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1.0 Purpose.

To introduce the clients of International Compliance Group, Inc. a summary of the process, stages and main rules applicable to management system certification services.

2.0 Scope.

This Document applies to all management system certification services offered by International Compliance Group, Inc.

3.0 Responsibility.

Operations & Marketing Manager is responsible to implement described in this Procedure.

Program Quality Manager is responsible to revise and update regularly this Procedure.

4.0 Definitions.

ICG: International Compliance Group, Inc.

5.0 Description of Activity.

5.1 Introduction.

- These rules have been prepared against criteria for competence set out in below. The Scope of Accreditation issued by EMA is an acknowledgement that International Compliance Group Inc. has the necessary expertise and ability to manage audits in those particular sectors. Details of all accredited scopes held are available on request to International Compliance Group Inc. If a particular sector is outside the present accredited scope of International Compliance Group Inc. then a non-accredited certificate will be offered at the discretion of International Compliance Group Inc.
- 5.1.2 Certification of a management system is not a statement by the certification body guaranteeing that the product or services actually meet specified requirements. Certification does not imply a view on the specification of a product or service. It does not guarantee a good product or service.
- 5.1.3 International Compliance Group Inc. is a privately owned independent organisation.

5.2 Scope

5.2.1 International Compliance Group Inc. undertakes the audit, evaluation and certification of management systems operated by companies to the respective management system standards applied for. The client must agree to supply all necessary information to International Compliance Group Inc.

5.3 Personnel.

5.3.1 International Compliance Group Inc. undertakes to provide suitably qualified personnel for all audit and surveillance work using their own staff or suitable qualified subcontractors. All members of International Compliance Group Inc. (full-time employees or sub-contractors) are required to sign confidentiality agreements concerned with all confidential information to which they may be exposed at client premises.



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5.3.2 The client has right to object to any auditor if the client perceives conflict of interest. The client can raise the objection to the designated ICG Manager, who shall review the potential impartiality threat and take necessary actions; however the change of auditor cannot be guaranteed.

5.4 Certification Process.

- 5.4.1 Service Application.
 - 5.4.1.1 Service Application are made by an organization and sent to ICG for analysis and preparation of an "Certification Service Quote".
 - 5.4.1.2 Organizations must use the "Application Form" defined by ICG and send the information to ICG's staff.
 - 5.4.1.3 On receiving a completed "Application Form", ICG will prepare a "Certification Service Quote" detailing audit cost, terms, conditions and requirements. On acceptance, the client will sign the "Certification Service Quote" and forward it with the advance payment to ICG. The project will then be allocated by the responsible manager to a competent audit team who will then carry out the audit in line with ICG's procedures.
- 5.4.2 Audit & Certification Services.
 - 5.4.2.1 Audit and Certification services are agreed in a "Contract" between an organization and ICG. Below is a general guide that summarizes the Certification Process:
 - 5.4.2.2 Pre-Audits.
 - 5.4.2.2.1 At ICG, Pre-Audits are an optional service and are not part of the Certification Process. Its purpose is to take a sample of the level of implementation of a Management System, and at the end of the audit a "Recommendation for Certification" is not made.
 - 5.4.2.3 Initial Audit (Stage 1).
 - 5.4.2.3.1 ICG performs a Document Review (Stage 1) to verify that a Management System documentation meets the requirements of the certification standard(s) that an organization uses as a reference and at the same time verify that the organization is ready to receive the Certification Audit (Stage 2). The Audit Team will submit to the organization a Report and an Audit Plan for the next Certification Visit. The Stage 1 Audit must be performed on site.
 - 5.4.2.4 Certification Audit (Stage 2).
 - 5.4.2.4.1 Its purpose is to evaluate the compliance of the organization's Management System against the applicable certification standard(s) and ensure that the policies, procedures, operational controls, and other documented information are effectively implemented.
 - 5.4.2.4.2 The time interval between Stage 1 and Stage 2 cannot be longer than 180 days. A time interval between the two audits is recommended as a way for the organization to have the opportunity to take corrective actions on possible Opportunity Areas/ Observations identified in Stage 1 before continuing with Stage 2.
 - 5.4.2.4.3 The identified Areas of Opportunity/ Observations, general comments and Non-Conformities will be discussed during the audit.



