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Certification PROCEDURE

<u>P-21</u>

	Designation	Name	Signature
Prepared by			
Approved by			

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1) Purpose

- 1-1 This document defines the ways in which Bureau Veritas Egypt LLC (hereinafter BVE) manages the certification process of a product, process or service (hereinafter "product") and relations with organizations that intend to obtain such certification. It applies to all cases for which BVE has prepared a specific scheme.
- 1-2 COMMITMENTS OF BUREAU VERITAS EGYPT: BVE grants free access to its services to organizations requesting certification, without any financial discrimination or other undue conditions. BVE may however refuse to accept an application or to maintain a certification contract with a customer for proven reasons, by informing the applicant accordingly. Access to certification does not depend on the size of the customer or on his belonging to an association or group, nor is the certification conditioned by the number of certifications already issued. The economic support of BVE is solely derived from the application of the certification fees which are proportionate to the resources necessary for the performance of the service. The tariff and application are supervised by a specific committee. Funding from Bureau Veritas Egypt is obtained, as needed, in the following ways:
 - direct funding from shareholders;
 - financing with the fees of the activities carried out.
 - BVE undertakes not to carry out consultancy activities and to make sure that the evaluators used in certification activities have not had contractual relations in this sense starting from the last two years from the date of the commitment undertaken and for the two years following that appointment.
 - The decisions of BVE are based on the evaluation of a consistent set of objective evidence, of test and verification activities, carried out both before the release of the certification, and subsequently through periodic checks. BVE assumes no obligation regarding the positive outcome of these activities and therefore of issuing the relative certificate.
 - Since the evidence of compliance is collected through sampling, their positive outcome does not guarantee total compliance with the requirements.
 - BVE recognizes the importance of impartiality in certification: for this reason it carries out
 its activities objectively, avoiding any conflicts of interest. A special Safeguard Committee,
 representative of the parties interested in certification, has the task of supervising compliance
 with impartiality.
- 1-3 COMMITMENTS OF THE ORGANIZATION: The customer who intends to achieve and maintain a certification undertakes to:
 - a) Meet the certification requirements for all production, service provision or process implementation.
 - b) Allow the carrying out of verification activities for the initial assessment and for surveillance, making all relevant documents and records available to BVE, allowing access to the sites, equipment and its sub-suppliers;
 - c) Allow the participation of observers in the verification activities (assessors of BVE in training and / or inspectors of accreditation / recognition bodies);
 - d) Maintain a record of complaints, allowing BVE to view them and manage them with appropriate corrective actions;
 - e) Inform BVE of any administrative or judicial measure in progress regarding the subject of the certification. BVE reserves the right, in these cases, to carry out the appropriate verification activities also with extraordinary audits, and to adopt any suspension measures,



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f) Use the certification and the BVE logo / brand according to the provisions referred to in par. 13.

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2) Scope of Application

This procedure describes how BE will carry the certification process of product with impartiality, showing what BVE commitment as well as the client.

3) Reference

- ISO / IEC 17065
- ISO / IEC 17067
- ISO / IEC 17025
- ISO / IEC 17021
- Technical Regulations of the Accreditation Bodies

4) Responsibility for Application

- Department managers
- o Quality Manager
- Auditors
- o Experts
- o Staff

5) <u>Definitions</u>

- o Client: the organization applying for or having obtained the product certification Product
- o requirements: requirements that relate directly to a product (service / process) specified in a document identified by the certification scheme Certification
- o requirements: requirements, including the product requirements, met by the requesting Organization as a condition for obtaining and maintaining the certification
- Reference regulatory document: document that specifies the product requirements to which
 the product / process / service is deemed compliant. It can be a technical standard, a technical
 specification, a collective specification of consortia, associations and the like or of a single
 organization.
- Certification scheme; certification system prepared by BVE, which identifies for the product / process / service for which the certification is issued, the particular rules and procedures followed by BVE to assess compliance with respect to certification requirements.

