

Auditing and review processes

1. Receipt of the certificate - Certification process for individual certifications

1.1 Initial audit

The initial certification procedure is as follows:

(1) Application

A business that wishes to be considered an authorised user (hereinafter: the “business”) concludes an agreement with the applicant.

In addition, the business must apply for certification by a certification body recognised by the applicant. In the process, the business specifies the desired scope of application for the certification (stage/sub-stage/product group). A written agreement must be concluded between the business and the recognised certification body regarding the performance of neutral audits and the certification.

(2) Audit and evaluation

(a) Audit

The certification body will audit the business for the first time on the basis of the requirements for the requested scope of application under the respective specifications.

This will be either

- a complete on-site audit (cf. aa)
- a remote audit (cf. ab) or
- a document check (cf. ac)

of all sites/operating units involved in the activities of the business, which fall within the requested scope of application. The auditor documents the assessment of the requirements and any deviations found; if necessary, a follow-up audit will be conducted.

(aa) On-site audit

The on-site audit is divided into introductory meeting, document inspection, facility inspection and final discussion as follows:

Introductory meeting:

- Introduction of the auditor and the persons involved in the audit

- Presentation of the planned audit schedule
- Clarification of fundamental questions regarding the audit schedule
- Checking whether there is an Agreement with the applicant

Document check:

- Review of the facility description and verification of risk grading, if applicable
- Check of the relevant business documents (e.g. organisational chart/organisation, quality management system, bills of lading)
- Verification of compliance with the Standard requirements (e.g. labelling of raw materials/feed, risk management)
- Mass flow control (input and output plausibility check in the facility)

Facility inspection:

- On-site assessment of the production areas, facilities and relevant production processes at all the sites included under the certification and of the activities of external service providers requiring certification
- Verification of compliance with the system requirements (e.g. segregation of goods flows, risk analysis)
- Interview of staff
- As provided for and/or in the case of suspected non-compliance, sampling and GMO testing, as necessary

Final discussion:

- Summary of deviations found and preliminary result
- Determination of any corrective actions to be taken by the business. These have no effect on the audit result.

(ab) Remote audit

In acute or ongoing crisis situations with official contact or exit restrictions/recommendations (e.g. pandemics, animal epidemics¹), VLOG permits remote audits for certain business and types of audits. In so doing, all the items of the on-site audit are retained, but the facility inspection can be replaced by a "digital facility inspection" using information and communications technology. Whether a "digital facility inspection" should be conducted is at the discretion of the applicant. The production areas, equipment and production processes included in the business are reviewed by the auditor based on the floor plan of the business. There are no other special features in comparison to an on-site audit.

Remote audits are external audits that are carried out with the aid of information and communications technology (e.g., via telephone (teleconference), video call or video conference). Audits of the following stages/sub-stages can generally be conducted as remote audits: Logistics – Drop shipping and Private Labelling, Agriculture – Livestock trade, Group Organisation Agriculture and Matrix Organisation in Logistics and Feed Manufacturing (only for auditing group/matrix organiser activities).

(ac) Document check:

External audit, which is only carried out for businesses that do not exceed a certain size. Certain business documents are checked (e.g. facility description, delivery slips, GMO-Free certificates, specifications) without an on-site facility inspection.

(b) Evaluation

The auditor examines and evaluates the compliance with each VLOG Standard requirement. The auditor must demonstrably justify and document any identified deviations and breaches (B, C and KO grading) as well as the assessment N.A. in the checklist. The following grading levels have been set for the evaluation of requirements at all stages:

Grading	Description	Points
A	Full compliance with a requirement	10 Points
B	Minor to moderate deviations from the requirement	5 Points
C	Non-compliance or major deviation from the requirement	- 10 points
N.A.	Not applicable	-
KO	Requirements with a critical impact on "Ohne Gentechnik" labelling in case of non-compliance.	Audit not passed

Table 1: Evaluation of Compliance of the Requirements

The audit analysis and the certification decision are made on the basis of the following table:

