

1. General

This procedure explains the procedure to be followed by ETKO and the activities to be carried out by the certified party in order to carry out the GLOBALGAP evaluation and certification of the production areas and processes of the certified party and GLOBALG.A.P. It does not contain requirements more stringent than its regulations. The producer/producer organization/entrepreneur who successfully obtains certification in accordance with this procedure is approved for its production areas and processes and is allowed to use the relevant ETKO logo in its commercial activities.

To obtain and maintain certification, the applicant must comply with the requirements set out in this procedure and other ETKO documents, as well as relevant legal and legal documents, and must maintain all records regarding production & processes in a satisfactory condition.

The scope of the ETKO certification process is limited only to directly controlled products and processes. The certification process does not cover systems where the products are not produced by the entrepreneur's/manufacturer's/producer organization's own system and the processes are not managed and supervised by the customer's own system.

Entrepreneurs/producers/producer organizations:

- Will comply with all applicable standards and requirements.
- The manufacturer to be certified by GLOBALBAP carries out an annual self-assessment or internal audit;
- Allow on-site inspections with full access to the production or processing operation, including non-certified production and processing areas, structures and offices;
- Will pay wages on time
- It will immediately notify ETKO in the following cases:
 - In any area, production unit, field, facility or product that is part of an operation, residue is detected at a level that exceeds MRL limits, and
 - Changes made in production sites or any section subject to certification that may affect compliance with regulations.

The document showing the fee structures is published on the ETKO website, and upon request for certification, all applicants will receive an application package containing a copy of the regulation for the relevant scope, the necessary documents considered to be relevant to the certification and other information.

2. Application for certification and contract

The offer/estimated cost to be submitted to the applicant is prepared using the Application Form (GP 23 F 01/ GP 23 F 02) and based on the information provided by the applicant. The applicant will fill out the application form according to the procedure and submit the copy to ETKO. The applicant company is given a unique license number.

In line with the information collected through the Application Form, a proposal/estimated cost will be prepared containing all the necessary details regarding the services to be provided by ETKO.

If the offer/estimated cost is accepted by the applicant, the applicant's authorized personnel will sign the necessary pages of the offer/estimated cost and submit the offer/estimated cost back to ETKO's office. The applicant will also submit an official document proving that the authority of the personnel who signed the quote/estimated cost is valid. This quote/estimated cost signed by the applicant's authorized personnel will be valid as a contract between ETKO and the applicant and will be considered an instruction to begin the certification process. GLOBALG.A.P. Payment of the control/audit and certification fee does not guarantee the issuance of the certificate.

After reviewing the documents, ETKO will determine the schedule for activities to be followed.

The first control date will be mutually determined by ETKO and the applicant. Periods and dates for surveillance visits will be determined by ETKO to ensure system suitability and maintenance of certification. Visit dates will be notified to the applicant by ETKO at least two weeks before the control.

2.1 Üreticinin GLOBALGAP Veri tabanı Kaydı

GLOBALG.A.P. Convention (GP 21 F 02) and GLOBALG.A.P. With the Sub-License and Certification Agreement (GP 23 F 04), certification rules, responsibilities of the producer/producer group and ETKO, certification processes, products of the producer, addresses and fee structure are clarified and signed between ETKO and the producer/producer group. (GP 21 F 02 and GP 23 F 04)

The applicant is always responsible for compliance with certification requirements, transmission of data updates to ETKO and compliance with GLOBALG.A.P. and GLOBALG.A.P. undertakes to comply with the payment of applicable fees determined by ETKO. After signing the Sublicense and Certification Agreement (GP 23 F 04), the existing or GLOBALG.A.P. a unique GLOBALG.A.P. identified in the database. All production sites that will be certified

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with the number (GGN) are GLOBALG.A.P. It is recorded in the database. GG_GR_Rules_for_CBs 6.1.a

During registration, the manufacturer defines the scope of the certification and completes the preparations for the audit in accordance with the scope. GG_GR_Rules_for_CBs 7.1

For GLOBALG.A.P certification, only producer groups or individual producers can apply to register their production processes. GG_GR_Rules_for_CBs 6.1.c

Product scope is linked to the location where that product is produced. Produce grown in an unregistered location will not be certified, and likewise uncertified produce grown in a registered location will not be certified. GG_GR_Rules_for_CBs 6.1.b

The registered producer is granted certificates and sublicenses for the production sites where the products are produced (and where they are packaged or processed) and for the declared products. GG_GR_Rules_for_CBs 6.1.d

Only the legal certificate holder (i.e. the legal entity specified in the certificate) can market products with reference to the GLOBALG.A.P certificate. Producer group members do not have legal certification. For this reason, the producer cannot market products on their own behalf based on the group certificate. All products sold, regardless of certification, will be recorded in the producer group mass balance system. GG_GR_Rules_for_CBs 6.1.e

ETKO and the producer agree to the terms of "notification", which includes ETKO's commitment to confirm receipt of the official application for (initial) registration within 28 calendar days. ETKO approval, GLOBALG.A.P. It contains a unique GLOBALG.A.P identification number (e.g. GGN, CoC Number) created by ETKO in its database systems. GG_GR_Rules_for_CBs 6.2.a

ETKO will create and disclose its detailed fee structure to potential customers and indicate the relevant GLOBALG.A.P system participation fee that ETKO pays to the GLOBALG.A.P Secretariat for each customer. GG_GR_Rules_for_CBs 6.2.b

ETKO asks whether a manufacturer has previously had a GLOBALG.A.P identification number and verifies the manufacturer's compliance with the transfer procedure between certification bodies. GG_GR_Rules_for_CBs 6.2.e

If a manufacturer wants to be transferred to ETKO from another certification body, ETKO must first check the status of this producer with GLOBALG.A.P. Verifies from the database system. GG_GR_Rules_for_CBs 6.2.f

If a manufacturer also receives services from a certification body other than ETKO, ETKO carries out its audits independently of the other certification body: GG_GR_Rules_for_CBs 6.2.g

* In case ETKO imposes a sanction on this manufacturer, it communicates with all certification bodies working with that manufacturer regarding the sanction and, when necessary, details of the actions to be taken in all certification bodies.

* Although it is the obligation of the manufacturer to forward a sanction to all certification bodies working with

that manufacturer, it can also be carried out by the GLOBALG.A.P Secretariat.

Producers will provide ETKO with data such as production location or product area information and inclusion/exclusion of members from a producer group during the application and for each change. GG_GR_Rules_for_CBs 6.2.h

ETKO records all information requested in the "GLOBALG.A.P data recording requirements" during database registration. GG_GR_Rules_for_CBs 6.2.1.a

ETKO ensures that all producer group members approved by the producer group QMS and included in the producer group internal registry are GLOBALG.A.P. It ensures that information is recorded individually in the database system in accordance with "GLOBALG.A.P data recording requirements" and that this information is always kept up to date. GG_GR_Rules_for_CBs 6.2.1.b

ETKO, GLOBALG.A.P. Database system, GLOBALG.A.P. It keeps the database system updated as described on its page (wiki.globalgap.org). GG_GR_Rules_for_CBs 6.2.1.c

3. Documents required by ETKO for Application Package Review

Following the conclusion of the contract, the applicant will prepare an "Application Package" for the production systems and processes and submit it to ETKO within two weeks.

Unless these documents and the copy of the contract are submitted to the ETKO office, it is not possible to make control planning.

The application package review includes the information provided in the Application Form and other documents submitted by the applicant. The purpose of this review is to determine the current status of the applicant's system and its level of compliance with the requirements and to estimate whether field checks will result in a certification at this stage.

At this stage, ETKO may request additional information for missing points or to clarify the data already submitted by the applicant. Following the examination, a report is prepared by ETKO and sent to the applicant. Prior to the site inspection, the applicant is expected to take corrective measures.

4. Content of the Application Package

- Latest internal audit reports and documents
- Name of the person filling out the application; the applicant's business name, address, and telephone number, and, if the applicant is an organization, the name, address, and telephone number of the person authorized to act on the applicant's behalf

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- Names of all certification bodies to which applications have been made before; years of application, the outcome of the applications, a copy of any notice of non-compliance or denial of certification issued to the applicant (EX: Cancellation), to be included when available, and a description of the actions taken by the applicant to correct the non-conformances and evidence of such correction
- Other information necessary to determine compliance with regulations (e.g. geographical coordinates).
- The Applicant must have documented policies and procedures to exclude agricultural products from sale if, according to the analysis results, residues higher than MRL limits or unlicensed product residues are detected in the product.

It must prepare the quality management system and production planning based on the criteria listed below and submit it to ETKO. According to these criteria, the manufacturer must conduct an internal audit on an annual basis and the results must be forwarded to ETKO.

All Farms Base

- Record keeping and internal control,
- Land management,
- Worker health, safety and welfare
- Waste and pollution management recycling and reuse
- Environmental Protection
- Complaints and Traceability

Product Base:

- Traceability
- Production Materials
- Site history and land management
- Soil management
- Fertilizer use
- Irrigation, aqueous fertilization
- Integrated combat
- Plant protection agents

Herbal Production Bases

- Production materials,
- Soil and substrate management
- Irrigation, Aqueous fertilization
- Harvest
- Processing of the product

Group Certification

- Group definition
- Management and structure
- Management and organization
- Personnel qualification and training
- Quality Handbook
- Document Control
- Records

- Evaluation of complaints
- Internal controls
- Product traceability and discrimination
- Sanctions and non-compliances
- Recall of certified product
- Subcontractors
- Internal controller and auditor

5. Field Control

Before the field control, the control plan prepared by the controller and approved by the control department manager will be sent to the applicant.