6) Procedure

6.1. CERTIFIABLE PRODUCTS

Products / processes / services for which BVE has prepared a certification scheme may be subject to certification, through the approval of specific "Particular Regulations" which detail the conditions and methods applied to evaluate their compliance.

6.2 APPLICABLE REGULATORY DOCUMENTS

The requirements against which the products / processes / services can be assessed must be contained in a regulatory document which must include:

- a) The identification of the specific product / process / service
- b) The certifiable characteristics and, when applicable,
- c) The test methods, measurements, values and tolerances
- d) The control plan
- e) The elements of quality system required.

Regulatory documents used by BVE for the development of a scheme can be issued by regulatory bodies, government authorities, private associations, consortia or individual bodies.



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6.3 REGULATORY DOCUMENTS FROM A PRIVATE SOURCE

Before developing a scheme against a document from a private source, BVE subjects the proposed documents to its own examination, addressing a committee - made up of impartial and competent people - for its validation, the results of which are communicated to the applicant. Requests for clarification regarding the application of the requirements may also be addressed to this committee by third parties. BVE can also define its own certification requirements in addition to those proposed.

6.4 REQUIREMENTS FOR THE APPLICANT ORGANIZATION

The certification is granted only if the applicant has implemented and maintains the production / supply process of the product / process or service according to documented methods, having suitable means available, in order to guarantee the constant conformity of the product / process / service to the specified requirements. In the case of certification of a product, the following can apply for certification:

- a) Own, verification, storage etc. of a specific product and therefore has full responsibility for the conformity of the product with the requirements to be certified.
- b) An Organization that has a specific agreement with the producer or manufacturer, legally usable, which guarantees to BVE the surveillance and control over the production processes that are no less than those feasible by the manufacturer.

6.5 COMPULSORY REQUIREMENTS AND LIMITS OF CERTIFICATION

BVE is responsible for verifying that the customer knows and is able to manage compliance (including the legal one), relating to the products-processes-services to be certified, but it is only the customer who is solely responsible of the correct performance of its activities and compliance with the legal obligations related to the products, processes and services provided, and the contractual obligations towards its customers.

6.6 REGISTRATIONS AND CONFIDENTIALITY

BVE manages and keeps confidential the information obtained in the certification process. It can make them known only against legal obligations or, in the case of accredited schemes, to accreditation bodies. The records are kept, unless otherwise specified in the individual schemes, for the entire certification cycle and for the previous one.

6.7 REQUEST FOR CERTIFICATION

To access the service, the organization concerned requests an offer from BVE, providing essential information by filling in a specific questionnaire. They must identify:

- the type of product / process / service, the model, the commercial series etc. to certify
- the regulatory document that contains the requirements to demonstrate compliance
- the general characteristics of the applicant specific according to the scheme
- the legal obligations, the significant aspects of the processes, the means and resources available, the sites used etc.
- any outsourced processes used and having an impact on compliance with the requirements. BVE, having assessed the completeness of the information received and its ability to provide the service within the required terms, sends an offer which, when accepted, defines the economic aspect of the contract.

The offer includes the costs related to the complete certification program - specific to each scheme - including the phases of the initial assessment, and, if required by the scheme, the surveillance activities for maintaining the certification (for the duration of the certification cycle specific to each scheme) and for its renewal.

6.8VALIDATION OF THE REGULATORY DOCUMENT

If the regulatory document requires, in the opinion of BVE, its preliminary validation, as it is the property of the applicant or of non-standardization bodies, the circumstance is made known to the applicant and any costs of validation are included in the offer with separate item. The refusal of the applicant to proceed with



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any subsequent changes to the document, or of BVE to proceed with the certification, may result in the interruption of the process and the cancellation of further obligations for both parties.

