

Policy on information transfer and disclosure

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| 1 | <p>Aim</p> <p>This policy aims at obtain a maximum of transparency in certification processes for all involved parties, without affecting the necessary principles of confidentiality.</p> |
| 2 | <p>Background</p> <p>Internal and external communication plays a key role in modern enterprises. The success of our certification body depends on a high degree of communication exchange in a effective manner to both inspectors and clients. Staff and clients are updated regularly concerning changes in regulation, ADITI policies and procedures.</p> <p>ADITI also makes it a priority to exchange information with the Accreditation bodies/Conformity verification Bodies relating to breaches/violations/frauds affecting the organic integrity or on any Certification decisions which lead to Cancellation of certificates/termination of contract.</p> |
| 3 | <p>Normative framework</p> <p>3.1 ISO/IEC 17065:2012</p> <p>4.6 Publicly available information</p> <p>The certification body shall maintain (through publications, electronic media or other means), and make available upon request, the following:</p> <ul style="list-style-type: none"> a) information about (or reference to) the certification scheme(s), including evaluation procedures, rules and procedures for granting, for maintaining, for extending or reducing the scope of, for suspending, for withdrawing or for refusing certification; b) a description of the means by which the certification body obtains financial support and general information on the fees charged to applicants and to clients; c) a description of the rights and duties of applicants and clients, including requirements, restrictions or limitations on the use of the certification body's name and certification mark and on the ways of referring to the certification granted d) information about procedures for handling complaints and appeals <p>(Annex A): A.4 Confidentiality and openness</p> <p>A.4.3 Openness</p> <p>A certification body needs to provide access to, and disclosure of, appropriate and timely information about its evaluation and certification processes, as well as about the certification status of any product (i.e. granting, maintaining, extending or reducing the scope of, suspending, withdrawing or refusing certification), in order to gain confidence in the integrity and credibility of certification. Openness is a principle of access to, or disclosure of, appropriate information.</p> <p>A.4.4 Access to information</p> <p>Any information held by the certification body on a product that is the subject of an evaluation and/or certification should be made accessible, upon request, to the person or organization that contracted the certification body to undertake the certification activity.</p> <p>3.2 NPOP-CHAPTER 4</p> <p>4.2.10 Public Information</p> <ul style="list-style-type: none"> (i) The Certification Bodies shall actively inform the public of the scope of its certification and the contents of the standards. (ii) The Certification Bodies shall have a documented policy for public information. <p>4.2.18 Other functions</p> <ul style="list-style-type: none"> (iii) Information available in the public as well as advice through newsletters, seminars etc, may be offered to the operators by the Certification Body in a nondiscriminatory manner. <p>4.4.5 Withdrawal of certification</p> |



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In case of any violation by the operator, the accredited Certification Body shall withdraw certification from the operator for a specified period and inform about their decision to APEDA and shall also publish the same on their website.

4.4.11 Exchange of Information

(i) In case of irregularity or infringements observed by the Certification Body of its registered operator, it shall without delay inform to APEDA.

(iii) When APEDA observes and finds any irregularity or infringement, it will inform all the Certification Bodies about such infringement. It may also reflect such infringement in its official website.

4.5.8 Accreditation contract

Such accredited Certification Body shall then sign an accreditation contract and code of conduct. The accredited Certification Body shall also submit the fee structure leviable on operators for various activities and shall also display it prominently on their website and office site.

3.2 NOP-USDA

§205.501 General requirements for accreditation.

(a) A private or governmental entity accredited as a certifying agent under this subpart must:

(8) Provide sufficient information to persons seeking certification to enable them to comply with the applicable requirements of the Act and the regulations in this part;

§205.504 Evidence of expertise and ability.

A private or governmental entity seeking accreditation as a certifying agent must submit the following documents and information to demonstrate its expertise in organic production or handling techniques.

(b) (5) A copy of the procedures to be used, including any fees to be assessed, for making the following information available to any member of the public upon request:

(i) Certification certificates issued during the current and 3 preceding calendar years;

(ii) A list of producers and handlers whose operations it has certified, including for each the name of the operation, type(s) of operation, products produced, and the effective date of the certification, during the current and 3 preceding calendar years;

(iii) The results of laboratory analyses for residues of pesticides and other prohibited substances conducted during the current and 3 preceding calendar years; and

(iv) Other business information as permitted in writing by the producer or handler; and

3.3 COS-COR V18

C.2.8 Suspension and cancellation

C.2.8.2 The CB shall report to its CVB all suspensions, change of a CB by an operator, and cancellations it issues on the 25th of each month, in case such decisions are made, or shall be provided as defined by the CVB. All reports shall include the name of the holder of certificate, the date of issue and the reason for the action.

C.2.8.4 The CB shall submit to the CFIA a request for removing the name of the holder of certificate from the list of cancelled holders of certificates posted on the CFIA web site.

C.2.8.5 The CB shall proceed with granting a certification after receiving conformation from the CFIA that the operator is removed from the CFIA list.

C.5 Issues regarding implementation of the standard

C.5.1 The CB shall notify all of its certificate holders of any amendments to the regulations or the standards within 2 months after their publication.

C.5.2 The CB shall allow a period of up to 12 months after the publication date of an amendment to CAN/CGSB-32.310, CAN/CGSB-32.311 and CAN/CGSB-32.312 for applicants to come into compliance with any changes to the requirements.

