of those findings can be forwarded prior to the Enrolment or On-Site Audit. Pre-assessment visits are not documented within a standard BRC report nor are eligible for registration and posting on the BRC Directory/Database.

4.0 BRC Consumer Product Enrollment Visit

The opportunity for an Enrollment Visit exists up until you undergo your Full Onsite Audit and may only be performed once. The Enrollment Visit is Optional and may be planned as part of the Pre-Assessment or separately or in lieu of a Pre-assessment. The intent of the Enrolment Visit is to give the site's customer some visibility on their commitment to the process through documented results of a simplistic yes/no evaluation and enrollment on the BRC Directory/Database. The activity provides an overall impression of the sites' readiness for formal assessment but is not an assessment against the requirements. The typical Enrollment Visit is planned as a single day onsite activity.

5.0 BRC Consumer Product Initial On-Site Audit

The organization shall select a mutually convenient date for the scheduling of the Initial

On-Site Audit. The Initial On-Site Audit must encompass the entire process from raw material to end-product dispatch and include all the requirements of the Standard. BRC/RILA Consumer Product Standard allows that, in some cases, a certain clause or clauses may be excluded due to the nature of the organization's products, customer requirements, or the applicable regulatory requirements. While such exclusions 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 product that meets customer and applicable regulatory requirements. Any such exclusion that is claimed must be clearly defined and justified in the Consumer Product system documentation and identified in the scope of certification. 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.

The organization shall ensure that production at the time of the audit covers products within the intended scope of certification. Where possible, the widest range of these products shall be in production for the auditor to assess. Where the product range is large or diverse, the audit team shall use discretion to continue the audit until sufficiently satisfied that the intended scope of the certification has been assessed. The organization shall ensure that appropriate and pertinent documentation and data is available at all times during the audit to ensure effectiveness of the audit. In addition all appropriate staff shall be available at all times during the on-site audit and may be subjected, at the discretion of the audit team, to interview.

The On-Site Audit consists of the following seven stages:

- The Opening Meeting to confirm the scope and process of the audit.
- A review of documented risk assessments, quality management systems, records, test reports, and other pertinent documentation.
- A formal verification that the Client Prerequisite Requirements have been met (regardless of results from pre-assessment or enrolment visit activities).
- A Production facility inspection conducted to verify practical implementation of the Standard's requirements within the organization's facility including the interview of personnel at management and non-management level.
- A Review of the results of documentation assessment and facility inspection to verify and conduct further assessment in any specific department, procedure or process.
- Final Review by the audit team of findings identified during the audit and preparation of the Closing Meeting.
- The Closing Meeting is held to review audit findings with the organization including non-conformities and follow up processes including required timeframes.

All audits may not carry out the activity in the sequence listed above but shall include all elements. The organization shall fully assist the audit team at all times and are expected to have appropriate senior management present during Opening and Closing Meetings and have appropriate authority to ensure that corrective action can be progressed if non-conformities are identified. The most senior operations manager on site or their nominated deputy shall be available at the audit and attend the Opening and Closing Meetings.

A written summary of the non-conformities identified during the audit and presented at the Closing Meeting will be documented by the auditor and provided to the organization, either at the Closing Meeting or within one working day after completion of the audit. Any major system weakness or non-conformance to the standard identified during the Initial On-Site Audit must be addressed to the satisfaction of UL-R prior to the registration of your system.

This is the first stage of the on-site certification assessment process.

The Opening Meeting

The opening meeting ensures that:

- to confirm the scope and process of the audit and that the audit process is confidential;
- the organization's personnel have a clear understanding of the assessment process;
- the organization's personnel are clear on the scope of the activity for which application has been made;
- all parties involved in the process are clear with regards to the primary contact person;
- there are no points of misunderstanding with respect to any areas of a sensitive nature and confidentiality is carefully maintained regarding proprietary aspects of the organization's operations;
- management personnel are clear and committed regarding the purpose of the assessment;
- classification of Nonconformities (Critical, Major and Minor) is understood by the organizations management to ensure all parties are clear regarding how the audit results will be reported and recorded;
- The organization has an understanding of the UL-R Disputes and Appeals Process.