6.9EVALUATION

The activities envisaged by the evaluation plan include, where defined in the specific regulations, an initial audit divided into the two phases of the documentary evaluation (Stage 1) and the on-site evaluation (Stage 2). The two phases, except for the exceptions provided for by specific schemes, take place at different times. To start the process, BVE appoints and communicates the verification team (VT) to the client in advance, taking into account the competence and the absence of potential conflicts of role and interests for the auditors who are part of it. The Organization may request the partial or total change of the group for justified reasons, giving reasons in writing. The verification group can also be composed of auditors / inspectors who are not employees of the CB, but whose work the CB is responsible for.

6.10 DOCUMENTAL VERIFICATION

This is carried out on the documentation that the applicant makes available to the verification group, which varies according to the specific particular scheme regulations. The documents must generally contain

- (a) the information required to demonstrate the conformity of the product / process / service,
- (b) the description of the means by which the organization is able to demonstrate and monitor the conformity of its product / service / process (control plan, procedures, instructions, registrations) with respect to the requirements set out in the regulatory document, the requirements for certification issued by BVE and the accreditation bodies, as well as with respect to any legal requirements.

Any deficiencies and gaps in the documentation may interrupt the process, in the opinion of the GV, until their resolution. Following the visit, BVE sends the company a report that identifies any gaps, or, if so, suggests the continuation of the verification activity. Once these gaps have been filled, the GV manager plans the on-site verification, communicating the audit plan to the Organization, with the details of the sites, processes, etc. to be evaluated, as well as the specific product / process / service evaluation program.

6.11 FIELD AUDIT AT THE ORGANIZATION

It has the purpose of verifying the application of what is contained in the technical documentation of the product / process / system to be certified, and of the required certification requirements. In the case of a product, the GV reviews:

- (a) The information, records, tests and sampling criteria used by the applicant to establish compliance with the required specifications;
- (b) The organization, resources and technical means envisaged in the specific scheme.

In the case of a process or service, the verification is carried out in the places where the services are provided or the process is carried out, with checks aimed at judging the correspondence of the characteristics of the services / processes provided with what is declared in the reference document for certification.

6.12 TESTS ON PRODUCTS AND OTHER EXTERNAL ACTIVITIES

BVE can outsource some assessment activities required by the certification scheme, but only to bodies that comply with the requirements of the ISO / IEC 17025 standards for laboratory tests, or ISO / IEC 17020 for inspections. In the event that these activities are carried out by non-independent bodies (eg in the customer's own laboratories) BVE ensures that they are carried out in a way that generates confidence in their results. For those outsourced BVE will review their accreditation certificate and the accreditation report for the NCR and observation. BVE can do onsite audit if required. The outsourced CAB will be evaluated using form (F-09-09). In all cases for all outsourced activities BVE take the all accountability for these activities.

6.13 EVALUATION RESULTS

Once the evaluation audit has been completed, if any non-conformities have emerged (hereinafter NC), which prevent the continuation of the process, they are recorded by the GV manager on special forms left in copy to the applicant. In the classification of BVE,

"major" Non-conformities are those that



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- o concern the non-compliance with one or more specific requirements of the reference standard, or
- o jeopardize the effectiveness of the management system or
- o are due to violations of applicable BVE Regulations.

On the other hand, the NCs that do not affect the functioning of the management system or have only a marginal weight for the coverage of a specific technical requirement are "minor".

Any other types of findings are specified in the particular regulations.

It is therefore up to the Organization, in order to continue the process, to indicate, within the times required by the GV and as described in the specific regulations, the actions it intends to implement to correct the non-conformities found. Such actions may include additional evidence that the GV can dispose of at the applicant's expense.

Based on the extension of the NC, the GV can also request a total reassessment or an additional visit to verify the implementation of the proposed CAs.

It is also up to the GV, if the scheme provides for it, to agree with the applicant the verification plan for the subsequent surveillance, which details in particular the tests that must be periodically carried out.

6.14 RELEASE OF THE CERTIFICATION

The decision on the issue of the certification F-21-04 rests with the Technical Committee which, for this purpose, reviews the entire file and the information received.