If the applicant objects to any of the appointed controllers, ETKO will formally notify its management with valid and objective evidence. If ETKO management finds the objection appropriate, the assigned controller will be replaced.

During the field check the applicant will:

- It will provide controllers with sufficient information proving that production processes comply with the relevant requirements.
- Provide access to facilities, records, personnel to enable controllers to verify that production systems and processes are maintained.
- Will collaboratively resolve nonconformance and initiate corrective action.

The operator/producer/producer organization will keep the updated documentation regarding the certification and send it to the controller during the inspection.

Initial site control will be carried out in accordance with ETKO procedures and will cover the following:

- An opening meeting with authorized personnel or management of the entrepreneur/producer/producer organization. Scope will be confirmed, reporting method and how to deal with nonconformities will be discussed. Responsible personnel of the entrepreneur/producer/producer organization will be present at the opening meeting. A site visit should be made after the meeting.
- All nonconformities and observations will be discussed with the entrepreneur/producer/producer organization.
- All findings will be reported to the entrepreneur/producer/producer organization at the closing meeting.
- A control report will be prepared and submitted to the entrepreneur/producer/producer organization.
- There may be producer organization projects in which producers with small production areas are members or partners. In this case, an internal control system is needed

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that conducts internal audits of manufacturers to prepare them for certification. The internal audit mechanism will also be audited within the framework of the relevant regulation.

5.1 Additional GLOBALGAP Requirements

ETKO audit is carried out annually. CB control covers:

GG_GR_Rules_for_CBs 7.1

- All registered products and production processes
- All registered production facilities
- All registered product processing units
- Administrative areas where relevant

ETKO audit content for both Option 2 and Option 1 scope is organized on a three-year cycle:

GG_GR_Rules_for_CBs 7.1

- First CB audit (for version 6): all requirements included in valid checklists (for QMS and farm audits)
- Subsequent UK audit (2nd year): operational elements identified in applicable checklists (for QMS and farm audits)
- Subsequent UK audit (3rd year): operational elements identified in applicable checklists (for QMS and farm audits)
- Re-certification audit: All requirements in the applicable checklists (for QMS and farm audits) in the same way as the first UK audit

Additionally, ETKO may conduct additional announced or unannounced inspections or on-site visits to investigate complaints.

GG_GR_Rules_for_CBs 7.1

The usual ETKO farm (for Option 1 individual producer without QMS) audit time for the GLOBALG.A.P IFA standard is between three and eight hours on site.

GR - Rules for plants scope 3.3.b

The minimum period of three hours applies to the simplest situations (a production facility, one or several products, simple machinery, a small number of workers, no product processing, subsequent ETKO farm inspection, well-organized documentation, etc.). This minimum period does not include preparation, travel and GRASP assessment.

GR - Rules for plants scope 3.3.c

ETKO farm inspection duration is a minimum of two hours per producer group member/production facility of the Option 2 producer group with QMS or the Multi-Field Option 1 Producer with QMS in simple cases. However, depending on the complexity of the farming situation, it may be determined to be shorter under certain circumstances.

GR - Rules for plants scope 3.3.d

Factors that will increase ETKO farm inspection time (for production facilities of both Option 2 producer group members and Option 1 individual producers) beyond a minimum of three hours include the following:

3.3.e

- * First farm inspection
- * Addition of new products during subsequent farm inspections
- * Addition of new locations during subsequent farm inspections
- * Having storage

- * Product transportation
- * Having different product types
- * Having different harvest types (harvest methods)
- * Having multiple areas and locations
- * Use of subcontractors

5.1.1 Single Field Producer and Multiple Field Producer Controls without QMS (Option 1):

GG_GR_Rules_for_Individual Producers 6 & GG_GR_Rules_for_CBs 7.2

Before the audit, the manufacturer completes its self-assessment and submits its evidence to ETKO, and ETKO audits are carried out as follows:

	First and Later Years in Certification
Producer Self-Assessment	1. Self-assessment of the entire scope (all registered products, sites and Product Processing Units) is carried out annually
CB Audit	1. First CB Audit: the entire scope (all registered products, sites and Product Processing Units) is inspected with notice. 2. Subsequent CB Audit: full scope (all registered products, sites and Product Processing Units); It is inspected annually with notice. However, depending on the risk situation, 10% can be inspected without notice.

5.1.1.1 Producer Self-Assessment

Self assessment;

- It will cover all registered production sites, products and processes within the scope of certification in order to verify compliance with the requirements defined in the applicable Principles and Criteria.
 - It will be carried out by the manufacturer or under the responsibility of the manufacturer.
 - It will be carried out annually and before ETKO audit.
- Completed Self-Assessment checklist;
- It will be kept on site at all times, ready for inspection.
 - Will include comments on observed evidence for all non-applicable and non-compliant Major Must and Minor Must Principles and Criteria. There is no need to comment on the recommendations, regardless of whether they are feasible or not.

5.1.1.2 ETKO Audit

These inspections (announced and unannounced) are performed by an ETKO auditor approved for the specific scope.

ETKO auditor performs the audit using the full checklist of the applicable scope(s).

ETKO audit covers all registered products and all production processes, all registered production sites, all

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registered product processing units and, where relevant, administrative facilities.

It is also checked that the checklist used by the manufacturer for self-assessment/internal audit is correct according to the scope of certification defined during the manufacturer's registration in the GLOBALGAP database.

GG_GA_Rules_for_CBs 7.1

5.1.1.2.1 Informed ETKO Inspection

The first CB audit of each producer and the subsequent CB audits carried out annually in the following years are carried out with notice.

5.1.1.2.2 Unannounced ETKO Inspection

A producer has a 10% chance of receiving an unannounced follow-up audit within the ETKO audit scope.

During registration, the producer may specify a maximum of 15 days for which he/she is not available for an unannounced ETKO inspection.

For unannounced inspection, ETKO informs the producer at most 48 hours (two business days) in advance. In the exceptional case where it is not possible for the producer to accept the proposed date (for medical or other justified reasons), the producer is given another chance to be informed about an unannounced ETKO inspection. Objective evidence of justification is maintained (e.g. medical documentation). If there is no justified reason, the manufacturer accepts the unannounced ETKO inspection or will be suspended. If the first proposed date is not accepted, a written warning will be given to the manufacturer, regardless of whether the rejection is justified or not. The producer receives another 48-hour notice for a new unannounced ETKO inspection. If this inspection cannot be carried out, all products will be suspended (i.e. the certificate will be suspended). The suspension is lifted following the unannounced ETKO inspection.

5.1.1.2.3 Off-site and on-site stages of ETKO Audit

ETKO may divide announced ETKO audits (both initial and subsequent audits) into two phases to be performed by the same ETKO auditor:

- Off-site phase: This phase includes the documents sent by the manufacturer to the ETKO auditor before the ETKO audit, such as self-assessment, risk assessments, necessary procedures regarding the Principles and Criteria, analysis program (frequency, parameters, locations), analysis reports, licenses, list of drugs used. (if applicable), list of plant protection products used (if applicable), evidence of laboratory accreditation, certificates or evaluation reports, subcontracting activities, plant protection product/fertilizer/medicine application records (if applicable), including animal health plan, etc. It consists of examining documents at a desk.

- The off-site phase is carried out a maximum of four weeks (28 days) before the on-site phase. Documentation; It can be supported by interviews and remote inspection of the site and facilities.

ETKO offers the Off-Site Audit Phase as an option to its customers. And the Off-Site Inspection Stage method is used only if mutual agreement is reached with the relevant manufacturer on the use of this stage. In this case, the ETKO Auditor determines a deadline for the producer to submit the documents that will be evaluated during the off-site audit phase and informs the producer. Using the Off-Site Audit Phase method does not cause a reduction in the overall duration of the ETKO audit, but allows more efficient use of on-site time. The duration of the on-field phase is never less than two hours.

The off-site phase is recorded in the audit checklist with adequate comments for specific principles and criteria. Comments are provided for all possible Major Musts and all non-compliant and non-applicable Minor Must policies and criteria.

The date, time and duration of each off-site inspection phase are recorded by the ETKO inspector and signed by the manufacturer or specifically confirmed by email.

The manufacturer has the right not to send certain requested documents to ETKO if they are considered confidential. In this case, the information will be available at the field stage.

The on-site phase is carried out after the off-site phase and consists of on-site inspection of the remaining content of the checklist, the production process, registered facilities/Product Processing Units and verification of previously reviewed information. The on-site phase includes, at a minimum, an audit of good agricultural practices and food safety requirements to determine compliance.

5.1.1.3 Initial and Subsequent CB Inspections

5.1.1.3.1 First CB Audit

This section;

- For manufacturers who want to obtain GLOBALG.A.P certification for the first time,
- For manufacturers who want to add a new product to the existing GLOBALG.A.P certification, and
- Applies to producers who change their status from producer group member to individual producer.

When a manufacturer switches from another certification body to ETKO, this is not considered an initial CB audit, but a subsequent audit.

