

**Type A Inspection Body**

<b>Data Rev</b>	<b>Editorial staff Resp. AQ</b>	<b>AU Approval</b>
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**Revision status**

Revision	Paragraph	Description
0	Entire document	First issue
1	§ 4	Insertion of accreditation term
2	Entire document	Accredia Surveys
3	Entire document	Accredia Surveys
4	Entire document	Accredia Surveys
5	Entire document	Accredia Surveys
6	§ 9 § 11	Added responsibility of BASE spa in case of subcontracting Detailed billing following inspection interruption
7	Last paragraph	Acceptance of the document
8		Inserted final responsibility of BASE
9	3.1	Updated reference standards
10	2-3-5-5.1-5.2- 6- 9	Revision following Accredia's findings and alignments with internal procedures

**1 INTRODUCTION**

This document defines the principles and procedures that BASE S.p.A. implements to carry out inspection, sampling, weight control, according to the GAFTA Standards, and the rules governing the relationship between the Customer and BASE S.p.A., and between personnel and BASE S.p.A.

BASE SPA – "Inspection Controls and Sampling Department" is an inspection body that carries out exclusively inspection activities and is therefore a third-party body, always acting respecting its principles of Independence and Impartiality within the general structure of BASE spa.

BASE SPA – "Inspection, control and sampling department" offers its services to customers without any discrimination;

BASE SPA – "Inspections, controls and sampling department" is organized in such a way that its employees are not subject to economic pressures that compromise their independence and impartiality; ensure that the personnel involved in the inspection are not remunerated in such a way as to influence the results of the service provided;

BASE SPA – "Inspections, controls and sampling department" ensures that all personnel act in accordance with what is defined in the Code of Ethics and in compliance with its Company Management Manual;

BASE SPA – "Inspection Control and Sampling Department" ensures that it undertakes not to execute the mandate in the event that it cannot guarantee the impartiality and independence and confidentiality required.

**2 PURPOSE AND SCOPE**

This regulation is applied by BASE S.p.A. "Directorate of Inspections, Controls and Sampling" and by designated personnel in accordance with the GAFTA CODE OF PRACTICE and all applicable GAFTA requirements, in their latest state of revision

The Field of Application refers to the three areas described:

- Supervision
- Weight control
- Sampling

### 3 MAIN REGULATORY REFERENCES

The rules referred to below are intended in their last state of revision / update

#### 3.1 Rules on accreditation

ACRONYM	TITLE
UNI CEI EN ISO/IEC 17020	"Conformity assessment. Requirements for the functioning of various types of bodies carrying out inspections";
UNI CEI EN ISO /IEC 17000	"Conformity assessment - General principles"
RG-01	Regulation for the accreditation of Certification, Inspection, Verification and Validation Bodies - General Part
RG-01-04 rev 1	Regulation for the accreditation of Inspection Bodies
RG-09	Regulation for the use of the Accredia trademark
ILAC G28 guideline	Guidelines for the formulation of accreditation scopes for inspection bodies
ILAC-P15 guideline	Application of ISO/IEC 17020:2012 for the accreditation of inspection bodies
ILAC guideline -P10	ILAC policy on metrological traceability of measurement results

#### 3.2 Regulations relating to inspection activity

ACRONYM	TITLE
GAFTA COP	"Approved Code of Conduct for Superintendents"
GAFTA REGULATION 123	"Weighing rules"
GAFTA REGULATION 124	"Sampling rules"

### 4 TERMS AND DEFINITIONS

For terminology, the definitions given in the UNI CEI EN ISO / IEC 17020, ISO 17000 and applicable ILAC lines apply, supplemented by the following.

N.	Term	Definition
1	OdI - Inspection Body	BASE spa that performs inspection activities on goods
2	BASE SPA	BASE International Shipments spa – Inspection, Control and Sampling Department
3	Customer or principal of the service	the one who contractually requests the inspection activities from the body
4	Inspector	person who carries out inspection activities on behalf of OdI
5	Inspection	examination of a conformity assessment object and determination of their conformity with detailed requirements or, on the basis of professional judgement, general requirements
6	DICC	Inspection, Control and Sampling Directorate

### 5 RESPONSIBILITY

This regulation describes in detail the responsibilities, rights and duties that BASE spa "Inspection, Control and Sampling Department" has towards customers and vice versa in carrying out the contractual relationship relating to inspection activities.