The Committee may decide to:

- (a) Approve the certification, allowing the issuance of the certificate. This choice can only be made if any corrective actions prepared for the NC have been implemented.
- (b) Request further clarifications regarding the evidence collected,
- (c) Request any additional verification activities, in the event that the evidence collected does not fully support the judgment of conformity, communicating the need to the applicant.

The Committee decides on the basis of the evidence obtained up to that moment. However, it can always order further test or verification activities, if it deems it necessary.

The review and decision of certification currently done by one person (The certification manager) Engineer: Tamer Ibrahim, he will not be involved in product evaluation.

6.15 ELEMENTS OF THE CERTIFICATE

The certificate of conformity issued by BVE contains the following information (without prejudice to any other legislative requirements):

- 1. The identification of the customer and any address of the production plant (s)
- 2. The identification of the product, process or service certificate and related characteristics subject to certification
- 3. The applicable certification scheme
- 4. The reference standard document
- 5. The validity dates of the certificate (issue and expiry date if applicable)
- 6. The references of BVE, as issuing body.
- 7. The mark of the Accreditation Body (where applicable)
- 8. The validity of the certificate of conformity is usually established in three years, provided that all the surveillance checks are successful. Different durations can be established according to the type of product.

6.16 INTERRUPTION OF THE PROCESS

Twelve months have elapsed from the acceptance of the application, without the applicant having been able to demonstrate compliance with the standard in several certification or supplementary audits, the process is interrupted and the contract with the Organization is cancelled. In case of failure to issue the Certification, the reasons are communicated to the Organization and the minimum time deemed necessary is indicated before proceeding with a re-examination of the application.



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6.17 OMISSION OF ACTIVITIES

In the assessment process BVE can rely on a certification that it has already previously issued to the same applicant or to other applicants (e.g. in the case of an applicant who has an agreement with a manufacturer for the same product already certified by BVE). In this case, some steps of the verification procedure can be omitted from the process. This circumstance is clarified to the applicant in the certification offer.

6.18 MAINTENANCE OF THE CERTIFICATION

a. SURVEILLANCE AT THE ORGANIZATION

During the period of validity of the certificate, BVE carries out a surveillance activity - if required by the specific scheme - in order to assess the permanence of the conditions that allowed the initial confirmation of conformity. The activity is carried out at the Organization with the frequency agreed in the initial contract and according to the plan defined after the initial audit. Compliance with both the technical and certification requirements and the aspects of the quality management system are subject to verification and in particular:

- the management of complaints relating to the product subject to certification,
- the use of the certification logo on the product and on the related documentation.
- If required by the specific certification scheme, BVE also carries out market surveillance.
- The audits are carried out and documented similarly to those for the initial certification and cases of non-compliance are managed in the same way.

b. ADDITIONAL AUDITS

They may be organized in the opinion of BVE at the Organization in the following cases:

- (a) misuse of the BVE logo / brand;
- (b) complaints about situations that could damage the image of BVE;
- (c) to verify the implementation of major non-conformities (follow-up);
- (d) for requests that emerged during the certificate issuance phase;
- (e) for the revocation of the suspension of the certificate;
- (f) in the event of receipt of news of serious, very serious or fatal accidents and / or any judicial measures / serious irregularities or reports connected with the certified system;
- (g) in the event of changes to the products, management system, organizational or business structure of the Organization
- (h) following specific requests from the accreditation bodies.
- (i) when an increase in the planned checks is required by the specific scheme.

Any NCs are recorded and treated as in the case of the initial check. If provided for by the specific scheme, additional audits may also be unannounced or at short notice.

c. REMOTE AUDIT

For exceptional circumstances due to causes of "force majeure" which prevent the normal audit at the customer's premises, Bureau Veritas Egypt reserves the right, subject to prior assessment of the feasibility and sharing with the customer, to carry out remote verification using Information Technology (IT) systems. For the methods of carrying out, refer to the document IAF MD04 "Use of Information and Communication Technology (ICT) for Auditing / Assessment Purposes" and to the applicable procedures of each department that incorporate what is defined by the issued and subsequent EGAC circulars, without prejudice to any indications provided by the competent authorities.

