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## **1. INTRODUCTION**

ANCCP Certification Agency (hereinafter ANCCP CA) develops its certification activities for Management Systems in such a way that:

- avoid any discrimination against customers
- make its services accessible to all who request them
- do not act as consultants for maintenance requirements to be measured, nor in the resolution of non-conformities
- do not provide internal audit services to customers
- do not issue certificates in cases where the relationship between ANCCP CA and the client may pose a threat to impartiality
- do not assume any obligation to the positive outcome of the audits and/or the issuing certifications

With the issuing of the certification ANCCP CA:

- a) aims to contribute to improving the performance of companies (in terms of improving the quality of products, environmental protection, pollution prevention and the added safety of workers) and it is with this objective that the certified companies must operate
- b) declares the conformity of the Management System of the client with the reference standard, however, does not guarantee compliance with the applicable legal requirements and does not imply a reduction of responsibility of the customer to contractual obligations with its customers and compliance of the provisions applicable regulatory.

The Committee for Safeguarding Impartiality (CSI), that is made by main stakeholders involved in the certification activities (manufacturers, users, regulators, etc.), oversees of the certifications issued and other purposes in compliance with the policies relating to the impartiality of certification activities, as specified in EN ISO / IEC 17021-1.

The correct application of this Regulation is ensured by ANCCP CA also through internal audits carried out periodically by the relevant departments.

## **2. PURPOSE AND SCOPE**

This procedure:

- forms an integral part of the contract with the customer
- defines the manner in which ANCCP CA assesses the compliance and issues (or deny) the certification
- describes the measures that customers are committed to meeting

It applies to the certification of all management systems governed by International Standards (ISO), European Standard (EN) or by other international standardization bodies.

## **3. RULES AND DEFINITIONS**

The rules and definitions of reference of this procedure are specified in the Quality Manual Management System ( 2. Normative references).

In specific sectors of activity where ANCCP CA operates with accreditation (as specified on the website of ANCCP CA) will also refer to the instructions given in the document cited above.

## **4. GENERAL**

Customers requesting certification must demonstrate that they:

- have applied for Certification
- maintain a Management System that is documented and complies with the requirements of the reference standard of a binding nature and those applicable to the products and / or services provided

- keep systematic records of complaints received (allowing access to the auditors ANCCP CA), as well as the actions taken to correct the causes

The phases developed for certification achievement and subsequent maintenance include:

- Offer
- Order of Certification (contract)
- Certification audits
- Decision on the outcome of the audit
- Periodic audits (surveillances / renewal)

Recently set up Management Systems can be certified only whether, the company is able to demonstrate that they have managed and kept under control, through appropriate recordings, at least a whole process of business-related activities to be certified.

#### 4.1 Reliefs classification

During the audit can be found different kind of reliefs:

- Non Conformities
- Remark
- Recommendations

Are defined as non conformities which show:

- Failure to meet one or more requirements of the rule relating to the management system
- Significant doubt on the ability of the system to achieve the results of monitoring and improvement provided

For instance (not exhaustive) can be considered non-conformities relative to the following aspects:

- scope of certification
- quality, environmental or safety relevant matters
- legal requirements and other requirements
- monitoring and measurement
- operational control
- definition of the statutory and regulatory requirements for the product / services provided
- Emergency Response
- Internal Audit
- Management Review

For the above non conformities the customer has the responsibility to ensure the adoption of appropriate corrective action before the certification release (maintenance, extension, renewal), forwarding to ANCCP CA documental evidence of its implementation in order to allow and verify the effectiveness. If deemed necessary, ANCCP CA may decide to assess additional audits.

For the Remark the customer must commit to establish and implement the actions necessary to the resolution, establishing the procedures and scheduling the resolutions. ANCCP CA, during the next audit, will evaluate the effective correction and the effectiveness thereof.

If some findings do not arise in non-conformity or remark, but generate proposals for improvement in terms of effectiveness, will be formalized Recommendations. The latter represent advices provided to the company on issues considered important. Not necessarily entail corrective actions on the Management System, but in any case, the customer is required to show to have done critical analysis.

ANCCP CA, in subsequent audits, checks the taking in charge by the client, by analyzing the motivations, and assess whether the actions taken have resulted in an improvement.