Initial CB audits fulfill the following requirements:

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- ETKO audit is carried out after ETKO accepts the manufacturer's registration.
- Before the certificate is issued, the harvest activities of each product to be included in the certification within the scope of the certification and also the product handling activities, if included, are inspected. Field work other than this can be inspected at a different time if possible, but this is not mandatory. GG_GR_Rules_for_plants 3.1.1
- A product is included in the certification after all applicable Principles and Criteria have been inspected during the production process (i.e. it is not possible to certify a future production process). GG_GR_Rules_for_plants 3.1.1
- If the inspection is carried out before harvest, it will not be possible to inspect some Principles and Criteria. In this case, a follow-up audit is carried out and the certificate is not issued until all Principles and Criteria applicable to the manufacturer have been audited and all non-conformities have been closed. GG_GR_Rules_for_plants 3.1.1
- If the audit takes place after harvest, the producer must retain evidence of compliance with the Principles and Criteria for that harvest, otherwise it will not be possible to audit these Principles and Criteria and certification of those products cannot be made until the next harvest. GG_GR_Rules_for_plants 3.1.1
- In cases where harvest is excluded, the inspection is carried out at a time when the relevant agricultural activities are carried out. GG_GR_Rules_for_plants 3.1.1
- If the manufacturer requests certification for more than one product and not all of the products have the same seasonal timing, although all the requirements specified in this section are valid for the relevant products, the ETKO auditor must review all the Principles applicable to each product in these groupings before the product(s) can be added to the certificate. and Criteria, and harvesting and product processing processes are inspected on-site for at least one product in each product group. GG_GR_Rules_for_plants 3.1.1
- The producer will have records that will be verified during the audit process from the date of registration or at least three months before the first CB audit takes place, whichever is longer.
- Products harvested/processed before registration are not included in the certificate.
- Records regarding harvest or product processing prior to registration are not valid.

5.1.1.3.2 Subsequent CB Inspections

The entire certification scope is audited annually by ETKO before the certificate is issued.

If product handling is included in the scope of certification, product handling at the site(s)/facility(s) is inspected annually. This inspection is performed while the product processing process is running. A product processing audit is carried out every two years only if a risk assessment by ETKO is available which clearly shows that the risk is low. The risk assessment will take into account GLOBALG.A.P's relevant instructions for examining the product(s) processed and specific criteria, as well as any known food safety incidents related to the relevant product(s). ETKO records the justification for the selected ETKO audit schedule. This exception only applies to Option 1 individual producers without a QMS. GG_GR_Rules_for_plants 3.1.2

If product handling is excluded from the scope of certification, the inspection is carried out every two years during the harvest season. At least one registered product per product group in the relevant year is inspected on-site during the harvest season. Product groupings are made based on similarities in production and harvesting processes and their risks. ETKO keeps in writing the justification for the selected audit timing and product groupings used. GG_GR_Rules_for_plants 3.1.2

Product groupings are based on the following process descriptions: GG_GR_Rules_for_plants 3.1.2

- Mechanical harvest (In cases where this is the only harvesting method, there is no obligation to make observations during harvest. Only the records regarding the operation of the machine and the harvester are checked before or after harvest.)
- Manual harvesting of products not classified as high risk in the GLOBALG.A.P product list
- Manual harvesting of products classified as high risk in the GLOBALG.A.P product list
- Packaging on site

If the producer does not undertake to continue the certification for the next cycle, ETKO ensures that a certificate does not cover more than one harvest and cultivation cycle of the same product harvested annually, for example by using the method of shortening the validity of the certificate. ETKO may determine the deadline for reconfirmation according to the harvest period of the product. GG_GR_Rules_for_plants 3.1.2

In cases where there is more than one product following each other, during the inspection, interviews with the producers and workers, examination of documents and records, etc. The production process of all products included in the scope of certification, including The manufacturer will maintain evidence of compliance with the applicable Principles and Criteria for all registered products. In years where the inspection does not need to be carried out during the harvest season and when the products do not have the same seasonal timing, ETKO selects a date when the relevant agricultural activities can be observed on site at least one of the products. If the

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difference between harvest seasons of registered products is longer than four months or cannot be met during the extension of the certificate validity period, additional inspection is carried out for harvest-specific requirements.

GG_GR_Rules_for_plants 3.1.2

Subsequent CB Audit management is also applied to manufacturers who switch to ETKO from another certification body.

For the 10% of certified individual producers without a QMS, subsequent UK audits are carried out unannounced. Subsequent UK audits must be carried out four months before the original expiry date of the certificate and the validity period of the certificate within GLOBALG.A.P. In case of extension in the database system, it is carried out at any time when the relevant agricultural activities and/or processing (but not only storage) are carried out within the period up to four months after the original expiry date of the certificate.

GG_GR_Rules_for_plants 3.1.2

The timing of the audit is determined as a period during which it can be ensured that all registered products are used in accordance with the certification requirements, even if they are not available at the time of the audit. Whenever possible, inspections are not carried out out of season or when farming activities are at a minimum.

GG_GR_Rules_for_plants 3.1.2

A gap of at least six months is allowed between two subsequent inspections.

Subsequent UK audit ensures that the manufacturer complies with GLOBALG.A.P. It is performed after updating the record in the database system. The registration renewal process is completed before the date of the subsequent CB audit.

5.1.2 Option 2 producer groups and Multi-site Option 1 Producer Audits with QMS:

GG_GR_Rules_for_CBs 7.3

5.1.2.1 Notified UK QMS audits

GG_GR_Rules_for_CBs 7.3.1

The informed UK QMS audit follows the three-year cycle described in the "Annual Audit Plan" section of this procedure.

ETKO QMS audit includes a sampling of components (e.g. producer group members, production facilities, Product Processing Units, documents, records) to check compliance with the relevant standard and enable certification. All documentation, sites, personnel and operations declared by the producer group/multi-site producer to be relevant to the installation and management of the QMS as described in the "GLOBALG.A.P general regulations - Rules for multi-site producers and producer groups with a QMS" are audited.

The purpose of the ETKO QMS audit is to evaluate whether the implemented QMS ensures that all components of the system comply with the certification requirements defined by the applicable scope(s).

ETKO QMS audit consists of the QMS audit (including central Product Processing Units, if any) and the audit of a sample of registered producer group members/productions/processing facilities.

ETKO sends the audit plan to the QMS representative before the UK QMS audit.

ETKO QMS audit is carried out at the head office/administrative center of the producer group/multi-field producer and central Product Processing Units.

The ETKO QMS audit takes at least six to eight hours depending on the size of the producer group/multi-site producer and includes:

- Opening meeting with management
- Review of all relevant documents
- Evaluation of records
- Assessment of qualifications of internal QMS auditors and internal farm auditors
- Review of internal QMS audits and internal farm audits
- Review of traceability and mass balance requirements
- Interviews with relevant personnel
- Closing meeting, including explanation of nonconformities identified at the QMS level

As part of the ETKO QMS audit, the results of external and internal audits are compared to evaluate whether the applicant's internal controls are appropriate.

The closing meeting of the entire ETKO QMS audit is held only after the QMS, Product Processing Units and minimum member/field sample are audited. The entire QMS audit (including the audit of central Product processing Units and the audit of member/field samples) is completed within a maximum of one month. The final ETKO audit report includes all findings and final conclusions for the entire producer group/multi-site producer and is presented during the closing meeting. The QMS representative signs the report or confirms its content specifically by email. 28 days to close the detected non-conformities start from the date the report is approved.

The closing meeting date is the audit report date and GLOBALG.A.P. It is recorded in database systems as ETKO audit date. ETKO QMS auditor is present at the closing meeting.

5.1.2.2 ETKO QMS audit off-site and on-site stages

GG_GR_Rules_for_CBs 7.3.2

ETKO can divide the announced QMS audit into two stages: off-site phase and on-site phase. Both stages are carried out by the same ETKO QMS auditor.

The off-site phase occurs up to four weeks (28 days) before the on-site phase. The off-site phase consists of a desk-based review of the documents sent to ETKO by the QMS before the on-site phase. The ETKO Auditor sets a deadline for the QMS to submit documents to be audited off-site,

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which will trigger a 4-week period for the on-site phase to be carried out. This date will trigger the 4-week period to carry out the field phase.

Documents evaluated by ETKO at the off-site stage; for example, internal QMS audit and internal farm audit reports, internal register of approved members/premises, risk assessments, procedures, residue monitoring system documentation (frequency, parameters, sampling schedule), residue analysis reports, licenses, list of drugs used, plant protection used. It includes a list of its products, evidence of laboratory accreditation, certifications and internal reports on subcontracting activities. Documentation; It can be supported by interviews and remote inspection of the sites.

The off-site phase is recorded in the QMS checklist with adequate comments on the evidence examined.

The date, time and duration of the off-site and on-site phases of each ETKO QMS audit are recorded by the ETKO QMS auditor and signed by the manufacturer or specifically confirmed by e-mail.

The on-site phase is carried out after the off-site phase and consists of an on-site audit of the remaining content of the QMS checklist, as well as the information reviewed during the off-site phase and the way the QMS operates (e.g. internal audits, traceability, separation and mass balance, centralized Product Processing Units) during the on-site phase. consists of verification.

If nonconformities are detected during the ETKO audit process, the countdown to the deadline for closing them begins with the last closing meeting of the on-site phase, where the audit result is signed or specifically approved by the manufacturer by e-mail.

