UL Registrar LLC
BRC CP Procedure for Certification

1.0 Purpose

The purpose of the UL R BRC Consumer Products (CP) Certification Program is to assess the extent to which an organization conforms to the applicable Global Standard for Consumer Products.

2.0 Scope

Certification is open to all interested organizations. The purpose of the certification process is to assess the extent of the organization's conformance with the applicable Global Standard for Consumer Products regarding the organization's activities, products and services.

All organizations that utilize UL Registrar LLC's certification services are guided by this procedure and is required to comply with all of the relevant provisions contained herein, including implementing appropriate changes when they are communicated by UL Registrar LLC (UL R).

The organization shall make all necessary arrangements for the conduct of the BRC audit with respect to participating observers, examining documentation, providing access to all areas, records and personnel for the purpose of certification audits, surveillances, re-certifications, follow-up, special audits and resolution within the scope of the certification audit.

3.0 Program Participation (New Applicants/Current Clients)

Application for Certification

Organizations to undergo audit must apply for certification by providing UL Registrar LLC pre-audit information on the BRC Application for Certification.

An Application for Certification will be forwarded to the applicant upon request. Submitting the completed Application for Certification is the first step in the certification process. The Application for Certification may be filled out on behalf of an organization by a UL R representative utilizing information provided by the organization to UL R. In addition to the Application, the organization may be requested to provide:

- the process flow diagram
- a simple site plan
- organization chart
- the list of products or product groups included within the audit scope
- typical shift patterns
- production schedules, to allow audits to cover relevant processes
- and any requested exclusions from the scope of the audit.

Upon receipt of the Application for Certification and required documentation, 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.

The Agreement will be provided to the organization for the purpose of signing. A signed copy will be submitted to UL Registrar LLC and a copy should be retained by the organization. To the extent that there is any

inconsistency between this "Procedure for Certification" document and the final contractual agreement, the terms of this procedure 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 to cease participation in the BRC Consumer Products Certification Program upon thirty calendar (30) days prior written notice to the other party.

Cancellation of the Agreement causes the Certificate of Conformance to be immediately withdrawn. The Certificate of Conformance is the property of UL Registrar LLC and must be surrendered without delay upon request to do so. All Certification Badges provided for use by the organization shall be surrendered as well and all advertising bearing the badges removed immediately from use and/or public domain.

Upon submission of a signed contractual agreement (proposal), the organization will be contacted by UL Registrar LLC scheduling 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 where UL Registrar LLC auditing personnel are available.

4.0 Audit Scope

Unless otherwise specified, the audit scope applies to one site/one factory and includes the organizational structure, responsibilities, procedures, processes, and resources for implementing quality management systems in meeting specified management system objectives and regulatory requirements. Multi-site organizations are assessed based on the level of activity involved with the private label item(s). These multi-site organizations may be assessed independently based on the design of operation management.

Defining the Audit Scope

The scope of the audit – products produced and manufacturing processes – shall be agreed between the site and UL R in advance of the audit, to ensure the allocation of auditor(s) with the correct category and product knowledge.

The audit shall include all applicable requirements within the Standard and all production processes undertaken for the products included within the scope at the site seeking certification.

The audit scope and any permitted exclusions shall be clearly defined both on the audit report and on any certificate issued. The wording of the scope will be verified by the auditor during the site audit. The wording of the scope, of the product groups and, where applicable, the packaging format, shall enable a recipient of the report or certificate to clearly identify whether the products supplied have been included within the scope. This shall include a description of processing activities undertaken at the site that fall within the scope of this Standard, where this adds clarity for the user of the report or certificate (e.g. the bottle blowing, mixing, filling and packaging of bath and shower products or plastic molding and assembly of electronic toys).

Exclusion from Scope

The fulfilment of the certification criteria relies on clear commitment from the site management to adopt the best-practice principles outlined within the Standard. It follows therefore that the exclusion of products from the scope of certification shall only be permitted by exception.

The BRC logo can only be used by sites that have no exclusions. The exclusion of products produced at a site will only be acceptable where:

- the excluded products can be clearly differentiated from products within scope and
- the products are produced in a physically segregated area of the factory.

Where exclusions are requested, these shall be agreed to with UL R in advance of the audit. Exclusions shall be clearly stated on the audit report and certificate and the justification recorded on the audit report.
The certification of products must include audit of the entire process from raw material to end-product dispatch. It is not possible to exclude either parts of the process undertaken at the site or parts of the Standard.

