



NSF-ISR

Policies for Accredited Registration and Other Third-Party Services

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TABLE OF REVISIONS

DATE	NATURE OF CHANGES
10/25/2010	<ul style="list-style-type: none"> • Created table of contents; • Added additional bid list requirement for ISO/TS 16949 clients; • Added performance trend information for AS clients prior to ORR; • Added Letter of Conformance requirements for ISO/TS 16949 clients; • Added responsibilities of client to include customer special status conditions, notification of applicable customer specific requirements and scorecard information to NSF-ISR (ISO/TS 16949); • Revised complaint process to align with sections #37-41
11/18/10	Updated page numbers in the Table of Contents
1/14/11	Changed title of document
1/14/11	Added requirement to item 18 regarding the use of the FSSC logo and advertising of certification on FS 22000 certificates.
2/21/11	<ul style="list-style-type: none"> • Added clarification that outsourcing of manufacturing or processing prevents registration to AS9120. • Item 26 is not exclusive to EMS (removed EMS only)
3/4/11	<ul style="list-style-type: none"> • Added clarification to item 17 that organizations certified to AS9120 that also manufacture or repair cannot advertise manufacturing or repair activities under its AS9120 certification. • Revised item 18 to indicate that the Accreditation Body (AB) mark (e.g. ANAB) cannot be used in isolation of the NSF Management Systems Registration (MSR) Mark and that the AB mark can be the same size or smaller than the NSF MSR Mark. • Added the maximum times allowed between a stage 1 and stage 2 audit in item 8.
4/5/11	<ul style="list-style-type: none"> • Revised complaint, dispute and appeals process • Required Organization notification of any food safety prosecution, significant regulatory food safety nonconformity, or any product recall relating to food safety. • New requirements added to the Modification notification requirements relevant to FS 22000. • Added FS 22000 eligibility requirements
6/2/11	<ul style="list-style-type: none"> • Reversed items 9 and 10. • Requirement for CAR resolution related to registration and reassessment audits prior to registration being granted. • Added definitions for correction/containment, root cause, and corrective action • Added to 1. Eligibility, “NSF-ISR cannot certify other management systems certification bodies” • Moved the registration pre-requisite from section 1 to section 7. Removed requirement for non-TS programs that a full cycle of internal audits and management reviews is required to obtain registration. • Added to item 2 Application that all AQMS audits on or after July 1, 2011 will be to the 2009 version. Also, by accepting the quotation, the organization is declaring that their system will conform prior to the audit. • Corrected Typo in section 26 (replaced ISO 20000 and FS20000 with 22000) • Revised section 26. • Corrected “Compliant” to “Complaint” in the definitions (June 14, 2011) • Removed requirement for AS9100 rev C customers to have 12 months of performance data in order to get registered (June 20, 2011)
11/23/11	<ul style="list-style-type: none"> • Revamped Policies to extract program-specific requirements for availability of information through Intranet (# insert website) • Deleted sections: Attorney Client Privilege – (OHS/EMS Only), Documentation

	<p>Report, Responsibility of the Organization, Organization Records of Complaints (QMS Only), Enforcement Sections (covered within Master Service Agreement)</p> <ul style="list-style-type: none"> Deleted all Auditor Reference sections (covered in CL3000) Added section: Special Audit Revised sections: Eligibility (added no longer with a requirement); Designation of Auditors (revised assignment of auditor criteria, provided both parties are in agreement); On-Site Readiness Review (ORR) (revised wording to ORR shall be scheduled); Registration Audit (reworded to conducting of Stage #1 and Stage #2 concurrent wording and recommendation wording); Independent Review and Registration and Recertification Decision (added favorable recommendation wording); Official Listing of Registered Sites (deleted industry db references); Modification to an Organization's Management System (deleted in writing requirement); Periodic Surveillance (or Additional) Assessments for Continued Registration (reworded shall statements with may on audit timing requirements); Cooperation with NSF-ISR (deleted organizational decision to require auditors to leave); Corrective Action for Minor Nonconformance (all audits) (deleted requirement for certificate decision timing); Corrective Action for Major Nonconformance (all audits) (added wording for corrective action timing requirement); Enforcement Action – Suspension (revised section on office consultation for decision); Enforcement Action – Withdrawal of Registration (revised wording to comply with all registration requirements); Reinstatement (reworded reinstatement wording); Appeals and Disputes (reworded for NSF-ISR management review on requests); Coordination of Services for Surveillance Audits (deleted Attachment C reference); Transfer of Registration (revised review responsibilities to NSF-ISR management as well as deleted quality manual requirement)
January 3, 2012	<ul style="list-style-type: none"> Added link to PEFC requirements in section 15.
September 27, 2012	<ul style="list-style-type: none"> Added text “GHG Validation/Verification, QMS, SFI, and TS 16949.” To item 37; corrected pagination; converted to .pdf format.
December 12, 2012	<ul style="list-style-type: none"> Converted to Word format.
March 2, 2013	<p>Revised the definition of Major Nonconformance (OHS/EMS/SFI) item (4) page 7 to the following:</p> <ul style="list-style-type: none"> The nonconformance could result in a significant impact to the environment for ISO 14001 or could result in serious injuries or illnesses for OHSAS 18001.”
August 27, 2013	<ul style="list-style-type: none"> Deleted reference to program specific requirements on the web-site
March 4, 2014	<ul style="list-style-type: none"> Added e-Stewards, Aerospace and Automotive Addendums
February 18, 2015	<ul style="list-style-type: none"> Added observer requirements to item 21. Revised item 28 to state that certificates are temporarily invalid during suspension and that the status shall be made publicly available. Revised clause 26 and 27 “Corrective Action Enforcement”. Removed all references to GHG
March 4, 2015	<ul style="list-style-type: none"> Revised section 15 to include new ANAB Accreditation Mark use requirements

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ACCREDITED REGISTRATION AND OTHER THIRD-PARTY SERVICES**

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NSF-ISR POLICIES FOR ACCREDITED REGISTRATION AND OTHER THRID-PARTY SERVICES

NSF International Strategic Registrations, Ltd. (NSF-ISR) offers to any Organization, Management System Registration or other third-party registration or services, subject to the requirements of these policies.