Upon completion of the opening meeting, a brief walk-through of the physical plant in order to orient the auditor to the facility will take place followed by an in-depth appraisal of

each quality system component. This assessment will be conducted by the auditor in order to determine the adequacy of the organization's implementation of the specific regulatory requirement(s) pertinent to the organization's scope of application.

As product standards specify conformance in industries, UL-Registrar, LLC will verify that manufacturers are in conformance with the applicable manufacturing regulations and practices. The audit will be conducted based on the audit standards that are appropriate to the products being produced.

Aborting the Audit

An audit that has already been started may be aborted when, for example:

- the safety of the auditor is in question;
- the organization refuses to cooperate during the audit process;
- the organization requests that the audit be stopped;
- the auditor immediately determines that the organization's quality systems are significantly non-conforming with the standard(s) and/or regulations.

The audit must be re-scheduled at the earliest date agreed between the parties when the organization has corrected or resolved the reason for stopping the audit.

Pre Closing Meeting Activities

After completion of the audit and prior to the closing meeting, the auditor will meet privately with the companies designated representative and will clearly identify deficient areas or non-conformant matters regarding the overall quality system, which will require an organization to develop an appropriate corrective action plan. Nonconformity documents will be signed by the designated company representative and copies left on site by the auditor.

The Closing Meeting

A formal closing meeting will be held on the final day of the assessment for the purpose of:

- presenting a summary of the auditor's activities to management personnel present;
- presenting the findings of the audit regarding matters of non-conformance (if applicable);

- ensuring that the organization understands the classification of Nonconformities (Critical, Major and Minor) and to ensure all parties are clear regarding how the audit results will be reported and recorded;
- listening to and acknowledging the organization's understanding of any non-conformance(s) which may be presented (if applicable);
- communicating that any nonconformity document must be signed by the management's representative and the auditor for each nonconformity noted;
- presenting the auditor's recommendation concerning the final audit grade;
- answering any questions concerning the auditor's findings and recommendation to be made to the Certification Committee;
- requesting that the organization provide any written comments or observations to UL-Registrar, LLC for consideration on improving the assessment process;
- the ultimate decision with respect to grade and score lies with the Certification Committee.

Results of the Audit shall be provided informally at the end of the onsite activity as well as submittal of final report after receipt of payment.

6.0 The BRC/RILA Consumer Product Certification Decision Process

Prior to the Certification Decision, a technical review of report and closing of non-conformances will be conducted. Following the technical review and non-conformance closure, qualified members of the UL-R management independent of the audit activity, will review the audit team's written report and all associated documentation. This review will determine if a certificate may be awarded and the final grade of the assessment conclusion. When all requirements for certification have been met, UL-R will register your organization on the BRC Directory/Database and issue the BRC Certificate of Conformance to your organization for the scope of the services evaluated. A copy of the audit report and any subsequent certificate or audit result will be supplied to the BRC and UL-R in the agreed format for the BRC Global Standard used. All documents in relation to the audit will be available to BRC upon request. BRC may contact the site directly in relation to its certification status or for feedback on UL-Registrar's performance, or investigation into reported issues.

Companies achieving BRC certification are qualified to use the BRC logo and/or the UL-Registrar Certification Marks on company stationery and other marketing materials however may not be used on products or product packaging. The BRC logo and UL-Registrar Certification Marks apply only to the certified site. Any certified site found to be misusing the mark(s) will be subject to the BRC referral process and may risk suspension or removal of their certification.

7.0 Ongoing Frequency, Surveillance and Certification Cycle

At the conclusion of on-site formal assessment a full written report is prepared in English and documented within the prescribed audit format defined by BRC. The final report will be prepared and dispatched to the organization within a period typically no longer than 42 calendar days (74 calendar days for the initial audit) after the audit date. The report will exclude confidential information about the site, such as customer names, in order to maintain client confidentiality. However, it will be necessary to describe the types of materials and technologies used. The detailed audit report section includes comments where criteria have been met, particularly where improvement or enhancement is evident and objective evidence to support any nonconformities that have been identified. Audit reports remain the property of the organization however must be uploaded by UL-Registrar in the required format to the BRC Directory.

An ongoing audit schedule will be agreed between the organization and UL-Registrar based on the final score and grade of the audit and in accordance with the frequency chart detailed in the BRC/RILA Consumer Product Standard (issue 3) Appendix 4.