Using the off-site phase does not shorten the overall ETKO inspection time, but it does allow for more efficient use of on-site time. The duration of the on-field phase is never less than three hours.

5.1.2.3 ETKO inspection of members/sites and Product Processing Units GG_GR_Rules_for_CBs 7.3.3

5.1.2.3.1 Annual Initial Certification/Subsequent certification audits GG_GR_Rules_for_CBs 7.3.3.2

Members/field sampling and/or selection is done as stated in the table below:

	First Certification Audit	Subsequent Audits
Audits performed internally by multi-site producer/producer group with QMS		
Internal QMS Audit	Full QMS Audit	Full QMS Audit
Internal Farm Audit	Full coverage (all registered members/sites)	Full coverage (all registered members/sites and

	and product processing units)	product processing units)
ETKO Audit		
ETKO QMS Audit	Initial Certification Audit: (Full QMS Audit + Square Root of Registered Central Product Processing Units in Producer/Producer Group)(Performed before Farm Audit)	Recertification Audit: (Full QMS Audit + Square Root of Registered Central Product Processing Units in the Producer/Producer Group) (Performed annually and before the Farm Audit)
ETKO Unannounced QMS Audit	-	Recertification Audit: QMS audit is carried out unannounced to at least 10% of all multi-field producers/producer groups with QMS
ETKO Farm Inspection	Initial Certification Audit: Farm inspection is carried out on at least the square root of the total registered members/fields.	Recertification Audit: a) If there are non-conformities detected during the previous audit: the square root of the minimum number of registered current members/sites, b) If no non-conformities were detected during the previous inspection: the square root of the current registered members/sites minus the number of members/sites inspected in the previous surveillance inspection.
	ETKO surveillance audit during certificate validity: 50% of the square root of currently	ETKO surveillance audit during certificate validity: 50% of the square root of currently

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	certified members/sites	certified members/sites
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Note: If the certificate has taken more than 12 months to expire, ETKO applies the initial certification audit rules.

The purpose of the ETKO QMS audit is to evaluate whether the implemented QMS ensures that all components of the system comply with the certification requirements as defined by the applicable scope(s).

ETKO QMS Audit consists of two stages as follows:

- a) QMS Audit (including central product processing units, if any)
- b) Audit of registered producer group members/production/processing sites sampled as described in the table in this section

ETKO sends the audit plan to the QMS representative before the ETKO QMS audit.

ETKO QMS audit is carried out at the head office/administrative center and central product processing units of the multi-field producer/producer group with QMS.

The ETKO QMS audit takes at least six to eight hours, depending on the size of the multi-site producer/producer group with a QMS, and includes the following:

- Opening meeting with management
- Review of all relevant documents
- Evaluation of records
- Assessment of qualifications of internal QMS auditors and internal farm auditors
- Review of internal QMS audits and internal farm audits
- Review of traceability and mass balance requirements
- Interview with relevant personnel
- Closing meeting including the explanation of nonconformities detected at the QMS level

As part of the ETKO QMS audit, the results of external and internal audits are compared to evaluate whether the applicant's internal controls are appropriate.

The closing meeting of the entire ETKO QMS audit is held only after the QMS, Product Processing Units and producer group members/sites are audited. The entire QMS audit (including the audit of central product processing units and the audit of producer group members/sites) is completed within a maximum of one month. The final ETKO audit report includes all findings and final conclusions for all multi-site producers/producer groups with QMS and is presented during the closing meeting. The QMS representative signs the report or confirms its contents with an e-mail. 28 days are counted from this date to close the detected nonconformities.

The closing meeting date is the audit report date and is recorded in GLOBALG.A.P IT systems as the ETKO audit date. ETKO QMS auditor is present at the closing meeting.

The selection of members/sites to be audited is carried out by ETKO during the ETKO QMS audit (in-field audit) using criteria defined in a risk-based sampling procedure based on the structure of the multi-field producer/producer group with QMS and notified to the QMS representative. The members/fields selected to be audited are notified to the QMS representative 48 hours (two business days) before the audit of the relevant member/field.

ETKO may increase the total number of registered members/sites sampled when necessary. The multi-site producer/producer group with a QMS has the right to appeal such a decision. Justifiable reasons for the increase will be any of the following:

- Failure to comply with significant QMS and/or product handling requirements affecting compliance of members/sites.
- Customer complaints, for example detection of pesticide residue above the legal limit
- Significant inconsistencies between internal audit reports and ETKO audit findings
- Possible need to determine whether findings at the farm level are structural.
- Number of products
- Types of activities in the field

Producers for plants according to the production type within the relevant scope; They are classified as greenhouse, open field production or perennial plants.

The minimum sample size is determined as the square root of the number of registered producers for each scope and production type. If there is a decimal place, the square root is rounded to the next whole number. During the ETKO audit of each of the selected members/sites, all registered products are inspected.

Audit of members/fields selected by sampling; It includes all scopes in which members/sites are registered, all production types, and all registered products produced by members/sites.

ETKO inspections of members/sites with more than one production type or scope are counted as one ETKO inspection for each scope or production type.

Risk factors, new manufacturers and random selection method are taken into account in the selection. Factors to be included in sampling for initial or subsequent audits include high operating risk, specific situation of the producer group member, number of products, previous certification body audit results, multi-site manufacturers with QMS, complaint records, differences in facility size, differences in shift patterns, final certification changes since inspection, environmental issues or variability, differences in language or cultural practices at sites, and geographic distribution. Producers who move from one producer group to another are more likely to be included

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in the sample of producer group members selected by ETKO.

If a producer group member operates a multi-site facility with a QMS, this will be merged with the producer group's central QMS, as there will be only one QMS for the producer group. In this case, the member of the producer group (legal entity) with multiple sites is taken into account when calculating the sample size, not the number of sites. If a producer group member is selected as part of the sampling, ETKO audits the square root of that member's field count during the ETKO audit. However, during the internal farm audit, all fields of the producer group member will be inspected.

5.1.2.3.1.1 Initial Inspection

Before the certificate is issued, the entire scope of certification, the harvesting activities of each product to be included in the certification, as well as the product handling activities, if included, are inspected. Field work other than this can be inspected at a different time if possible, but this is not mandatory. GG_GR_Rules_for_plants 3.1.1

A product is included in the certification after all applicable Principles and Criteria have been inspected during the production process (i.e. it is not possible to certify a future production process). GG_GR_Rules_for_plants 3.1.1

If the inspection is carried out before harvest, it will not be possible to inspect some Principles and Criteria. In this case, a follow-up audit is carried out and the certificate is not issued until all Principles and Criteria applicable to the manufacturer have been audited and all non-conformities have been closed. GG_GR_Rules_for_plants 3.1.1

If the audit takes place after harvest, the producer must retain evidence of compliance with the Principles and Criteria for that harvest, otherwise it will not be possible to audit these Principles and Criteria and certification of those products cannot be made until the next harvest. GG_GR_Rules_for_plants 3.1.1

In cases where harvest is excluded, the inspection is carried out at a time when the relevant agricultural activities are carried out. GG_GR_Rules_for_plants 3.1.1

If the manufacturer requests certification for more than one product and not all of the products have the same seasonal timing, although all the requirements specified in this section are valid for the relevant products, the ETKO auditor must review all Principles and Principles applicable to each product in these groupings before the product(s) can be added to the certificate. It inspects the criteria and harvesting and product processing processes are inspected on-site for at least one product in each product group. GG_GR_Rules_for_plants 3.1.1

5.1.2.3.1.2 Subsequent Inspection

If product handling is excluded from the scope of certification, the inspection is carried out every two years during the harvest season. At least one registered product

per product group in the relevant year is inspected on-site during the harvest season. Product groupings are made based on similarities in production and harvesting processes and their risks. ETKO keeps in writing the justification for the selected audit timing and product groupings used. GG_GR_Rules_for_plants 3.1.2

Product groupings are based on the following process descriptions: GG_GR_Rules_for_plants 3.1.2

- Mechanical harvest (In cases where this is the only harvesting method, there is no obligation to make observations during harvest. Only the records regarding the operation of the machine and the harvester are checked before or after harvest.)
- Manual harvesting of products not classified as high risk in the GLOBALG.A.P product list
- Manual harvesting of products classified as high risk in the GLOBALG.A.P product list
- Packaging on site

If the producer does not undertake to continue the certification for the next cycle, ETKO ensures that a certificate does not cover more than one harvest and cultivation cycle of the same product harvested annually, for example by using the method of shortening the validity of the certificate. ETKO may determine the deadline for reconfirmation according to the harvest period of the product. GG_GR_Rules_for_plants 3.1.2

In cases where there is more than one product following each other, during the inspection, interviews with the producers and workers, examination of documents and records, etc. The production process of all products included in the scope of certification, including The manufacturer will maintain evidence of compliance with the applicable Principles and Criteria for all registered products. In years where the inspection does not need to be carried out during the harvest season and when the products do not have the same seasonal timing, ETKO selects a date when the relevant agricultural activities can be observed on site at least one of the products. If the difference between harvest seasons of registered products is longer than four months or cannot be met during the extension of the certificate validity period, additional inspection is carried out for harvest-specific requirements. GG_GR_Rules_for_plants 3.1.2

Subsequent UK audits must be carried out four months before the original expiry date of the certificate and the validity period of the certificate within GLOBALG.A.P. In case of extension in the database system, it is carried out at any time when the relevant agricultural activities and/or processing (but not only storage) are carried out within the period up to four months after the original expiry date of the certificate. GG_GR_Rules_for_plants 3.1.2

The timing of the audit is determined as a period during which it can be ensured that all registered products are used in accordance with the certification requirements,

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even if they are not available at the time of the audit. Whenever possible, inspections are not carried out out of season or when farming activities are at a minimum.