The policies apply to an Organization's requesting third-party registration or other services against the specific standard(s) within the scope of NSF-ISR's Registration Program. The policies shall be considered in their entirety, and shall be applied within the context of the selected standard(s) and the contract between the Organization and NSF-ISR. For clarity and ease of reference, these policies are presented as individual items.

DEFINITIONS

<u>Appeal</u>	A request from a customer for NSF-ISR to reconsider a decision.
<u>Assessment:</u>	The process of compiling and evaluating audit results to determine the conformance of all applicable requirements of the specific standard.
<u>Audit:</u>	Systematic, documented verification process of objectively obtaining and evaluating audit evidence to determine whether specified activities, events, conditions, management systems, or information about these matters conform with audit criteria, and communicating the results of this process to the client.
<u>AQMS:</u>	Aerospace Quality Management Systems standards; i.e. AS9100, AS9110 and AS9120.
<u>Certificate of Registration:</u>	A Certificate recognizing the Organization has been assessed by NSF-ISR and is in conformance with the specified standard(s), within the scope of NSF-ISR's registration program, and these policies.
<u>Company:</u>	Any public or private organization, group, individual, other entity, or subsidiary or division of such an entity contracting with NSF-ISR.
<u>Conformance:</u>	Fulfillment of a specified Standard requirement, applicable requirements of an Organization's Management System, and NSF-ISR requirements.
<u>Containment/Correction:</u>	Actions taken to correct the identified nonconformity including evidence that the nonconforming situation was brought back into a state of conformance (i.e., "the quick fix").
<u>Complaint:</u>	A statement of dissatisfaction with NSF-ISR's service or a statement of dissatisfaction with the Organization received by an external body.
<u>Compliance</u>	Adhering to Federal, State, Local, Regional or National regulations and laws.

- Contract: Any authorized written agreement between the Organization and NSF-ISR. An authorized agreement is any agreement signed by a corporate officer of NSF-ISR.
- Corrective Action: Action taken to address the root cause of the nonconformance to keep the nonconformity from happening again (i.e., recurrence). The “permanent fix”.
- EMS: Environmental Management System the part of the overall management system that includes organizational structure, planning activities, responsibilities, practices, procedures, processes and resources for developing, implementing, achieving, reviewing and maintaining the environmental policy.
- Finding: Use of objective evidence to formalize a conclusion.
- Listing Of Registered Sites: Tabulation of sites, by Organization, that have been Registered.
- Major Nonconformance (QMS):
- One or more requirements of the applicable standard(s) have not been addressed.
 - One or more requirements of the applicable standard(s) have not been implemented.
 - Several requirements of the applicable standard(s) show similar minor nonconformance’s in documentation and/or implementation indicating a breakdown of the Organization’s QMS.
 - A nonconformance that would result in the probable shipment of non-conforming product or reduce the usability of the product or service for its intended use.
 - A nonconformance that would result in the failure of the quality system or materially reduce its ability to assure controlled processes and products.
 - AS Specific: Failure to assign a Site Administrator in the IAQG’s OASIS database (www.iaqg.org/oasis) for each site (AS9100/9110/9120)
 - The absence of, or total breakdown in an FSMS element, including: (1) One or more numbered requirements of ISO 22000 have not been addressed. (2) One or more numbered requirements of ISO 22000 have not been implemented (3) Several similar minor nonconformance’s in documentation and/or implementation, taken together, lead a reasonable auditor to conclude that one or more numbered requirements of ISO 22000 have not been addressed or implemented, and (4) The nonconformance is the result of critical hazard points not being managed accordingly or there exists a potential for unsafe food practices to be exposed to final customer.

Major Nonconformance (OHS/EMS/SFI):

- The absence of, or total breakdown in an OHS or EMS element, including: (1) One or more numbered requirements of OHSAS 18001 or ISO 14001 have not been addressed. (2) One or more numbered requirements of OHSAS 18001 or ISO 14001 have not been implemented (3) Several similar minor nonconformance's in documentation and/or implementation, taken together, lead a reasonable auditor to conclude that one or more numbered requirements of OHSAS 18001 or ISO 14001 have not been addressed or implemented, and (4) The nonconformance could result in a significant impact to the environment for ISO 14001 or a could result in serious injuries or illnesses for OHSAS 18001."
- A finding of Major-nonconformance is warranted when one or more of the Sustainable Forestry Initiative standard (SFIS) performance measures or indicators has not been addressed or has not been implemented to the extent that a systematic failure of a program participants SFI system to meet an SFI objective, performance measure or indicator occurs (SFI)

Minor Nonconformance

- A single observed nonconformance to the Management System Standard or the Organization's Management System, and is not considered to be a breakdown in the Organization's Management System or reduce its ability to assure controlled processes or products.
- A Minor nonconformance occurs when there is an isolated lapse in SFIS program implementation which does not indicate a systematic failure to consistently meet an SFI objective, performance measure or indicator (SFI)
- For AQMS audits, a minor nonconformance can be issued if the organization fails to maintain the accuracy site or OASIS administrator information in the OASIS database (www.iaqg.org/oasis).

Nonconformance:

CAR(s). Non-fulfillment of a specified Standard requirement, applicable requirements internal to the Organization, or NSF-ISR requirements.

NSF-ISR:

NSF International Strategic Registrations, Ltd., its staff or other authorized representatives.

NSF-ISR Requirements:

Requirements of the selected Standard, policies, and any agreements or contracts upon which NSF-ISR Registration is based.

NSF Management Systems
Certification Mark:

A registered NSF Registration Mark that references a management systems standard (e.g. ISO 9001) - in this instance “registered” means a formal process with an appropriate official agency.