Audit results	Status	Certificate, measures
- more than 75% of the maximum points - no KO grading	passed	Issuance of the VLOG certificate or inclusion in the VLOG group or VLOG matrix
Only for document audit (expansion certification in agriculture) - no KO grading "A" grade for the facility - description requiremen		Issuance of the VLOG certificate or inclusion in the VLOG group
- less than 75% of the maximum points - no KO grading	not passed	- Within process of initial certification: No issuance of a certificate or inclusion in a group or matrix - Within process of follow-up certification: No issuance of a new certificate (currently valid certificate is not suspended or revoked) or inclusion in a group or matrix remains in place for the time being until the end of the calendar year - A new routine audit must be performed - The certification body must notify the applicant within 2 working days about the failure to pass the audit (does not apply to group or matrix members who did not pass the audits)

Audit results	Status	Certificate, measures
One or more KO gradings	not passed	- No issuance of a VLOG certificate or inclusion in the VLOG group or VLOG matrix - Certification body must suspend the current VLOG certificate within 2 working days or the group or matrix member must be removed from the list of members or sites - The business must implement the required corrective actions before the VLOG certificate is re-issued or before it will be added back to the list of members or sites - A new routine audit must be performed. If the sole reason for the KO evaluation was the lack of documentation, a document audit can be performed instead. The decision whether a new routine audit or a document audit must be performed is the responsibility of the certification body - Certification body must notify applicant about the KO grading within 2 working days (does not apply to group or matrix members who did not pass)

Table 2: Evaluation of audit results**(3) Certificate Issuance**

Following a successful VLOG audit, the certification body will issue the business a certificate according to the VLOG Standard no later than 8 weeks after the audit. Businesses or facilities undergoing initial certification are authorised to start shipping only after the issuance of the certificate. If the certificate is not issued within 8 weeks after the audit, a new routine audit is to be performed.

(4) Validity of the VLOG Certificate

All stages
The validity period of the certificate extends until a new certificate is issued, but not later than the end of the following year (relative to the audit date).
Exceptions to this are to be handled as follows:
Logistics stage <u>VLOG-certified drop shippers simultaneously certified under the guidelines of the QS system:</u> If a drop shipper has a QS certification, the VLOG auditing interval can be adjusted to match the audit interval under QS controls (max. 2 years). If the VLOG audit interval is adjusted to the audit interval of the QS controls (maximum of 2 years), the validity may extend no longer than the end of the second following year (relative to the date of the VLOG audit).
Feed Manufacturing Stage <u>VLOG-certified mobile grinding and mixing facilities simultaneously certified under the guidelines of the QS system:</u> If the VLOG audit interval is adjusted to the audit interval of the QS controls (maximum of 2 years), the validity may extend no longer than the end of the second following year (relative to the date of the VLOG audit).
Agriculture Stage <u>Individual VLOG-certified businesses:</u> - The validity of the VLOG individual certification is to be based on the audit interval and may extend no longer than the end of the year in which the next routine audit must be performed at the latest. Therefore, the audit interval is dependent on the risk category of the business or the scope of application of the individual certification. <u>VLOG-certified livestock traders/transporters which are simultaneously certified under the guidelines of the QS system:</u> - If the VLOG audit interval is adjusted to the audit interval of the QS controls (maximum of 2 or 3 years), the validity may extend no longer than the end of the second or third following year (relative to the date of the VLOG audit).

Table 3: Validity of the VLOG Certificate**1.2 Expansion audit:**

If, during the validity period of the certificate, the business wants to include new product groups, processes, production lines, etc. into the scope of application, this is to be assessed within the framework of an expansion audit. Whether a full audit must be performed or only specific requirements need to be checked will be decided by the relevant certification body. The latter will also decide, in consultation with the business, whether the audit of the requirements must be performed on-site or whether an audit of all the relevant documents/records will suffice.