Where exclusions are accepted, the auditor(s) shall assess any hazards presented by excluded areas or products (e.g. the introduction of pests or foreign body risks) and non-conformities may be raised relating to the excluded area where this poses a risk to the products within the audit scope.

The auditor retains the right to refuse the exclusion request where the criteria are not adequately met.

5.0 Audit Standards Defined

The Global Standards for Consumer Products were developed to ensure they are rigorous and detailed but clearly focused on the key issues to produce safe, legal products in accordance with customer quality requirements. The Standards provide a framework to manage product safety, integrity, legality and quality, and the operational controls for these criteria. Organizations undergoing a BRC audit to the BRC Global Standard for Consumer Products Issue 4 shall have access to an official copy of the applicable Consumer Products Standard. There are 2 Consumer Product Standards.

Each of the Standards can be certificated at 2 levels, Foundation Level or Higher level. This enables both flexibility to reflect customer's needs depending on the product sector and product /brand risk and provides a clear pathway for continuous development.

Foundation Level

The site must be able to demonstrate compliance with all of the requirements in the column headed 'Foundation'. All legal, safety and critical quality checks must be in place. Product must comply with legislation in the intended place of sale. This is often the responsibility of a third party on behalf of the customer. Foundation Level audits are not graded but operate on a pass or fail system.

Higher Level

The site must comply with all of the requirements in the column headed 'Higher'. This includes documented procedures for risk audits to define product and process controls and for practical application of all requirements.
Higher Level audits are graded on an AA – D scale.

5.1 Global Standard for Consumer Products – Personal Care and Households

The Personal Care and Households standard covers formulated and fabricated products which typically have higher hygiene requirements due to the nature and usage of products. Examples include cosmetics, medical devices, nappies, food wrap and household cleaners.

Scope of Operations
This Standard applies to manufacturing sites of raw materials (excluding packaging) and of finished products for business to business or for retail sale to consumers. It includes the activities of contract or assembly packers of consumer products.

It does not apply to activities relating to wholesale, importation, distribution or storage outside the direct control of the site.

The Standard does not apply directly to importers and cannot be used to assess importers' operations. Importers may find it useful to request that their manufacturers should meet the requirements of the Standard, as this will help the importers to meet their responsibilities to import safe and legal products.

Scope of Products
The scope of the Standard is for non-food, manufactured products placed on the consumer market – in other words, sold or given to consumers. It may also be used by companies producing raw materials and components for consumer products. The Personal Care and Household Standard is designed to include products such as cleaning products, toothbrushes, nursery accessories and food wrap.

Specific exclusions from the scope of the Standard are pharmaceuticals, vitamins, minerals and herbal supplements.

The Standard shall be applied at the points of manufacture and subsequent storage and distribution which are under the control of the manufacturer, prior to delivery to the retailer or customer.

5.2 Global Standard for Consumer Products – General Merchandise
The General Merchandise standard covers a wide range of mainly fabricated products where management of the production process to ensure the safety and quality of the products is the primary concern. Examples include electrical equipment, toys, furniture, textiles and jewelry.

Scope of Operations
The Standard applies to manufacturing sites of raw materials (excluding packaging) and of finished products for business to business or for retail sale to consumers. It includes the activities of contract or assembly packers of consumer products.

The Standard does not apply to activities relating to wholesale, importation, distribution or storage outside the direct control of the site.

The Standard does not apply directly to importers and cannot be used to assess importers' operations. Importers may find it useful to request that their manufacturers should meet the requirements of the Standard, as this will help the importers to meet their responsibilities to import safe and legal products.

Scope of Products
The scope of the Standard is for non-food, manufactured products placed on the consumer market – in other words, sold or given to consumers. It may also be used by companies producing raw materials and components for consumer products. The General Merchandise Standard is designed to include

products such as apparel, hair accessories, furniture, flooring, electrical appliances, DIY goods, toys and cookware. For a more extensive list of examples, see Appendix 2.

Specific exclusions from the scope of the Standard are pharmaceuticals, vitamins, minerals and herbal supplements.

The Standard shall be applied at the points of manufacture and subsequent storage and distribution which are under the control of the manufacturer, prior to delivery to the retailer or customer.

Regardless of the Standard, where the product range is large or diverse, the auditor(s) has the discretion to continue the audit until sufficiently satisfied that the intended scope of the certification has been assessed. Where a significant production process is undertaken only during a different period of the year from the audit, a separate audit may be required to assess that production method. The need for an additional audit will depend on the nature of the additional process and products and how they vary from the process and products in the audit scope.

