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| <b>ACPL</b>  | <b>Procedure Manual</b>      |
| Section Name | Procedure for Subcontracting |

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## 1. General

The general requirements, roles, and responsibilities for working with a Marketing Representative are set out in a formal Memorandum of Understanding (MOU) (ACPL-86) signed and agreed by both parties. The MOU, together with this procedure, shall ensure that ACME Certification Pvt. Ltd. and ISO 17021 requirements are met, and that the integrity of the certification process is maintained.

**Reference: ISO 17021**

### Definitions

Opportunity for improvement (OFI)

- Where the auditor feels that there is a potential non conformity but cannot provide objective evidence to prove it (for guidance only)

CAR - Corrective Action Request. Written notification to a Client of non-compliance identified during an audit. These will be classified either major or minor nonconformity.

Minor nonconformity Nonconformity (non-fulfilment of a requirement) that does not affect the capability of the management system to achieve the intended results.

Major nonconformity Nonconformity (non-fulfilment of a requirement) that affects the capability of the management system to achieve the intended results.

*Note: Nonconformities could be classified as major in the following circumstances:*

- if there is a significant doubt that effective process control is in place, or that products or services will meet specified requirements;
- a number of minor nonconformities associated with the same requirement or issue could demonstrate a systemic failure and thus constitute a major nonconformity.

Root cause analysis (RCA) A root cause is a factor that caused a nonconformity and should be permanently eliminated through process improvement. Root cause analysis is a collective term that describes a wide range of approaches, tools, and techniques used to uncover causes of problems e.g. 5 Whys is an iterative interrogative technique used to explore the cause-and-effect relationships underlying a particular problem. The primary goal of the technique is to determine the root cause of a defect or problem by repeating the question "Why?".

Subcontractor Key Location: Entities performing and/or managing key management system certification activities, on behalf of accredited certification bodies, which are not wholly or partly owned or employed by the CB.

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Marketing Representative:

Subcontractor Non-Key Location Only Collecting Application, Sending Quotations, and communication information regarding Surveillance.

## 2. Setup, Approval and Monitoring of Performance

**2.1** Only ACME Certification Pvt. Ltd. has the authority to set up, evaluate and approve Marketing Representative.

**2.2** Marketing Representative start-up operations shall be reviewed and approved by ACME Certification Pvt. Ltd. As part of the initial approval ACME Certification Pvt. Ltd. will arrange an initial training of the Marketing Representative. Marketing Representative shall be monitored by ACME Certification Pvt. Ltd. on an ongoing basis. In addition to providing initial training in ACME Certification Pvt. Ltd. assessment and certification techniques, ACME Certification Pvt. Ltd.

**2.3** Once operations have been successfully established, ACME Certification Pvt. Ltd. will review documents from offices and Marketing Representative on a random basis to ensure that the correct issue documents are being used. A virtual online audit will take place based on the risk and as planned in the Head office audits of the Marketing Representative Audit programme to check that all offices understand MS and is fully adhering to MS procedures this review will be documented and reported to the ACME Certification Pvt. Ltd. Management without delay. ACME Certification Pvt. Ltd. Will visit (Physical/Remote) each office based on the risk and the Head office audits of Marketing Representative Audit programme. During the visit a full and detailed internal audit will be carried out including witnessed site visits as appropriate. Risk based audit programme is defined according to the process detailed in **ACPL-QP-29**. For Subcontracting key locations ACME will also Review of Performance of personnel atleast once in a year.

**2.4** Each Marketing Representative is required to submit annually to ACME Certification Pvt. Ltd. head office review the following documents: Risk assessment, copy of insurance, List of overdue Surveillance, Status of their clients (Suspended, Withdrawn), proof of funds. These documents are reviewed in the head office and further actions raised as identified in the documents.

**2.5** ACME Certification Pvt. Ltd. use several different methods of control of activities:

- 1) Processes – all ACME Certification Pvt. Ltd. processes are detailed in ACME Certification Pvt. Ltd. MS Certification process.
- 2) Technical areas of ACME Certification Pvt. Ltd. operation – technical areas where ACME Certification Pvt. Ltd. operates are defined based on accreditations.
- 3) Competence of personnel – competence process for personnel is detailed in Procedure ACPL-QP-06.
- 4) Lines of management control – each Marketing Representative has identified their internal structure, responsibilities, authorities and Head office contacts which have been reviewed and approved by Head Office.