Certified organizations with Product Groups 1 and 2 will require a minimum frequency of 12 months, but may vary according to the performance of the company at a given audit as reflected by the grade and detailed in the BRC/RILA Consumer Product Standard (issue 3) Appendix 4.

Certified organizations with Product Group 3 only are provided with a 24 month certification cycle, however are required to undergo an interim surveillance audit at 12 months. Surveillance audits cover only the “fundamental” requirements and confirmation that any previous nonconformities raised have been addressed to the satisfaction of UL-Registrar. More frequent audits may be required depending on performance as stated in the BRC/RILA Consumer Product Standard (issue 3) Appendix 4.

Note: A condition of undertaking an audit using BRC scheme is that the auditor may be accompanied by other personnel for training, assessment or calibration purposes (e.g. training of new auditors, routine shadow audit programs, witness audits by Accreditation Bodies, witness audits by the BRC). BRC reserves the right to conduct its own audit or visit a site once certificated in response to complaints or as part of the routine BRC compliance activity to ensure the integrity of the Global Standard Schemes. Such visits may be announced or unannounced.

8.0 BRC/RILA Consumer Product Re-certification On-Site Audit

Re-certification audits are conducted following the initial certification audit and based on the frequency requirements noted above, to verify that your organization continues to satisfy the Standards’ requirements under which you’ve been registered. As opposed to Surveillance audits, the Re-certification audit is more in depth and closely resembles the Initial On-Site Audit.

Audit results are reported verbally at the conclusion of the audit, and subsequently in a written report. Any major non-conformance to the standard identified must be corrected to the satisfaction of UL-R, prior to recommendation to the Certification Committee for renewed registration of your system.

Upon conclusion of the audit and prior to the Certification Decision, a technical review of report and closing of non-conformances will be conducted. Following the technical review and non-conformance closure, qualified members of the UL-R management independent of the audit activity, will review the audit team's written report and all associated documentation. This review will determine if a certificate may be awarded and the final grade of the assessment conclusion. When all requirements for re-certification have been met, UL-R will re-register your organization on the BRC Directory/Database and issue an updated BRC Certificate of Conformance to your organization for the scope of the services evaluated. Irrespective of the outcome of the audit, a copy of the audit report and any subsequent certificate or audit result will be supplied to the BRC and UL-R in the agreed format for the BRC Global Standard used. All documents in relation to the audit will be available to BRC upon request. BRC may contact the site directly in relation to its certification status or for feedback on UL-Registrar's performance, or investigation into reported issues.

The certification body shall not issue a certificate or report until the administration fee has been received, irrespective of the outcome of the certification process.

8.0 Scheduling of BRC/RILA Consumer Product Audits

Should you elect to pursue registration through UL-R, we will work to coordinate the scheduling of the on-site audit dates with you and will provide the details of our planned audit team representatives for your approval. Subsequent audits must be scheduled to occur within a 28 calendar day time period prior to the next audit due date. The due date of the subsequent audit is calculated from the date of the Initial On-site Audit, and not from the certificate issuance date, and irrespective of the need of further site visits made to verify corrective actions arising from the Initial On-site Audit date.

9.0 BRC/RILA Consumer Product Continual Development Audit Scheme

The BRC/RILA Consumer Product Audit scheme provides for a reporting and scoring structure outside of the Certification scheme. Where Certification requirements have not been met (for example one or more Critical Nonconformity has been identified), the organization's report is still required to be submitted to the BRC Directory/Database by UL-Registrar. Although certification requirements have not been met, the organization

may still benefit and comply with customer's requirements by undergoing BRC audit and providing access to their site's details through the BRC Directory/Database.

Even where certification requirements have been met, it may be a decision of the organization to utilize the Continual Development Directory in lieu of the certification process. All On-Site Audits are conducted following the same process and requirements as defined above under "Initial On-Site Audits" and for subsequent audits also include follow up verification for corrective actions taken based on Initial audit identification. Frequency of subsequent audits are determined by the organization and in some cases may be dictated by the organization's customers, however once a 12 month period has lapsed, the site's details are removed from the Directory.