NSF Online:

Online system where customers may view their audit reports and submit corrective actions. <https://clients.nsf.org>

Opportunity for Improvement:

A finding not determined to be a nonconformance but which, in the opinion of the audit team, would be a management system improvement. These will be identified during the audit, without the Auditors recommending specific solutions.

(Note: For 14001, the use of the finding “Opportunity for Improvement” during the audit process is optional for companies.)

Organization:

Company, corporation, firm, enterprise, municipality, authority or institution, or part or combination thereof, whether incorporated or not, public or private, that has its own function.

Public Notice:

For new Registrations, the issuance of a copy of the Official Listing and Certification of Registration to a Organization which may distribute this information; for enforcement purposes, distribution of a written notice for nonconformance.

Registered Organization:

An organization that has a written agreement with NSF-ISR for accredited registration services and has at least one Registered site or product.

Registration:

NSF-ISR attestation that an Organization meets a specified standard(s), applicable requirements internal to the organization, and all NSF-ISR requirements and is authorized to use the NSF Management Systems Certification Mark.

Root Cause:

Information the Organization provides to NSF-ISR detailing what systemic issue (s) allowed the management system to operate in a nonconforming manner.

Site:

The site will be defined between NSF-ISR and the client according to the standard being audited.

Site Registration:

The result of a decision by NSF-ISR that a site meets NSF-ISR requirements for the selected accredited services.

Suspension:

A period of time, normally no more than 120 days, under which an Organization is still registered but will be subject to more frequent internal and/or external audits. Specific corrective actions must be submitted under defined time frames.

Standard:

The recognized Standard that is the basis for Registration.

INITIAL ASSESSMENT AND REGISTRATION

1. Eligibility

An Organization requesting certification to a Standard for which NSF-ISR offers Registration is eligible for assessment and Registration by NSF-ISR.

2. Application for NSF-ISR Registration

The application provided by NSF-ISR shall be submitted by the Organization to NSF-ISR for each site.

3. Contract for NSF-ISR Registration

A 'Master Agreement' provided by NSF International Strategic Registrations, Ltd. (NSF-ISR) shall be executed by the Organization and NSF-ISR.

4. Designation of Auditors

Upon acceptance of an Application, NSF-ISR shall assign the audit team based upon several factors including but not limited to required competency, logistics, availability, lack of any conflict of interest, etc. At the election of NSF-ISR, subcontract auditors may be used in lieu of NSF-ISR staff auditors.

NSF-ISR may allow requests by clients for auditor changes/substitutions, provided both parties are in agreement. Conformance to rules concerning export controls, auditor nationalities, and confidentiality/conflict of interest challenges shall be an exception to this requirement. NSF-ISR shall be able to assign and rotate auditors, as available.

5. Document Review - Desk Audit

When required by the accredited registration program the Organization shall submit to NSF-ISR documentation of its Management System. The Management System documentation shall include, as a minimum, the Organization's relevant policy and state the Organization's approach to each requirement of the recognized Standard. The designated auditor shall review the Organization's Management System documentation and provide a written report to the Organization on conformance and nonconformance of the documented Management System to each requirement of the recognized Standard.

6. On-Site Readiness Review (ORR)

Where required by the accredited registration program, following (or including) the review of Management System documentation, an ORR shall be scheduled and confirmed with the Organization. The ORR is an on-site visit for the purpose of resolving any Management System documentation nonconformance and to verify that the Management System has been sufficiently implemented at the site for an on-site audit for registration. This audit includes verification that internal audits and management reviews are being planned and performed to a level of implementation that confirms the Organization is ready for the Registration (stage 2) audit. The lead auditor shall also use the ORR to determine audit resources and logistics needed to conduct the registration audit. The ORR shall also result in planning for the on-site registration audit. An audit

report will be prepared and sent to the client by the lead auditor after the ORR is completed. A readiness review must be completed prior to the registration audit.

7. Registration Audit (Stage 2)

The designated Audit team shall conduct an on-site audit to verify that the Organization conforms with the requirements of the specified Standard, including any changes from the desk audit and ORR (if applicable), and that the specified standard has been implemented and maintained. During the on-site audit, any nonconformities shall be documented and a copy provided to the Organization. Prior to the completion of the on-site audit, all nonconformities shall be classified as follows: Major Nonconformance or Minor Nonconformance.

The lead auditor shall provide the Organization a written report on the results of the audit, including the audit team's recommendation relating to registration. The audit team shall make one of three recommendations:

- Recommendation To Register or To Maintain Registration
- Recommendation **NOT** To Register or To Maintain Registration
- Unable To Make Recommendation At This Time – Follow-Up Audit Required (*All requirements are addressed, however, there is insufficient evidence that the system is effectively implemented or the number of nonconformities indicates a lapse in the maintenance of the management system*).

8. Reassessment

NSF-ISR will perform a periodic reassessment audit in accordance with international, oversight body, and sector specific requirements. Generally, reassessments are performed three years after the initial assessment. Exceptions include Sustainable Forestry Initiative (five years) and Bio-Solids (five years). Reassessment audit durations will be in accordance with these publications or NSF-ISR specific procedures. The purpose of a reassessment is to affirm the organizations continued conformance with effective maintenance of the system designed to conform to the standard of registration. Reassessments are subject to certification board review. NSF-ISR shall make decisions based on the results of the recertification audit, as well as the results of the review of the system over the period of certification and complaints received from users of certification.

9. Independent Review and Registration and Recertification Decision

Upon receiving a favorable recommendation for registration by the Audit team, a Certification Board Reviewer (CB Reviewer), shall review the audit team's report and recommendation and issue the final Registration decision. The review will include ensuring that the audit covered the scope of registration in a sufficient enough depth to grant certification and that corrective actions are acceptable.