## **5. OFFER, ORDER AND OPENING CERTIFICATION PROCESS**

Company interested in certification of its Management System applies to ANCCP CA for a quotation provid-

ing the following information (Form SSG-M001):

- Company data (name, name, address, names of company contacts, etc.)
- Production plants to be audited and certified (including remote sites, operating sites, etc.)
- Activities to be certified (certification scope) indicating the outsourced activities, exclusions, etc.
- Company Organization
- Other applicable rules to the activities
- Any external consultant to the management system
- Relevant aspects

For the environment, occupational health & safety and anti-bribery schemes, additional information is required in the questionnaire attached to the SSG 001 form.

Given these data, ANCCP CA carrier out the "Review of requirements" in order to assess the feasibility in terms of needed skills and resources. For this purpose are identified sector of business activity to be certified (IAF codes), and the time to be spent in accordance with MD5 IAF "determination of audit time of quality, environmental, and occupational health & safety management systems". For the determination of audit time of Anti-Bribery Management System the references are the EMS table of the IAF MD05.

To determine the audit times of Management System, Anccp CA also evaluates the degree of risk associated with the activities and organization as indicated in the tables of the IAF MD 05.

Following the review, is issued a Proposal on the basis of the ANCCP CA tariffs, which will highlight the contractual conditions of sale for activities requested. The latter will be determinate in accordance with the principles described in the above-mentioned IAF guidelines and in particular:

1. First Assessment audit (Phase 1 + Phase 2): according to the tables (at least 30% used for Phase 1)
2. Surveillance audit: one third of the time allotted for the evaluation audit (not less than 1 man day)
3. Renewal audit: 2/3 of the time provided for the evaluation audit

In general, the timing of audits provide that at least 80% must be spent for the audit on site.

In case of acceptance of Proposal, formalizes the customer order by countersigning the same offer and the annex "Conditions of Sale".

When ordering, the customer declares to accept the certification requirements of this Regulation also available on the website of ANCCP CA.

In the absence of such documents, the certification process does not start.

Received the order, ANCCP CA shall review the information and documents of the customer to confirm:

- Scope and activity (EA)
- Exclusions
- Outsourced processes
- Production type (characteristics of the production process, technology used, etc.).
- Company Organization

After the positive review outcome, certification process is started by communicating with the acceptance to the customer, including the names of:

1. Job Manager (RC), which operates as Responsible of the audit program, forms the interface with the customer to manage the activities of the job
2. Audit Group (GVI), the auditors appointed to perform the verification of the evaluation.

The audit program for first certification must include a two stage initial audit, surveillance audits in the first and second years following the certification grant, and a renewal of the certification audit in the third year, before the expiry of the certification.

Subsequent three-years certification cycles, begin with the decision to re-certification.

Before carrying out Phase 1 audit, the client can request a review of pre-assessment of adequacy of the management system; this audit:

- will make a general assessment of the state of compliance of the Management System
- Can be done only once
- Follows operating procedures as those of Phase 2 audit
- Will have a duration and depth in relation to the type and complexity of the company

The results of these review will be recorded in a written report, but will not be considered for the purposes of conformity assessment pursuant final.

## **6. PLANNING AND EXECUTION OF AUDIT PHASE 1**

The assessment for the certification of a Management System is carried out following 2 successive phases.

The audit Phase 1 is oriented to:

- assess the conformity of the documentation management system and other aspects of the client as defined by ISO / IEC 17021 (eg legal and regulatory aspects)
- enable effective planning and execution of the audit Phase 2

This audit is held "on site" and is planned considering the activities to be certified, the complexity of the production processes and related issues and the company organization.

If the customer need to be certified to perform tasks on multiple operating sites (multi-site), is developed, and communicated to the customer, a sampling program (see guideline IAF MD1) designed to ensure adequate coverage audit on the field.

ANCCP CA agrees with the client the date for Phase 1 audit and inform the Responsible at least 3 days in advance, specifying the names of the audit team, which will be composed by a Team Leader (RGVI), any other auditors (IQ), any experts (ETS) to ensure the presence of the necessary skills. In some cases they may also participate in the audit observers and / or inspectors in training.