9.0 Nonconformities Defined

The following nonconformance classifications shall be used during the audit as well as being documented in the audit reports:

Critical Nonconformity
A failure where there is a critical failure to comply with a product safety or legal compliance issue and/or a major non-conformity against a 'fundamental' clause is determined.

No certificate shall be issued until critical non-conformities have been demonstrated as having been corrected. It is normally expected that major non-conformities will be corrected within 28 calendar days of the audit taking place. For initial audits 60 calendar days are allowed for correction of non-conformities. The company may remain in the certification program, but will be un-certificated and will only be certificated following verification of the corrective action being implemented. If non-conformity cannot be closed out within the 60-day period, the process of certification will commence again, i.e. a full audit.

Where a critical or major non-conformity against the statement of intent of a 'fundamental' clause has been established at an initial audit, the company shall not gain certification. Where a critical non-conformity is found at a subsequent audit, certification must be immediately suspended. This means that fundamental requirements must be substantially in place at the time of the audit visit and cannot be corrected later without the need for a complete re-audit.

In the event that a critical or major non-conformity against the statement of intent of a fundamental clause has been established by UL-R, the company shall immediately inform

its current customers and make them fully aware of the circumstances. It should also review whether the circumstances of the non-conformity compromise product safety and warrant the informing of past customers. Information on the corrective actions to be taken in order to achieve certification status will also be provided to customers.

Major Nonconformity

A systemic failure of any system, procedure or process or failure to comply with required regulations *that would have significant impact on the quality, strength, identity or purity of the product o*r the lack of a system, process or procedure required by the Standard.

No certificate shall be issued until major non-conformities have been demonstrated as having been corrected. It is normally expected that major non-conformities will be corrected within 28 calendar days of the audit taking place. For initial audits 60 calendar days are allowed for correction of non-conformities. The company may remain in the certification program, but will be un-certificated and will only be certificated following verification of the corrective action being implemented. If non-conformity cannot be closed out within the 60-day period, the process of certification will commence again, i.e. a full audit.

Where a major non-conformity against the statement of intent of a ‘fundamental’ clause has been established at an initial audit, the company shall not gain certification. Where a critical non-conformity is found at a subsequent audit, certification must be immediately suspended. This means that fundamental requirements must be substantially in place at the time of the audit visit and cannot be corrected later without the need for a complete re-audit.

In the event that a critical or major non-conformity against the statement of intent of a fundamental clause has been established by the UL-R, the company shall immediately inform its current customers and make them fully aware of the circumstances. It should also review whether the circumstances of the non-conformity compromise product safety and warrant the informing of past customers. Information on the corrective actions to be taken in order to achieve certification status will also be provided to customers.

If there is no formal commitment to implement corrective action received by the certification body within the 28/60 calendar day post-audit period as appropriate for existing or new certifications, or if there is a failure to meet the timescale proposed in the non-conformity summary sheet without justification, the company does not remain in the certification program. The company will then require a further full audit in order to be considered for certification.

Minor Nonconformity
Failure to adhere to an approved policy, procedure, instruction or process or failure to comply with required regulations where:

- There is insufficient evidence to be classified as a major
- There is little potential for significant health risk to the consumer
- The quality, strength, identity, purity of the product has not been compromised.

Certification will only be awarded where minor non-conformities have been addressed, the corrective action taken and evidence (e.g. photos, invoices) for work completed has been provided to the certification body within 28 calendar days following the audit (60 calendar days for an initial audit). UL-R may undertake further site visits to verify that action has been taken. Where documentary evidence is provided, absolute verification may be left until the next audit. At the subsequent audit, if verification cannot be confirmed, then a non-conformity may be raised and this may be elevated to a major non-conformity.

All CA plans shall be submitted to LST.ENF.CAPA@ul.com so that UL-R can send to the auditor for approval. Once CA plans have been approved, changes that are made by the organization to approved CA plans must be re-submitted to UL-Registrar, LLC.

10.0 BRC/RILA Consumer Product Continued Certification Actions

In the event that the organization becomes aware of legal proceedings with respect to product safety or legality, or in the event of a product recall, the organization shall immediately notify UL-Registrar in writing of the situation.

For certified organizations, where deemed appropriate, UL-Registrar may carry out further audits or questions activities to validate continued certification at any time. These visits may take the form of announced or unannounced visits to undertake either a full or partial audit.

