GMP+ International

GMP+ International Integrity Policy

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GMP+ International

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1. Introduction

The objective of GMP+ certification is to give impartial, reliable certification to all companies that have a feed safety and/or feed responsibility management system which fulfils the applicable GMP+ requirements. The value of certification is the degree of confidence that is established by means of an impartial, objective and competent assessment conducted by a third-party (GMP+ accepted Certification Body).

The purpose of the Integrity Policy is to define a clear objective and the roles & responsibilities for all parties involved. Next to that explain the GMP+ compliance assessment program and the additional topics to complete the Integrity Policy.

2. Objective Integrity Policy

The Integrity Policy has the objective to contribute to food/feed safety and sustainability worldwide. It aims to have added value to the confidence and continuous improvement in certification regarding the GMP+ Feed Certification (FC) scheme in a proper and unimpaired manner.

Therefore, GMP+ International evaluates the effectiveness of its Integrity Policy every 3 years for improvement purposes. The Integrity Policy is implemented in an annual compliance assessment program and has the following objectives:

- To contribute to the consistent implementation of the GMP+ FC scheme worldwide, both the FSA and FRA modules,
- Encourage the continues improvement of GMP+ certified companies, Certification Bodies and GMP+ International.
- Maintaining and improving the GMP+ normative documents,
- Follow up complaints.

3. Roles and responsibilities

To achieve the objective of the Integrity Policy, each party involved has its own role and responsibility but together all parties have a common responsibility regarding feed safety. Therefore GMP+ International is working together with representatives of GMP+ certified companies, GMP+ Partners, Registered Consultants and GMP+ accepted Certification Bodies for continuous improvement of the GMP+ FC scheme.

<u>GMP+ certified company:</u>
A GMP+ certified company has the responsibility to implement the applicable GMP+ requirements into their feed safety and/or feed responsibility management system and to comply with the applicable GMP+ requirements. The management is responsible for creating a feed safety and/or responsibility culture within their organisation. An internal audit shall be

conducted annually to verify if the feed safety and/or responsibility management system complies with the applicable GMP+ requirements.

GMP+ accepted Certification Body
The GMP+ accepted Certification Body has the responsibility to assess whether the GMP+ certified company complies with the applicable GMP+ requirements. This assessment must be performed in an impartial manner, and by competent people involved in the certification process. It is recognized that the source of revenue for a Certification Body is its clients paying for certification, and that this is a potential threat of impartiality. Therefore, the certification decision must comply with the GMP+ requirements based on objective evidence of (non)conformity, and that this decision shall not be influenced by other interests or persons/parties.

GMP+ International
GMP+ International has the responsibility to develop and maintain its normative documents with the goal to secure feed safety and sustainability. A method of securing this is by using the structure of the ISO/IEC 17021-1:2015 and ISO 22003-1:2022. In addition, the following support tools are provided, for example a public accessible database with the certification status of all companies listed, the GMP+ Monitoring database, Risk Management tools and the International Database Transport (for) Feed (IDTF). For developing and maintaining the normative documents GMP+ International has established technical subcommittees and the International Expert Committee. Also, public consultation is a way to collect comments and remarks. In addition, GMP+ International concludes a GMP+ FC scheme License Agreement with GMP+ accepted Certification Bodies and performs a compliance assessment program (see chapter 4).

Committees:
The International Expert Committee is asked to give advice to GMP+ International regarding developing and maintaining the GMP+ FC scheme. Members are appointed by GMP+ International based on nomination by Partners. Proposals for the International Expert Committees are prepared by GMP+ International together with the technical subcommittees. Members of these technical committees are representatives of GMP+ certified companies, GMP+ accepted Certification Bodies, GMP+ partners. Regarding the Integrity Policy and compliance assessment program the subcommittee Certification & Compliance is always engaged.

4. Potential risks regarding to Integrity

Potential risks related to GMP+ certified companies:

- Participation in the GMP+ FC scheme because of market demand only, can lead to insufficient commitment to feed safety and/or responsibility.
- Insufficient commitment of the management regarding the implementation of a feed safety and/or responsibility culture.

The determining factor for a weak or strong Feed Safety and/or Responsibility Culture is how feed safety control is implemented, as a priority or as a company value because it is the daily force for all operations. The certified company must strive to implement a culture of feed safety and/or responsibility but it is pending on individual behavior, decency honesty and openness.

Potential risks related to GMP+ accepted Certification Bodies:

- Insufficient commitment, resulting in a lack of depth during assessments that can result in an inaccurate implementation by the GMP+ certified company regarding feed safety and/or responsibility control.
- As mentioned in chapter 3, clients of Certification Bodies are paying for certification. This can lead to a potential threat of impartiality.