The customer is entitled to request information about members of the audit team (and / or participating in the audit) and, if there are justified reasons, reject one or more of them.

### 6.1 Examination of documents

The examination of documents is carried out by a qualified auditor at the customer's premises in order to verify:

- compliance with the reference standard
- completeness and adequacy for all applicable elements

Where necessary, require additional documentation.

The results of this examination are recorded in a report (Form SSG-M004), which will highlight:

- observations
- corrections to be made

This report will be sent to the customer who must provide changes required before the Phase 2.

In case of marginal relief, the documentation will be verified directly during the audit of phase 2; if not properly treated, these findings may still generate non conformity.

In the case of requests for substantive changes to the documentation, the updated documents must be sent directly to ANCCP CA for further analysis and for final approval. In these cases, with will be defined a period within which to make changes. Elapsed a period longer than 6 months without the positive resolution of the document stage, ANCCP CA may decide to close the certification process. In order to reactivate you will need to order a new certification and payment of new shares.

### 6.2 Evaluation

Aspects to be tested during the audit of Phase 1 are:

- scope of certification
- identification of areas / activities involved in the management system
- completeness of the documentation management system
- execution of a full cycle of internal audits (covering all operational sites) and management review
- resources needed to stage 2
- implementation of the Management Review

For Environmental and Health & Safety Management Systems will need to also check:

- Proper identification of significant environmental/safety aspects
- compliance with legislative requirements applicable
- possession, validity and completeness of the legislative authorizations
- possession of certificates of analyzes, test reports required by permits

For Anti-Bribery Management System will need to also check:

- anti-corruption policy, procedures and controls;
- communication of this policy and related program to all interested parties and/or members;
- leadership, commitment and responsibility;
- surveillance procedure;
- training related to the prevention of corruption;
- risk assessment;
- due diligence on projects and business partners of the organization;
- reporting, monitoring, investigation and review by Top Management and, if present, by the Governing Body;
- request to sign a commitment for the prevention of corruption to its associates;
- implement financial controls to reduce the risks of corruption;
- corrective actions and continuous improvement.

The audit begins with an opening meeting with the client company management, to define the rules for the implementation of the audit, also in logistics.

The customer must:

- allow access to production areas, activities covered by the assessment, technical documentation and management system, and other information relevant for the audit, to the auditor ANCCP CA that any observers
- Provide the GVI information on specific risks in the environment where the audit will be carried out on preventive measures and emergency procedures adopted and any other useful information for the conduct of the audit with feel-safe
- Make the appropriate Personal Protective Equipment available
- Ensure cooperation and their staff availability (ensuring the role of "observers" to any consultants)

The auditors, having signed a definite "confidentiality agreement" with ANCCP CA are bound to strict confidentiality on information obtained during the audit. In addition, any observers (including external) undertake to maintain the same confidentiality.

During the audit, the audit team noted that every problem in the audit of Phase 2 could be classified as non conformity.

At the end of the audit a meeting is carried out in which the GVI illustrates to Management the audit results, and draw up a Final Report. The client on this occasion, will have the opportunity to clarify eventual issues, provide clarification, make comments or express reservations.

The customer is also required to analyze the problems identified and the actions needed to assess the relative resolution goes, in order to determine the time between Phase 1 and Phase 2. Interval of time agreed will then be registered RGVI from the audit report.

If at the conclusion of Phase 1 audit, have not been problems that may subsequently generate non conformity such as to preclude the release of the certification and thus requiring solution before the continuation of the assessment, it can be carried out the audit client in Phase 2 consecutively. In this case the RGVI, will proceed with the execution of Phase 2, subject to any provisions coming from ANCCP CA.

This option is applicable only for Quality Management Systems in companies with a staff fewer than 10 people.

For Environmental and Health & Safety Management Systems is also necessary that the asset is classified as "low" or "limited" risk.

Then, the GVI by agreement with the client, prepare the audit plan for Phase 2 (as output if the phase1), and will notify to the customer and sends it to ANCCP CA for any corrective and updates.

If major problems arising in the audit Phase 1, Phase 2 will not run consecutively to that of Phase 1.