6.0 Audit Duration

Before the audit takes place, UL R will indicate the approximate duration of the audit. The typical duration of an audit will vary from 1 to 1.5 days (8 hours per day at the site) at foundation level and 2 to 3 days at higher level. UL R utilizes the BRC Duration Matrix to assess the expected time required to undertake the audit of any particular site to ensure consistency and is the basis for calculating the total audit duration.

The calculation for the audit duration is based on:

- the number of employees (as full-time equivalent employees) per main site, including seasonal workers;
- the size of the manufacturing facility (including storage facilities on site);
- the number of manufacturing processes at the site.

Additional factors that may influence the calculation include:

- the complexity of the manufacturing process;
- the number of product lines;
- the age of the site and its impact on material flow;
- the labor intensity of processes;
- audit not carried out in the first language of the auditor or the site personnel;
- the number of non-conformities recorded in the previous audit;
- difficulties experienced during the audit requiring further investigation;
- the quality of site preparation (e.g. documentation, risk audit, quality management systems).

If additional storage facilities, locations or head office audits are included within the audit process then additional time shall be allocated for this over and above that indicated in the audit calculator.

7.0 Pre-audits

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

The pre-audit will allow UL R the opportunity to gain additional information regarding the Organization's size, nature of operations, expertise, and readiness for an initial certification audit. The size of the audit team used for the initial certification audit may be determined at this time.

The pre-audit may include the following activities:

- an audit of the requested scope of certification;
- an on-site desk top review of the Organization's Manual;
- a tour of the Organization's facility;
- an on-site verification that the Organization's procedures exist and addresses the elements and activities described in the management system;
- a written report to the Organization's management, when requested by the Organization.

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

The Organization's implementing procedures should be as near complete as possible prior to the pre-audit.

8.0 Initial Certification Audit Process

The purpose of the initial certification audit is to determine that the Organization has implemented an **effective** management system, which meets the applicable BRC Consumer Products Standard. The initial certification audit will always take place at the organization's location. In order to ensure a successful outcome to the audit, the Organization shall ensure:

a) the company has an original copy of the current issue of the Standard, in either electronic or paper format;
b) appropriate documentation must be available for auditor(s) to assess;
c) appropriate staff is available at all times during the audit;
d) an accurate gap analysis of their situation versus the requirements of the Standard was conducted;
e) the production schedule at the time of the audit covers products for the intended scope of the certification.
f) where possible, the widest range of these products shall be in production for the auditor(s) to assess;
g) operational control of the organization's processes;
h) that staff are adequately trained in:
    - the Standard
    - risk audit
    - obtaining legal and safety information relevant to their products
    - relevant product standards or codes of practice.

Prior to commencing any on-site certification audit activity, the auditor will provide an advanced audit schedule/agenda 14 calendar days prior to the audit date. Prior to commencing the formal audit, the audit team will meet with the organization's management to conduct an opening meeting. This is the first stage in the on-site audit process.

The Opening Meeting
The opening meeting ensures that:

- The organization's personnel have a clear understanding of the certification audit 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 audit;
- Classification of Nonconformities (Critical, Major and Minor) is understood by the organization's 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 Inquiries, Complaints, Disputes and Appeals Process.

It is expected that at the opening meeting those attending on behalf of the site will be senior managers who have the appropriate authority to ensure that corrective action can be progressed if non-conformities are found. The most senior operations manager on site at the time of the audit, or their nominated deputy, shall be available at the audit and attend the opening meetings.

Upon completion of the opening meeting, an in depth appraisal of the processes will be conducted by the audit team in order to determine the adequacy of the Organization's program implementation.

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 Section 4.0, in the paragraph entitled Audit Scope of this procedure are significantly non-conforming with the applicable BRC Standard(s);
- Failure to ensure that the production schedule at the time of the audit covers products for the intended scope of the certification will result in an aborted audit at the client's expense.

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 company's 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. Non-conformity documents will be signed by the designated company representative and copies left on site by the auditor.

Corrective Action Requests (CARs) 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 audit 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 nonconformity (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 nonconformities which may be presented (if applicable);
- communicating that any nonconformity document must be signed by the management's representative and the auditor;
- 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 audit process;
- the ultimate decision with respect to grade and certification lies with the Certification Committee;
- providing information regarding the BRC Global Standards Directory, which allows secure access to audit data to both the client and their nominated customers, together with the feedback systems available to communicate with UL R and with the BRC.