10. Notification of Registration

The Organization shall be advised in writing of the Registration, and the Registration shall be made public by NSF-ISR. A Certificate of Registration shall be issued by NSF-ISR.

11. Official Listing of Registered Sites

NSF-ISR shall maintain a public Listing of Registered Organization sites. In addition, NSF-ISR may provide information to other organizations as required (e.g. IAQG OASIS, IATF, FSSC, etc.).

12. Written Authorization for Registration and Use of the NSF Management Systems Certification Mark

NSF and its Mark(s) are registered trademarks of NSF International. No Organization or person shall apply or use a Mark in connection with a site or product, or represent in any way that the site or product is Registered, until receipt of written authorization by NSF-ISR.

The Mark shall be displayed as described on in this document. Failure to conform to these requirements may result in a request for formal corrective action or legal action.

All marks are property of either NSF-ISR or accrediting bodies and must be returned to NSF-ISR upon termination of services.

13. Use of the NSF Management Systems Certification Mark- Listing of Registered Sites Only

An Organization shall use the NSF Management Systems Certification Mark only in association with a site shown in the Listing of Registered sites.

14. Use of the NSF Management Systems Certification Mark or Certificate - Advertising and Literature

Use of the Marks, certificates, or statements of management systems certification on sales literature, websites, brochures, promotions, and catalogs in advertising of Registration is acceptable, provided the Organization complies with the following:

The Organization shall not:

- Directly or indirectly represent, advertise, imply or claim that products (including services) or a non-Registered site are registered by NSF-ISR. This also includes any business activities not covered under the Scope of Registration in the NSF-ISR certificate.
- Does not reference certification in such a manner that would bring the Accreditation Body or NSF-ISR into disrepute and lose public trust.

The NSF Management Systems Certification Marks, certificate or statements of management systems certification shall not:

- Be used to imply that a product is Certified, has an environmental benefit, or is of superior quality. A product is defined as a tangible product itself or product in product packaging seen by the consumer. In the case of testing / analyzing activities, it could be a test / analysis report, certificate of conformance, product warrantee or guarantee.
- Be used on products or consumer packaging, under any circumstances.
- Be used on lab test, calibration or inspection reports or any document/record that attests to product suitability, fitness, or conformance (e.g. product specification sheets, technical

datasheets, certificates of conformance, certificates of analysis, e.g.). When using symbols or logos, adequate attention should be paid to avoid that no certificate document, mark or report, or any report thereof, is used in a misleading manner.

- Be advertised should the organization's certification be suspended or withdrawn.
- Be used to imply that activities, processes, products, services or sites outside of the scope of registration are part of the certification.

15. Use of Accreditation Marks

An Organization registered by NSF-ISR for a scope that is within NSF-ISR's accredited scope, shall be issued a Registration Certificate that includes the Mark of the Accreditation Body. NSF-ISR will provide the Organization with an electronic copy of the NSF Management Systems Certification and the official Accreditation Body Marks. The Organization may use the Accreditation Mark, in conjunction with the NSF Management Systems Certification Mark, as follows:

- The Accreditation Mark(s) shall be used in a manner that clearly communicates the meaning of the Accreditation Mark in regard to the NSF Registration Mark, and does not imply that the Organization is Registered by the Accreditation Body (i.e. the Accreditation Mark(s) may not be used without the NSF Management Systems Certification Mark);
- The Accreditation Mark(s) shall be reproduced on a white or light-colored background or in blue (PMS 286 or equivalent) and red (PMS 485 or equivalent) in a size that makes all features of the symbol clearly distinguishable without distortion of its dimension and not larger in size than the NSF Management Systems Certification Mark.
- The Accreditation Mark shall not be used in isolation of the NSF Management Systems Certification Mark and shall be in direct proximity to the NSF Registration Mark.
- The NSF Management Systems Certification Mark and Accreditation Mark(s) may be used on an Organization's stationary, literature and advertising subject to the conditions for use of this policy.
- The NSF Management Systems Certification Mark and the Accreditation Mark(s) may not be used on a product, process, service, or product packaging of a certified organization to imply, in such a way, certification or approval of the product, process, service, or packaging.
- NSF Management Systems Certification Mark and Accreditation Marks acquired by contacting your Certification Services Specialist.
- Additional requirements for using the PEFC mark may be found here: <http://www.pefc.org/index.php/standards/logo-use>

PERIODIC ASSESSMENT AND CONTINUED REGISTRATION

16. Modifications to an Organization's Management System

The Organization shall promptly notify NSF-ISR in writing within (30) days of any modification that may affect the scope of registration at any of its Registered site(s), including: legal,

commercial, organizational status, or ownership. NSF-ISR shall assess the proposed modifications and promptly notify the Organization if the modifications may adversely affect the Organization's Registration and determine what actions if any are required to maintain the registration.

17. Transfer of Authorization for Registration and Use of the NSF Management Systems Certification Mark

Upon request, and with documentation of continued conformance with all applicable NSF-ISR requirements and after the new Organization's execution of the Contract along with payment of any outstanding fees, NSF-ISR may transfer authorization for continued Registration of a specific site to another Organization for the purpose of a name change, change of ownership, or change of a production and/or service location. Additional audit time may be required.

18. Periodic Surveillance (or Additional) Assessments for Continued Registration

In order to monitor conformance for continued Registration, NSF-ISR shall conduct surveillance audits every 6, 9, or 12 months based on the last day of the Registration (Stage 2) audit or the last day of the reassessment audit (whichever began the current audit cycle). The first surveillance audit after initial registration shall not exceed 12 months from the last day of the registration audit (with the exception of ISO/TS 16949). Every surveillance audit thereafter should be conducted no later than 1 month within the specified timeframe (i.e. 6, 9, 12 months).