Therefore, it is important that Certification Bodies and the Auditors make their decisions demonstrably based on objective evidence of (non)conformity and that these decisions are not influenced by other interests. Management of impartiality must comply with the GMP+ requirements. Certification Bodies and their subsidiaries also stretches to comply with general law and requirements among which the (un)written rules governing this particular profession.

Risks related to GMP+ International:

- Improper development/maintenance of the GMP+ FC scheme.
- The compositions of (sub) committees and stakeholders do not reflect the GMP+ Community.
- Compliance assessment with insufficient depth.

Therefore, consultation of all (sub) committees and stakeholders for the development/maintenance of the GMP+ FC scheme is highly important. Due to diversity of the composition of these (sub) committees and stakeholders, the development/maintenance of the GMP+ FC scheme is performed in an impartial and independent manner.
The compliance assessment program toward Certification Bodies executed by GMP+ International must be performed in a harmonised, reliable and impartial way based on objective evidence.

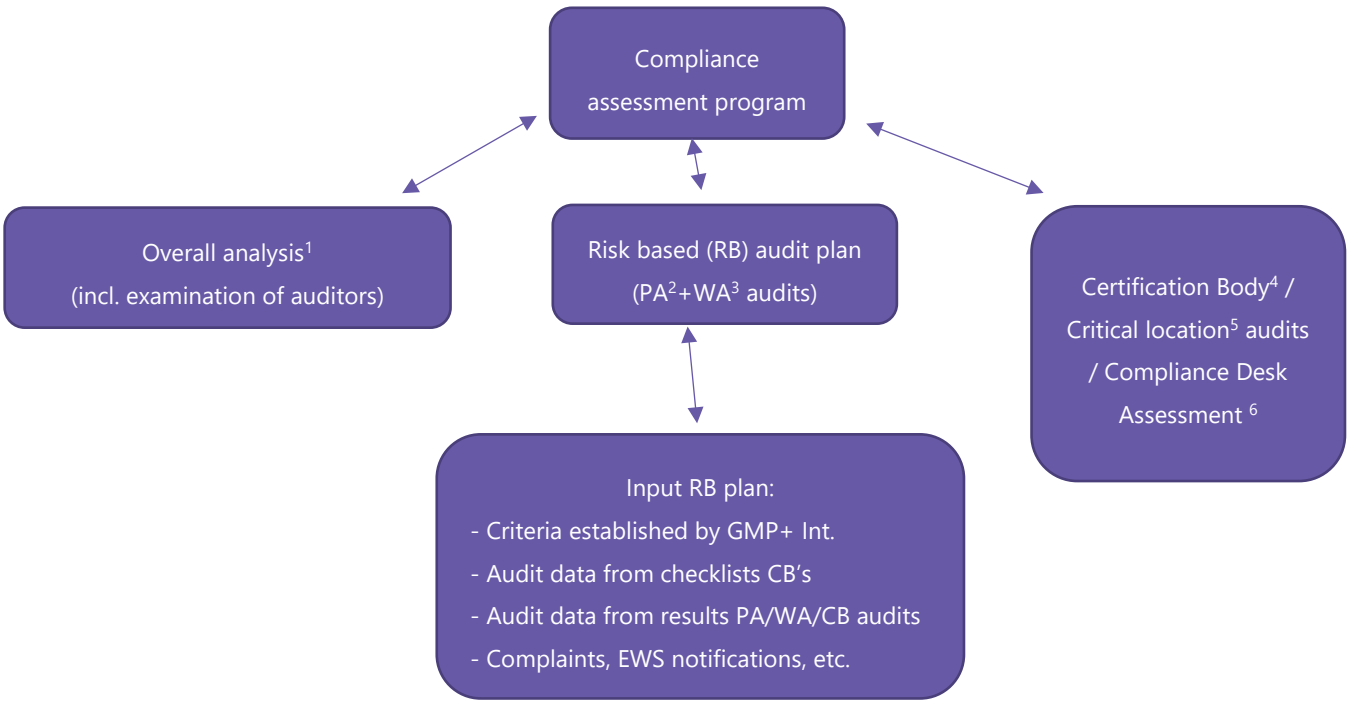
5. Compliance Assessment Program

5.1. Objective compliance assessment program.

GMP+ International performs compliance assessment considering market input/trends. The objective of compliance assessment, as part of the Integrity Policy, is to assess the performance of a Certification Body and their auditors' certifying companies in accordance with the requirements of the GMP+ FC scheme in an impartial, competent and consistent way. This shall result in confidence toward the GMP+ Community.