At the conclusion of Phase 1 audit report is issued to the customer (Mod SSG-M002).

All documentation regarding the audit of Step 1 is filed and stored on a confidential basis.

### **6.3 SAMPLING MULTI-SITE**

In the case of multisite, all processes must be carried out substantially of the same nature and should be handled with similar methods and procedures. If some of the sites considered to develop similar processes, but fewer in number, may be included in the multi-site certification, provided that at these sites the most critical processes or processes are subject to audit.

Where the processes at each site are not alike, but they are clearly linked to a sampling plan must include at least one example of each process conducted by the organization (e.g. manufacture of electronic components in a single place, the mounting of the same components in several other places).

All sites involved in sampling must be audited by internal organization

The organization needs to demonstrate its ability to collect and analyze data from all sites including the central office. The headquarters must also demonstrate his authority and ability to initiate organizational change, where necessary, in relation to:

- documentation of the Management System and changes in the system
- Management Review
- Complaints and appeals
- evaluation of Corrective Actions
- planning of Internal Audits and the evaluation of results
- legal requirements

ANCCP CA can reduce this sample if it deems it is not sufficient to provide confidence in the effectiveness of the Management System; such restrictions may include:

- Sectors or activities
- Size of sites
- Using temporary sites operating under the organization's management system and are not to be included within the scope of the certificate

In case of non-compliance are found on a single site (the organization or by the certification body) should be carried out a further analysis to determine whether other sites are involved.

In such cases, ANCCP CA requires the organization to analyze the non-compliance to determine if they indicate a deficiency in the system as a whole or not.

Depending on how much will be defined and then set the appropriate corrective actions and will be verified by the organization to its internal and ANCCP CA.

For Anti-Bribery Management System, the sites where processes/activities at risk of corruption are carried out, and those deriving from the risk analysis prepared by the organisation, cannot be excluded from sampling.

## **7. PLANNING AND EXECUTION OF PHASE 2**

In the audit of the Phase 2 audit GVI:

- The status of the observations recorded in the audit of Step 1
- The conformity of the management system to the requirements of the reference standard, as well as its correct application and effectiveness in the pursuit of policy and in achieving the targets set

At the end of the audit a meeting is held in which the GVI illustrates the customer management the audit results, draws and verbal notification of the closure, which may include any non-compliance. The client on this occasion, will have the opportunity to clarify any issues, provide clarification, make comments or express reservations.

The reports of the audit and the reports of non-compliance shall be signed by the customer. For the latter, the signature certifies acceptance and commitment to implement corrective actions. For each of them you will need to indicate:

- 1) Correction proposed for the elimination of non-compliance
- 2) Analysis and identification of the main causes that led to the non conformity
- 3) Corrective / preventive actions proposed to eliminate the causes and prevent recurrence of the non conformity
- 4) Implementation time required

Corrective actions may be proposed in the closing phase of the audit or within a subsequent period, agreed with GVI. In any case, must be accepted by auditor (GVI) of ANCCP CA.

For any non conformity, the customer must provide timely evidence of the resolution, before the certification decision.

The effectiveness of correction and corrective action can be done on the basis of a review of the documented information provided by the client or, where necessary, through a verification in the field. This activity is generally carried out by a member of the audit team.

If the organization fails to implement the corrections and corrective actions of any non-conformity, within 6 months after the last day of Phase 2, ANCCP must conduct another Phase 2 for the certification decision.

At the conclusion of the phases mentioned above, ANCCP CA verifies the completeness of the records sent by the audit RGVI and, if circumstances so require, shall practice, together with any other information useful to the Commission Management Systems (CSG) for the final decision on certification.

## **8. ACTING AND RELEASE OF CERTIFICATION**

The Commission Management Systems, consisting of one or more persons in order to ensure the necessary skills, can that resolve by deciding:

- granting certification (unreserved)
- certification issue (providing additional audits and / or monitoring in advance)
- denial of certification (audits by providing additional supplementary)

In case of issue of the certificate, it will issue a certificate of conformity bearing the following information:

- company name
- address of the operating units/plants/sites
- reference standard
- scope (related to products, processes, services, etc.)
- classification (EA codes)
- ANCCP certification and identification code (highlighting any revisions)
- date of issue, update and expiry
- clear references of ANCCP CA

The list of customers certified is available at ANCCP CA offices and, upon reasoned request, information may be given to eventual stakeholder regarding (at least):

- 1) certification status: valid, suspended, waived, reduced, withdrawal, etc.)
- 2) object of certification (scope)
- 3) validity (expiring date)
- 4) sites included in certificates

This information will be periodically and systematically sent to institutions (SNAS, Ministries, etc.). Manner and timing established by them, and at the request of a third party, following a formal request motivated.