GG_GR_Rules_for_plants 3.1.2

5.1.2.3.2 ETKO surveillance audit during the Certificate Validity Process GG_GR_Rules_for_CBs 7.3.3.3

Certification/Recertification audits and ETKO surveillance audits are carried out in two separate visits, at least 30 days apart from each other.

ETKO surveillance audits are carried out at least half the square root of the actual number of certified members/sites.

In all cases, the members/sites selected for auditing are notified to the QMS representative 48 hours (two business days) before the audit of the relevant member/site.

5.1.2.4 ETKO inspection of Product Processing Units (producer group / multi-site producer with QMS) GG_GR_Rules_for_CBs 7.3.4

ETKO audits centralized product processing units (i.e. where multiple members/sites use the same product processing unit) using the combined QMS and product processing checklist provided by GLOBALG.A.P.

At least the square root of the number of central product processing units in the period in which production is carried out is inspected annually.

In cases where product processing is carried out not centrally but at the production sites of each producer group member, this factor is taken into account when determining the sample of the producer group members to be inspected. In this case, ETKO uses the farm inspection checklist, including product handling requirements applicable to each member of the producer group being inspected.

During internal audits, each product processing unit will be inspected.

5.1.3 Unannounced ETKO Audit GG_GR_Rules_for_CBs 7.4

During subsequent ETKO audits, at least 10% of all certificate holders certified by ETKO are audited unannounced.

The choice of the 10% rate will not only take into account total numbers, but also geography, legislation (where several jurisdictions are covered by ETKO), crop type, compliance history etc. It will also be based on possible risks and factors such as.

The 10% rate is calculated over a 12-month period. The number of unannounced ETKO audits per 12-month period reflects 10% of the total certificates issued, with and without QMS.

All countries within the scope of ETKO's certification are included in the selection of the 10% rate.

At least one unannounced ETKO audit is conducted per year per scope and option (with and without QMS).

In case of having only one Option 2/Option 1 manufacturer with QMS; An unannounced ETKO QMS audit is carried out at least every two years.

Notification of an unannounced ETKO inspection does not exceed 48 hours (two business days). In the exceptional case where it is not possible for the certificate holder to accept the proposed date (for medical or other justified reasons), the certificate holder is given another chance to be informed about an unannounced ETKO audit. Objective evidence of the justification is maintained in the file (for example, a medical document).

In cases where there is no evidence showing justification, the producer will be suspended if he does not accept the unannounced ETKO inspection. If the first proposed date is not accepted, a written warning will be given to the manufacturer, regardless of whether the rejection is justified or not. The producer receives another 48-hour notice for a new unannounced ETKO inspection. If this inspection cannot be carried out, all products (i.e. the certificate) will be suspended. The hanger is removed when an unannounced ETKO inspection is carried out.

During registration, the certificate holder may indicate a 15-day period during which he/she will not be available for an unannounced ETKO audit.

5.1.4 Harvest Exclusion GG_GR_Rules_for_plants 2.2

If the product is sold in the field before harvest and the buyer is responsible for the harvest, the principles and criteria regarding the harvest are excluded from the scope of certification.

In all cases where the product belongs to the producer, whether the harvest is carried out by the producer or by outsourcing, all principles and criteria regarding harvest are included in the scope of ETKO audit and certification.

“Harvest exclusion” applies when the product no longer belongs to the producer before the start of harvest and the producer has no control over the harvesting process. This exception does not apply if the harvest is outsourced to another legal entity by the producer.

The producer will apply for harvest exemption per product with detailed justification during registration.

ETKO excludes the harvesting process only if there is a contract between the producer and the buyer stating that the legal entity/buyer undertaking the harvest will do all of the following:

- Taking ownership of the product before harvest
- Assuming responsibility for ensuring that harvesting occurs only after the pre-harvest interval is observed.
- Processing of the product after harvest (not only during harvest)
- Purchasing the entire product (If the producer harvests a certain part of the product and sells

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another part before harvest, “harvest exclusion” is not possible)

If the producer does not recognize the recipient at the time of registration with GLOBALG.A.P, the following shall be provided:

- Declaration of the producer to inform the legal entity/buyer who will carry out the harvest of the pre-harvest interval
- Signing the contract specified in this section with the buyer as soon as the legal entity/buyer that will carry out the harvest is determined.

If harvesting is excluded for a product, product processing is also excluded for that product.

5.1.5 Post-Harvest Product Handling Exclusion GG_GR_Rules_for_plants 2.3

Product processing includes any post-harvest handling of products such as storage, chemical treatment, pruning, washing, or other operations in which the harvested product may be in physical contact with other materials or substances. Details of specific processes for each product are included in the checklist notes.

If the product is waiting to be collected at the collection point on the farm during the day, this is not considered storage. If the product is stored overnight or longer, this is considered storage and the relevant requirements apply.

If product processing does not take place on the property of the manufacturer, this is declared per product during registration and indicated in the certificate.

When harvest is excluded, the post-harvest product processing part is not automatically excluded.

The post-harvest product handling portion is also included in the harvest exclusion if the product was owned by the producer at the time of processing, unless there is written evidence that the producer had no control over packaging/handling/storage/labeling, the product was not returned to the producer, and the producer is no longer responsible for the product.

If the product processing unit already has a post-farm food safety certificate recognized by GFSI (www.mygfsi.com) for the scope of BII “Agriculture of grains and legumes” and/or BIII “Pre-processing operations of plant products”, the ETKO auditor will, if possible, carry out post-harvest operations as well as The sequence controls separation and traceability as a minimum. If the Product Processing Unit is covered by a PHA certification (e.g. subcontracted Product Processing Unit), the IFA Principles and Criteria for product processing are considered covered. The Product Processing Unit is included in the IFA certification annex without further monitoring of traceability or post-harvest handling requirements.

If a producer processes products not on the farm but in the product processing unit of another producer with GLOBALG.A.P certification, ETKO accepts the certificate issued by the other certification body.

ETKO audit report includes the following:

- All data fields marked as required in the GLOBALGAP Online Audit Hub (previous audit notes)
- Scope of audit: Company, field, product processing unit and product information according to GLOBALG.A.P registration data requirements
- Calculation of the total applicable Major Must, Minor Must and Recommendation Principles and Criteria and the percentage of compliance achieved for each level
- List of non-compliances, non-conformities and follow-up actions agreed with the manufacturer (including relevant Principles and Criteria, details of findings based on objective evidence, deadline for corrective action, reference to objective evidence for the implementation of corrective action, evaluation results of corrective action (open/closed) and (contains relevant dates of activities and a description of the corrective action agreed with the manufacturer)
- Conclusion on whether the manufacturer is compliant or not

Whenever possible, GLOBALG.A.P. It will use the audit report template published by database systems.

The audit report forms the basis for the decision on issuing a certificate.

A fully completed audit checklist includes all applicable Principles and Criteria, required comments, findings, and objective evidence of the implementation of corrections and/or corrective actions.

All production facilities of the Option 1 multi-site manufacturer without QMS, where its registered products are produced, are inspected before the certificate is issued.

In this case, even if a separate checklist is used for each manufacturer, it includes all registered facilities and the results are combined and reported in a single checklist that summarizes the result for all legal entities (manufacturers).

If Option 1 with QMS is for a multi-site producer or producer group, a checklist is completed for the QMS and per sampled member/site/product handling unit and the result is not summarized but reported separately for each member/site, product handling unit and QMS. The result for each member/field is approved by the member/field/product processing unit manager by signing the checklist or a report containing the date and duration.

In both cases, upon complete completion of the ETKO audit process, a full written ETKO report is prepared, summarizing the audit activity undertaken, providing objective evidence and information on how the manufacturer complies with the requirements of the standard, and listing any identified non-compliances

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and/or non-conformities, if any.

The individual producer or producer group representative signs or approves the report during the closing meeting, which includes the ETKO audit result, the name of the ETKO auditor, the scope of the ETKO audit, the inspected sites, the producer group members, facilities, the percentage of compliance for different Principles and Criteria levels, and the findings. Documentary or electronic confirmation from the manufacturer is considered equivalent to the manufacturer's signature. In case of a digital signature, it will be a real and valid signature. (i.e. .JPG images are not considered valid signatures).

Additionally, if requested by the manufacturer, ETKO will submit the complete inspection report, including the completed inspection checklist, within five business days after the certification decision, after ETKO's internal technical review. Externally distributed reports (e.g., audit report, corrective action report) and completed audit checklist are set to be write-protected or otherwise protected prior to distribution to prevent unauthorized modification or tampering. GLOBALG.A.P. automatically generated audit report (including checklist) This report is used when it can be obtained from database systems.

When required by the GLOBALG.A.P Secretariat, ETKO audit report and completed audit checklist are available at GLOBALG.A.P. It is uploaded to database systems.

Complaints or objections can be made in accordance with the complaint procedure shared by ETKO on its website. If ETKO does not address the complaint or objection and/or does not take the necessary actions regarding the issue, the complaint can be forwarded to the GLOBALG.A.P Secretariat using the GLOBALG.A.P incident/complaint form available on the GLOBALG.A.P website (www.globalgap.org).