#### 5.1 CUSTOMER RESPONSIBILITIES

The customer with the assignment assumes the following rights and obligations:

- must confer the task for the execution of the mandate limited to the performance of the professional activity carried out by BASE SPA;
- must provide precise and clear instructions in writing, including the possible recusal of inspectors on grounds of impartiality. Objection may take place at any time before 24 hours after the start of the inspection.
- must promptly provide all the documentation in its possession necessary for the correct execution of the service
- accepts the condition that for the execution of the mandate BASE SPA may avail itself, under its own responsibility, of both employees and qualified external collaborators of trust.
- If you also request the sending of the sample(s) for analysis, you can indicate the laboratory of your trust, or accept that Base Spa sends it to one of the laboratories present in the Register of Approved Analysts of GAFTA (<https://www.gafta.com/Membership-Directory/analysts>), without prejudice to the principle that Base Spa can never be held responsible for the results of laboratory tests.
- Inspectors of the Accreditation Body (Accredia) have the right to participate in the inspection activities, upon notice. It accepts the obligation to suspend inspection activities in case of non-acceptance by customers of the presence of Accredia Inspectors in inspection activities.

- The customer has the right to request sampling activities without shipment of samples to the analysis laboratory.

## 5.2 BASIC RESPONSIBILITIES SPA

BASE SPA with the acceptance of the assignment assumes the following rights and obligations:

- carry out the service in compliance with the principles of independence and impartiality,
- confidentiality of the information acquired
- use only qualified personnel according to internal procedures
- ensure that staff have received appropriate safety instruction
- The inspection activity carried out by BASE spa does not exempt the customer from legal obligations deriving from the products, processes and services provided and from contractual obligations towards its customers with the exclusion of any liability or warranty obligation on the part of BASE spa.
- No responsibility can be attributed to BASE spa for defects in products, processes and services provided by the Customer.
- BASE spa is not responsible for any damage to third parties caused by the products, processes and services provided by the Customer.
- If the inspection service is to be provided outside the national territory (Italy), Base Spa will have the inspection service carried out by a qualified correspondent (subcontractor) (GAFTA) without notifying the customer.
- If the customer requests the sending of samples, taken from the product during the inspection, to a test or analysis laboratory, BASE spa is obliged to send these samples to an accredited analysis laboratory UNICEI EN ISO / IEC 17025 and included in the Register of Approved Analysts of GAFTA (<https://www.gafta.com/Membership-Directory/analysts>). BASE spa is not responsible in any way for the results or for the conduct of tests and analyzes by these laboratories. Base spa is responsible for sending the analysis reports of said laboratories to the customer attached to the inspection report / certificate.

## 6 DISTRIBUTION

This regulation is always available on the Base SpA website and is sent by BASE spa to interested parties on the occasion of the first order. In any case, customers intending to enter into the contract with BASE SpA or who have already entered into such a contract can always request a copy (even if available on the website <https://www.basespa.com> ). The latest update of the regulation is published on the website and in every communication email to the customer, please note that the same must consult the website, to verify the presence of any updates to the regulation itself. The updating of the Regulation does not entail new issues of offers already signed that remain valid unless the withdrawal is formally expressed by the customer. Base SpA always applies the latest revision of this regulation and it is the customer's responsibility to verify the issue of updates in the specific section of the website and adapt.

## 7 IMPARTIALITY AND INDEPENDENCE

BASE SPA ensures that all information acquired during inspections is treated in a strictly confidential manner, unless otherwise prescribed by:

1. legal provisions;
2. Disposition of accreditation and/or notification bodies.

In such exceptional cases, the customer shall be informed of the information disclosed to third parties.

BASE SPA guarantees the customer that the activities of its subsidiaries or subcontractors do not affect the confidentiality, objectivity or impartiality of the verification activities, guarantees to carry out the verification activities with the utmost professional integrity and the technical competence required in the specific field and not be influenced by pressures or incentives, especially of a financial nature, which may influence their judgement or the results of their verification activities, in particular if they come from persons or groups of persons concerned by the results of the verifications.

To this end, see the "Declaration of Impartiality" on the website [www.basespa.com](http://www.basespa.com)

## 8 CONFIDENTIALITY

BASE SPA - "Inspection Control and Sampling Department" is responsible as a result of legally valid commitments, for the management of all information obtained or produced during the execution of inspection activities. BASE SPA will indicate to the customer, in advance, the information it intends to make public, or what has been agreed between BASE SPA and the customer (for example, in order to respond to complaints). All other information (with the exception of information that the customer makes available to the public or when agreed between BASE SPA and the customer) is considered proprietary information and must be considered confidential.

The information concerning the customer obtained from sources other than the customer, will be treated by BASE SPA as confidential information.