Where justifiable, certificate suspension or withdrawal may be implemented pending the outcomes of such further reviews by UL-Registrar. UL-Registrar maintains the right for ultimate decision to suspend or withdraw certification in accordance with the defined procedure for Suspension and Withdrawal of Certification and ISO/IEC Guide 65 and BRC 004 Procedure for Certification Bodies.

Furthermore, the organization's certification is subject to withdrawal by UL-Registrar where objective evidence and intent on behalf of the organization to take appropriate corrective actions, or the corrective actions taken, are deemed in appropriate. In the event of certification withdrawal or suspended it is the responsibility of the organization to immediately inform its customers and make them fully aware of the circumstances relating to the withdrawal or suspension. Information on the corrective actions to be taken in order to reinstate certification status will also be provided to customers upon request.

11.0 BRC Directory/Database

The Global Standards Directory (www.brcdirectory.com) is an online searchable directory of organizations certificated to the BRC Global Standards for consumer products. Each entry includes relevant company details, contact and certification information. The directory also includes details of certification bodies approved by the BRC.

The Directory was developed to publicize the list of certificated organizations, provide key information to retailers and improve the management of the BRC Global Standards program. It provides a system of data storage of audit information, both live and archived. Data is centrally managed and controlled by the BRC to maintain accuracy and integrity.

Information about UL-Registrar certified organizations is provided to BRC by UL-Registrar. The Directory provides a searchable list of certified organizations, including contact details, link to the organization's website, the Standard against they are certified, and scope of certification. Further access to the Directory may be provided to retailers and other users of the Directory, at the discretion of the certified organization and can include initial audit date, certification date, next audit due date, certificate expiry date, and access directly to posted report.

Organizations may choose not to appear on the Directory however it is advisable to review these expectations with customers seeking to confirm the organization's status with respect to BRC registration.

12.0 Accreditation & Prior Experience

The registration and assessment services offered in this procedure will be conducted under UL-Registrar's ISO/IEC Guide 65 system and in accordance with the BRC004 Requirements for Certification Bodies.

13.0 BRC/RILA Final Report

Following each audit, a full written report will be prepared in the agreed format, defined by the BRC. The report shall be produced in open text format in English or in another language, dependent upon customer needs. The first section of the report must be available in English. A checklist of audit questions may also be available and appended to the report. The report will not include any confidential information about the site, such as customer names, proprietary processes or detailed formulations, in order to maintain client confidentiality. However, it will be necessary to describe, in general terms, the types of materials and technologies used. The detailed audit report section will include comment where criteria have been met, particularly where improvement or enhancement is evident, and objective evidence to support any nonconformities that have been identified. Product and production information will be referenced throughout the report which will have a clear focus on product-sector issues that will assist the reader to:

- gain greater understanding of individual clauses either for conformity or for non-conformity
- be informed of corrective action taken
- be informed of improvements made since the last audit
- be informed of 'best-practice' systems, procedures or equipment in place
- be informed of any additional pertinent comments the auditor made.

The report will accurately reflect the findings of the auditor during the audit. Reports will be prepared and dispatched to the company within a period typically no longer than 42 calendar days (74 calendar days for the initial audit) after the audit date.

Audit reports remain the property of the company commissioning the audit (which is usually the site but could be an agent, holding company or another entity) and shall not be released, in whole or part, to a third party unless the company has given prior consent (unless otherwise required by law). This authorization may be by a consent form, or may be contained within a contract between the company and user or the company and UL-R. UL-Registrar will retain a copy of the audit report. A copy of the audit report shall be uploaded by UL-R in the required format to the BRC Directory.

14.0 Modifications or Revisions to the Certificate

The Certificate of Conformity is only valid at the location(s) that appear(s) on the certificate. If an organization changes locations, the organization may be subject to a surveillance or special audit in order to maintain the validity of the certificate. After all

audit fees have been paid, a revised Certificate of Conformity will be issued to the organization.

Changes in ownership, physical location, key personnel, and/or changes in facilities must be provided in writing to UL-Registrar, LLC who will determine whether the changes impact the existing Certification.