Example 1-Annual:

June 1, 2011 = Last day of the registration audit

1st annual Surveillance audit must start no later than June 1, 2012

2nd annual Surveillance should start no later than June 1, 2013

Example 2-Semi-Annual:

June 1, 2011 = Last day of the registration audit

1st semi-annual Surveillance audit should start no later than January 1, 2012

2nd semi-annual Surveillance should start no later than June 1, 2013

If an adjustment to this timing is requested, these requests shall be forwarded to NSF-ISR for a final decision.

19. Special Audits

NSF-ISR may conduct additional audits, announced or unannounced, as needed to monitor for continued confirmation with all NSF-ISR requirements. Short-notice audits may be necessary due to complaints about certified Organizations or to follow-up on suspension. NSF-ISR may request additional information from the client to conduct these types of audits.

20. Access for Assessments/Audits

Access for NSF-ISR assessments/audits shall be granted promptly by the Organization upon NSF-ISR's request during any operating hours. NSF-ISR shall make every attempt to accommodate vacations, inventory shutdowns and other non-productive periods or *site* closings where NSF-ISR has been notified in advance. NSF-ISR shall be granted access to the *site(s)* of the Organization, except where precluded from doing so by restrictions included in agreements between the Organization and NSF-ISR or by government requirements (includes regulations and security

agreements), and where NSF-ISR has been notified in advance and is satisfied as to the validity of these restrictions. Refused or delayed access may result in withdrawal of Registration. Companies contracted with NSF-ISR may not reject a request for a witness audit by an accreditation body or related regulatory bodies or scheme oversight (e.g. Health Canada, FAA, Aerospace or automotive OEMs, IAQG member companies, etc). Companies may not refuse the presence of an NSF-ISR internal witness auditor. Additionally, NSF-ISR is required upon request to provide said entities with a copy of the audit team's reports on their findings as to the conformity or non-conformity of an Organization's management system.

21. Cooperation with NSF-ISR

It is assumed and expected that the Organization and NSF-ISR conduct business in accordance with all applicable laws and regulations, and without unlawful discrimination and harassment. Assessments/audits by NSF-ISR are for the benefit of the Organization as well as the public interest. While engaged in the performance of these audits, NSF-ISR shall be given every assistance necessary, and shall have the right to examine all records bearing upon the duties and responsibilities of NSF-ISR or the Organization with respect to conformance with NSF-ISR requirements. No NSF-ISR representative shall be required to make any agreements, waive any rights or privileges or enter into any compromises as a condition of assessment/audit. While on the Organization's site, NSF-ISR's representatives shall comply with the applicable health and safety rules of the Organization, and be accompanied by authorized Organization personnel.

NSF-ISR auditors may discontinue an audit at a site where their health and safety may be at risk, if they are subjected to sexual harassment, discrimination, or the conduct of Organization staff hampers the completion of a valid audit. An auditor shall immediately notify executive management of the Organization and NSF-ISR if an audit is to be discontinued.

Should the Organization desire to have any observers, including consultants, present at an audit, the Organization shall communicate that desire to NSF-ISR in writing. NSF-ISR will forward the information to the respective business unit to determine whether an agreement can be reached to allow the observer presence at the given audit.

CONFIDENTIALITY

22. Confidentiality

NSF-ISR shall not disclose without the Organization's prior written consent and shall keep confidential any information supplied to it by the Organization about the Organization and its product(s), its management system, formulations, components, processes, ingredients or the identity of its suppliers, vendors, or customers. Confidential business information may be disclosed to an oversight/accreditation body that is under a non-disclosure agreement with NSF-ISR or interested party (e.g., ANSI-ASQ National Accreditation Board (ANAB); International Automotive Oversight Bureau (IAOB); International Aerospace Quality Group (IAQG); Americas Aerospace Quality Group (AAQG); Federal Aviation Authority (FAA); Institute of Scrap Recycling Industries (ISRI) associated with R2/RIOS; Basel Action Network (BAN)). NSF-ISR shall keep confidential all information regarding procedures and equipment gained during site assessments/audits. NSF-ISR shall release information required by law to be disclosed. NSF-ISR shall release the information only to those persons or agencies authorized or required by law to receive such information. Confidentiality does not apply to any information known to NSF-ISR independently, generally

available to the public, or obtained by NSF-ISR from a third-party under no obligation to the Organization not to disclose said information.

NSF-ISR and its auditors may disclose to auditor certification bodies the following information that is considered to be non-confidential: Organization name, address, contact, telephone number, scope, audit days, audit team members, and management standard and elements audited.

23. Procedures upon Receipt of Subpoena for Confidential Business Information

NSF-ISR shall notify the Organization promptly of a subpoena or a request for production of the Organization's confidential business information, seek the Organization's consent to release the information and inquire whether the Organization asserts a proprietary interest in the information. If the Organization does not assert a proprietary interest within a reasonable time after NSF-ISR inquiry, NSF-ISR shall release the information to parties requesting the information.

If the Organization advises within a reasonable time that it does assert a proprietary interest and does not consent to release, NSF-ISR and the Organization shall, through designated counsel, take appropriate steps to quash the subpoena or request, including the filing of motions and attendance at hearings where necessary. Such steps shall be taken at the Organization's expense, including attorney's fees. If the Court orders release of the information covered by the subpoena or production request, NSF-ISR shall release the information only to parties entitled by the Court's order to receive such information.

24. Compliance with Laws and Regulations

NSF-ISR shall assure that the Organization being registered has a commitment and a program for compliance with laws and regulations.

If an Auditor finds evidence of non-compliance with a law or regulation during an audit, the Auditor shall:

- Report the evidence to the Organization, and determine whether the evidence indicates a failure of the management system or an oversight of applicable regulatory requirement(s).
- If the non-compliance could result in a serious and/or immediate threat to the environment or worker safety and/or health, the auditor shall immediately report the matter to highest available level of management of the Organization and NSF-ISR.
- If finding is within the scope of the audit, the auditor shall classify finding as a major non-conformance against the appropriate management system standard requirement.