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- 5.4.2.4.4 The ICG's Audit Team will prepare and submit to the organization an Audit Report, which includes the identified Findings.
- 5.4.2.4.5 According to the recommendation by the Audit Team, and depending on the non-conformities identified, a Special Audit may be necessary, which will apply an extra charge.
- 5.4.2.4.6 To schedule a Special Audit, ICG will provide the Organization with any additional information necessary to achieve the certification process.
- 5.4.2.4.7 Stage 2 ends once the Non-Conformities are closed (no more than 90 days after the last day of the Stage 2 Audit).

5.4.2.5 Issuing Certificates.

- 5.4.2.5.1 Certification can only be granted when all agreed Corrective Actions for identified Non-Conformities have been accepted, implemented, verified and closed by an ICG Auditor.
- 5.4.2.5.2 Once the above is completed, ICG will issue a Certificate with a validity period of 3 years less one day, starting from the date on which the certification is granted. The time to issue a Certificate is 30 calendar days from the closure of Non-Conformities.
- 5.4.2.5.3 The Certificate details the corporate name of the Organization, the standard, the address of the sites included in the process and the scope of certification.
- 5.4.2.5.4 Reduction in scope of Certificates issued.
 - 5.4.2.5.4.1 International Compliance Group Inc. shall, wherever applicable, reduce the scope of certification if during the time of routine surveillance audits / Re approval or Renewal audits it finds that the certified client has continually / seriously failed to meet the certification requirements for those parts of the scope of certification. The reduction in scope will be approved by the Chairman of the Certification Committee.

5.4.2.5.5 Certificate Misuse.

5.4.2.5.5.1 International Compliance Group Inc. will take all reasonable precautions to see that there is no misuse of their certificate in client advertising etc. The client undertakes to use certification marks as appropriate to its audited scope of registration and relevant Standards.

5.4.2.6 Maintenance of Certification.

- 5.4.2.6.1 The Certification is maintained by complying with a Surveillance Audit program. This program is prepared taking into account the last audit day of Stage 2 and the contracted audit frequency. ICG can carry out Surveillance Audits for annual or semi-annual periods.
- 5.4.2.6.2 ICG will notify the organization of the date of the proposed Surveillance Audit a minimum of 30 days in advance.
- 5.4.2.6.3 ICG requires the organization to report as soon as possible any significant change in its Management System(s), or any other circumstance that may affect



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the validity of its certification, in accordance with the clauses of the Certification Contract signed.

5.4.2.6.4 The maximum time from one Surveillance Audit to another should not exceed 12 months, a maximum of 60 days of extension can be granted with approval of ICG, except for the first Surveillance Audit, which must be carried out within the 12 months following the Decision Making date.

5.4.2.7 Special Audits.

5.4.2.7.1 ICG will carry out a Special Audit during the Certification period if the organization wishes to extend the Scope of the Certification, due to a significant change within the Management System or in its Organizational Structure, after a merger or acquisition, during the Suspension process, upon request and in response to a sanction from your client, or upon detection of a Major Non-Conformity. For some cases, ICG will carry out a Special Audit with little time for notification.

5.4.2.8 Recertification.

- 5.4.2.8.1 The ISO/IEC 17021-1:2015 Standard establishes that the Management System must be evaluated in its entirety once every three years, at least. Before the end of the certificate validity period, a Recertification Audit must be performed to renew the validity of the certificate.
- 5.4.2.8.2 At the end of the Recertification Audit, the Certificate Issuance process (see Point 5.2.5) and Certification Maintenance (see 5.2.6) is applied.
- 5.4.2.8.3 In general, the Certification Contract is for an indefinite period and includes the activities of Certification Audit (Stage 1 and Stage 2), Surveillance Audits, Special Audits (when applicable) and Re-certification Audit.
- 5.4.2.8.4 The Re-certification Audit must be concluded before the expiration of the Certificate's validity.

5.4.2.9 Corrective Actions.

- 5.4.2.9.1 Non-conformities arise when there is a non-compliance in the implementation of the Management System during the Document Review (Stage 1), Certification (Stage 2) or Surveillance, the ICG Audit Team may issue Minor or Major Non-conformities.
- 5.4.2.9.2 The organization must resolve and close these Non-Conformities (both Minor and Major) in a timely manner to ensure the Maintenance of its Certification in accordance with the Certification Contract.
- 5.4.2.9.3 The Client has 90 days to Close Non-Conformities, starting from the last day of the Audit.
- 5.4.2.9.4 If the nonconformities are not closed, ICG will apply Procedure QP24 "Suspension & Cancellation".
- 5.4.2.9.5 Non-conformities must be addressed according to the organization's procedure and forms.
- 5.4.2.9.6 In order to accept the corrective action plan must include:
 - Root cause(s) defined according to the Non-Conformities; This must be consistent with the Non-Conformity(s), the Corrections and/or Corrective Actions defined;