C 5.3 Some of the revisions in the standards may require more than 12 months to implement,

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| | <p>such as barn renovations to comply with new flock sizes, exit spaces and natural lighting in poultry installations. When applicable, any period longer than 12 months is specified within the standards.</p> <p>C.7.15 The CB shall exchange any information deemed confidential with other CFIA accredited CBs and/or CFIA to verify the validity of information on a holder of certificate. Such exchange is still considered to be and shall be managed as confidential by the receiving party.</p> <p>3.4 ICB AG and BioSuisse</p> <p>BioSuisse standards</p> <p>Appendix to Part V, Chapter 3.8 – Products that carry potential risk</p> <p>1. General Requirements</p> <p>Positive test results must be reported without undue delay to the certification body (in conformance with the terms of the contract with the certification body) and to Bio Suisse (by means of the Notification form for residues in Bud products, which is available on www.bio-suisse.ch-Import with Bio Suisse Residues & Pest management -Procedures for residues).</p> |
| 4 | Terms: None |
| 5 | Policy |
| | <p>In order to provide a more accessible service to our customers and to inform the public as much as possible, ADITI publishes the following documents on its website:</p> <ul style="list-style-type: none"> • Parts of this Quality Manual, • Lists of all certified customers, • All relevant information relating to our Certification System including information about the certification process, fees and many more. <p>ADITI ensures data transfer as per requirements mentioned in section 3 in a timely manner with complete transparency. All the procedural requirements along with the rules and regulations concerning the evaluation process, including complaint addressal are made public by publishing the same in their website and also in related documents/periodicals/emails/Boucher, etc. Within the application process, the potential clients receive a set of documents, containing contract(s), sanction catalogue, offer(s), information about the requested standard(s), Application for Organic Certification and a template for the Organic Management Plan (in the case of organic certification).</p> <p>ADITI offers appropriate know-how in what refers to the correct implementation of the standards, as far as this is relevant for the respective operator. This is not considered consultancy in the sense of ISO 17065:2012. It is seen as integral part of the standard's requirements to inform the applicant about the certification procedure and the standard itself.</p> <p>ADITI notifies without any delay to its accreditation body regarding any irregularity or infringements of its registered operator or the products ADITI certifies.</p> |
| 5.1 | <p>Keeping staff informed:</p> <ul style="list-style-type: none"> • ADITI will provide inspectors and other interested staff copies of all relevant regulations and relevant parts of the Quality Manual • ADITI will inform all inspectors and other interested staff with a maximum delay of one month about changes in relevant regulations, policies and procedures. Besides the respective regulation |

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| | <p>text, an easily understandable explanation will be provided.</p> <ul style="list-style-type: none"> ADITI management and headquarter staff meets at least once per month, among others to exchange all relevant information. |
| 5.2 | <p>Staff participation in decisions:</p> <p>Whenever possible, before making decisions, all potentially involved or affected staff should be informed and encouraged to give their opinions and comments. The management shall take into account the criteria expressed by the staff.</p> |
| 5.3 | <p>Keeping clients informed:</p> <ul style="list-style-type: none"> ADITI will provide clients or applicants for certification copies of the respective standard(s), if possible, in a language understandable for them, accompanied by easily understandable summaries of the most important requirements. ADITI will publish certification policies and most parts of the Quality Manual on its website, in order to make structures and procedures as transparent as possible. All ADITI staff will give clients or other interested public satisfying information upon requests concerning standards, policies, or procedures. Inspectors or other local ADITI representatives are responsible of informing all local clients immediately about relevant changes in regulations, policies, or procedures. <p>The following kind of documents will always have to be provided in a locally understandable language:</p> <ul style="list-style-type: none"> - Organic Management Plans - Brief information - ADITI Policies - Contracts <p>If necessary, the inspector will have to translate all non-conformities and remediation measures into a language understandable to the operator. The operator and the inspector have to sign them.</p> |
| 5.4 | <p>Keeping Accreditation Bodies (AB's)/Conformity Verification Bodies (CVB's) informed:</p> <ul style="list-style-type: none"> ADITI will provide data related to the certified clients along with details of certification decisions (Suspension/Cancellation/Withdrawal) in a timely manner. Any data deemed necessary shall be provided to the ABs/CVBs within the stipulated time. Any incidents affecting the organic integrity of the product shall be notified on priority. (Aditi informs, ICB AG within one week in case of changes in the certification status, violations and sanctions, positive residue analyses are detected concerning BioSuisse certified operations) |
| 5.5 | <p>Keeping Peers informed</p> <ul style="list-style-type: none"> Incidences of frauds and any information required to assist investigation of any residue identified shall be shared with other Certification bodies. |
| 6 | <p>Access to this policy</p> <ul style="list-style-type: none"> This policy is available to all interested public It must be handed out to all ADITI certification and inspection personnel |
| 7 | <p>Related documents:</p> <ul style="list-style-type: none"> INF-3.2.0 Brief Information for the clients on respective certification scope CON-7.2.3 Client's Declaration on information Disclosure |

8. Revision History:



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| Revision date | Version | Description of Changes |
|----------------------|----------------|---|
| 07/10/2020 | 02 | <ul style="list-style-type: none">• Normative Framework section has been modified as per relevant standards.• Updated ADITI logo with ® mark |
| 25/11/2020 | 03 | <ul style="list-style-type: none">• The sections 5.4 and 5.5 has been included• Normative references have been updated as per BioSuisse. |