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- 5) Reporting and remote access to operations including records – all reporting and access to records. Other records are either emailed for head office access.

### 3. CONTRACT requirements

As a minimum, the MOU shall include the following clauses:

1. Territory - *geographical territory to be covered*
2. Exclusivity - *exclusivity statement*
3. Insurance - *requirement for each party to have insurance cover*
4. Term & Termination - *statement of initial & ongoing renewal terms*
5. Contractual - *ISO 17021 requirements, copyright, payment of fees*
6. Responsibilities - *responsibilities of both parties, impartiality,*
7. Roles - *statement of each parties' role*
8. Certification process - *brief overview of process including complaint handling*
9. Language - *audits to be in native language and/or use of interpreter*
10. Accredited scope extension - *possible need to extend accredited scopes*
12. Fees - *fees required to be paid*

### 4. Initial Enquiries

On receipt of an enquiry for certification and registration Marketing Representative shall obtain information from the prospective client and a check shall be made to ensure that the scope is one for which ACME Certification Pvt. Ltd. is currently accredited. If not within the list of ACME Certification Pvt. Ltd. accredited scopes, the client will be advised of the fact and the matter not progressed further. (Unless steps have already been taken to apply for an accredited scope extension). The client shall be advised that we offer non accreditation.

The client shall be advised if it is not possible to undertake the work because of a lack of experience, expertise, or trained personnel. If there is any doubt over scope classification or whether the client's scope falls within the existing ACME Certification Pvt. Ltd. accredited scope range, the advice of the ACME Certification Pvt. Ltd. Scheme Manager shall be sought. Declined enquiries shall be monitored to ensure that possible business opportunities are not being overlooked. If Marketing Representative believes this to be the case, then suitable representation shall be made to the Scheme Manager of ACME Certification Pvt. Ltd.

The decision on ACME Certification Pvt. Ltd. capability and competency will take account of the following

- Scope of activity & scope of certification
- Technical complexity and special processes
- Regulation and legislation
- Structure, size, and location(s) of the organization
- Language and culture
- Manager to non-manager ratio

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- Whether an expert is required on the assessment team
- Customer required timescale for assessment
- Current/projected assessment work load
- Availability of suitable auditors

Based on the details which have been obtained from the client, ACME shall estimate the amount of time required for undertaking a document review, planning and conducting the assessment, undertaking routine surveillance etc. and Marketing Representative shall provide a firm quotation of costs for the client.

## **5. Receipt of Applications (ACPL-QP-09)**

On receipt of a completed application form, Marketing Representative shall check to ensure that form has been fully completed and details are accurate.

The completed application form shall be send to ACME HO. ACME is responsible to ensure that they only accept applications for which they can demonstrate they have the required competency. ACME Certification Pvt. Ltd. monitors this during application review.

A suitable Auditor(s) shall be selected based on the competence, taking account of skills, experience and availability. The Auditor is responsible for undertaking the initial document review, planning the assessment, and producing an Audit Plan in accordance with the ACME Certification Pvt. Ltd. procedures. The Audit Plan shall contain the Audit standard, details of the audit team (auditors, interpreters, and observers), and shall state the audit language.

As the client has the right to appeal against audit team selection, the Audit Plan shall be given to the client so that sufficient time is available to handle such appeals. On the rare occasion when changes have to be made to the Audit team at a late stage, the client shall be provided with an amended Audit Plan and shall be consulted to ensure that there are no objections or appeals. Any objections or appeals shall be notified to ACME.

ACME ensure that all Auditors complete an individual contractor (ACPL-41) contract and declaration of Confidentiality (ACPL-42) and for each job they are given and accept they sign Form ACPL-06 (Impartiality/ Conflict of Interest- Auditor). By signing the form ACPL-06, the Auditor is confirming that they can act impartially and have had no previous professional involvement (including consultancy) with the client within the previous two years.