In the case of denial of certification, the client is notified of the reasons for indicating the conditions to continue or resume the certification process.

In no, case decisions regarding the resolution can be delegated to third parties.

The validity of the three-year certification is conditional upon:

- ❖ The confirmation of the conditions that led to certification
- ❖ Favorable outcome with the conduct of surveillance audits
- ❖ In respect of payments by the customer
- ❖ Proper use of certification and / or trademark

## **9. SURVEILLANCE, RENEWAL AND EXTENSION OF CERTIFICATION**

Following the release of certification, is established three-year Audit Program of activities; this program shall consider:

- ❖ size of the customer (n° of employee, plants, sites, organization, etc.)
- ❖ scope of certification
- ❖ complexity of Management System
- ❖ products, services and processes provided (including the effectiveness of Management System)
- ❖ results of previous audits

It is identified an operating periods of the surveillance audits and renewal audit.

Should be carried out at least n° 1 Surveillance Audit every year (calendar year). The date of the first surveillance audit, following initial certification, must not exceed 12 months from the date of the certification decision.

The renewal Audit must be held before the expiring date of the certification and must be completed successfully.

The extension of the surveillance audits will enable the evaluation over the three years of certification of all standard requirements, the processes involved and the certified locations/plants, in addition to assess the sites / remote sites operating. The program will be formalized and sent to the customer (SSG-M001-PT) together with the certificate of conformity.

It may be necessary to vary the frequency of surveillance audits in order to some factors such as seasonal activities, limited duration of external processes to be audited (e.g. temporary construction sites).

### 9.1 Surveillance Audit Certification

Planning of annual surveillance audits will be confirmed as shown in the three-year program mentioned above, except for cases in which the client communicates changes related staffing company, at company headquarters and / or certified activities. In this case IT will need to revise the program and issue a specific audit plan (SSG-M016).

In each surveillance audit will be checked the following aspects:

- corrective action (as a result of previous non-compliance)
- internal audits and management reviews
- management of complaints
- effectiveness of the management system in meeting the objectives
- management of planned activities aimed at continual improvement
- use of trademarks and / or other reference to certification
- maintaining legislative compliance and / or possession of the permits

The logistics and timing will be agreed with the client and formalized through official communications with a notice of at least 3 days.

The implementing rules and registration will be similar to those of the audit of Phase 2. Certification order may be valid, any non-conformities must be solved.

Where are detected non-conformity or critical situations that might lead to suspension or revocation of certification, the practice will be analyzed by the CSG to evaluate the actions to be taken.

Anccp CA, if requested from client, shall conduct the transition for ISO 37001:2025 audit in conjunction with the surveillance audit; Anccp CA established its criteria for transition ISO 37001:2025, considering the requirements of IAF MD 30:2025, in the document "ISTR. 015 Transition for ISO 37001:2025" available on the site [www.anccp.eu](http://www.anccp.eu).

### 9.2 Additional Audit

Additional audits (to annual surveillance) may be carried out in the following cases:

- Non conformity/remark are not resolved
- effectiveness of corrective actions
- complaints or external reports (customers, regulators, etc.)
- misuse of certification
- important operational changes and / or organizational management system certificate
- request of authorities for authorization / accreditation (Accreditation, ministries, etc.)

Additional audits may also be carried out at short notice (Short Notice Audit - maximum 2 days) in cases of:

- important changes and / or organizational
- revaluation of the management system as a result of suspension
- serious and relevant complaints or reports

In the latter case, details of the audit will be agreed with the client.

It is possible that ANCCP CA carried out audit without notice to investigate complaints or in response to changes or as a subsequent action against customers whose certification has been suspended.