The Organization shall:

- Verify the finding with the Auditor
- Take appropriate corrective and preventive action (immediate action must be taken if the finding could result in a serious and/or immediate threat to the environment or worker safety and/or health)
- File all reports required by law
- Report its conformance to these practices to NSF-ISR

NSF-ISR shall treat such a finding and report as confidential, consistent with these policies. In the event the Auditor believes such evidence legally or ethically requires an immediate report to appropriate authorities, the Auditor shall report it to the highest available level of management of

the Organization and NSF-ISR. The Auditor shall not report it to any other parties without the authorization of NSF-ISR. (Excepted from the NSF-ISR Policies for Management Systems Registrations, SOP 4876). The Audit Team will summarize any findings daily with the Organization. Each Auditor should discuss their individual findings with the Company.

INVESTIGATION OF EXTERNAL COMPLAINTS ABOUT CERTIFIED CUSTOMERS

25. Complaints (external)

Should NSF-ISR Receive complaints about its customers, NSF-ISR will contact the organization and request information to assist it in its investigation. NSF-ISR may require an on-site Verification audit at the judgment of NSF-ISR management.

CORRECTIVE ACTION AND ENFORCEMENT

26. Corrective Action for a Minor Nonconformance (all audits)

The Organization shall be advised of a finding classified as a Minor non-conformance. The Organization shall be responsible for effectively closing any and all minor nonconformities.

Corrective Action Plan: All standards are required to submit a valid or acceptable corrective action plan within 14 days from the closing meeting. A corrective action plan shall include (at minimum) the following:

- Containment
- Root cause analysis
- Corrective action plan
- Responsible person(s) with Implementation timing.

Evidence of implementation is not required with the submittal of the plan. Verification of implementation shall be verified at the next on-site audit event.

Corrective Action: TS and AS standards (only) require corrective action be completed with evidence of implementation. A valid or acceptable corrective action response includes the following:

- Implemented correction (containment) taken to address the identified nonconformity were effective
- Investigation to determine if the problem exists elsewhere in the system [*Note: If the identified nonconformity has the potential to affect product or service conformity, such actions must include information pertaining to product/service acceptance verification activities (e.g. quarantining, scrapping, containment, etc) and recall notifications, where appropriate.*]
- Root cause analysis (5 why's or equivalent)
- Corrective action
- Responsible person
- Date of expected completion

NSF-ISR shall verify conformance. Verification may include an on-site Verification audit.

All corrective action response and plan must be completed, submitted to NSF online system, and reviewed by NSF-ISR auditor with status approval within 60 calendar days (or sooner if agreed with the Audit team) of the closing meeting prior to a certificate being issued or a certificate expiration (recertification).

When subsequent assessments/audits, including Verification audits, indicate that corrective actions have not been effective, or for repeated recurrence of an item of nonconformance, the nonconformance shall be classified as a Major nonconformance.

27. Corrective Action for Major Nonconformance (all audits)

The Organization shall be advised of a finding classified as a Major non-conformance. The Organization shall be responsible for effectively closing any and all major nonconformities.

Corrective Action Plan: All standards are required to submit a valid or acceptable corrective action plan within 14 days from the closing meeting. A corrective action plan shall include (at minimum) the following:

- Containment
- Root cause analysis
- Corrective action plan with implementation timing

Corrective Action: All standards require corrective actions be completed with evidence of implementation. A valid or acceptable corrective action response includes the following:

Implemented correction (containment) taken to address the identified nonconformity were effective.

- Investigation to determine if the problem exist elsewhere in the system [*Note: If the identified nonconformity has the potential to affect product or service conformity, such actions must include information pertaining to product/service acceptance verification activities (e.g. quarantining, scrapping, containment, etc) and recall notifications, where appropriate.*]
- Root cause analysis (5 why's or equivalent)
- Corrective action
- Responsible person
- Date of expected completion

NSF-ISR shall verify conformance. Verification may include an on-site Verification audit.

All corrective action responses and plans must be completed, submitted to NSF online system, and reviewed by NSF-ISR auditor with status approval within 60 calendar days (or sooner if agreed with the Audit team) of the closing meeting prior to a certificate being issued.

For recertification, this information must be submitted prior to certificate expiration.

For initial certification, the certification decision must be made within 120 calendar days of the closing meeting to avoid the requirement of an additional registration audit.

When subsequent audits, including Verification audits, indicate that the corrective action for a Major non-conformance has not been implemented or is not effective, NSF-ISR may suspend Registration and may take other appropriate actions including, but not limited to, withdrawal.

28. Enforcement Action – Suspension

NSF-ISR may place an organization on Suspension, for failure to conform to any of the requirements contained within this document and/or other applicable accreditation/registration requirements. This may include, but is not limited to, the following:

- Failure to conduct audits as required w/in the required timeframe
- Failure to submit acceptable corrective actions w/in the required timeframe
- Issuance of a Major CAR
- Repeat of Major CAR
- Receipt of external complaint (e.g. Q1 revocation from Ford)
- Failure to pay an NSF-ISR invoice

NSF-ISR shall notify organization, in writing, of the Suspension. Under suspension, the Organization's Certificate of Registration is temporarily invalid and the Organization shall refrain from further promotion of its Registration until the suspension is lifted. If the registered company that is placed on suspension is part of a corporate registration scheme, any affected sites may be placed on suspension until the noncompliance is cleared by NSF-ISR. Before any suspension can be lifted, NSF-ISR may conduct an on-site assessment of appropriate length to verify effective implementation of all corrective actions. If the noncompliance is not resolved prior to the suspension period expiring then NSF-ISR may withdraw registration of the organization. The organization will have (30) days to appeal the withdrawal decision. NSF-ISR shall make the suspension status publically available where required by accreditation requirements.

29. Enforcement Action - Withdrawal of Registration

NSF-ISR may withdraw Registration of an organization, at any time, for failure to conform to any of the requirements contained within this document and/or other applicable accreditation/registration requirements. Certification Withdrawal is typically preceded by a Suspension.