Even in the case of remote audits, the sharing of information between the customer and the BVE will be subject to the Bureau Veritas group's information security policy.

6.19 RENEWAL OF THE CERTIFICATION

Where applicable, the certificate of conformity is renewed when it expires in accordance with the contractually agreed terms. This occurs following a renewal audit conducted as for the initial certification on all the required requirements.

The renewal process must take place within the existing certification cycle, well in advance of its expiry, in order to have the time necessary to manage any non-conformity.



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6.20 VALIDITY OF THE CERTIFICATE

The certificate has the duration foreseen by the specific scheme. The certification cycle starts from the date of the resolution in the case of first certification, and from the date of expiry of the previous certificate for renewals carried out within the aforementioned terms in case of renewal.

Scope extensions do not affect the certificate expiration date.

At the end of the certification validity period, the Organizations that have not completed the renewal procedure lose the right to use the BVE logo / brand and to declare the certification of their product / service / process.

6.21 REGISTER OF CERTIFIED PRODUCTS

Once the certification has been obtained, the name of the product and the customer are included in a special list, which can be consulted on the website www.bureauveritas.eg, and, if required by law, in any other official registers, for the time in which the certificate is valid.

6.22 AMENDMENTS TO THE FIELD OF APPLICATION AND RULES

(Obligation to notify) The organization must inform BVE without delay of the changes that may affect its ability to meet the certification requirements and BVE is required to communicate any changes affecting the requirements themselves.

The customer is required to communicate any changes that may concern the legal status, the offices, the organizational structure and processes, the quality system, the reference regulatory documents as well as the technical specifications of the certified product.

BVE is required to evaluate in advance any reported changes, deciding the appropriate actions in this regard. They may include an additional audit (at the customer's expense) if the changes are significant. (Extension or reduction) The scope of the certificate within the validity period can be extended or reduced upon specific request of the organization. It is up to Bureau Veritas Egypt to accept the request or not, evaluating any contractual additions and the need for an additional audit,

Whether or not combined with an audit already scheduled. The extensions / reductions do not affect the expiration date of the certificate.

(Changes to technical or certification standards) In the event of significant changes in the reference standards of a certificate or in the certification / accreditation requirements, Bureau Veritas Egypt warns the organizations in writing, giving appropriate instructions and sufficient time to adapt to the new legislation. If the customer does not accept these changes, he can withdraw from the contract in compliance with the Sales procedure P-22

6.23 SUSPENSION, REVOCATION AND RENUNCIATION OF THE CERTIFICATION a. SUSPENSION OF THE CERTIFICATE

BVE has the right to suspend the validity of the certificate in the following cases:

- (a) If the surveillance audit detects non-conformities that seriously and immediately affect the characteristics of the certified product;
- (b) If in the face of non-conformities found during surveillance, the customer does not implement the corrective actions required within the pre-established time;
- (c) In case of complaints, legal actions, or for failure to report administrative or judicial measures;
- (d) If the customer does not allow to carry out the periodic checks, or the extraordinary ones requested by the Technical Committee, within the foreseen times;
- (e) If the customer fails to notify BVE in good time of significant changes to their organization or product specifications;
- (f) If the customer makes an incorrect or deceptive use of the Bureau Veritas Egypt certification;
- (g) If the surveillance activities have not been legitimately carried out by BVE following an exception of non-fulfillment, due to the non-payment of the certification fees, communicated by BVE to the Client;
- (h) If the customer formally requests suspension.

The suspension is approved by the Technical Committee, which is responsible for indicating the effective date, the duration (which cannot exceed six months) and the specific object (which may concern only a part of the field of application) and the conditions under which the validity of the certificate can be restored. The suspension period does not change the expiration of the certificate. During the suspension period, the organization cannot use the brand / logo and advertise the certification. As for the management of any products in stock during the suspension, refer to the individual scheme regulations.



