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

2. Objective Integrity Policy

The Integrity Policy has the objective to contribute to food/feed safety worldwide. It aims to have added value to the confidence and continuous improvement in certification regarding the GMP+ Feed Certification 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 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+ Feed Certification scheme.

GMP+ certified company

A GMP+ certified company has the responsibility to implement the applicable GMP+ requirements into its 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

performed 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 recognised 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 responsibility. This is secured by applying the structure of ISO/IEC 17021-1:2015 and ISO 22003-1:2022, complemented by other relevant ISO standards (such as ISO 22000:2018, ISO/IEC 17025:2017, ISO/IEC 17020:2012) and various IAF documents that strengthen the GMP+ FC scheme. In addition, several support tools are provided, such as a publicly accessible database with the certification status of all listed companies, the Monitoring Database, the Product List, and the International Database for Transport of 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+ Feed Certification scheme License Agreement with GMP+ accepted Certification Bodies and performs a compliance assessment program (see chapter 5).

Committees:
The International Expert Committee is asked to give advice to GMP+ International regarding developing and maintaining the GMP+ Feed Certification 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+ Feed Certification scheme because of market demand 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 is pending on individual behaviour, 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 must also comply with general law and requirements, including the (un)written rules governing the profession.
Risks related to GMP+ International:

- Improper development/maintenance of the GMP+ Feed Certification scheme.
- The compositions of (sub) committees and stakeholders are not reflecting the GMP+ community.
- Compliance assessment with insufficient depth.

Therefore, consultation of all (sub) committees and stakeholders for the development/maintenance of the GMP+ Feed Certification scheme is highly important. Due to diversity of the composition of these (sub) committees and stakeholders, the development/maintenance of the GMP+ Feed Certification 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. 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+ Feed Certification scheme in an impartial, competent and consistent way. This shall result in confidence in the GMP+ community.

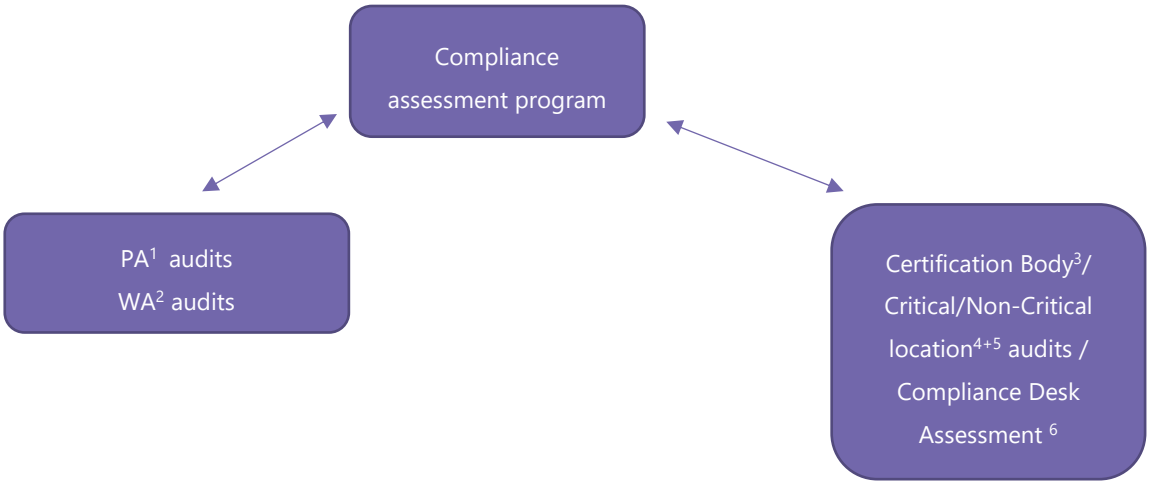
GMP+ International defines a coherent set of requirements for certification. These requirements are determined in CR1.0 *Acceptation requirements,* CR2.0 *Assessment and Certification of Feed Safety Assurance scopes* and in CR3.0 *Assessment and Certification of Feed Responsibility Assurance scopes*.

GMP+ International sets clear competence requirements, focusing on the necessary skills, knowledge, and qualifications for auditors, technical reviewers, inspectors, and GMP+ coordinators.

To accept an auditor, technical reviewer, or inspector, successfully passing the relevant examination is mandatory. These examinations serve as a tool to assess both theoretical knowledge and its practical application in accordance with the requirements of the GMP+ Feed Certification scheme.

Furthermore, GMP+ International established a mandatory audit frequency, minimum obliged audit times and classification requirements for (classifying) nonconformities including corrective actions and sanctions.

5.2. Structure Compliance Assessment program



[1]*Parallel audit: assessment of the method by which an audit is planned, executed and reported by the Certification Body.*
[2]*Witness audit: verification of auditors/inspectors how they perform their assessment and the way they categorise their nonconformities.*
[3]*Certification body audit: assessment of how Certification Bodies implement the requirements laid down in the GMP+ Feed Certification scheme.*
[4]*Critical location audit: assessment of how Critical Locations implement the requirements laid down in the GMP+ Feed Certification scheme.*

[5]*Non-Critical location(s) audit: assessment of how Non-Critical locations implement the requirements laid down in the GMP+ Feed Certification 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:

- Retrospective analysis of the:
  - certification process of a specific company,
  - performance of an individual auditor,
  - overall analysis (*annual analysis of performance of a Certification Body over the last 3 calendar years).*

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 report from Certification Bodies will be handled as follows:
  - Critical NC; within 2 working days after receiving the final corrective actions from the Certification Body.
  - Major NC; within 10 working days after receiving the final corrective actions from the Certification Body.
  - Minor NC; withing 10 working days after receiving the final corrective actions from the Certification Body.
- The application to become a GMP+ accepted certification body will be finalised 26 weeks.

5.3. Internal Integrity Committee

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

- Acceptance, suspension or withdrawal of a (applicant) Certification Body,
- Concluding/terminating the GMP+ Feed Certification 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 this Integrity Policy.

6. Additional topics

6.1. Complaints

Everybody can submit a complaint related to noncompliance of a requirement of the GMP+ Feed Certification scheme, omission or unreasonable behaviour. Complaints based on sufficient objective evidence will be handled confidentially.
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) Each complaint case will be discussed within the management team for approval.
b) the outcome of a complaint to the petitioner, this outcome will be brief for reasons of confidentiality.
c) Annually, a report of the complaints of the previous calendar year is made. The aim is to provide input for the audit plan and/or certification body audits or for continuous improvement of the GMP+ Feed Certification scheme.

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

6.2. EWS (Early Warning System)-notifications

GMP+ certified companies are obliged to notify observed exceedances 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, to limit the distribution of contaminated feed.
GMP+ International processes the EWS notification in the secure part of the GMP+ CRM-database. On an annual basis GMP+ International will report on the analysis of the EWS notifications for the previous calendar year. This can provide input for the audit program as well as for the generic risk analysis of feed materials. An EWS notification can result in a repeat audit.

6.3. Exemptions

For special circumstances not covered in the GMP+ Feed Certification 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 feed responsibility. Approximately 300 exemptions requests are handled per year. Exemptions can be assessed during audits. Certification Bodies and GMP+ certified companies must comply with conditions stated in the exemption.

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