Marketing Representative is responsible to ensure that only ACME approved personnel are used, that the required undertakings have been completed, that sufficient time has been allocated for the assessment, and that the Audit documentation provides the necessary coverage for the client's declared scope. ACME Certification Pvt. Ltd. monitors this during review.

***Note: Failure to comply with this requirement is considered to be a serious breach of procedure by ACME CERTIFICATION PVT. LTD. and IAS.***

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When during the contract review is identified that an interpreter or technical expert is required, the Marketing Representative is responsible of sourcing the competent resource and seek relevant competence approvals from ACME Certification Pvt. Ltd.

Where special language requirements exist, a Lead Auditor who is fluent in the language will be used. When a suitable person is not available, arrangements will be made for an independent interpreter to be co-opted to the team. Security undertakings and statements of confidentiality are required to be completed by all interpreters and technical experts. The completed forms shall be retained in the client file.

## 6. Applications for Transfer of Registration (ACPL-QP-24)

If an application is received from a client who wishes to transfer their existing registration from another Accredited Certification Body, Marketing Representative shall endeavor to identify the reasons behind the request and shall ask the prospective client to complete an application form and return it with the required fee. The transfer fee shall be determined by Marketing Representative and shall take account of any additional work, which may be required in dealing with other Certification or Regulatory bodies. The client's stated reasons for the transfer shall be written on the Transfer Checklist ACPL-03.

The initial visit to process the transfer of registration shall be aimed at ensuring that the management system is continuing to be maintained, is within the previous Certification Bodies schedule of surveillance and that any problems highlighted by the previous Certification Body have been satisfactorily resolved. The visit will cover all mandatory topics identified in the Auditor procedures and will sample the key activities within the organization. If not within surveillance schedule, then a reassessment audit visit is required.

If no significant problems are identified, then a recommendation for transfer of registration can be made and the client shall be advised to return their existing Certificate of Registration to the relevant Certification Body and cease using their ISO9001 approval markings.

## 7. Assessment reporting

ACME Certification Pvt. Ltd. Auditors are responsible for planning and undertaking assessment and surveillance visits in accordance with the procedures, which is issued to them. Marketing Representative responsible for sending surveillance visit information to clients and. Where Audit Reports are written in the local language, Marketing Representative is responsible for providing an English translation of the Report.

The ACME Certification Pvt. Ltd. HEAD OFFICE review reports and related documents, which is used to ensure that:

- The report's is in English, is clear, concise, and legible.
- The client details contain all the information required by ACME Certification Pvt. Ltd.
- The correct references to Standards have been made.

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- The relevant client's processes and their areas of application and interaction have been identified and they are functioning correctly to planned requirements.
- The recommendation regarding registration is recommended and the valid dates are indicated on the certificates.

Any problems or difficulties will be resolved by the Auditor being contacted, via Marketing Representative, for further information. The response is expected within seven days from the Head Office contact and resolution is expected within 30 days. If Audit Reports or recommendations are considered unsuitable, the Auditor(s) shall be requested to provide further information to supplement the Report. In extreme cases it may be necessary for an additional visit to be undertaken in order to obtain such information.

## 8. Receipt of Corrective Action (PM-17)

The ACME Certification Pvt. Ltd. Marketing Representative is responsible for progressing the receipt of client corrective action plans. Evidence of corrective action should be requested whenever possible for minor non-compliances this can be achieved by the client providing copies of amended procedures, corrected/amended records, test results, supplying missing information etc. and by confirming that satisfactory action has been taken. For major non-compliances an additional visit may be required to clear and sign-off the corrective actions.

The response time for corrective action is defined in Procedure and communicated to the client in the closing meeting. The late return of client corrective action plans shall be monitored regularly as this may result in delays in the certification process. If a corrective action plan is not received from the client in the agreed timeline Marketing Representative shall contact the client to resolve the matter. If corrective action is written in the local language the Marketing Representative is responsible for providing a suitable English translation.

On receipt of corrective action details at nominated Lead Auditor shall check the suitability of the client's response and the adequacy of corrective action. Any deficiencies shall be brought to the attention of ACME Certification Pvt. Ltd. for resolution.

## 9. Certification

The decision to proceed with Certification (either initial or ongoing) shall be made by the ACME Certification Pvt. Ltd. HEAD OFFICE.

