ROSS MITCHKO REGISTRAR

CERTIFICATION REGULATIONS

4.0-P Rev.3

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1. INTRODUCTION

Ross Mitchko Registrar Inc. (RMR) is a third-party certification body providing impartial, competent, and consistent certification services for management systems and programs such as ISO 9001, ISO 14001, ISO 45001, and R2v3.

This document ("Certification Regulations" / "Client Guide") describes:

- The **end-to-end** certification process
- The **responsibilities, rights, and obligations** of RMR and the Applicant/Client
- **Rules for use of certificates and marks**
- Processes for **complaints, appeals, suspension, withdrawal, and special audits**

By applying for certification with RMR, the Applicant/Client agrees to comply with these requirements and to support an impartial and transparent certification process.

2. KEY DEFINITIONS

- **RMR –** Ross Mitchko Registrar Inc., the accredited certification body.
- **Applicant –** Any organization that has initiated the certification process (e.g., requested a quotation or submitted a profile) but has not yet entered into a formal contract with RMR.
- **Client –** An Applicant that has signed a certification agreement/contract with RMR and is actively seeking or maintaining certification.
- **Document Review –** Review of the Client's documented management system against the applicable standard.
- **Pre-Audit –** Optional preliminary review of the management system to identify strengths and improvement areas; does **not** result in certification.
- **Stage 1 Audit –** Audit to assess readiness for Stage 2 by reviewing documentation, implementation status, and preparedness.
- **Stage 2 Audit –** Audit to assess full implementation and effectiveness of the management system against the applicable standard(s).
- **Surveillance Audit –** Periodic audit to verify continued conformity and effectiveness of the management system between initial certification and recertification.
- **Recertification Audit –** Comprehensive audit at the end of the certification cycle (typically three years for management systems) to confirm continued conformity.
- **Standard –** Any applicable normative document, such as ISO 9001, ISO 14001, ISO 45001, or the R2v3 Standard and Code of Practices.
- **Certificate –** Document issued by RMR confirming that the Client's management system or product has been audited and found to conform to the specified standard(s). Certificates remain the property of RMR.
- **Management System –** Documented, implemented, and maintained processes used by the organization to meet the requirements of the applicable standard(s).

3. OVERVIEW OF THE CERTIFICATION PROCESS

RMR's certification process is designed to be rigorous, impartial, and transparent, in line with ISO/IEC 17021-1.

3.1 Initiation

- **Company Profile**
  - The Applicant provides a completed company profile outlining:
    - Legal name and location(s)
    - Scope of activities and processes
    - Desired standard(s) and certification scope
    - Key contact information
- **Quotation**
  - Based on the profile, RMR prepares a quotation describing:
    - Audit time and structure (Stage 1, Stage 2, surveillance, and recertification)
    - Applicable fees
    - Any special requirements (e.g., multi-site, R2v3, transfers)

3.2 Formal Engagement

- **Application for Certification**
  - Once the quotation is accepted, the Applicant completes the application and signs the certification agreement/contract.
  - Upon signature, the Applicant becomes the **Client**.
  - The agreement defines rights, obligations, confidentiality, access, and audit activities.

3.3 Certification Journey

- **Optional Pre-Audit**
  - A non-binding review to assess readiness for Stage 1 and Stage 2, identify gaps, and provide early feedback.
- **Stage 1 Audit**
  - Typically conducted on-site (or remote where allowed by the standard/scheme).
  - Confirms that the documented system and its initial implementation can reasonably support a successful Stage 2.
- **Stage 2 Audit**
  - Comprehensive on-site audit of implementation and effectiveness across processes, locations, and standard requirements.
  - Nonconformities are identified and must be addressed through corrective action.
- **Certification Decision & Certificate Issuance**
  - RMR's certification decision makers (who were not part of the audit team) review the audit package.
  - Certification is granted when all major nonconformities are closed and required corrective actions are verified.
  - A certificate is issued for the defined scope and validity period.