A draft Audit Summary Report will be left on-site with the organization at the conclusion of the audit. The Organization may communicate to interested parties that they have been recommended for certification at this time if that is the conclusion of the audit team.

Audit Results

At the conclusion of the on-site formal audit, a full written report is prepared in English and documented within the prescribed audit format defined by the BRC. 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, they must be uploaded by UL Registrar in the required format to the BRC Directory.

The final audit report will be submitted to Technical Review without delay for processing immediately following the audit. Upon completion of the technical review and closing of nonconformities, the Certification Committee will review all audit records and issue a final audit report, Certificate of Conformance, applicable Accreditation and Certification Marks, and the applicable UL Certification Badge to the organization. The final report will be prepared and dispatched to the organization within a period typically no longer than 42 calendar days (104 calendar days for the initial audit) after the audit date. The organization shall not use any audit records or any part thereof in a misleading manner.

Nonconformities Defined

Following identification of any non-conformities during the audit, the site must undertake corrective action to remedy the immediate issue (correction) and undertake an analysis of the underlying cause of the non-

conformity (root cause) to develop a preventive action plan addressing the root cause and preventing recurrence.

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

Critical Nonconformity - Where there is a critical failure to comply with a product safety or other legal requirement.

Major Nonconformity - Where there is a substantial failure to comply with the statement of intent of a clause or any requirement of the Standard, or where a situation is identified which would, on the basis of available objective evidence, raise significant doubt as to the conformity of the product being manufactured.

Minor Nonconformity - Where a requirement has not been fully met but, on the basis of objective evidence, the conformity of the product is not in doubt.

Critical non-conformities or non-conformities resulting in non-certification
In some circumstances the number or severity of non-conformities raised at the audit prevents the site from being certificated at either foundation or higher level following that audit. This will be the case where:

- a critical non-conformity is raised, and/or
- a major non-conformity against the statement of intent of a fundamental clause is raised, and/or
- the number or type of non-conformities exceeds the limits for certification, as per Table 1 in the applicable BRC Consumer Product Standard.

The grading of non-conformities will be reviewed by the independent certification process of the certification body as soon as possible after the audit. Where the review confirms that a certificate cannot be awarded, the site will be required to undertake another full audit before audit for certification. Where this occurs at a certificated site, certification must be withdrawn immediately.

Re-audits shall not take place any earlier than 28 days from the audit date, as it is unlikely that non-conformities can be addressed and fully effective improvements implemented and established within that time – although there may be some exceptions.

It is a requirement of some customers that they shall be informed when their suppliers have a critical non-conformity identified or where they fail to gain certification. In such circumstances the company shall immediately inform its customers and make them fully aware of the circumstances. Information on the corrective actions to be taken in order to address the non-conformities will also be provided to customers where required.

Major and minor non-conformities
No certificate shall be issued until major and minor non-conformities have been demonstrated as having been corrected, either permanently or via a temporary solution that is acceptable to UL R.

For each nonconformity raised, the site shall, in addition to undertaking the necessary immediate corrective action, undertake a review of the root cause of the non-conformity. The root cause shall be identified and an action plan to correct this, including timescale, provided to UL R. The proposed preventive action shall be included in the audit report.

Close-out of nonconformities can be achieved either by objective evidence being submitted to the certification body, such as updated procedures, records, photographs or invoices for work undertaken, or by UL R undertaking a further on-site visit.

Where the number and level of non-conformities identified at a higher-level audit would result in a grade of D being awarded (foundation-level audits are not graded), the closure of nonconformities shall be by means of a further site visit to review the action taken. This visit shall be within 28 calendar days of the audit if a certificate is to be issued.
For initial audits only, up to 90 calendar days are allowed to provide objective evidence of the correction of any non-conformities identified at the audit. The site will, however, remain uncertificated and will only be certificated following verification of the corrective action being implemented.

For all minor non-conformities and major non-conformities raised at recertification audits, if satisfactory evidence is not provided within the 28 calendar-day period allowed for submission following the audit, certification will not be granted.

In both instances, if the site cannot close out the non-conformity within the time period, the site will require a further full audit in order to be considered for certification.

UL R's Certification Committee will review objective evidence of corrective action completed prior to awarding a certificate.

Additional Nonconformity Information
In the case that corrective actions plans and evidence of implementation are rejected and more information is required, the organization will be requested to resubmit within 5 calendar days of rejection. In no case shall the time for responding to corrective action requests exceed 28 calendar days. If the organization does not respond within the required timeframes, certification will not be granted and / or existing client certificates will be suspended.