Management staff responsible for technical matters shall have appropriate levels of Attributes, knowledge, Skills and experience in the areas of responsibility and to meet the requirements of the ACME Certification Pvt. Ltd. MS and ISO 17021.

The certificate is valid date is 3 years after the certification decision date.

ACME Certification Pvt. Ltd. HEAD OFFICE is solely responsible to issue certificate no Marketing Representative is authorize to Issue or edit certificate, ACME Certification Pvt. Ltd. has the ultimate

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control of the approval process it may during its review of the submitted application requests reject the certification approval and request a corrective action.

The Certificate of Approval shall be approved on behalf of the Governing Board by the ACME Certification Pvt. Ltd. Scheme manager and the approval email being sent to Marketing Representative (in case of certificate issue is delayed). Marketing Representative may send an approval letter to the client written in the local language. The letter/Certificate shall be accompanied by copies of the ACME Certification Pvt. Ltd. logos and the publication titled “Conditions for Use of Logo”.

If the client requires a Certificate of Approval in the local language, Marketing Representative is responsible for its production and for sending it to ACME Certification Pvt. Ltd. for review and approval.

## **10. Appeals**

### **10.1 General**

Although it is expected to be an unusual event, a client may wish to lodge a formal appeal either against the selection of an audit team (auditors, observers, interpreters etc.) or the Decision/recommendation made by an auditor or other employee of ACME Certification Pvt. Ltd. If an appeal is received, whether verbal or in writing, the following procedure **must** be followed.

### **10.2 Appeals against team selection**

When the client is provided with the Audit plan it identifies the personnel involved in the assessment or surveillance visit. If the client wishes to appeal or object against the inclusion of any of the people concerned, Marketing Representative shall bring the matter to the attention of the ACME for review and resolution.

### **10.3 Appeals against decisions or recommendations**

a. The client or Marketing Representative wishing to appeal against decisions or recommendations must be made aware that the appeal shall be made in writing to ACME Certification Pvt. Ltd. The client shall be advised of the appeals procedure (ACPL-QP-18). The client shall be informed by Marketing Representative that the formal appeal must be sent to ACME Certification Pvt. Ltd. HEAD OFFICE.

b. Marketing Representative Executive shall agree the date of a meeting to consider the appeal. The meeting must take place within 30 working days of receipt of the appeal.

c. Marketing Representative shall advise the appellant, in writing, of the date and place of the meeting, ensuring that at least 14 days advance notice of the meeting is given. If the appellant objects to the constitution of the Appeals Committee then ACME Certification Pvt. Ltd. HEAD

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OFFICE shall be advised so that consideration can be given to changing the members of the committee.

d. Marketing Representative of ACME Certification Pvt. Ltd. HEAD OFFICE or Marketing Representative shall attend the meeting and shall be responsible for providing the Approvals committee with details of the appeal and any other supporting information.

e. The appellant may present his/her case to the Appeals Committee either in person or in writing. When a decision has been taken by the committee it shall be formally minuted and communicated to the appellant within 14 days of the meeting. The decision of the Appeals Committee is final. As the Appeals Committee is a sub-committee of the Governing Board, details of appeals and their outcome shall be reported back at full scheduled meetings.

## 11. Complaints

It is ACME Certification Pvt. Ltd. aim for all customers with a problem to feel comfortable in voicing their concerns, no matter how small. Customer loyalty will be high among those who have had their problems sorted out and resolved to their satisfaction. The key objective is to resolve complaints quickly and restore customer's confidence.

A complaint is defined as a customer's expression of dissatisfaction with any aspect of the ACME Certification Pvt. Ltd. certification services. It can be written or oral and is considered to be a complaint regardless of whether it is felt to be justified. Account queries and requests for information are not complaints though they may lead to complaints if they are not handled to the customer's satisfaction.