3.4 Maintaining Certification

- **Surveillance Audits**
    - Conducted at least once every 12 months (or as required by standard/program).
    - Verify continued compliance, effectiveness, and proper use of certificates/marks.
- **Recertification Audit**
    - Typically every three years for management system certification (five years for some product certifications/programs).
    - Covers the full management system and ensures sustained conformity and relevance.

3.5 Corrective Action

- Identified nonconformities are documented on Nonconformity Reports (NCRs).
- The Client must:
    - Provide a documented correction, root cause analysis, and corrective action plan within the timeframes set by the applicable standard/program (e.g., usually within 30 days).
    - Implement and provide evidence of corrective actions.
- RMR may conduct follow-up or corrective action audits (on-site or remote) where necessary.

4. CLIENT RESPONSIBILITIES

4.1 Documentation and System Maintenance

- For **management system certification**:
    - Develop, implement, and maintain a documented management system that meets the requirements of the applicable standard(s).
- For **product or program certification**:
    - Implement and maintain controls to meet the relevant scheme requirements.

4.2 Internal Assessments and Audits

- Conduct internal audits and management reviews at planned intervals.
- Complete at least one full cycle of internal audits and management review before the Stage 2 audit.

4.3 Access, Cooperation, and Notifications

The Client shall:

- Grant RMR access to all relevant locations, processes, records, and personnel during normal working hours for audits.
- Allow access for witness audits by accreditation bodies, SERI (for R2v3), and other oversight bodies when required.

- Inform RMR in writing of significant changes that may affect the management system or certification, such as:
  - Legal status, ownership, or organizational structure
  - Changes in key personnel or resources
  - Changes in processes, products, or services
  - New or changed legal/regulatory obligations
  - Changes in locations (additions, closures, relocations)
- Notify RMR promptly of:
  - Serious incidents, accidents, or significant noncompliance events
  - Regulatory/bodily harm events or enforcement actions

4.4 Complaints and Records

- Maintain records of complaints relating to certified activities, products, or services, along with corrective actions taken.
- Make these records available to RMR upon request.

4.5 Use of Certificates and Marks

The Client shall:

- Use certificates, marks, and logos only as authorized by RMR and the relevant program owner.
- Follow RMR's **Use of Logo** procedure and guidance on RMR's website.
- Avoid misleading statements or implications about certification (e.g., implying product certification when only the management system is certified).
- Immediately discontinue use of marks and references to certification upon suspension, withdrawal, or scope reduction, and return certificates when required.

4.6 Right to Object

- The Client has the right to object to the assignment of a particular auditor and to request a different auditor, providing reasonable justification.

5. RMR RESPONSIBILITIES

RMR shall:

- Conduct audits (pre-audit, Stage 1, Stage 2, surveillance, recertification, transfer, special, and corrective action audits) in accordance with:
  - ISO/IEC 17021-1 and applicable scheme rules
  - RMR procedures and accreditation requirements
- Provide written audit reports after each audit. Ownership of reports remains with RMR; the Client may reproduce them in full.
- Maintain the confidentiality of Client information, except where disclosure is:
  - Required by law, accreditation bodies, or program owners (e.g., SERI for R2v3)
  - Required by the program (e.g., public listing of certified clients)

- Respect the Client's reasonable rules, safety requirements, and confidentiality obligations while on site.
- Provide clear explanations when the requested scope relates to specific systems or schemes operated by RMR.
- Adhere to all relevant accreditation rules, SERI/R2v3 program requirements, and internal procedures.

6. COMPANY INFORMATION REQUIREMENTS

To initiate and plan certification activities, the Client must provide:

- **Scope of Certification –** Standards/programs requested and the activities, products, and services to be included.
- **Organization Details –** Legal entity name, addresses, number of employees, operating shifts, and relevant legal/regulatory obligations.
- **Operations and Structure –** Description of processes, human and technical resources, organizational structure, and links to parent or associated companies.
- **Outsourced Processes –** Identification of outsourced processes that may affect conformity with requirements.
- **Applicable Standards/Requirements –** Specific standards and any industry-specific requirements or regulations to be covered.
- **Management System Consultancy –** Disclosure of any consultancy used to develop or implement the management system.