6. Laboratory Analysis

During the control, the controller may take samples to be sent to a laboratory accredited according to the ISO 17025 standard for analysis in cases where he suspects that production techniques or inputs that do not comply with the provisions of the regulation are used.

7. Review of the Audit File

After the field control, a control report is prepared. If additional information and documents regarding the control obtained from the entrepreneur/producer/producer organization have been made separately, the audit file is prepared together with the analysis results and delivered to the certifier for review. The audit file is reviewed by the certifier.

Certificate:

- Retrieves the control file from the controller
- Checks the content of the file and detects any deficiencies

and requests them from the relevant controller

-Fills out the Certification Decision Form, and a certification decision is taken after completing the deficiencies specified here.

8. Corrective Actions

The maximum time allowed to take and verify corrective actions for major and minor nonconformities is 28 days and this must be verified by ETKO.

In GLOBALGAP, if corrective actions are not delivered to ETKO within 28 days from the audit date for new applications, an "open non-conformity" situation is determined in the database and if the cause of the open non-conformity is not resolved within three (3) months, a full audit is carried out before the document is issued. If the corrective actions are not delivered to ETKO within 28 days as of the audit date of the certified entrepreneur/producer/producer organization, the certificate is suspended, and if the cause of the non-conformity is not resolved within 12 months as of the suspension date, the certificate is cancelled.

Nonconformity detected in GLOBALGAP; This period can be shortened if it is critical for worker, environmental and consumer safety. Where a serious threat to food safety, employee safety, the environment, consumers and/or product integrity exists (e.g. the sale of non-certified products as certified), certification will be suspended immediately and this will be communicated with a formal warning letter.

In cases where corrective action plans are approved by ETKO, their implementation is verified at the next control visit.

In case of renewal of certification, costs will be charged based on the control fees valid at that time.

9. Certification Decision

ETKO issues it within 28 calendar days at the latest after the non-conformity is closed within the scope of GLOBALGAP, and in cases where the non-conformity is not detected within 28 days at the latest after the end of the inspection/audit. A certification certificate is issued in accordance with Annex 1.3 within the scope of GLOBALGAP on behalf of the agricultural product, entrepreneur or producer or producer organization whose compliance with the regulation is determined as a result of the control activities.

The validity period of the certification is 12 months and the applicable standards / regulations are also taken into account. Annual control is a requirement for the continuation of the validity of the certification, and if this

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chain is broken due to interruption of the control, the products/areas produced during the production period when the control is not carried out may lose their status. Any major non-conformity detected in GLOBALGAP for any reason during the validity period may result in the suspension of the Certification.

ETKO informs the entrepreneur in writing of its decision not to grant the certification of any entrepreneur/producer/producer organization, together with the reasons. If the entrepreneur/producer/producer organization expresses its desire to continue the certification process, ETKO restarts the evaluation process.

9.1 GLOBALGAP Certificate Validity Extension GG_GR_Rules_for_CBs 8.4

The validity period of the certificate can only be extended for a maximum of 4 months beyond the usual 12 months if there is a valid reason. There is no extension of validity for certificates whose validity period has expired.

Before the extension is granted, ETKO will have a signed, complete application form and a signed certification agreement for subsequent certification.

Note: If ETKO or the manufacturer wishes to extend the validity of a certificate, ETKO obtains confirmation from the manufacturer of the request for extension and a clear written statement that this action cannot be changed in the BK during this certification process.

After the extension begins, the entire GLOBALG.A.P system participation fee for the next certificate will be paid to ETKO by the producer.

In case of certificate extension, the full GLOBALG.A.P system participation fee will be paid for the next certificate. During the extension period, the producer is inspected again. The manufacturer cannot switch to another certification body during the certification process following the certificate for which the extension is granted.

10. Logo ve Sertifika Kullanımı

ETKO Logo can be used on certified products, the use of the GLOBALGAP logo is subject to the rules specified in the general regulation section I ANNEX I.1.

A guidance document defining the rules to be followed in the use of the certificate and logo is published on the ETKO website. The entrepreneur/producer/producer organization will send their logo samples to ETKO for approval before use. Additionally, ETKO will control how the logo is used at its own discretion and during surveillance visits.

In case of incorrect use of the logo, non-conformity is brought to the agenda and the entrepreneur/manufacturer/producer organization is requested to take corrective actions. Such non-compliance may result in suspension or withdrawal of certification.

11. Maintaining Certification Approval

Maintaining the certificate depends on whether the entrepreneur/producer/producer organization complies with the relevant requirements of the standards and legal documents. ETKO will ensure compliance with the planned surveillance visit.

The surveillance visit is planned by December 31 of each year at the latest and is notified to the entrepreneur/producer/producer organization weeks before its implementation.

12 GRASP GRASP_general_rules

12.1 GRASP Application Options

GRASP only applies to producers with a valid certificate according to the Integrated Farm Assurance for fruit and vegetables.

Additionally, for any GRASP application, evidence is provided that the criteria for the health, safety and welfare of employees have been verified.

In order to receive a letter of compliance, a full compliance result must be obtained in this category.

GRASP does not apply if the producer does not employ any type of workers during the certification cycle or during the year before the assessment. But:

- GRASP is valid for family farms with no workers hired during the certification cycle or during the year before the assessment. A letter of compliance is issued if the family farm achieves the required level of compliance and evidence of full compliance with the health, safety and welfare of employees criteria.
 - Family farms are evaluated for the availability of hired labor and selected Principles and Criteria from the GRASP checklist.
- Facilities of multi-site producers (Option 1) and producer group members (Option 2) that do not employ workers are considered in internal and external GRASP QMS audits and are visited by the auditor to assess the shortage of hired labor. These manufacturers will also provide evidence of full compliance with workers' health, safety and welfare criteria.

12.1.1 GRASP for product handling units

It is not possible to evaluate only the product processing units or the producer group's own production areas. GRASP applies to product processing units only if the product processing is covered by GLOBALG.A.P.

In such a case, Product Processing Units and/or the producer group's own production facilities/sites are included in the GRASP assessment as another

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member/facility and are evaluated in addition to the producer group members/production sites. Product Processing Units will also provide evidence of full compliance with workers' welfare criteria.

12.1.2 GRASP Application to labor subcontractors, other subcontractors and visitors

GRASP applies to all subcontractors who provide farm labor (including farm labor and equipment, farm labor and material, or some combination of farm labor, material, and equipment) for primary farm activities of agricultural production at produce processing units or production sites. These workers/agricultural workers are included in the GRASP assessment. The term "primary farm activities" refers to activities directly related to the production of the product (for example, including pruning of fruit trees but excluding farm barn construction).

The producer will inform ETKO about subcontracted labor activities during registration. The producer shall ensure that the labor subcontractor or employment agency complies with GRASP requirements.

Other subcontractors may not be included in the GRASP evaluation unless the auditor identifies a risk of GRASP integrity issues.

For outsourced activities that require the presence of visitors or subcontracted personnel on the farm, ETKO checks whether the producer declares a zero tolerance policy for non-compliance with human rights and local laws (GRASP human rights policy) during the presence of subcontracted personnel on the farm.

12.2 GRASP Requirements of Individual Producers and Producer Groups

Any GRASP applicant shall comply with GLOBALG.A.P general regulations regarding individual/producer group requirements.

12.3 GRASP Registration Process

The GRASP registration process will comply with the GLOBALG.A.P general regulations and additional rules. Moreover;

It will be ensured that the product to be registered for certification by ETKO is not registered under another certification body;

- Ensure that the same product is not registered under more than one Option (as an individual producer and producer group member)
- Ensure that production facilities in different countries are not registered (unless an exception is granted by the GLOBALG.A.P Secretariat for the relevant case)

The applicant will register for GRASP on the same CB as the primary production standard.

GRASP only applies to producers with a valid certificate according to Integrated Farm Assurance for fruit and vegetables.

If the applicant is registered with ETKO for Integrated Farm Assurance certification for fruits and vegetables, he/she will also be registered for GRASP certification.

The applicant shall provide information by gender on the number of workers in the year prior to registration and the type of workers (permanent, seasonal, etc.) recruited in the previous evaluation period.

The applicant shall state whether the subcontracted worker has been employed and, if so, the number of workers employed in this condition in the year preceding registration.

The applicant shall indicate whether the farm is operated as a family farm (operated as a nuclear family business) and indicate the number of family members working and the family relationships of the group.

A multi-site producer/producer group applicant with a QMS shall indicate the total number of producer group members/production facilities and how many of them are with and without workers.

12.4 GRASP Audit Process

In addition to the latest GLOBALG.A.P general regulations and GLOBALG.A.P general plug-in rules, the GRASP-specific rules and instructions set out in this section provided in the applicable supporting documentation for GRASP apply.

12.4.1 GRASP Self-assessments/Internal Farm Audits

For all producers, GRASP self-assessment or internal farm audit, respectively covering product processing units, is mandatory as specified in the GLOBALG.A.P general regulations. In both cases, verification of full compliance with the criteria for the health, safety and welfare of employees will be noted in the report.

Each self-assessment or internal farm audit will be carried out as specified in the GLOBALG.A.P general regulations.