BASE SPA guarantees the confidentiality of all information and documents owned by the customer / mandates of which the staff of BASE spa may become aware and of all communications between BASE SPA and the customer. When BASE SPA is obliged by law, or authorized by contractual commitments, to release confidential information, the customer or the individual concerned, must, unless prohibited by law, be notified of the information provided.

## 9 PROCEDURES FOR CARRYING OUT INSPECTION, CONTROL AND SAMPLING ACTIVITIES

The general procedures for carrying out inspection activities are in accordance with the requirements of the UNI CEI EN ISO / IEC 17020 standard and the internal procedures of BASE SPA - Inspection Control and Sampling Department.

The inspection activity is planned through an "Inspection Plan" that shows the main phases in which the inspection takes place. Within the Inspection Plan there is the name of the inspector who will perform the activity. The customer has up to 24 hours before the execution of the inspection the right to object to the inspector, notifying Base SpA via email.

The Inspection Plan shall include a verification of the impartiality of the inspection activity to be carried out.

The resp. of BASE SPA plans the inspection activity to be carried out in accordance with the requirements, appointing in the first instance the Inspector in charge, according to criteria of competence and logistical proximity. The main task of the inspector is to ensure that the checks he carries out are carried out in accordance with the requirements of the reference regulatory and technical documents, as well as the particular requirements of the customer. The Inspector does not have the right to question methods, standards or other contractual documents or to endorse any deviations from the requirements.

The responsibility for the work of the inspectors is always the responsibility of BASE spa.

The checks will be carried out according to the regulations

- GAFTA-approved Superintendent Code of Conduct
- GAFTA RULES 123 Weighing Rules
- GAFTA RULES 124 Sampling rules

In their last revision/update status.

Inspection, control and sampling activities shall be carried out in compliance with the applicable mandatory safety and hygiene rules and the special requirements existing on the external site of activity.

### Subcontracting

Inspection and sampling activities may be partially or wholly subcontracted to third parties depending on logistics; in case the customer will be informed in advance.

Upon informing the Customer, BASE SPA reserves the right to subcontract part of the requested Service to third parties, where this is not excluded by applicable law. The Customer has the right to refuse, for justified reasons, such outsourcing within five (5) working days from the date of communication.

BASE SPA assumes full responsibility for any activity entrusted externally and guarantees that the subject to whom the subcontract is entrusted is competent and complies with the applicable regulatory provisions and is not involved with the design, production, purchase, brokerage sale, storage, transport, selection, disposal of the products subject to product inspection, so as not to compromise the impartiality referred to in § 7.

The conformity assessment of the inspection results remains under the direct responsibility of BASE spa even in the case of subcontracting.

The subcontracting of the inspection activity provides two possibilities with different qualification methods:

Case 1 – Subcontracting only auditing activities to auditing companies is the most frequent case. In this case they are chosen by the manager of BASE SPA on the basis of the following qualification criteria:

- Competence of inspection personnel
- Inclusion in GAFTA Supervisor Records
- Proven quality of service (from previous experience or news detected by the market).

Case 2 – Subcontracting of the inspection activity. In this case, organizations are chosen by the manager of BASE SPA, based on the following qualification criteria:

- ISO 17020 Accreditation
- Inclusion in GAFTA Supervisor Records
- Proven quality of service (from previous experience or news detected by the market).

The final responsibility towards the customer/customer for the determination of compliance with the requirements remains in any case with BASE S.p.A.

**Analysis and testing laboratories.** The DICC sends the samples taken during the inspection activity to test laboratories defined by the customer when ordering or to the laboratory territorially close to the sampling site.

The resp. of the DICC verifies that the laboratories are included in the Register of Approved Analysts of GAFTA (<https://www.gafta.com/Membership-Directory/analysts>) and are accredited according to UNI CEI EN ISO / IEC 17025.

The activity of these laboratories is not under the direct responsibility of BASE spa.

BASE spa acquires the Laboratory Certificates and transmits them to customers without expressing judgments on the merits of the results. The responsibility of BASE spa is limited to taking samples and sending them to GAFTA qualified and ISO 17025 accredited laboratories.

#### **Use of the Accredia trademark**

No trademark of BASE SPA or third parties is issued for any reason in use by the customer as a result of the inspection activity. In fact, the Accredia RG-09 regulation precludes customers of Inspection Bodies from using the Accredia brand. Furthermore, BASE SPA does not issue labels on the inspected items, as the application is not practicable.

#### **Inspection Reports**

At the end of the inspection activity, OdI sends the customer an "Inspection Report" which contains all the data concerning the inspection activity. The OdI does not generally issue Certificates of Inspection as they are not significant for the client. If expressly requested by a client, the SB issues it with reference to the identifier of the Inspection Report which contains all the results of the inspection.