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- Actions to treat the root cause(s);
- · Identification of those responsible for the actions; and
- A schedule (dates) for implementation.
- Always a "change" to the system. Training and/or publishing a newsletter are generally not changes to your system.
- 5.4.2.9.7 In order to accept evidence of implementation:
 - Receive sufficient evidence to show implementation, as described in the corrective action plan.
- 5.4.2.9.8 The Evidence must be grouped by each Non-Conformity identified and referred in accordance with corrective action plan.
- 5.4.2.9.9 For each Feedback submitted by the ICG Auditor, the Client must resubmit the complete Evidence Package that includes all updated Supporting Evidence.
- 5.4.2.10 Suspension, Withdraw, or Cancellation of Certification.
 - 5.4.2.10.1 ICG may Suspend, Withdraw or Cancel Certification when it deems necessary. If such actions are deemed necessary, the organization will be duly informed and given all information and opportunity to take Corrective Actions before ICG makes a final decision.
 - 5.4.2.10.2 ICG may publish that it has made a decision to suspend, withdraw or cancel certification.
 - 5.4.2.10.3 The organization whose Certification has been suspended, withdrawn or canceled must immediately cease the use of advertising material for the Certification.
- 5.4.2.11 Complaints, Appeals and Disputes.
 - 5.4.2.11.1 If the organization wishes to appeal ICG decisions, or present disputes, it may do so within the provisions of ICG's Procedure QP07 "Appeals and Complaints". A copy of this procedure is available on the official ICG's Internet Site: www.ic-group.com
 - 5.4.2.11.2 The organization must formalize and present appeals, complaints, or disputes to ICG.
 - 5.4.2.11.3 Complaints against International Compliance Group Inc. Personnel.
 - 5.4.2.11.3.1 If a client has a complaint regarding any employee of International Compliance Group Inc., this should be sent through post mail or via email at complaints@ic-group.com. If the complaint involves the President, then the complaint is to be addressed to the Board of Directors of International Compliance Group Inc. The complaint shall be handled as per International Compliance Group Inc.'s defined complaint handling process, which is listed on the company's website.
 - 5.4.2.11.4 Complaints against International Compliance Group Inc. certified Clients.
 - 5.4.2.11.4.1 If any interested party has a complaint against International Compliance Group Inc. certified client, this should be sent through post mail or email to the President of ICG at the main office address. The complaint shall be handled as per International



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Compliance Group Inc.'s defined complaint handling process, which is listed on the company's website.

5.4.2.12 Extension to the Scope of Registration.

5.4.2.12.1 This may be applied for in the same way as the initial audit, indicating the increased scope of registration being required. Audit will be carried out in the areas not previously audited. If successful, a new certificate indicating the new full scope will be issued by International Compliance Group Inc. There will be a charge for extensions to scope and re-issue of the certificates.

5.4.2.13 Short Notice Audits.

5.4.2.13.1 International Compliance Group Inc. may, when necessary, conduct short notice audits to investigate complaints, or in response to changes, or as follow up to suspended clients.

5.4.2.14 Publicity.

5.4.2.14.1 Once a certificate has been issued, the client has the right to publish the fact. The relevant logos can be used on its stationery relating only to the audited scope of registration and the relevant part of the standard. All conditions of the Logo Rules issued along with the Certificate will need to be followed.

5.5 Liability.

5.5.1 Neither International Compliance Group Inc. nor any of its employees, auditors, managers, officers, support staff, subcontractors or agents warrants the accuracy of any audit, review, information, certification, service or advice supplied. Except as stated in this document, neither International Compliance Group Inc. nor any of its employees or agents shall be liable for any loss, expense or damage however so sustained by any company, client or person due to any act whatsoever taken by International Compliance Group Inc. or its employees or agents, save to the extent that any attempted exclusion or liability would be contrary to law.

5.6 Accreditation Body Witnessed Audits.

- 5.6.1 It is a condition of the rules of registration that all International Compliance Group Inc. certified clients should, if requested, allow, Accreditation Body auditors to visit the client premises / witness International Compliance Group Inc. staff carrying out their audits. Failure to allow this could jeopardize the client's registration.
- 5.6.2 International Compliance Group Inc. reserves the right to change these rules of registration herewith without prior notification.

6.0 References.

QP24. Suspension & Cancellation. **QP07** Appeals and Complaints.

7.0 Formats / Exhibits.

NA.