In the following cases additional audit will not be charged additional cost to customers:

- request of authorities for authorization / accreditation
- complaints

The certified company can request a special audit (extraordinary assessment) to verify that its management system complies with the requirements of the ISO 37001:2025 standard. Anccp CA has established its criteria for transition to the ISO 37001:2025 standard, taking into account the requirements of the IAF MD 30:2025, in document "ISTR. 015 Transition for ISO 37001:2025" available on the site [www.anccp.eu](http://www.anccp.eu).

### 9.3 Renewal of certification

Before the expiry of the three-year period of validity of the certificate, ANCCP CA plans the renewal audit on the basis of:

- reports of periodic surveillance audits
- performance management system in the previous period of certification

The audit is intended to confirm:

- compliance with the standard
- the effectiveness of the management system
- commitment to pursue the improvement
- implementation of the policy
- achievement of the objectives

If the renewal is done after the expiring date, but within six months, it must issue a new certificate, but it is not necessary to do an initial audit, the following cases are expected:

1. If the renewal activities, already started before the expiry, are not completed must reissue the certificate with a renewal audit
2. If the renewal activities begin after the expiry the body must make a stage 2 and not a renewal, if all activities end within 6 months after the expiry
3. After 6 months from the expiry the before must make an initial certification (stage 1 + stage 2)

The certificate will indicate the actual date of issue of the certificate, and the expiration date consistent with the previous cycle.

If the certificate shall also indicate the date of first issue then the certificate must also specify the period of invalidity (the expiry of the previous cycle, which is the point from which the certificate was not valid)

In cases where the customer to perform tasks on various operating sites (multi-site) the audit must ensure appropriate coverage of the activities and sites according to the sampling procedure already considered in the planning of the audit certification.

Generally, the method of execution and registration of the audit will be similar to those of Phase 2. If there had been substantial changes in the management system or in the legislative context, ANCCP CA can also perform a Phase 1 audit. In any case, the renewal audit will focus on all the points of the standard applicable to verify its effectiveness.

Ensure that certification will remain valid for any non-conformities must be solved.

The duration of the contractual relationship between ANCCP CA and the client is open-ended: the economic conditions defined in offering before certification can be confirmed for a further three years on condition that:

- 1) the renewal audit is carried out within 36 months from the first certification (Phase 2 audit)
- 2) no changes have been related to organizational, regulatory or external conditions

Otherwise will be issued a new quotation within 3 months after the expiry of the certification.

If this does not intend to renew, the certification shall give immediate notice to ANCCP CA certification will be invalidated due.

Anccp CA, if requested from client, shall conduct the transition for ISO 37001:2025 audit in conjunction with the recertification audit; Anccp CA established its criteria for transition ISO 37001:2025, considering the requirements of IAF MD 30: 2025, in the document "ISTR. 015 Transition for ISO 37001:2025" available on the site [www.anccp.eu](http://www.anccp.eu).

#### 9.4 Scope of certification

In case of request for extension of the activities to be certified and / or operational headquarters ANCCP CA carries out a review of the new requirements and plans the activities to be carried out in terms of expertise and time of audit. The related audits may possibly be carried out simultaneously with the surveillance audit and / or renewal.

#### 9.5 Reduction of certification

If as a result of an audit, ANCCP CA verifies that some activities, processes, sites or business units are no longer to be considered part of the object of certification, may approve a reduction of the field of application and issuance of a new certificate .

ANCCP CA reserves also reduce the scope of certification, if the customer does not comply, so persistent or severe, certification requirements related to the parts subject to reduction.

#### 9.6 Transfer of certification

If a company equipped with a management system already certified by another certification body, re-ask for the transfer of certification to ANCCP CA, supplementing this Regulation following the IAF MD2.

#### 9.7 Changes to Certification

ANCCP CA systematically communicates to customers any changes to the requirements for certification (procedures, reference standards, etc.), as well as the manner and timing of adjustment.