On receipt of a complaint the Marketing Representative shall be responsible for recording the following details and email them to ACME Certification Pvt. Ltd. HEAD OFFICE for information:

- The customer and/or contact name
- Address
- Telephone number
- Complaint description
- Date received
- Method of complaint (written/oral)

Marketing Representative shall help to investigate the matter as a matter of urgency to ACME Certification Pvt. Ltd. HEAD OFFICE. An agreed action-by date will be entered in the ACME Certification Pvt. Ltd. Register of Complaints. When sufficient details have been obtained, appropriate corrective action will be taken to address the problem and satisfy the customer. Wherever possible, action should be aimed at preventing recurrence. Details of the action taken shall be recorded at ACME Certification Pvt. Ltd. and shall be reported to the Governing Board.

## 12. Recommendation for Certification/Registration Withdrawal

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Where the Marketing Representative finds that the client is not meeting the requirements of ACPL-QP-17, Marketing Representative shall make recommendation (email) for the suspension/cancellation of certification to ACME Certification Pvt. Ltd. HEAD OFFICE for clients application submitted by the Marketing Representative.

Marketing Representative upon receiving ACME Certification Pvt. Ltd. approval for suspension/cancellation (ACPL-QP-17) Marketing Representative shall inform the client, letter, that the certificate is suspended/cancelled. Marketing Representative shall send the letter to ACME Certification Pvt. Ltd. HEAD OFFICE to suspend/cancel the client.

| Step | Activity                                                                                 | Procedure  | Forms                                       |                                         |
|------|------------------------------------------------------------------------------------------|------------|---------------------------------------------|-----------------------------------------|
| 1    | Enquiry received from Client<br>Send Brochure-Route to certification<br>Send Application | ACPL-QP-09 | ACPL-01                                     | Application                             |
| 2    | Received Completed Application, send to ACME<br>Conduct Contract Review                  | ACPL-QP-09 | ACPL-01<br>ACPL- 02                         | Contract review<br>eCMS                 |
| 3    | Send completed Quotation for 3 year certification and Contract                           | ACPL-QP-09 | ACPL-04                                     | Contract<br>Quotation                   |
| 4    | Received signed Contract and Quotation and send to ACME for Plan audit, appoint auditor  | ACPL-QP-09 | ACPL-04<br>ACPL-08                          | Audit Team Appointment<br>Form<br>Plans |
| 5    | Pre Audit, Stage 1 Report and Invoice                                                    | ACPL-QP-12 | ACPL-10<br>ACPL-12<br>ACPL-16<br>ACPL-105 A | Report                                  |

#### Corrective Actions

|   |                                                                                  |            |                                             |                                                |
|---|----------------------------------------------------------------------------------|------------|---------------------------------------------|------------------------------------------------|
| 6 | Plan Stage 2 Audit, allocate Team and agree audit dates with client and auditors | ACPL-QP-12 | ACPL-04<br>ACPL-09                          | Report                                         |
| 7 | Audit Report and Invoice                                                         | ACPL-QP-12 | ACPL-11<br>ACPL-13<br>ACPL-17<br>ACPL-106 A | Report<br>CAR's/Observations<br>recommendation |

#### Corrective Actions

|   |                                                                                       |            |                     |                              |
|---|---------------------------------------------------------------------------------------|------------|---------------------|------------------------------|
|   | Report and CARs translated into English                                               |            | ACPL-35             | email                        |
| 8 | Certification Review                                                                  | ACPL-QP-17 | ACPL-35             | eCMS                         |
| 9 | Certificate Approval and Issue of certificate<br>Sign certificates and email to issue | ACPL-QP-17 | ACPL-35<br>ACPL-114 | Certificate<br>Certification |

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|  |  |  |  | Conditions |
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|----|------------------------------------------------------|------------|-----------|----------------------|
| 10 | 3 Year Surveillance Programme and Invoice each audit | ACPL-QP-14 | ACPL- 122 | Surveillance history |
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|----|-------------------------------------------------|------------|-----------|-------------------|
| 11 | Third year review<br>Plan recertification audit | ACPL-QP-15 | ACPL- 122 | Third year review |
|----|-------------------------------------------------|------------|-----------|-------------------|

#### Quality Records

| Quality Record Number | Quality Record Title: | Type of File | Retention Time |
|-----------------------|-----------------------|--------------|----------------|
| Email.                | Communication Records | Operations   | 3 years        |
| Email.                | Certificates English  | Operations   | 5 years        |

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