NSF-ISR shall promptly notify the Organization, in writing, of withdrawal of Registration. Upon notice by NSF-ISR to the Organization of withdrawal of Registration, the Organization shall immediately stop the use of the NSF Management Systems and Accreditation Body Marks. NSF-ISR may make notice of withdrawal of registration and the reasons of such action as required by the appropriate standard and accreditation requirements.

30. Reinstatement

Following withdrawal of Registration, the Organization may be reinstated once NSF-ISR has reevaluated the site, has verified that any items of nonconformance have been satisfactorily resolved, and has notified the Organization in writing that it is authorized to use the NSF Management Systems Certification Mark in connection to the site. The Organization shall be responsible for any fees associated with reinstatement, and for additional fees necessary to verify conformance with NSF-ISR requirements.

COMPLAINTS & APPEALS

31. Complaints

Complaints related to NSF-ISR's services should be forwarded to the Organization's assigned Certification Services Specialist or sent via email to complaints@nsf-isr.org. Complaints will be reviewed by appropriate members of NSF-ISR management.

32. Appeals and Disputes

The Organization has a right to appeal nonconformities, auditor recommendations, or decisions related to certification including enforcement actions. Requests for appeal should be forwarded to the Organization's assigned Certification Services Specialist. The appeal will be forwarded to NSF-ISR's management for review and resolution.

33. General Information

NSF-ISR will take into account the following information when reviewing a complaint, dispute or appeal:

- 1) The requirements of the standard
- 2) NSF-ISR's accreditation/scheme requirements
- 3) Results from similar complaints, disputes or appeals
- 4) Information received from other parties to the complaint, dispute or appeal

Parties or individuals named in the complaint may be interviewed, but will be excluded from the decision making process, including those who are perceived to have a vested interest in the outcome of the appeal or dispute.

The result of the complaint, dispute and appeal may result in one or more of the following results:

- 1) A decision to uphold the nonconformance, recommendation or decision
- 2) A decision to withdraw or reclassify a nonconformance, recommendation or decision
- 3) A requirement for the Organization to undergo a special audit as part of the investigation
- 4) A nonconformance being issued to the Organization; or,
- 5) Enforcement action

34. Escalation

Should the organization not be satisfied with the outcome of the complaint resolution, dispute or appeal, the organization has the right to file an appeal with NSF-ISR's accreditation/oversight bodies. This includes:

- 1) Programs covered by ANAB (www.anab.org) accreditation; i.e.:
 - ISO 9001
 - ISO 14001
 - AQMS
 - ISO 13485
 - RCMS/RC 14001
 - OHSAS 18001
 - ISO 22000
 - ISO 20000-1
 - ATFS
 - SFI
- 2) The IAOB (www.iaatfglobaloversight.org) ; NSF-ISR's oversight body for ISO/TS 16949 registration
- 3) The FSSC (www.fssc22000.com) ; The entity that owns the FS 22000 registration scheme.

SPECIAL POLICIES

35. Coordination of Services for Surveillance Activities

NSF-ISR may coordinate its multiple conformity assessment services to an Organization (e.g. multiple product Certification programs; Product Certification and ISO 9000 Registration, laboratory Accreditation and ISO 9000 Registration, ISO 9000 Registration and EMS Registration) to assure full and continuing conformance with all NSF International and NSF-ISR requirements for each conformity assessment service, to reduce costs for overlapping services.

NSF-ISR may also coordinate services with other organizations that provide conformity assessment services to an Organization to assure full and continuing conformance with all NSF-ISR requirements for each conformity assessment service, but to reduce costs for overlapping services. There shall be a written agreement by all parties; the Organization; any other conformity assessment organization; and NSF-ISR for coordinated services.

36. Transfer of Registrations

The following documents shall be submitted by the organization for review by NSF-ISR to proceed with the transfer process:

- Completed NSF-ISR application
- Copy of the current accredited certificate
- Copy of any recent complaints received since their last audit activity and actions taken
- Copy of the last certification or recertification audit report and all CARs issued (NOTE: Status should be noted for verification) for each applied site
- Copy of the last full cycle of surveillance audit reports all CARs issued (NOTE: Status should be noted for verification)
- Documented “reason for transfer” for each applied site
- **TS only:** Copy of the previous audit report and all CARs issued (NOTE: 100% closure is required)
- **TS only:** Copy of key indicators of quality management system performance (i.e. OEM customer scorecards and or customer satisfaction data)

Upon completing a review of this documentation, NSF-ISR may require an on-site audit prior to the transfer being completed. For ISO/TS 16949, transfers of registration from another IATF recognized certification body requires NSF-ISR to conduct a reassessment audit.

ALL transfer activities shall be completed prior to the next scheduled surveillance audit or the next scheduled recertification audit with the previous certification body. In the event the potential client is not approved for transfer, the potential client shall be treated as an initial application (i.e. On-site Readiness review and Registration audit).

STANDARD SPECIFIC ADDENDUMS

e-Stewards Addendum

The following excerpts apply to all eStewards clients which are above and beyond the stated terms and conditions.

1. Scope:

Corporate certification, with one country: The eStewards certification program requires certification of all recycling facilities located within one country and owned (fully owned or owning a controlling interest) by an individual, corporate, organization, or government entity. While individual recycling facilities (processing sites) may receive a site certification, all multi-sited eStewards entities shall eventually possess eStewards certification for all its eligible recycling sites held within the entity, as well as all its electronics recycling subsidiaries, regardless of brand, in order to be considered a licensed and valid certified eStewards entity. It is not a requirement that a parent company of a certified eStewards entity becomes certified, nor is it a requirement that any other subsidiaries owned by that parent become certified. However, if a certified eStewards entity owns another subsidiary that processes or controls electronic equipment, all subsidiary sites within the same country must also become eStewards certified concurrent with or subsequent to the eStewards parent company's certification, within 18 months of the initial site certification, irrespective of brand names used by entities. The rules for "use of logo" shall always apply.