## **10. CUSTOMER OBLIGATIONS**

From the certification grant and for the three years period of validity, the customer agrees to:

- comply with the contractual requirements stipulated ANCCP CA
- comply with the requirements of the reference standard of the certified management system
- comply with statutory and regulatory requirements applicable to the products / services certified
- do not use the certification incorrectly or misleading
- accept any additional audits
- record the actions, claims, disputes
- ensure the completeness and thoroughness of the documents and information provided to ANCCP CA
- communicate promptly to ANCCP CA:
  - situations of irregularity found by the control authorities
  - suspensions / revocations of authorizations for products / services certified
  - judicial and / or administrative procedures related to products / services certified

The customer also agrees to promptly notify CA ANCCP any modifications to the system of management and / or certified processes, in particular regarding:

- Activity (scope of certification)
- Corporate structure (organization, premises, structure, etc.).
- Legal aspects

Changes concern only the formal aspects will be evaluated directly in the subsequent audit at the company. If they relate to substantive aspects will be assessed, if compared to the initial certification:

- do not invalidate the conditions: It'll be checked for compliance in the subsequent audit at the company
- alter the conditions: a supplementary audit will be carried out
- not invalidate the conditions: It'll be prompted for a new certification system

For Anti-Bribery Management System:

- the certified organization or in the process of being certified must inform promptly when it becomes involved in any critical situation such as to compromise the guarantee of the certification of the system (e.g. scandal, crisis or involvement in any judicial proceeding for corruption or similar phenomena).
- the organization must promptly notify the ANCCP CA of any event relating to corruption that may have involved one or more of its human resources, and the consequent actions taken to contain the effects of this event, the analysis of the root causes, the related corrective actions.

## **11. CERTIFICATION MARK**

Following the issuance of certification, ANCCP CA grants the customer the use of "certification mark" in order to advertise the obtained certification.

For the activities covered by the accredited certification, the ANCCP CA brand can be added with the accreditation mark.

The customer can use the certification mark on communication materials considered useful (letterheads, catalogs, websites, etc.). Provided that:

- It complies with the requirements provided by ANCCP CA
- exclusive reference is made to the certification of the management system
- is used with reference to activity / production units covered by certification

The customer also agrees to:

- do not apply the mark on the final product / service or packaging visible to the consumer (on de-certified so that you feel the quality of the product)

- do not apply the brand of test reports, calibration or inspection
- to separate the brand from the company logo (to highlight that ANCCP CA is a reality by the certified self-employed)
- provide evidence of the status of their certification

The customer must make available to ANCCP CA evidence demonstrating how to use the certification mark.

Any declaration attached to the packaging of a product or in the accompanying information, about the fact that the certified client has a certified management system must include references to:

- identification (e.g. brand or name) of the client
- the type of operating system (e.g. Quality, Safety, Environmental) and the applicable standard
- Anccp CA that issued the certificate

It is considered as packaging that can be removed without the product is disintegrated or damaged. They are considered as day accompanying information that is available separately or easily separable. The type or identification plates labels are considered part of the product.

If it expires, withdrawal, suspension or waiver of certification, the client is obliged to immediate cessation of the use of any form of certification mark.

The use of the mark is deemed improper or incorrect if:

- certification has not yet been granted, or appears suspended or withdrawal
- certification is used or publicized outside its scope
- the client has made changes to the management system have not yet been approved by ANCCP CA
- the customer does not meet the requirements of ANCCP CA and / or statutory requirements
- damage the reputation of ANCCP CA
- undermine public confidence

In the event that it is established the improper or incorrect use of the mark, ANCCP CA may:

- ❖ require the customer to provide the appropriate corrective actions
- ❖ distrust the client from continuing misuse (by threatening the withdrawal of certification)
- ❖ require the customer to publish the correction of incorrect information
- ❖ suspend or withdraw the certificate (giving due publicity of the measure)
- ❖ ask the customer to compensation for damage caused

The brand is the exclusive property of ANCCP CA and is registered at the Italian and Trademark Office.