During the inspection activity according to GAFTA standards, there are no surveys, but an assessment of the outcome of the weighing supervision activity and the possible description of the samples taken for further analysis according to the customer's requirements.

With regard to the above, the Inspector of BASE spa expresses an overall and synthetic judgment of conformity or non-conformity.

With regard to the conduct of the inspection:

**Compliant:** the Inspection was conducted according to contractual requirements and according to the applicable special rules and regulations

**Non-compliant: it** was not possible to conduct the Inspection according to contractual requirements; in this case the reason will be specified and communicated to the customer.

With regard to the results of the Inspection:

**Compliant:** the product quality does not differ from the standard one with the further specifications of the customer

**Non-compliant:** the product quality differs from the standard one with the further specifications of the customer for the intrinsic characteristics of the product and / or as a result of alterations of the product during transport / storage.

In this case if the survey is expressed on the basis of laboratory analyzes, these are summarized in the report / certificate of inspection and attached to the report itself.

#### **Reissue of Inspection Reports**

Following modification or integration of an inspection report, BASE SPA reissues the report referring to the previous one that is considered outdated and that is cited in the amended report.

The responsibilities and operating procedures for the reissue of a report or certificate are the same as for the first issue.

Inspection reports/certificates are not auditable.

## **10 COMPLAINTS, APPEALS AND LITIGATION**

### **10.1 Complaints**

The complaint by customers or other interested parties can be presented even before the intervention in the field of the inspector and must be presented by registered mail or PEC to the attention of BASE SPA - Inspection Controls and Sampling Department. However, it is possible to manage complaints received by the principal / customer by telephone or personally from other staff of the OdI through the application of the procedure of the management system of BASE SPA.

The customer must submit a complaint no later than 30 days from receipt of the Inspection Report

In the communication, in addition to the references of the Report with respect to which the complaint is made, the motivation of the complaint must also be indicated.

If the complaint does not contain all the necessary information, the Director of BASE SPA - Inspection Control and Sampling Directorate, contacts the customer for the necessary clarifications.

The Head of BASE SPA - Inspections, controls and sampling department, having received the complaint, assigns the Procedure to a person of BASE spa not directly involved in the activity object of the complaint.

The Head of the Procedure takes charge of the complaint, analyzes it and defines the methods of management.

At the end of the analysis (carried out within 2 months from the date of receipt of the complaint) the Head of the Procedure will communicate to the Director of BASE spa - Inspections, controls and sampling department, the

results of the analysis carried out on the basis of this will be drawn up the answer for the Customer / interested party who has submitted a complaint.

BASE SPA communicates to the customer both the acceptance / rejection of the complaint, within 3 days of the decision and the response following the analysis of the complaint for the determination of the causes and the proposed solution. The customer may at any time request information about the progress of the complaint by writing to [base@basespa.com](mailto:base@basespa.com)

## 10.2 Appeals

The customer who decides to appeal, must send communication by mail or PEC to BASE SPA to the attention of the AU ([base@basespa.com](mailto:base@basespa.com)) no later than 10 days from the date of receipt of the Inspection Report with respect to which the appeal is made.

This letter must contain the references of the Organization that makes the appeal, all the references that may contribute to the identification of the object with respect to which the appeal is made, the reasons (including any supporting attachments), the signature of the Legal Representative of the Organization or person delegated to the purpose. It should be noted that the lack of one or more of the elements mentioned above constitutes an element for not following up the appeal; in such cases, the Body will send the sender a communication with the reasons.

The Head of BASE SPA - Inspections, controls and sampling department, having received the appeal, assigns the Procedure to a person of BASE spa not directly involved in the Verification object of the Appeal.

The Head of the Procedure takes charge of the appeal, analyzes it and defines the management methods.

At the end of the analysis (carried out within 5 working days from the date of receipt of the appeal) the Head of the Procedure will communicate to the AU the results of the analysis carried out on the basis of this will be drawn up the answer for the Customer / Organization that has appealed.

OdI communicates to the customer both the acceptance / rejection of the appeal, within 3 days of the decision, and the response following the analysis of the complaint for the determination of the causes and the proposed solution. The customer may at any time request information about the progress of the appeal by writing to [base@basespa.com](mailto:base@basespa.com)

## 10.3 Litigation

All disputes arising from the execution of an Audit, including those relating to its validity, interpretation, execution and resolution, will be referred to the exclusive jurisdiction of the Court of Livorno;

Within BASE spa, the litigation is followed by the Sole Director Mr. Sergio Pitto, who avails himself of the collaboration of a trusted lawyer.