GMP+ International defines a coherent set of requirements for certification. These requirements are determined in CR1.0 *Acceptation requirements,* CR2.0 *Assessment and Certification* and in CR3.0 *Assessment and Certification of additional scopes*.
For GMP+ International it is about skills, knowledge and competence requirements of auditors, technical reviewers, inspectors and GMP+ coordinators. For becoming and remaining an auditor, technical reviewer and inspector succeeding for the relevant examination is essential. Examination of auditors, technical reviewer and inspectors is a tool to measure their knowledge and application of this knowledge in accordance with the requirements of the GMP+ FC scheme. Additionally, it is about audit frequency, minimum audit time, rules for classification of nonconformities and imposing the related measures, corrective actions and sanctions.

5.2. Structure compliance Assessment program



[1]*Overall analysis: annual analysis of performance of a Certification Body over the last 3 calendar years.*
[2]*Parallel audit: assessment of the method by which an audit is planned, executed and reported by the Certification Body.*
[3]*Witness audit: verification of auditors/inspectors how they perform their assessment and the way they categorise their nonconformities.*
[4]*Certification body audit: assessment how Certification Bodies implement the requirements laid down in the GMP+ FC scheme.*
[5]*Critical location audit: assessment how Critical Locations implement the requirements laid down in the GMP+ FC scheme.*
[6]*Compliance Desk assessment: A determination whether the Certification Body and Critical Location(s) comply with the requirements laid down in the GMP+ FC scheme.*

In addition, the following compliance assessment methods can be performed on an ad-hoc basis when the necessity is there:

- Ad-hoc audit: based on EWS-notifications, complaints and incidents.
- Retrospective analysis of the:
  - certification process of a specific company,
  - performance of an individual auditor.

The compliances assessment program is documented in the CR 1.0 *Acceptation requirements*.

GMP+ International has established the following Key Performance Indicators (KPI's) to inform Certification Bodies about the results of the compliance assessment:

- Receiving the audit reports at the latest 6 weeks after the audit has been performed.
- The submitted corrective actions reports from Certification Bodies will be handled as follows:
  - Critical NC; within 2 working days after the deadline.
  - Major NC; within 10 working days after the deadline.
  - Minor NC; withing 10 working days after the deadline.
- The handling of an application of an applicant Certification Body will be handled within 6 weeks.

5.3. Internal Integrity Committee

GMP+ International has established an Internal Integrity Committee consisting out of the management team. The responsibilities are defined as follows:

- Acceptance, suspension or withdrawal of a (applicant) Certification Body,
- Concluding/terminating the GMP+ FC scheme License Agreement,
- Critical nonconformity, giving approval in an impartial way to close / upgrade / downgrade the Critical nonconformity and to make the compliance assessment report final,
- Approval of the Integrity Policy and its evaluation.

6. Additional topics

6.1. Complaints

Everybody can submit a complaint related to noncompliance of a requirement of the GMP+ FC scheme, omission or unreasonable behaviour. Complaints based on sufficient objective evidence will be handled confidential. Complaints will be investigated properly, and a reasonable effort will be made to resolve them. Effective responsiveness to complaints is an important means of protection for GMP+ International, the accepted Certification Bodies, GMP+ certified companies, Registered Consultants, etc. Complaints are processed by clear and transparent internal procedures.

GMP+ International will report:

a) the final outcome of a complaint to the petitioner, this final outcome will be brief for reasons of confidentiality;
b) regularly inform the management of GMP+ International about the received complaints and the progress and results of handling them;
c) annually (in April) a report of the complaints of the previous calendar year is made. The aim is to provide input for the risk-based plan and/or Certification Body audits or for continuous improvement of the GMP+ FC scheme.

GMP+ International has also a dispute procedure documented in the F 0.5 *Dispute procedure* and an independent Dispute Committee for disputes.

6.2. EWS (Early Warning System)-notifications

GMP+ certified companies are obliged to notify perceived exceeding of the maximum permitted level of undesirable substances in feed. The involved GMP+ certified company is primary responsible for taking the proper control measures, to communicate with customers downstream and to trace back to the source and cause of contamination, in order to limit the distribution of contaminated feed.
GMP+ International processed the EWS notification in the secured part of the GMP+ database. On an annual basis GMP+ International will report the analysis of the EWS notifications of the previous calendar year. This can provide input for the risk-based audit program as well as for the generic risk analysis of feed materials (FSP). For GMP+ International, an EWS notification can result in an ad-hoc audit or a repeat audit.

6.3. Exemptions

For special circumstances not covered in the GMP+ FC scheme an exemption can be requested by GMP+ certified companies and/or GMP+ accepted Certification Body only if not conflicting with feed safety and/or responsibility. Approximately 390 exemptions requests are handled per year. Exemptions can be assessed during audits.

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