Nonconformities from the audit shall also be verified for long term effectiveness during the next site audit. Any repetition of the same nonconformities in the current audit shall be noted and consideration shall be given to raising the status of repeated minor nonconformities to a major nonconformance.

9.0 The Certification Decision Process

The purpose of UL R Certification Committee is to review the audit team's recommendation(s) concerning the issuance of the UL R Certificate of Conformity and render an independent decision regarding whether a Certificate of Conformance is warranted. The audit 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 certification is granted, UL R will:

a) notify the Organization that a certification has been granted, provided the Organization continues to comply with this Procedure for Certification;
b) provide the Organization with a Certificate of Conformity;
c) include the Organization's certification status in the BRC Global Standards Directory;

d) authorize the Organization to use the UL badge, subject to the provisions stated for its use in paragraph 15.0 (e) below and grant use of the UL badge and provide the Certificate of Conformity only after the Organization signs an agreement governing the use of the Mark(s) and Certificate.

If the Certification Committee denies granting of certification, the Organization shall be notified of the reason on which that decision was based.

10.0 Ongoing Audit Frequency & Maintenance Of Certification

The ongoing audit schedule and choice of audit program will be agreed between the organization and UL R. The frequency of announced audits will be 12 months.

The due date of subsequent audits is calculated from the date of the initial audit, irrespective of whether further site visits were made to verify corrective action arising from the initial audit, and not from the certificate issue date.

The subsequent announced audit(s) shall be scheduled to occur within a 28 day time period up to the next audit due date. This allows sufficient time for corrective action to take place in the event of any nonconformities being raised, without jeopardizing continued certification.

Surveillance

For certificated companies, where appropriate, UL R or the BRC Global Standards team may carry out further audits or question activities to validate continued certification at any time. These visits may take the form of announced or unannounced visits to undertake wither a full or partial audit. Refusal of access to the site may affect certification status.

Any non-conformities identified at a visit must be corrected and closed out within the normal protocol (i.e. within 28 days of the visit), and reviewed and accepted by UL R. If there is no intention on behalf of the site to take appropriate corrective actions, or the corrective actions are deemed appropriate, certification shall be withdrawn. The ultimate decision to suspend or withdraw certification remains with UL R. UL R will communicate any change in certification status to the BRC by updating the status in the BRC Global Standards Directory.

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 corrective actions to be taken in order to reinstate certification status should also be provided to customers.

Justifiable Circumstance

It is the responsibility of the organization to maintain certification. Where an audit is delayed beyond the due date, except in justifiable circumstances, this shall result in a major nonconformity being awarded at the next audit. Justifiable circumstances shall be documented in the audit report.

Moving the audit date to a more ‘acceptable’ later date for reasons of combining audits, lack of personnel or undertaking building work is not an acceptable reason for missing the due date. It is not justifiable to delay an audit just because the site is not in full production; however, audits must be undertaken while there are products being manufactured.

Audits Undertaken Prior to Due Dates

The due date of renewal audits occur within a 28 day window prior to the 12 month anniversary of the initial audit. In some circumstances it is possible to undertake the audit earlier than these due dates, for example to reset the audit dates to allow combined audits with another scheme or to include a product produced at a different season. Where an audit date is brought forward, the following rules shall apply:

- The audit report will detail the reasons why an audit has been brought forward;
- The audit due date will be 'reset' to be 12 months from this audit date;
- The certificate will be issued with an expiry date of 12 months + 42 days from the 'new' audit date;
- Under no circumstances should a certificate have a validity of more than 12 months.

Seasonal Production Sites

A seasonal production site is defined in the Global Standards for Consumer Products as, a product harvested and processed on a site that is opened specifically for the duration of the short term of that harvest (typically 12 weeks or less) during a 12 month cycle.

A site that is open for 12 months of the year may process products in different seasons, but would not be classed as a seasonal production site as it would operate all the year round. If specific seasonal products are in scope, there may be a case to visit the site more than once a year.

For true seasonal production sites, there may be circumstances where the frequency of audits could be more than 1 2months. The on-site audit date will be dictated by seasonal demands driven by key festivals and events. The certificate expiry date in these cases will be controlled by the actual date rather than the anniversary of the initial audit date. Justification needs to be included in the audit report.

11.0 Modifications To The Certification Scope and Special Audits

Communication with UL R Post Audit

In the event that any circumstances change within the organization that may affect the validity of continuing certification, the organization must immediately notify UL R. This includes:

- Legal proceedings with respect to product safety or legality
- Product Recall
- Significant damage to the site (e.g. natural disaster such as flood or damage by fire)
- Change in ownership
- Significant change in the operation or scope.