7. R2v3-SPECIFIC REQUIREMENTS

For R2v3 certification, additional requirements apply in line with the R2v3 Standard and Code of Practices (COP).

7.1 Scope Definition

R2v3 Clients must define the R2 scope, including:

- Legal entity name and physical address(es)
- Applicable R2 processes and activities
- Core Requirements and Process Requirements to be included
- Facilities under common ownership or control and any related structures (e.g., Campus, multi-site)

7.2 Required R2v3 Plans and Documentation

Before Stage 2, the Client must have, as applicable:

- Focus Materials Management Plan
- Downstream recycling chain documentation and due diligence records
- Data Sanitization Plan and records (including any Appendix B claims)
- Reuse Plan (if reuse is in scope)

- Closure Plan and supporting financial assurance instruments
- Legal compliance audit report
- Health and safety risk assessment(s)
- Signed and valid **SERI License Agreement**

7.3 R2v3 Evaluation by RMR

RMR will:

- Conduct a readiness review (Stage 1) to confirm required R2v3 documentation and implementation status.
- Verify that required R2v3 plans and controls are in place prior to Stage 2.
- Assign R2-qualified auditors and technical reviewers to evaluate the R2v3 audit package.

7.4 Use of R2 Logo

- The R2 logo may only be used:
  - After issuance of a valid R2v3 certificate, and
  - In accordance with RMR's logo procedure and SERI's logo rules.

7.5 Ongoing R2v3 Client Obligations

R2v3 certified Clients shall:

- Inform RMR of major changes affecting their R2v3 scope or structure.
- Cooperate with SERI witness audits and assurance program activities.
- Submit any required reports (e.g., annual compliance reports) to SERI.
- Maintain continuous conformity with the R2v3 Standard, COP, and applicable appendices.

7.6 R2v3 Certification Requirements and Transition

RMR shall:

- Review each application against the R2v3 Certification Structure and eligibility criteria (COP Table 3).
- Inform Clients of any structural or scope-related R2v3 requirements.
- Notify Clients of changes to R2v3 requirements within a defined time after notice from SERI.
- Require Clients to transition to updated R2v3 requirements within SERI or RMR-established timelines.
- Conduct special audits or adjust certification status where Clients fail to conform to updated requirements.

8. QUOTATION

Upon receipt of the Company Profile and required information, RMR will provide a written quotation including, as applicable:

- Optional Pre-Audit (if requested)
- Stage 1 Audit
- Stage 2 Audit
- Initial surveillance audit(s) (frequency options where allowed)
- Any anticipated special activities (e.g., multi-site sampling, transfer, or R2v3 complexity)

Recertification audit fees may be included or provided upon request. Audit time is determined in accordance with relevant standards, accreditation rules, and program requirements.

9. APPLICATION FOR CERTIFICATION

RMR will only accept applications where the Applicant has:

- A documented and implemented management system aligned with the applicable standard(s), or
- A system under development with a realistic timeline to achieve implementation before Stage 2.

To apply, the Applicant must:

- Complete the Company Profile and application forms accurately.
- Review and sign the certification agreement, including:
    - Confidentiality provisions
    - Access and cooperation requirements
    - Complaint and appeal procedures
    - Financial terms and termination provisions

The Client commits to:

- Maintain complaint records and corrective actions.
- Provide access to these records and any other relevant documentation during audits.

10. PRE-AUDIT (OPTIONAL)

Objective:

- Evaluate readiness for Stage 1 and Stage 2 and identify improvement opportunities.

Process:

- RMR reviews management system documentation and may conduct on-site interviews and walkthroughs.

- A report is issued summarizing observations and potential nonconformities.
- The Client may object to the assigned pre-audit auditor(s).

The pre-audit has **no** direct impact on the certification decision but can significantly improve readiness.

11. STAGE 1 AUDIT

Purpose:

- Verify the Client's readiness for Stage 2 and provide feedback on the documented system and its initial implementation.