Ancillary sites: When an organization owns or controls ancillary sites (e.g. collection sites, warehouses, or other non-processing sites), each ancillary site shall be included in the scope of the environmental management system of the associated recycling facility. NSF does not, however, need to conduct onsite audits of ancillary sites, but may choose to in order to increase confidence of conformity to applicable requirements.

The certified eStewards organization shall assure through its internal processes that the applicable elements of the environmental health and safety management system have been implemented at each ancillary site. When auditing a recycling facility NSF shall confirm that the applicable elements of the standard are implemented and maintained as they apply to corresponding ancillary sites, including but not necessarily limited to internal auditing, material balance account, safety training and downstream accountability.

Separate electronics recycling companies with same ownership: If the top management or owner of an eStewards entity also owns or owns a controlling interest in a separate electronics recycling entity, all of these recycling facilities are also required to become eStewards certified, regardless of brand names used by the entities, but the rules for "use of logo" shall always apply.

Co-location: While it is permissible that a certified eStewards recycler is co-located with other entities, the recycler shall be responsible for controlling their operations in conformity with the standard, including impacts of their operations upon co-located entities' areas. Additionally, a co-located eStewards organization shall assure that their own workers, visitors, and customers on-site are protected against health and safety hazards used by co-located entities.

2. Contracting

When an organization consists of more than one site, it is required that the organization contracts for the certification of all sites which are eligible (listed under bullet #1) and located in the same country. The organization may elect to certify all sites at one time, or to certify them sequentially. All sites shall be certified within 18 months of the initial certificate issuance. An organization that fails to certify all of its required sites within 18 months shall have its certification suspended or withdrawn.

No sampling is permitted for auditing of multisite organizations for the initial certification, but approved sampling methods may be permitted and follow IAF MD1: Requirements for sampling during surveillance and recertification activities.

If an eligible new site is opened or acquired after initial site certification, that site must be certified within 18 months of its opening or acquisition.

When multiple CB's are involved in an organizations corporate certification, the CB that has certified the headquarters site shall be the CB of record for the corporate certification.

3. Certification and Use of Logo

When NSF has concluded and confirmed that all certification requirements are met, notification to the eStewards Program Management will be made and a license agreement will be sent to the qualified recycler. Certification from NSF can only be granted once the license agreement has been signed and approved by BAN and the respective company. No delivery or announcement of certification shall be made until the certificate has been delivered to both the client and BAN.

If the client is a corporate certification scheme and not conducting sequential audits, individual site certifications may be granted. These however, may also be revoked if all required sites are not certified within 18 months.

4. Significant Changes to Organization

The organization shall make NSF aware of any significant changes to ownership, management, facilities, bankruptcy filing, issuance of critical non-conformity, employee counts, processing methods, emergencies, or other changes that may impact certification. This notification shall be made within 14 business days of the change. NSF shall conduct, an onsite evaluation to determine effects on conformance. This visit can be conducted at the same time as a scheduled onsite activity but must take place within 6 months of the original notification of change date.

5. Oversight by the eStewards Program Manager

An organization shall permit announced or un-announced oversight by the eStewards Program Manger, or third party designated by them, of any and all audit and certification activities including records providing evidence of such. This shall and could include the witnessing of onsite audits by NSF, ANAB or eStewards officials.

Automotive Addendum

1. Contract for NSF-ISR Registration

Section 3 “Contract for NSF-ISR Registration” shall also include the following additional requirement for ISO/TS 16949 Organizations

- Automotive – All Organizations registered to ISO/TS 16949 are required to comply with the requirements specified in the Automotive Certification scheme for ISO/TS 16949 “Rules for achieving and maintaining IATF recognition” (Latest Edition) and the requirements specified on the IATF Website (www.iatfglobaloversight.org).

Aerospace Addendum

1. Access for Assessments/Audits

Section 20 “Access for Assessments/Audits” shall also include the following additional requirement for Organizations certified to any of the Aerospace Standards

- ABs, OP assessors, regulatory agencies, or customer representatives may accompany the audit team as observers of the audit process at any time. When customer or government representatives are accompanying the audit as observers, the audit team leader shall have the option of including in the audit report any comments/concerns brought forward by these representatives. Visitors who accompany the audit team shall be coordinated with the client, prior to the start of the audit and include any necessary organizational, statutory or regulatory approvals required for the observers (e.g. ITAR, EAR, etc.).

(End)

Record Retention Table

AESOP #	AESOP Title	Filing Responsibility (Choose one)	Storage Location (Choose one)	Naming Convention	Required Retention: AESOP 2751 Retention Authority
4876		<input type="checkbox"/> BDM <input type="checkbox"/> Regional Mgr <input type="checkbox"/> BUM <input type="checkbox"/> Sales Asst <input type="checkbox"/> CRM <input type="checkbox"/> Pres/VP <input type="checkbox"/> Lead Auditor <input checked="" type="checkbox"/> Other Director Technical Operations & Business Units	<input type="checkbox"/> IQ <input type="checkbox"/> OASIS <input checked="" type="checkbox"/> Drive: (specify)	<input checked="" type="checkbox"/> Document Naming Protocol AESOP 12632 <input type="checkbox"/> Other (specify)	<input type="checkbox"/> Audit Manager <input checked="" type="checkbox"/> President/VP

Amendment Record

Version #	Submitted Date	Summary of Changes
28	08/2013	Remove item 37
29	03/2014	Added e-Stewards, Aerospace and Automotive Addendums
30	05/14	Revised item 5 e-Stewards Addendum
31	2/2015	Revised item 21, 26, 27 and 28 Various sections to remove all reference to GHG
32	3/4/2015	Revised section 15 to include new ANAB Accreditation Mark use requirements