UL R must take appropriate steps upon being notified of the above to assess the situation and any implications for the certification and shall take appropriate action.

Information shall be provided to UL R upon request so that an audit can be made as to the effect on the validity of the current certificate. UL R may, as appropriate:

- confirm the validity of certification
- suspend certification pending further investigation
- require further details of corrective action taken by the site
- undertake a site visit to verify the control of processes and confirm continued certification
- withdraw certification
- issue a new certificate with the new owner's details.

Changes to the certification status of a site is recorded in the BRC Global Standards Directory.

Extension to Scope
Once certification has been granted, a certified Organization may not revise the scope of its previously approved Certification scope without the written approval of UL R. UL R will consider requests for changes to the scope of the Certificate of Conformity and inform the Organization of its acceptance or rejection. Requests for such changes shall be documented on UL R supplied Scope Extension form.

Any additional significant products manufactured or processes undertaken by the site, which are required to be included in the scope of certification, shall be communicated to UL R via the Scope Extension form. UL R will assess the significance of the new products or processes and decide whether to conduct a site visit to examine the aspects of the required extension to scope.

A revisit may be required prior to granting scope extensions in the following cases:

- Inclusion of manufacturing facilities not taken into account in the original audit;
- Inclusion of a new processing technology;
- Inclusion of new products which introduce a significant new risk to the facility;
- Changes in geographical locations;
- Changes in ownership;
- Changes of key personnel.

When a revisit is considered necessary, the duration of this visit will vary depending on the aspects to be examined for the required extension to scope. The site visit will be conducted along the same principles as the original audit including an opening meeting, inspection of the operation of the process, documentation trails and closing meeting). The revisit is announced.

Identified non-conformities should be documented and actioned as defined in section 8.0 Nonconformities Defined. The additional non-conformities raised at the site visit will affect neither the current certificated grade nor continued certification. However, if practices are seen that give UL R cause to doubt continued certification (e.g. the identification of a critical non-conformity) then UL R will arrange a full re-audit of the site. In these circumstances the current certificate shall be withdrawn.

A visit report will be documented. The site's current certificate will be superseded by any new certificate issued.

After changes are found acceptable, unacceptable, or audit required, UL 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 and that an audit is or is not required. Where changes are found acceptable, a new certificate will be issued that supersedes the previously issued.

12.0 Complaints & Recalls

The Organization must maintain records of all complaints received from purchasers or other interested parties concerning its certified program. These records should be maintained in a separate file in order to review and evaluate the effectiveness of the Organization's certification 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 UL R at ULWarningsRecalls@ul.com of any irregularity in the Organization's certified program.

In the event of a warning letter, recall or market withdrawal of product that is covered and described on the certificate's scope of certification, UL Registrar LLC shall be notified via email at ULWarningsRecalls@ul.com without undue delay. Upon receipt of such notice, UL Registrar LLC performs a review of the recall or warning letter, including additional information from the organization, if necessary. A decision will be rendered regarding whether or not a special audit will be required (see paragraph 11.0) and 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 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 Certification, UL Registrar LLC's Certification Committee reserves the right to suspend or withdraw Certification.

Where and to the extent that it is necessary for either of the 2 circumstances noted above, the Organization shall prepare a corrective action plan for evaluation and acceptance by UL R.

13.0 Withdrawal, Maintaining, Extending, & Suspending Of a Certification

A certified Organization may at any time, terminate its certificate and responsibility with UL R. If a company wishes to terminate its certification, the Organization shall notify UL 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 UL R becomes the property of UL R and may not be released to other parties unless otherwise agreed upon between the Organization and UL R.

UL Registrar LLC may, at its discretion, withdraw or suspend the Certification of an organization for cause such as non-payment, 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.

UL Registrar LLC also has the right to suspend or withdraw Certification and update the organization's certification status on the BRC Global Standards Directory for failure to complete the next activity by the applicable anniversary date of the audit cycle. Upon suspension, withdrawal, or termination of certification, the client discontinues its use of all advertising matter that contains any reference thereto, returns the certificate, and takes any other required measure as requested by UL Registrar LLC.

The certificate may be withdrawn by UL R in a number of circumstances where the site may no longer comply with the requirements of the BRC certification scheme and ISO/IEC 17065 requirement. Examples of these instances are:

- Evidence that the site no longer complies with the requirements of the Standard, raising significant doubt of the conformity of the products produced;
- Failure to implement adequate corrective action plans within appropriate timescales;
- Evidence of falsification of records.