Scope includes (as applicable):

- Review of documented management system, including scope, processes, and integration.
- Site visit(s) to understand the physical context, operations, and key risks.
- Review of:
  - Internal audits and management reviews
  - Legal/regulatory identification and compliance planning
  - Objectives, targets, and performance measures
- Agreement of the Stage 2 audit plan and logistics.

For R2v3 audits, Stage 1 also:

- Confirms proposed R2 scope, locations, and processes.
- Reviews internal R2 audits, legal compliance audits, FM plans, data sanitization plans, closure plans, financial assurance, and SERI license.

Stage 1 findings may be documented as nonconformities or "areas of concern" that must be addressed before Stage 2.

12. STAGE 2 AUDIT

Purpose:

- Confirm full implementation and effectiveness of the Client's management system against the applicable standard(s).

Scope:

- Evaluation of:
  - Conformity to all standard clauses and applicable normative documents
  - Performance monitoring, measurement, and improvement
  - Legal and regulatory compliance processes
  - Operational control of processes and outsourced activities
  - Internal audits and management reviews

  - Management commitment and leadership
  - Coherence between policies, objectives, risks, and operations

For R2v3, Stage 2 additionally evaluates:

- R2 Core Requirements and applicable Process Requirements
- Focus Material management and downstream recycling controls
- Data security and data sanitization (including Appendix B where applicable)
- Closure and financial assurance provisions

The audit team conducts interviews, reviews records, and observes operations. Nonconformities are documented and form the basis for corrective action requirements and certification decisions.

Auditors do **not** provide consultancy or specific solutions as part of the audit.

13. NONCONFORMITY REPORTS (NCRs) & CORRECTIVE ACTION

All audit-identified nonconformities are documented on NCRs and classified as:

- **Major Nonconformity –** A significant failure of the management system to meet requirements or effectively control risks, or multiple related minor nonconformities indicating a systemic issue.
- **Minor Nonconformity –** A limited or isolated failure that does not significantly impact the overall effectiveness of the management system.

The Client must:

- Provide a written correction, root cause analysis, and corrective action plan typically within 30 days (or as required by the applicable scheme).
- Implement and submit evidence of corrective action within defined timelines (which may differ per standard).

Major nonconformities must generally be closed before certification or recertification is granted. Extended unresolved major nonconformities may require a new Stage 2 audit.

RMR may:

- Accept or reject the Client’s response; rejected responses must be revised.
- Conduct corrective action audits (on-site or remote) where necessary.
- Treat serious or unresolved nonconformities as grounds for suspension or withdrawal.

Where legal/regulatory issues are identified, they are recorded as failures of the management system to ensure compliance. If imminent danger to life, health, or the environment is observed, RMR may be required to report to appropriate authorities in line with legal obligations.

14. CERTIFICATION

Certification is granted when:

- The Stage 2 (and any required follow-up) audit concludes that the management system conforms to the standard(s);
- All major nonconformities are closed and corrective actions are verified; and
- The certification decision maker, independent of the audit team, approves the recommendation.

Certificates:

- Are valid for a defined cycle (typically 3 years for management systems).
- Remain the property of RMR.
- Specify the certified scope, locations, standard(s), and dates.

Ongoing validity depends on:

- Successful surveillance and recertification audits;
- Maintenance of the management system; and
- Compliance with RMR's requirements and financial terms.

15. USE OF CERTIFICATES & MARKS

The Client may:

- Use RMR and applicable accreditation/program marks/ logos in accordance with RMR's **Use of Logo** procedure and program rules.
- Reproduce certificates in full.

The Client shall not:

- Use certificates or marks in a misleading manner or imply product certification when only a management system is certified.
- Continue to use certificates or marks after suspension, withdrawal, or scope reduction.

Misuse may result in:

- Nonconformities and corrective action;
- Suspension or withdrawal of certification; and
- Public notice where required by accreditation bodies or program rules.

16. VERIFICATION OF CERTIFICATES

RMR maintains records of certified Clients, including:

- Name and location

- Certified standard(s) and scope
- Certificate number and validity period

RMR may provide verification of certification status to stakeholders and may publish certified Client details where required by accreditation bodies or program owners (e.g., SERI).