15.0 Complaints & Recalls

Regardless of the regulatory status of the products being produced, each organization must maintain records of all product complaints received from purchasers or other interested parties. These records should be maintained in a separate file in order to be reviewed and evaluate as part of the effectiveness of organization's quality system and to take corrective measures to preclude those problems from recurring in the future.

In the event of a recall or market withdrawal of product that is covered and described on the certificates scope of certification, UL-Registrar, LLC shall be notified without undue delay. Upon receipt of such notice, UL-Registrar, LLC will establish and determine if a new certificate needs to be issued based on the recalled product or market withdrawal.

In any event, all recalls/withdrawals will be reviewed as part of the next BRC/RILA audit.

If analysis of a complaint or significant recall or if any other information indicates that the certified organization no longer conforms with these Procedures for Registration, UL-Registrar, LLC's certification committee reserves the right to suspend or withdraw Certification.

16.0 Withdrawal, Maintaining, Extending & Suspending of Participation

An organization may at any time, terminate its participation in the BRC/RILA Consumer Product Program with UL-Registrar, LLC. If an organization wishes to terminate its involvement with the BRC/RILA Consumer Product Certification Program, the organization shall cease to make reference to involvement with the UL-Registrar, LLC BRC/RILA Consumer Product Certification Program.

UL-Registrar, LLC may, at its discretion, withdraw or suspend the Certification of an organization for cause such as violating the terms of Certification listed in this document or failure to notify UL-Registrar, LLC of any significant changes that may affect the quality of the products supplied to its customers or consumers.

If there is no intention on behalf of the company to take appropriate corrective actions or the corrective actions taken are deemed inappropriate, certification shall be withdrawn. In the event that certification is withdrawn or suspended by UL-R, the company shall immediately inform its customers and make them fully aware of the circumstances relating to the withdrawal or suspension. Information on the corrective actions to be taken in order to reinstate certification status will also be provided to customers.

UL-Registrar, LLC also has the right to suspend or withdraw Certification and remove the organization's name from the certified companies list for failure to complete the next activity by the applicable anniversary date.

UL-Registrar, LLC maintains an impartial and nondiscriminatory disputes and appeals program to evaluate the consideration of disputes and appeals against any and all decisions. (See Section 19.0)

UL-Registrar, LLC may terminate its Certification program at any time provided that all qualified companies are notified at least six (6) months in advance.

17.0 Certification Criteria Changes

As requirements change, UL-Registrar, LLC may revise this document at any time.

When substantive changes are made to the process, UL-Registrar, LLC will notify those organizations of the change(s) and if necessary, of the effective date, allowing the organization time to implement the change(s).

18.0 Use of Certificate of Conformity, Use of Certification Marks and reference to BRC/RILA Participation

The Certificate of Conformity and Certification Marks are the property of UL-Registrar, LLC and are on loan to the certified organization for its use in accordance with this document. The BRC name or logo shall not be misrepresented or used in any manner that could be misconstrued or be defamatory to the BRC. If it is found that the BRC name or logo has been mis-used, it will be reported immediately to BRC for investigation.

The organization may refer to involvement with the UL-Registrar, LLC BRC/RILA Consumer Product Certification Program and publish their Certification status and use the UL-R Certification Mark in any professional, technical, trade or other business publication; however, such references must not imply product endorsement. Prior approval is required by completing and signing the UL-Registrar, LLC Agreement for use of the

BRC/RILA Certificate and Certification Marks which outlines correct use of the UL-Registrar, LLC Certification Marks.

19.0 Disputes and Appeals

The Disputes and Appeals Committee will review all disputes and appeals from an applicant, certified organization or individual. The audit report/CAR, written testimony and any additional documents provided by the applicant will be reviewed prior to any decision being rendered.

A current client may request a copy of the UL-R Disputes and Appeals process by written request at any time.

20.0 Confidentiality

UL-Registrar, LLC maintains a high level of confidentiality at all 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 or the organization has requested such disclosure in writing, in which case UL-Registrar, LLC will notify the organization prior to disclosing the information.

Upon request UL-Registrar, LLC will send duplicate copies of a confidentiality agreement to the organization. One signed copy of the agreement should be signed and returned prior to the audit. At no point in time will auditors be required to sign confidentiality agreements on the day of the audit.