UL R maintains an impartial and nondiscriminatory appeals program to evaluate the consideration of appeals against its decision to terminate an Organization's certification (see paragraph 16.0). The UL R inquiries, complaints, disputes and appeals policy is available upon request.

UL R may terminate its certification program at any time provided that all certified companies are notified at least 60 days in advance in order to transfer all of the certifications to another accredited registrar.

In the event of withdrawal (revocation) of UL R's BRC accreditation, UL R will assist its affected customers in the transfer of their certifications to another appropriately qualified BRC registrar and cooperate fully with that registrar in the transfer of the client's certification file information.

14.0 Certification Criteria Changes

If necessary, UL R may revise this Procedure for Certification at any time. When substantive changes are made to the certification process, UL 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 UL R Certification Rules.

15.0 Use of Certification Symbols

UL Enhanced Certification Mark

UL Enhanced Certification Badge

BRC Certification Body Logo

The above BRC Certification Body Logo is for use on the UL R Certificate only. Information and conditions relating to the use of the BRC Logo are available at www.brcglobalstandards.com.

The above UL Enhanced Certification Mark and UL Certification Badge are certification marks owned by UL LLC. Permission to use the UL Certification Badge and Certificate of Conformance, which includes the UL Enhanced Certification Mark, is granted or withdrawn at the sole discretion of UL Registrar LLC, UL LLC, UL AG or UL SarL. Subject to the terms and conditions of this agreement, UL allows an organization whose processes have been certified by UL the limited non-exclusive, non-transferable and non-transferable right to use the applicable UL Certification Badge in any professional, technical, trade, website or other business publications in order to advertise their accomplishments of UL certification of their processes. Any such reference shall not imply any product conformity, certification or endorsement based on the UL certification or inspection process, nor shall the UL Enhanced Certification Mark or UL Certification Badge be placed or used on any products themselves or in advertising or marketing materials for any products.

The Certificate of Conformance is the property of UL Registrar LLC. The Certificate of Conformance may be photocopied, scanned, or duplicated provided that the print and UL Enhanced Certification Mark is legible and the certificate is reproduced in its entirety in a secured or unalterable format (i.e. "jpg"). UL maintains the right to require the organization to cease using the UL Enhanced Certification Mark, UL Certification Badge, BRC Logo or Certificate of Conformance at any time as outlined in the current Procedure for Certification. The UL Marks must be applied in a proper and lasting manner. 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. For more information on how to use the UL Enhanced Certification Mark and UL Certification Badge, please contact ULRInfo@ul.com.

15.1 UL Enhanced Certification Mark Requirements

ANSI Accredited Certificate of Conformance: The ANSI UL R Certificate of Conformance includes the Certified Process UL Mark, the ANSI Mark, the IAF-MLA Mark and the BRC Logo. The ANSI Marks, IAF-MLA Marks and BRC Logo signify the certification of your organization's processes **only within the scope of your certification**. These accreditation marks can only be used on the Certificate of Conformance.

- The UL Enhanced Certification Mark may be used **ONLY** on the Certificate of Conformity issued to your organization by UL.
- **The UL Enhanced Certification Mark shall not be used on any product.**
- The UL Enhanced Certification Mark shall not be used in advertising or promotional materials.
- Note: The Certificate of Conformity may be reproduced as permitted above, but the UL Enhanced Certification Mark alone shall not be reproduced in any manner, hard copy or electronically.

NOTE: The UL Enhanced Certification Mark and UL Certification Badge are not product certification marks and shall not be used on product or product packaging of any kind.

15.2 UL Certification Badge Requirements

Once you have received the Certificate of Conformance from UL bearing the UL Enhanced Certification Mark, a UL Certification Badge is available for your creation/use in advertising or other printed or electronic media. The UL Certification Badge is designed to promote and advertise your UL Certification, providing an attractive way to share this information with the marketplace. UL Certification Badge may appear on a range of materials, from brochures, web content, marketing collaterals, etc. The UL Certification Badge shall be used only in conjunction with a UL's Certification Programs, and solely in accordance with the guidelines in this agreement.