## 11 TARIFF AND INVOICING

BASE spa's inspection fees are shown in the individual offers drawn up specifically for each customer.

Invoicing takes place under the conditions indicated in the individual offers.

The following also applies:

- A. if the customer cancels the inspection activities scheduled within 20 working days prior to the date already agreed in writing, BASE SPA reserves the right to charge the amount of the verification;
- B. in the event of interruption of activities due to any reason attributable to the customer, the customer receives an invoice from BASE spa relating to all services performed up to the time of interruption;
- C. in case of interruption due to force majeure or by decision of the competent authority, the customer receives an invoice from BASE spa relating to all services performed up to the time of interruption;
- D. in case of interruption due to decision of BASE spa for any reason, the customer receives an invoice from BASE spa relating to all the services performed up to the time of interruption;
- E. After acceptance of the order, it is in principle no longer possible to change the contractual documents; however, BASE spa reserves the right to revise the contractual documents if during the course of the activities it finds variations with respect to the conditions declared by the customer on the basis of which the offer was issued.

## 12 PROTECTION OF PERSONAL DATA

### 12.1 Processing of personal data

Pursuant to Regulation (EU) no. 2016/679 on the protection of individuals with regard to the processing of personal data ("General Data Protection Regulation") and Legislative Decree no. 196/2003 and subsequent amendments ("Privacy Code"), personal data directly provided by the Customer or through third parties, are and will be processed by BASE SPA - and in particular recorded and stored in a database - in order to ensure a correct conduct of contractual relations with the Customer. Particular categories of data as well as criminal data pursuant to, respectively, Articles. 9 and 10 of the General Data Protection Regulation may be requested as a mandatory condition for the release of the inspection report and will be processed solely for the purpose of providing the requested service, according to appropriate technical and organizational security measures.

In relation to the aforementioned purposes, the processing of requested data (hereinafter, the "Data") takes place using computerized, manual and telematic tools, with logic strictly related to the purposes themselves and, in any case, in order to guarantee the security and confidentiality of the data.

The provision of Customer Data is therefore essential in relation to the proper conduct of contractual relations with BASE spa, with the consequence that any refusal to provide them will make it impossible for BASE spa to proceed with the same relationships.

The Data will be processed for the time strictly necessary to carry out contractual relations with the Customer, without prejudice to the retention of data for a further period of 10 years (variable in the case of particular EU regulations and directives that require a further retention period) from the expiry of the last service performed, to fulfill the legal and regulatory obligations provided.

The Data may be communicated by BASE SPA, as far as their respective and specific competence is concerned, to accreditation bodies, administrations, institutions, judicial authorities and public security authorities as well as to any other competent authority in the matter and, in general, to any public and private subject whose communication is mandatory by law or is necessary for the execution of the services provided by BASE SPA. These subjects will process the Data in their capacity as independent data controllers.

## 12.2 Data controller

The "Data Controller" is BASE S.p.A., with registered office in Via Fabio Filzi 31, Livorno. Pursuant to art. 15-21 of the GDPR and art. 7 of the Privacy Code (Rights of the interested party), the Customer may at any time exercise the rights of access, rectification or cancellation (so-called "right to be forgotten"), limitation of processing, as well as the portability of their data by sending a specific request to the address of the DPO: [basespa@base.basespa.com](mailto:basespa@base.basespa.com).

The Data may be communicated and processed by third-party companies or by other subjects (by way of example only, IT service providers, credit institutions, professional firms, inspectors, consultants) who carry out outsourced activities on behalf of the Data Controller, in their capacity as external data processors.

The list of external data processors specifically appointed who process the Data is available from the Data Controller.

## 12.3 Consent to processing

By accepting these Regulations, the Customer agrees that the Data are processed for the purposes indicated above and are also subject to communication and dissemination within the scope of the purposes indicated above.

## 12.4 Data breach

In the event of a data breach of personal data, the data controller shall notify the breach (in cases where serious risks arise for the rights and freedoms of data subjects) to the supervisory authority without undue delay within 72 hours from the moment it became aware of it. In case of delay in communication, everything is justified in writing. Any violations are documented via the Data Breach Registry. The personal data controller also communicates the violation to the interested party without undue delay by email, in simple and clear language, communicating, for example, the probable consequences of the personal data breach and the measures taken to remedy the breach. In the event of a personal data breach, the company can use the support of a special IT service provider.

Base SpA

*The Sole Director*

Signature and Stamp for Customer Acceptance

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