If the requirements were met, the certificate or the scope of application will be amended to include the new product groups, processes, etc. If no complete on-site audit was performed, the amended certificate will expire at the same time as the certificate for the previous routine audit.

2. Receipt of the certificate – Certification process for Matrix Certifications Logistics

A VLOG matrix or matrix organisation is a combination of different businesses/sites with activities at the logistics and/or feed manufacturing stage (the so-called matrix members) for the purpose of VLOG matrix certification. The matrix is organised by a matrix organiser, while the participating businesses are referred to as matrix members and their sites as matrix sites.

The prerequisite for certification is:

- Contract between the matrix organiser and a certification body recognised by the applicant
- existing contract between the matrix organiser and the applicant

(1) Application

The matrix organiser will apply to a certification body recognised by the applicant for matrix certification in accordance with the relevant requirements. In the process, the matrix organiser must establish the certification procedure on which the initial certification and future approvals of additional sites are to be carried out. For this purpose it can be chosen between the 33% process and the 100% process. The 33%-process is an initial data collection at the matrix sites by the matrix organiser, combined with audits by the certification body of the matrix organiser, at 100% of feed manufacturers and 33% of logistics sites and, if applicable, mobile grinding and/or mixing facilities. In the 100%-process audits of the matrix organiser and all matrix sites are conducted by the certification body.

(2) Audit

The initial certification based on initial data collection by the matrix organiser (33%-process) is carried out as follows:

The certification body must perform an initial audit of the matrix organiser. The matrix organiser performs the initial collection of data from all sites, i.e. on-site self-monitoring on the basis of the VLOG checklists of the respective Logistics and Feed Manufacturing stage, by demonstrably competent personnel. The matrix organiser thereby verifies the information in the site-related facility descriptions. The initial data collections are to be performed in coordination with certification bodies recognised by the applicant and are formally approved by them. The matrix organiser subsequently forwards all facility descriptions and initial data collections of for each member/site to the certification body. The certification body reviews and evaluates the matrix description of the matrix organiser and the site-related facility descriptions of all matrix sites. Information/documents that are missing or must be corrected are to be requested from the matrix organiser. Once all information/documents are available, the certification body will review the matrix organiser's results of the initial data collection from 100% of feed manufacturers, at least 33% of logistic sites and, if applicable, at least 33% of mobile grinding and/or mixing facilities through own initial audits. The certification body compares the results of initial data collection by the matrix organiser with its own audit results, initiates any actions and decides on the certification and the clearance of the sites for inclusion on the list of sites based on its own audit. The audit intervals for every individual site for the upcoming audit period are to be determined by the certification body.

The initial certification according to the 100% process is performed in the following steps: The certification body must perform an initial audit of the matrix organiser. The matrix organiser forwards facility descriptions for each site to the certification body recognised by the applicant. The certification body must perform an initial audit of all matrix members (There is no initial data collection by the matrix organiser.). The decision on certification and the clearance of the sites for inclusion on the list of sites are based on the VLOG audits.

(3) Certificate Issuance:

The VLOG certificate shall be issued with the company name of the matrix organiser of the VLOG Matrix Organisation – Logistics and Feed Manufacturing. Matrix members do not receive individual VLOG certificates. The certification body recognised by the applicant can issue the matrix member a certificate stating that it is part of a matrix certification.

(4) Validity of the Certificate

The validity period of the certificate extends until a new certificate is issued, but not later than the end of the following year (relative to the audit date).

3. Receipt of the certificate - Certification process for Group Certifications Agriculture

A VLOG agricultural group is a combination of different businesses or sites (the so-called agricultural group members) for the purpose of VLOG group certification in agriculture. The group is organised by a group organiser, and the participating businesses/sites are referred to as group members.

The prerequisite for certification is:

- Contract between the group organiser and a certification body recognised by the applicant
- existing contract between the group organiser and the applicant

(1) Application

The group organiser will apply to a certification body recognised by the applicant for group certification in accordance with the relevant requirements. In the process, the group organiser must establish the certification procedure on which the initial certification and future approvals of additional members are to be carried out. For this purpose, it can be chosen between the 25% process and the 100% process. During the 25%-process there is an initial collection of all group member data by the group organiser, together with audits by the certification body at the group organiser and at 25% of the group members. During the 100%-process the certification body performs audits of the group organiser and all group members.