15.3 USE OF THE BRC LOGO

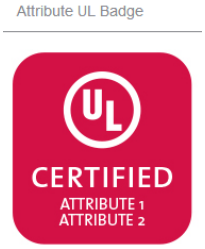
Companies that achieve certification and have NO exclusions from their scope are qualified to use the BRC Logo on site stationery and other marketing materials. The BRC Logo is not a product certification mark and shall not be used on products or product packaging. Any certificated site found to be misusing the mark will be subject to the BRC complaints/referral process and may risk suspension or removal of its certification. The BRC Logo may not be used by companies that do not include all products within the audit scope. Information and conditions relating to the use of the BRC Logo are available at www.brcglobalstandards.com. To request a BRC Logo visit http://Logo.brcdirectory.com/.

15.3.1 Use of the UL Certification Badge

See below for the clear space and minimum requirements of the UL Certification Badge.

Note:
To maintain visual integrity, applications using alternative reproduction techniques, such as silk screening, may require presenting the logomark at a larger size than is indicated here.

15.3.2 UL Certification Badge Variation Chosen by UL



The variation used by a UL Certification Client is the Attribute Badge.

Attribute 1 – "Process"
Attribute 2 – Applicable Standard of your Certification

- When applying the UL Certification Badge to various applications, such as promotional items, point-of-sale pieces, etc., adhering to the guidelines within the Marks Hub is a must. Clear space and proportion of the UL Certification Badge are imperative.
- UL Certification Badges cannot appear larger than the organization's name on any promotional materials.
- UL Certification Badges may not be used on business cards, company stationary, or company vehicles.
- Text on UL Certification Badges must accurately reflect the scope of UL Certification.
- This UL Certification Badge shall be used only in association with a UL Certified Process. If a Process is no longer certified by UL, the UL Certification Badge must be removed or promotional materials destroyed.
- If an organization uses or plans to use the UL Certification Badge in advertising or promotion, UL has the right to review the materials prior to publication.
- UL shall have the right, on demand, to acquire any or all advertising and promotional material using the UL Certification Badge from the organization.

The BRC Logo can only be used by sites that have no exclusions. The exclusion of products produced at a site will only be acceptable where:

- the excluded products can be clearly differentiated from products within scope and
- the products are produced in a physically segregated area of the factory.

See below for correct footnote/statements of clear acknowledgement of standards/products:

Correct Statement
Process Certified by UL with regard to (standard)
Process, with regard to (standard), is Certified by UL
Process Certified by UL with regard to (scheme)

15.3.3 Agreement on Use of the UL Certification Badge

This agreement is binding on the organization. Failure to strictly abide by this agreement and the UL Procedure for Certification may result in the suspension or withdrawal and discontinuance of for further use of both the Certificate of Conformance and the UL Enhanced Certification Mark and UL Certification Badge.

16.0 Inquiries, Complaints, Disputes and Appeals

UL R maintains an inquiries, complaints, disputes and appeals procedure describing due process whereby an applicant and/or certified Organization may submit a formal complaint or dispute. UL R's impartial Complaints, Disputes, and Appeals Committee will review all complaints, disputes and appeals from an applicant, certified organization or individual. The audit report/CAPA, written testimony and any additional documents provided by the applicant will be reviewed prior to any decision being rendered.

The Certificate Holder may request a copy of the UL R Inquiries, Complaints, Disputes and Appeals process by written request to ULRegistrarQAReportRelease@UL.com.

17.0 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. Notwithstanding the foregoing, the organization authorizes UL R to make records of its work available for review by the accreditation body during the course of their periodic surveillance.

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.

BRC Directory/Database

UL Registrar is required to provide all audit documentation to the BRC via the public BRC Global Standards Directory. All documents provided to the BRC is treated as confidential. The BRC Global Standards Directory (www.brcdirectory.com) is an online searchable directory of organizations certificated to the BRC Global Standards for consumer products.

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.

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.

18.0 Accreditation

The certification services offered in this Procedure will be conducted in conformance with the ISO/ IEC 17065:2012 Standard. UL R is pending accreditation by the American National Standards Institute (ANSI).

UL R is required by accreditation bodies to share information for the purpose of demonstrating conformance to the standards for which UL R is accredited. Such records may include audit results and UL Registrar's certification processes and procedures. Notwithstanding the foregoing, the organization authorizes UL R to make records of its work available for review by the accreditation body and/or the BRC during the course of their periodic surveillances.

American National Standards Institute (ANSI) and the BRC may periodically monitor and evaluate UL R's conformity to the accreditation criteria throughout the term of its accreditation cycle. This activity includes periodic witnessing of UL R's audit team conducting BRC certification audits/audits at organization locations.

NOTE: All services are performed according to the General Terms and Conditions for Certification Services, UL R Advisories and this Procedure for Certification.