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|  | <b>MS AGROLAND SERVICES PRIVATE LIMITED (AGROCERT)</b> | Doc no.       | ASPL-QD-49 |
|  |  | Issue no.     | 01         |
|  | <b>Policy of sanctions and disciplinary measures</b>   | Issue date    | 26.07.2022 |
|  |  | Revision no.  | 00         |
|  |  | Revision date | 00         |

### 1. Purposes

This policy establishes the steps that are required to be taken for protecting organic integrity.

### 2. Scope

This policy is applicable to all organic certifications.

### 3. Responsibility

Certification Manager, Quality Manager, and COO are responsible for executing this policy.

### 5. Policy

MS Agroland Services Pvt Ltd (MS ASPL) categorizes noncompliance as major and minor based on the severity. MS ASPL develops the sanction catalog as per the scope i.e – Crop production (ASPL-AD-01- Sanction catalog for an individual farmer), Organic grower Group (ASPL-AD-02- Sanction catalog for an Organic grower group), Processing (ASPL-AD-03- Sanction catalog for Processing), trading (ASPL-AD-04- Sanction catalog for trading, wild collection (ASPL-AD-23- Sanction catalog for wild collection ) and ASPL-AD-24-sanction catalog for off-farm input approval) and their consequences. Major and Minor noncompliance can be described as following

**A- Minor Noncompliance** – Noncompliances that do not affect the integrity of the certification process and are rectifiable Examples of such minor noncompliances include, but are not limited to, failure to submit information on time, improper document & record submission, etc. Minor issues, whether found in operational practices or recordkeeping, indicate no systemic failure in the design or implementation of the organic management plan of all the scopes (crop production, organic grower group, processing, trading, and wild collection) i.e they do not show an inability to comply with the NPOP organic standards. Certification can be granted or continued before correction, but correction must occur within the time period. MS ASPL grants certification which includes requirements for the correction of minor noncompliances within a specific time period as a condition of continued certification.

Certification can be granted along with the notification to the operation, typically a “minor issue letter or along with the certification letter” describing the noncompliance. MS ASPL requires correction during a specific period that can be no later than prior to the next inspection or annual update. MS ASPL keeps written records of the issues identified and their corrections.

**B- Major Noncompliance** – Noncompliance affects the integrity of the organic standard in general and the certification process in particular. Examples of such major noncompliances include, but are not limited to, noncompliance with organic standards, knowingly providing false information/ documents,

#### APPROVALS:

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| <b>PREPARED BY</b>     | <b>APPROVED BY</b> |
| <b>QUALITY MANAGER</b> | <b>COO</b>         |

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misrepresentation as to the certification status, repetition of same nonconformities, and failure to rectify such non compliances, etc. In case of the raised of the warning letter, suspension letter, withdrawn letter, termination letter and if any lot of product of infringement details shall communicate to the APEDA on immediate basis.

| S.NO | Noncompliance Type | Description   | Action   |
|------|--------------------|---|--|
| 1    | Major              | Refusal to notify MS ASPL of the changes which affect the operation,s organic status.   | 1st Incidence – warning letter and /or suspension of certificate minimum 15 days.<br>2nd incidence – 30 days minimum suspension<br>3rd incidence – Termination of a certificate. |
| 2    | Major              | Provide false information to a certifying agent concerning changes to the operation which affect the operation’s organic status, falsification of documentation, selling non-organic crops or products as organic | Termination or denial of certification or strict disciplinary action will be based on the severity of the incidence.   |
| 3    | Major              | In case the NC raised by the last inspector/ auditor is Major & no corrective action will be taken  | Withdrawn and Denial of certification  |
| 4    | Major              | Application of prohibited materials, falsification of records concerning application of prohibited materials  | Termination or denial of certification or disciplinary action will be based on the severity of incidence   |
| 5    | Major              | If product and label profiles ar not complted, and ingredients certifiers details are not valiable.   | Product will not be listed in certificate or removed from certificate.   |

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| 6 | Major | If operator is willfully/ purposefully violating the requirements of standards, or if they fail to correct existing major noncompliance issues | <p>1st Incidence- Warning letter and/ or suspension of certificate minimum 15 days.</p> <p>2nd incidence- 30 days minimum suspension</p> <p>3rd incidence- Termination of certificate.</p> <p>Action shall be based on the severity of incidence . Special control measures/ restrictions will be issued for export of organic products.</p>  |
| 7 | Major | If MS ASPL observes residue detection from laboratories , regular authorities or any reliable sources  | <p>1st incidence- Warning letter and / or suspension of certificate minimum 15 days</p> <p>2nd Incidence- 30 days minimum suspension</p> <p>3rd Incidence- Termination of certificate.</p> <p>Action shall be based on the severity of incidence . Special control measures/ restrictions will be issued for export of organic products.</p> <p>Reduction of scope may be done.</p> |
| 8 | Major | Infringement that affects the organic integrity in the production .  | 1st Incidence- MS ASPL release the suspension letter to the operator and instruct them to   |

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|   |       |  | <p>remove indication of certification from the entire lot of the production cycle which is affected by the infringement concerned.</p> <p>2nd incidence- Warning letter and / or suspension of certificate minimum 15 days.</p> <p>3rd Incidence- 30 days minimum suspension</p> <p>4th Incidence- Termination of certificate.</p> <p>Action shall be based on the severity of incidence . Special control measures/ restrictions will be issued for export of organic products.</p> |
| 9 | Major | If operator fails to submit certification fee in time. | <p>Late fee will be charged.</p> <p>Certification may be denied or it can be suspended/ withdrawn.</p>   |

**6. Records:**

- ASPL-AD-01- Sanction catalogue for the individual farmer
- ASPL-AD-02- Sanction catalogue for OGG
- ASPL-AD-03- Sanction catalogue for Processing
- ASPL-AD-04- Sanction catalogue for Trading
- ASPL-AD-23- Sanction catalogue for Wild collection
- ASPL-AD-24- Sanction catalogue of Off-farm input approval

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