(2) Audit

The initial certification based on initial data collection by the group organiser (25%-process) is carried out as follows:

The certification body must perform an initial audit of the group organiser. The group organiser employs verifiably competent personnel to perform initial data collection from 100 % of the group members, i.e. on-site self-monitoring, utilising the VLOG checklists for the Agriculture stage. The group organiser thereby verifies the information in the facility descriptions of the individual group members. The initial data collections are to be performed in coordination with certification bodies recognised by the applicant and are formally approved by them. On the basis of these initial data collections, the group organiser is to perform a risk grading of all group members according to the requirements. The group organiser subsequently forwards all facility descriptions to the certification body, also indicating the corresponding risk categories and checklists for each group member. The certification body reviews and evaluates the group description of the group organiser and the facility descriptions of all group members. Information/documents that are missing or require correction are requested from the group organiser. Once all information/documents are complete, the certification body is to verify the results of the initial data collection by the group organiser for at least 25% of the group members by performing its own initial audits. During the 25% audit, the certification body is responsible for ensuring a balanced distribution of the audits of the group members, taking into account the risk grading of the group organiser and e.g. size of the facility and organisation, geographic location, feed, etc. The certification body compares the results of initial data collection by the group organiser with its own audit results, initiates further actions if necessary and decides on the certification based on its own audit. The certification body is to verify the grading of the group members into risk categories and will base the audit intervals of each group member on this grading.

The initial certification based on 100% audits by the certification body (100% process) is performed in the following steps: The certification body must perform an initial audit of the group organiser. The group organiser is to transmit the facility descriptions of the group members to the certification body. The certification body must perform an initial audit of all group members. A review of the grading of risk categories, clearance of the members for the list of members and the decision on certification is made on the basis of this VLOG audits.

(3) Certificate Issuance:

The VLOG certificate will be issued for a VLOG agricultural group and must contain the business name of the group organiser. The certification body recognised by the applicant can issue the group member a certificate stating that it is part of a group certification.

(4) Validity of the Certificate

The validity period of the certificate extends until a new certificate is issued, but not later than the end of the following year (relative to the audit date).

4. Receipt of the certificate - Certification process for Group Certifications Retail

Combinations of branches/sites at the Retail stage are certified according to the VLOG Standard under this type of certification. The group is organised by a group organiser, the participating branches/sites are called group members.

The prerequisite for certification is:

- Contract between the group organiser and a certification body recognised by the applicant
- existing contract between the group organiser and the applicant

(1) Application

The group organiser will apply to a certification body recognised by the applicant for group certification in accordance with the relevant requirements and submits the group description.

(2) Audit

The certification body conducts one initial audit or routine audit of the group organiser per calendar year and one initial or routine audit of the group members in accordance with the following sample sizes:

- 10% of the group members per calendar year if "Ohne Gentechnik"/"VLOG" food is centrally purchased and traceability up until sale to the customer must be ensured. These audits are announced.
- 10% of the group members per calendar year if "Ohne Gentechnik"/"VLOG" food is centrally purchased and traceability up until the service counter must be ensured. These audits are unannounced.
- 100% of the group members if the "Ohne Gentechnik"/"VLOG" food may be purchased locally. These audits are announced.

(3) Certificate Issuance:

The VLOG certificate will be issued for the VLOG group and must contain the business name of the group organiser for stage retail with the defined scope of applicability of bulk products. Group members do not receive individual VLOG certificates. The participating branches must be listed in an annex to the certificate. The certification body can issue the group member a written confirmation indicating that it is part of a VLOG group organisation.

(4) Validity period of the certificate

The validity period of the certificate extends until a new certificate is issued, but not later than the end of the following year (relative to the audit date).