17. SURVEILLANCE

Following initial certification:

- Surveillance audits are conducted at least once per calendar year (or as required by the scheme).
- The first surveillance is typically conducted within 12 months from the certification decision.

Surveillance audits focus on:

- Internal audits and management reviews
- Actions taken on previous nonconformities
- Complaint handling
- Achievement of objectives and continual improvement
- Ongoing operational control and risk management
- Changes to the management system and operations
- Proper use of certificates and marks

Surveillance may be on-site or, where allowed, partially remote.

18. RECERTIFICATION

Recertification audits:

- Occur at the end of the certification cycle (typically every 3 years).
- Assess continued conformity, effectiveness, and suitability of the management system.
- Consider:
  - Results of previous surveillance audits
  - Performance trends and changes in context
  - Legal and regulatory changes

A Stage 1 may be required if significant changes have occurred (e.g., major reorganization, significant system changes, or new legislation).

Failure to complete recertification in time may result in certificate expiry and the need for a new certification cycle.

19. MODIFICATION OF SCOPE

The Client may request:

- **Scope Decrease –** Reduction of certified activities or locations.
- **Scope Increase –** Expansion of certified activities, processes, or locations.

RMR will review the request and may conduct document review, special audits, or expanded surveillance/recertification to support the decision.

20. CHANGES TO THE CLIENT'S MANAGEMENT SYSTEM

The Client must notify RMR within 30 days of significant changes affecting certification, such as:

- Organizational changes (ownership, key personnel, structure)
- Removal or substantial downgrading of system elements
- Failure to conduct required internal audits or management reviews
- Major process, technology, or regulatory changes
- Significant reductions in resources affecting system performance

RMR will assess impacts and may:

- Conduct a special audit
- Bring forward surveillance or recertification
- Request additional documentation
- Take no action if risk is low

21. CHANGES IN APPLICABLE STANDARDS

When standards or program requirements change:

- RMR will inform Clients of relevant changes and transition timelines.
- Clients must implement necessary changes within the specified timeframe.

Failure to transition appropriately may result in suspension or withdrawal of certification.

22. CHANGES IN RMR REQUIREMENTS

RMR may update its certification requirements (e.g., procedures, rules for use of marks, reporting requirements).

- Clients will be informed of such changes.
- Compliance will be verified during audits or through other agreed means.

23. COMPLAINTS ABOUT RMR OR CLIENTS

Any stakeholder may submit a complaint regarding:

- RMR's certification activities, or
- Practices of a certified Client related to certified scope.

Complaints may be submitted verbally or in writing, but written complaints are preferred for traceability.

RMR will:

- Acknowledge and log complaints;
- Investigate impartially;
- Take appropriate corrective action; and
- Provide a response to the complainant, within confidentiality limits.

24. APPEALS

Appeals relate to decisions that impact certification outcomes (e.g., denial, suspension, withdrawal).

- Appeals must be submitted in writing.
- RMR will ensure that individuals handling the appeal were not involved in the original decision.
- An impartial appeals committee reviews the case and makes a decision.
- The Appellant is informed of the outcome.
- If disagreement remains, the Appellant may contact the relevant accreditation body or program owner.

No discriminatory action will be taken against anyone for submitting an appeal.

25. SUSPENSION

Certification may be suspended when:

- Major nonconformities are not addressed within required timeframes;
- There is evidence of serious misrepresentation or misuse of certificates/marks;
- Required audits cannot be conducted (e.g., denial of access);
- Financial obligations to RMR are not met; or
- Other serious breaches of these Certification Regulations occur.

During suspension, the Client must:

- Cease use of RMR and accreditation/program marks;
- Avoid any statements implying active certification;
- Inform relevant customers, where appropriate, about suspension status.

If suspension is not resolved within the defined period (often up to 6 months), certification may be withdrawn or scope reduced.