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It is up to the certified customer to undertake any action aimed at restoring conformity, informing BVE which has the right - at the expense of the customer - to ascertain this restoration also with an extraordinary verification.

b. WITHDRAWAL OF THE CERTIFICATE

The certification can be revoked by BVE based on the following conditions:

- (a) If the causes that caused the suspension of the certificate have not been eliminated, within the established terms;
- (b) For very serious non-conformities that affect not only the quality and safety characteristics of the certified product, but also the image of BVE itself.
- (c) For failure to comply, within the time limits communicated by BVE, with the requisites required for certification
- (d) Bankruptcy or termination of the concessionaire's activity (BVE does not receive any communication but being unable to carry out the planned surveillance or renewal checks, after checks

Through the offices in charge, collects the certificate by communicating it to the notification authorities and others). The revocation decision, based on a compliant resolution of the Technical Committee of BVE, takes effect from the day the resolution is communicated.

Once a certificate has been revoked, the management of any products in stock or on the market is subject to the provisions of the individual scheme regulations.

c. WAIVER OF THE CERTIFICATE

The customer can renounce the certification:

- (a) Upon expiry of the contractually established period, giving notice in compliance with the Sales procedure P-22
- (b) In the event of an unacceptable revision of the BVE certification rules or certification requirements;
- (c) In the event of cessation of business.

The waiver takes effect from the date of its communication.

d. EFFECTS OF REVOCATION AND RENUNCIATION

In case of revocation and renunciation of the certificate, BVE deletes the customer's name from the register of certified products and withdraws the certificate, giving any communication, if due, to the administrative authorities.

The customer undertakes to return the original certificate, not to use any copies of it and to eliminate any reference or symbol to the cancelled certification from all technical and advertising documentation.

The particular scheme rules may provide for particular provisions to avoid the presence on the market of products that use the trademark even following a revocation of the certification.

These conditions also apply in the case of certificates which, after the expiry date, have not been renewed.

6.24 USE OF THE CERTIFICATE AND THE BUREAU VERITAS LOGO / BRAND

Once the certification has been obtained, the Organization can refer to it in its documents and communication in a manner consistent with the scope of the certificate, without ambiguity or misleading content, and without discrediting BVE.

If envisaged by the specific scheme, BVE also authorizes the use of its trademark on the product-process-service itself and in its presentation, according to the rules contained in the Requirements for Third-Party Marks of Conformity PROCEDURE-P-25 and in the particular scheme Regulations. In any case, the methods of use of the certificate and / or trademark must be agreed in advance with BVE, by sending the drafts themselves, according to the detailed instructions sent by the BVE offices. In the case of continuous granting of use of the BVE trademark, the surveillance activities (par. 6.18) are mandatory.



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BVE examines and processes both complaints received from customers and relating to services rendered by BVE, and those relating to services and products rendered by its customers to the market and to users. All complaints that reach Bureau Veritas Egypt, without any discrimination, are examined and managed by the BVE itself (never by external personnel), which is solely responsible for any decisions made in this regard. In the event of verbal or telephone reports, anyone who receives such a complaint must ask the complainant for a written definition of the complaint.

As for appeals, they can only be presented by the Organization that has been the subject of the conformity assessment carried out by BVE, and are taken into consideration only for the following cases:

- Rejection of the certification request
- Suspension, withdrawal and cancellation of the certification handling of complaints and appeals is specified in the P-23, which can be consulted and downloaded from the website www.bureauveritas.eg

6.26 ACCEPTANCE OF THE CONTENT OF THE REGULATION - APPROVAL OF CLAUSES

The signing of these regulations by the Organization implies the acceptance of all clauses contained in this regulation which are valid as integration of the terms and conditions contained in the Offer of services that Bureau Veritas Egypt has formulated to the Organization for the provision of certification services and which the Organization has accepted as well as integration of the Sales P-22

Forms:

#	Name	Code
1.	Audit report	F-21-01
2.	NCR	F-21-02
3.	Audit Plan	F-21-03
4.	Certificate of conformity	F-21-04