To ensure appropriate auditing of all Principles and Criteria for all applicable sites/producers, self-assessment/internal farm auditing is carried out where the number of workers available is representative of the workforce hired during the year/production cycle (particularly subcontracted and seasonal labour) and where agricultural activities take place (e.g. It will be carried out during a period (peak period or harvest period).

Country risk level will be checked and adhered to to determine the necessary evidence methods to be used in internal farm auditing. Interviews will be conducted (where necessary) and cross-checked through document review. Information on this subject will be included in the summary reports. This rule does not apply to self-assessments under Option 1 and Option 1 multi-site generator without QMS.

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For each Principle and Criteria assessed in all GRASP self-assessments/internal farm audits, clarifications and comments on all non-compliant Major Musts and Minor Musts will be provided. Summary reports will provide objective evidence (e.g., worker interviews where appropriate) and information regarding how the manufacturer complies with GRASP requirements and list any non-compliances and/or nonconformances identified. Which document(s) were sampled, which workers were interviewed, etc. Comments and evidence such as these will be site and product specific and will be included in the checklist.

12.4.2 ETKO GRASP Audit

ETKO GRASP Audit is carried out by personnel who meet the requirements defined in the GLOBALG.A.P general regulations and this document and are authorized by ETKO as GRASP Assessors.

The GRASP assessment is carried out in conjunction with the Integrated Farm Assurance audit and QMS audit for fruit and vegetables.

GRASP assessment is carried out by ETKO only for producers whose Integrated Farm Assurance audit and QMS audit for fruits and vegetables are carried out by ETKO.

GRASP compliance letter is issued only after the manufacturer provides the necessary information and documents regarding the findings as a result of the GRASP evaluation, showing full compliance with all Principles and Criteria regarding the health, safety and welfare of workers, and after their verification by ETKO.

ETKO GRASP Assessor uses the GRASP checklist for Option 1, Option 2 and family farms, available in GLOBALG.A.P IT systems.

ETKO GRASP Assessor checks the country risk level and determines the necessary evidence methods before making the assessment. Additionally, the ETKO GRASP Assessor checks and records the number of workers (by employment, immigration status and gender) present on the farm visited on the day of the assessment. The ETKO GRASP Assessor applies the correct sample size for document review and, where appropriate, the sample size for interviews.

Due to the social nature of GRASP, explanations and comments are provided in all cases (Yes/No) for each Principle and Criteria evaluated in all ETKO audits. Clarifications and comments (e.g. which document is/is sampled) are added to the checklist to be site specific and demonstrate that all Principles and Criteria have been appropriately assessed.

A full written summary of the evaluation activity performed is provided by ETKO. This provides objective evidence and information on how the manufacturer complies with GRASP requirements and, where applicable,

lists any non-compliances and/or non-conformities identified. Comments and evidence, such as which document(s) were sampled, which workers were interviewed, are site and product specific and are included in the checklist to ensure that all Principles and Criteria are appropriately audited for all applicable production facilities, product processing units and products.

"Company description" in Audit Online Hub provides information about the company, its organizational structure; location of production facilities, product processing units and office (main office/human resources); and different operating seasons or recruiting activity/surge windows, etc., where applicable. It will contain qualitative information.

Ent Farm Assurance QMS Checklist is used during ETKO GRASP QMS audit. Comments (Yes/No) regarding GRASP compliance are always included for each applicable Policy and Criteria. If any Principles & Criteria are deemed not to apply to GRASP, the full justification for the inapplicability will be stated.

The names and personal data of responsible persons or other employees are not specified in any comments on the GRASP checklist. Instead, initials/other abbreviations or internal codes/numbers determined by the worker's position or the manufacturer/company are used.

Other personal data of employees (e.g. contract, time records, paychecks) will be accessible to the ETKO GRASP Assessor and will be provided by the employer. The document prepared on the protection of personal data can be used by the employer in order to provide appropriate data and ensure transparency. If the workers need and request, the employer will communicate this to the workers.

Where the GRASP National Interpretation Guide for Turkey is available, ETKO uses it by applying the rule that provides greater protection to workers. If GRASP provides greater protection, it overrides local law, and if local law provides greater protection, it overrides the GRASP Principles and Criteria. The inclusion of a topic in the National Interpretation Guide does not enable changes to the GRASP Principles and Criteria.

12.4.2.1 ETKO Inspection of Labor Subcontractors

ETKO evaluates the subcontracted worker's compliance with the GRASP Principles and Criteria as part of the manufacturer's responsibility and liability during the GRASP evaluation of the manufacturer.

The manufacturer is responsible for providing ETKO with evidence of GRASP compliance of its labor subcontractors. ETKO reports a non-compliance for the relevant Principle and Criterion if compliance cannot be verified due to the subcontractor's lack of necessary evidence (e.g. lack of documentation or lack of access to evidence).

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ETKO may visit an office/production site at the labor subcontractor's facilities if deemed necessary. Labor subcontractors, through their commercial agreement with the manufacturer, will accept that GLOBALG.A.P approved certification bodies allow a physical certification body audit within the scope of GRASP in case of doubt. It is the manufacturer's responsibility to add this clause to the agreement signed with labor subcontractors.

Any non-compliance revealed during the evaluation of subcontracted labor activities is recorded as non-conformance of the manufacturer. These non-conformities are subject to corrective actions in accordance with GLOBALG.A.P general regulations. The manufacturer will provide evidence to the ETKO GRASP Assessor that the nonconformity has been corrected. If corrections have not been made by the subcontractor, the manufacturer will have evidence that a warning was given and/or the commercial relationship was terminated after the subcontractor did not respond.

ETKO will notify you of an additional non-compliance with the criteria related to the self-assessment/internal QMS audit if the subcontractor's non-compliance is noted in the internal QMS audit or self-assessment, but no correction is requested. Any request for correction of a subcontractor's non-compliance in an internal QMS audit or self-assessment shall be made in writing, and if the requested corrections are not followed up until evidence of correction is received, the manufacturer will also be deemed non-compliant.

If the labor subcontractor has official and up-to-date social audit/compliance evidence valid for the same scope of GLOBALG.A.P certification, including the service they provided to the manufacturer, the ETKO GRASP Assessor may consider the labor subcontractor's compliance to be verified. Evidence of subcontractor audit/compliance may be provided in the form of group level verification to each producer group member included in the external evaluation or to group members who have signed a commercial contract with the producer group.

In all agency work evaluations, the assessor will include explanations in each Principle and Criteria of the checklist.

12.4.2.2 Duty to communicate with subcontractors or other visitors on the farm

Visitors and subcontractors other than labor subcontractors are not within the scope of GRASP and are not evaluated.

The manufacturer is responsible for informing visitors entering and visiting subcontractors of a GRASP-registered manufacturer's premises that non-compliance with the manufacturer's human rights policy will not be tolerated. The producer shall provide ETKO with evidence of both of the following:

- Evidence that all visiting visitors and subcontractors have been informed by the manufacturer about the manufacturer's zero tolerance policy regarding human rights and local law violations;
- Evidence that if violations are detected on the farm, the producer requests the immediate cessation of activity at its facilities.

Lack of evidence of communication or evidence of a request for immediate cessation of activity is noted in the GRASP checklist as failure to comply with the duty to communicate the human rights policy to subcontractors.

12.4.2.3 Option 1 Evaluation of Individual Producers Without QMS

The results of self-assessments/corrections are verified during the ETKO GRASP Assessment. Internally, each production site will be evaluated.

ETKO follows the GLOBALG.A.P general regulations regarding audit processes for initial and subsequent evaluations, which are also defined in this procedure. In order to facilitate worker interviews, the timing of the evaluation is determined taking into account the availability of workers on the day of the evaluation and the availability/accessibility of the workers' representative on the day of the evaluation. Only if none of the workers are present will the evaluation be rescheduled.

	Early and Subsequent Years
Producer self-assessment	The entire scope (all registered products, production facilities and product processing units registered under the Integrated Farm Assurance for fruits and vegetables) is assessed annually
ETKO GRASP Evaluation	Initial Assessment: Informed evaluation of the entire scope (all registered products, production facilities and product processing units registered under the Integrated Farm Assurance for fruits and vegetables)
	Subsequent Evaluation: Annually announced evaluation including the entire scope (all registered products, production facilities and product processing units registered within the scope of Integrated Farm Assurance for fruits and vegetables) and 10% unannounced evaluation probability (Producer ETKO's 10% of GLOBALGAP customers may be selected within the scope of the unannounced GRAPS Evaluation.)

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ETKO carries out GRASP evaluation of production sites and sampled central product processing units (square root of the total number) by following the sampling rules of GLOBALG.A.P general regulations specified in this procedure. The final GRASP report combines results and evaluation notes for all production sites and product processing units visited, showing any differences between sites.

ETKO also interviews management, cross-checks information on worker health and safety training, personal protective equipment and other topics of the primary production certification checklist, considers farm conditions, checks official self-inspections, examines producer declarations, inspects production and fruit and cross-checks with harvest yield data from the Integrated Farm Assurance audit for vegetables.

12.4.2.4 Option 1 Multi-Field Producer and Producer Group GRASP Assessment with QMS

The results of the internal QMS audit will be summarized and maintained in the GRASP internal checklist for producer groups and Option 1 multi-site producers with a QMS.

The annual ETKO assessment uses the Integrated Farm Assurance_QMS Checklist to determine how the QMS is performing against the GRASP Principles and Criteria. Evaluates and checks the applicability of QMS procedures and systems within the scope of GRASP.