26. WITHDRAWAL OF CERTIFICATION

Certification may be withdrawn when:

- Suspension issues remain unresolved;
- Major system breakdowns or loss of control are evident;
- The Client requests withdrawal;
- The Client fails to comply with new or revised standard/program requirements;
- Certified services cease for prolonged periods; or
- Significant unpaid financial obligations to RMR persist.

Upon withdrawal, the Client must:

- Stop all references to certification and cease use of marks;
- Inform affected customers as appropriate;
- Return original certificates and any other RMR property if required.

27. SPECIAL AUDITS

Special audits may be conducted when:

- Significant changes occur in the Client's system or scope;
- Complaints or information suggest serious implementation issues;
- Follow-up on suspended clients is required;
- Program owners or accreditation bodies request additional oversight.

Special audits may be announced or, in specific circumstances, unannounced (in line with ISO/IEC 17021-1 and program rules).

28. TRANSFERS

RMR may accept the transfer of certificates from other accredited certification bodies, consistent with applicable IAF MDs and scheme rules, without repeating all initial certification activities.

Transfer requires review of:

- Valid accredited certificate and scope;
- Previous audit reports and nonconformity status;
- Outstanding issues or risks.

29. ADDITIONAL REQUIREMENTS FOR SPECIFIC STANDARDS OR PROGRAMS

Some standards or programs (e.g., R2v3, RIOS, sector-specific schemes) may impose additional requirements on both RMR and the Client.

- These requirements are provided as part of the contract, proposal, or separate program documents.
- Both RMR and the Client must comply with all applicable program rules.

30. CONSULTANT PARTICIPATION DURING AUDITS

At the Client's request, and with the prior approval of Ross Mitchko Registrar (RMR), a management system consultant or other designated advisor may be present during audit activities in an observer capacity.

To preserve the impartiality, integrity, and independence of the certification process, the following requirements apply:

- The consultant is **not** a member of the audit team and shall not influence, direct, or interfere with the audit process or the audit team's conclusions.
- All communication regarding audit findings, nonconformities, audit conclusions, and certification recommendations shall occur between the RMR audit team and the Client's designated representatives.
- Consultants may provide clarification regarding the management system when requested by the Client; however, they shall not answer questions on behalf of employees unless specifically requested by the audit team to clarify factual information.
- Consultants shall not negotiate, challenge, or attempt to influence audit findings, classifications of nonconformities, or certification decisions during the audit.
- RMR auditors shall maintain independence and impartiality at all times and shall not provide consultancy, recommend specific solutions, or participate in the development or implementation of the Client's management system.
- The presence of a consultant shall not restrict the audit team's access to personnel, facilities, records, or objective evidence, nor interfere with interviews conducted with Client personnel.
- The audit team leader reserves the right to limit or terminate a consultant's participation if their presence compromises audit effectiveness, impartiality, confidentiality, safety, or compliance with accreditation or program requirements.
- For **R2v3** certification activities, consultant participation shall also comply with all applicable requirements of the **SERI R2v3 Code of Practices (COP)**, including requirements related to impartiality, auditor independence, witness audits, and the integrity of the certification process.

These requirements are intended to ensure that certification decisions remain objective, evidence-based, and free from undue influence while allowing Clients to have advisors present during the audit process.

31. REFERENCES

This document should be read in conjunction with:

- ISO/IEC 17021-1: Conformity assessment – Requirements for bodies providing audit and certification of management systems

- Applicable scheme-specific standards and guidance (e.g., ISO 9001, ISO 14001, ISO 45001, R2v3 Standard and Code of Practices)
- RMR internal procedures (e.g., Use of Logo, Appeals & Complaints, Special Audits, Nonconformity & Corrective Action)
- RMR’s website and client-specific certification agreement

Revision History

Rev	Date	Description of Change	Prepared By	Approved By
01	01-01-2024	Original Release	CEO	COO
02	10-31-2025	Reformatted & Fully Updated for ISO 17021-1, ANAB & COP v2.4 Compliance	CEO	COO
03	7/27/2026	Added Section 30 for Consultant Participation	CEO	COO