## **12. WAIVER, SUSPENSION AND WITHDRAWAL OF CERTIFICATION**

### 12.1 Suspension

ANCCP CA reserves the right to suspend certification in cases of:

- Non-payment of amounts due to ANCCP CA
- Failure to manage the audits planned and / or failure to comply with deadlines for cause attributable to the customer
- Lack of availability, without valid reason, to audit the presence of observers bodies authorization / accreditation
- Lack of resolution of non-compliance major and / or failure to take adequate corrective actions on schedule
- Failure to manage substantial complaints and / or reports
- Improper use of the certification mark
- Failure to ANCCP AC elements that can affect the efficiency / reliability of the system certificate
- Failure to ANCCP AC judicial and / or administrative
- Failure to comply with statutory and regulatory requirements applicable to certified management system
- Request a voluntary suspension of certification

For Anti-Bribery Management System, if ANCCP CA learns, directly from the organization or from other sources, that the Organization or its managers are involved in some scandal or in some judicial proceeding for corruption phenomena, it will evaluate specific insights.

In the afore mentioned cases, ANCCP CA will carry out the necessary investigations and undertake the appropriate measures and actions, decide to file the report, decide on sanctions (if necessary it will adopt the suspension provision), intensify the inspection activities. Any provision or action will be evaluated based on the adequacy of the response and the strategies adopted by the organization.

For any provision of suspension ANCCP CA sends formal notice to the customer to be regularized within a defined period. At the expiry of that period and in the absence of an answer on the re-quest is sent notice of suspension of certification for by "Certified e-mail (P.E.C.)" indicating:

1. the duration of the measure
2. the necessary conditions for the lifting of suspension

During the period of suspension of the certificate the client is obliged not to use references to certification marks.

Finally, the customer can request the revocation of the suspension if it has solved the causes that have generated the measure.

## 12.2 WITHDRAWAL

ANCCP CA reserves the right to revoke the certification if:

- the causes that led to the suspension have not been removed in the manner and on time and / or the measures taken are not appropriate
- certification requirements change, and the customer does not abide by its own management system within the time allowed, without giving formal certification

Direct withdrawal of certification without suspension will be carried out if the client:

- is ultimately convicted for failure to comply with statutory and regulatory requirements applicable to certified management system
- suspend operation certified for at least one year
- definitively winding up its business certified

The withdrawal shall be notified to the customer by "Certified e-mail" (P.E.C.):

- the cancellation of the certification from the registers ANCCP ca
- the request for return of the certificate

The client, in case of revocation, shall delete from the documentation and other support used, the ANCCP ca mark of certification and / or any reference in this regard.

In the event of suspension, revocation or waiver of certification by the customer, ANCCP CA will give formal notice to the interested parties who will then have the appropriate steps.

## 12.3 Waiver

The client may waive the certification obtained, but will be required to send a written notice by "Certified a-mail (P.E.C.)" at least 6 months in advance to the expiry of the three-year certification. This fixed-term will be 30 days from the notification, in cases of non-acceptance of changes in economic conditions and contractual, or standards. In these cases ANCCP CA analyzes the reasons given and, after assessing the fairness and compliance with the conditions laid down, shall cancel the certification resulting in the immediate termination of the relationship with the customer.

For every status change of the certificate issued will be updated on the website of Db ANCCP CA.

## **13 CONFIDENTIALITY**

ANCCP CA will handle under an obligation of confidentiality, the records relating to the certification process of the customer. To this end, the functions involved at all levels (managers, auditors, committees, etc.). Subscribe-no formal commitment of confidentiality of information that may come to know during the course of business.

ANCCP CA is also committed to ensuring the fairness of the processing of data relating to the customer in accordance with the current legislation on privacy, allowing access only to the functions involved in the certification, the client and the responsible authority to control.

In the event that, by law, some information must be transmitted to third parties, ANCCP CA gives preventive communication to the customer concerned, if required by law.

#### **14 CLAIMS, DISPUTES AND APPEALS**

ANCCP CA accepts complaints from customers or other stakeholders in the certification provided in written form. In this case, it performs the test, check the facts complained of and shall respond within 60 days. Any verbal or telephonic complaints are considered on the basis of the importance of what is reported.

They can also be submitted appeals against decisions of customers ANCCP CA within 30 days of notification of the decision. In this case, it performs the test, examine the opposition and expresses the opinion within 90 days.

The resolution of any disputes arising between the parties is entrusted to the courts, exclusive jurisdiction.

For more details about how to manage complaints, appeals and disputes, refer to the document ISTR-005 available on the site [www.anccp.eu](http://www.anccp.eu).