When the ETKO GRAPS Assessor evaluates the level of implementation of the GRASP QMS using the Integrated Farm Assurance_QMS Checklist, he also states the overall conclusion in the QMS Principles and Criteria in the GRASP Principles and Criteria based on the internal audit results and the ETKO QMS audit. It also includes comments on the GRASP Principles and Criteria. Additionally, the ETKO GRAPS Assessor examines whether the internal QMS audit has been carried out and what the results were.

All producer group members, production facilities and units with Integrated Farm Assurance certification are registered in GRASP and are considered for sampling in the GRASP assessment. GLOBALG.A.P general regulations specified in this procedure are applied in the ETKO GRASP evaluation of the sampled producer group members, production sites and product processing units. The sample will always be the same sample selected for the Integrated Farm Assurance audit.

Instead of evaluating all producers of a producer group within the scope of GRASP, ETKO performs a GRASP Assessment for the square root of the number of producers and the sampling rules for the Integrated Farm Assurance and GRASP scopes specified in this procedure are applied. It is not ETKO's responsibility to determine the suitability of each manufacturer (this responsibility lies with the applicant). ETKO evaluates whether the applicant's internal

controls are appropriate and this is done during the ETKO QMS audit.

In initial, surveillance and subsequent evaluations, ETKO applies the GLOBALG.A.P general regulations regarding audit processes, which are stated in the table below.

In order to facilitate worker interviews, when determining the time for the assessment (and the distribution between surveillance and recertification visits), the presence of workers on the day of the assessment and the presence/accessibility of worker representation at the production site of the producer group members are taken into account. If the resulting sample includes workers at the production site or members of the producer group without workers' representation, the following applies:

- ETKO GRASP Assessor verifies the reasons for the absence of workers and workers' representatives.
- When producer group members cannot be evaluated according to GRASP, the ETKO GRASP Assessor includes notes in the report confirming the reasons for workers' absence and devotes this visit to document review (if low-risk country sampling rules apply).
- The ETKO GRASP Assessor verifies whether the Principles and Criteria regarding the health, safety and welfare of workers are fully complied with, whether workers are present at the time of the inspection and how many people are missing from the existing workforce. Notes and explanations regarding this verification are included in the report.
- In the next closest evaluation or surveillance/subsequent evaluation, ETKO includes the producer group members who do not have workers and requests them to have workers.

	Initial Evaluation	Subsequent Evaluation
Internal Evaluation of Multi-Domain Producer/Producer Group with QMS		
Internal QMS Audit	Fully comprehensive QMS Audit	Fully comprehensive QMS Audit
Internal Farm Audit	Full coverage (all registered producer group members/product ion sites and product processing units registered under Integrated Farm Assurance)	Full coverage (all registered producer group members/producti on sites and product processing units registered under Integrated Farm Assurance)
ETKO Audit		

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ETKO QMS Audit	Certification Audit:	
	Initial Certification Audit: (Full QMS Audit + Square Root Audit of the total registered Central Product Processing Units whose production process had started before the ETKO Farm Audit)	Recertification Audit: (Full QMS Audit + annual audit of the Square Root of the total registered Central Product Processing Units whose production process was started before the ETKO Farm Audit)
Unannounced ETKO QMS Audit	-	Recertification Audit: QMS audit is carried out unannounced to at least 10% of all multi-field producers/producer groups with QMS
ETKO Farm Inspection	Initial Certification Audit: Farm inspection is carried out on at least the square root of the total registered members/production areas.	Recertification Audit: a) If there are non-conformities detected during the previous audit: the square root of the minimum number of registered existing members/production sites, b) If no non-conformities were detected during the previous inspection: the square root of the current registered members/sites minus the number of members/sites inspected in the previous surveillance inspection.
	ETKO surveillance audit during certificate validity: At least 50% of the square root of	ETKO surveillance audit during certificate validity: At least 50% of the square root of

	existing certified producer group members/production sites	existing certified producer group members/production sites
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Only the producer group's own production location is not evaluated. The producer group's own production facility is counted as an additional producer group member in the Option 2 producer group member evaluation sampling. If they are part of a producer group, producers/production facilities without workers and family farms without hired workers will also be included in the group's internal GRASP QMS audit to ensure that GRASP QMS procedures are implemented.

If during the certification cycle the worker is hired by producers/production facilities that form part of a producer/producer group and do not normally recruit workers, a new internal GRASP QMS audit and farm audit will be carried out. This GRASP QMS audit will include verification of full compliance with the Principles and Criteria regarding the health, safety and welfare of workers. This will be done for the duration of the workers' presence.

In case of recruitment of workers by producers/production facilities that form part of a producer/producer group that does not normally recruit workers, the QMS manager will direct these producer group members/production facilities to ETKO. These producer group members/production facilities are then included in the next closest ETKO GRASP assessment.

- If this is not possible or workers cannot be present at the nearest ETKO Inspection, ETKO carries out a GRASP assessment at that production site after the notification of the QMS manager of the producer group.
- If a non-compliance identified in the GRASP assessment cannot be corrected, ETKO immediately escalates the matter to the GLOBALG.A.P Secretariat to amend the group's assessment evidence.

Producer group members/production facilities with no workers form part of the sampling for ETKO Audit during GRASP assessments with QMS. The composition of the sample reflects the percentage of family farms and producer group members in the producer group that do not have workers. In other words, a physical ETKO RASP assessment is applied to producer group members/production facilities where there are no workers.

Producer group members/production facilities that do not employ workers included in the sample are subjected to the ETKO GRASP Assessment to verify both the shortage of hired labor during the year/production cycle preceding the

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assessment and their full compliance with the Principles and Criteria on worker health and safety. Among other steps, ETKO holds discussions with management; Cross-checks information on worker health and safety training, personal protective equipment and other welfare aspects of the primary production certification checklist; considers the conditions of the farm; checks the manufacturer's official self-employment declarations; and examines production, cross-checking documentation with harvest yield data from Integrated Farm Assurance audits.

Family farms included in the sample are evaluated taking into account the above conditions (lack of hired labor) and the Principles and Criteria selected from the GRASP checklist. A level of compliance and interpretation (any yes/no) to the relevant Principles and Criteria are indicated and are not marked as "not applicable".

If a producer/producer group requests to add new producer group members/production sites, GLOBALG.A.P general regulations regarding the registration of additional producer group members/production sites in the certificate shall apply, including the following, for 12 months after the validity of the assessment:

- New producer group members/production facilities must demonstrate full compliance with the Principles and Criteria on the health, safety and welfare of workers before being added.
- The producer group will conduct an internal GRASP audit for each new producer group member.
- ETKO obtains internal evaluations of these new producer group members before adding them to the GRASP compliance letter.

If a producer/producer group requests to add new producer group members/production sites within 12 months of the assessment validity, GLOBALG.A.P general regulations regarding the registration of additional producer group members/production sites in the certificate apply, including:

If the new producer group members/production facilities added increase the total number of approved producer group members/production facilities by 10% of the producer group members/production facilities that have already been GRASP assessed, the following applies:

- The producer group will internally verify evidence of full compliance with the Integrated Farm Assurance Principles and Criteria regarding the health, safety and welfare of workers.
- The producer group will conduct an internal GRASP audit of these new producer group members before approving them.
- ETKO obtains evaluation of these members and internal GRASP QMS, including evidence of full compliance with the

Integrated Farm Assurance Principles and Criteria regarding the health, safety and welfare of workers.

If the new producer group members/production facilities added increase the total number of approved producer group members/production facilities by more than 10% or the production area increases by more than 10% due to the new members/facility; ETKO requires evidence that new members fully comply with the Integrated Farm Assurance Principles and Criteria regarding the health, safety and welfare of workers and applies the GLOBALG.A.P general regulations for this situation.

If the ETKO (external) evaluation of a sampling of producer group members/production facilities or product processing units reveals major differences between the internal and external evaluation results, this difference is noted in the "Comments/Comments" field of the GRASP checklist for each relevant Principle and Criterion. . The same applies to the internal QMS evaluation and any corrective actions taken before the ETKO evaluation. Large differences may indicate a serious error in the internal evaluation results, in which case the ETKO GRASP evaluator applies the GLOBALG.A.P general regulations.

All non-compliances, wherever located (on site, in the product processing unit or subcontractor), are recorded in the "Remarks" field of the GRASP checklist, with reference to the production site, product processing unit or labor subcontractor, and corrective action is requested.

The final GRASP evaluation report includes all findings and final conclusions for the entire producer/producer group/multi-site producer and is presented at the closing meeting. The GRASP assessment report contains the same information as described in the GLOBALG.A.P general regulations. Whenever possible, ETKO uses the evaluation report template published by GLOBALG.A.P Information Technology systems.

12.4.3 ETKO GRASP Evaluation Procedure for Subcontracted Product Processing Units or other outsourcing services

In addition to the current GLOBALG.A.P general regulations and GLOBALG.A.P general add-on rules, the following GRASP-specific rules will apply:

If another certification body has carried out a GRASP assessment for an organization that provides a product processing unit/other outsourcing service subcontracted within the scope of GRASP in a production cycle, ETKO shall review the GRASP assessment that this certification body has completed for the product processing unit/other outsourcing service. accepts the result.

ETKO may accept a non-GLOBALG.A.P audit/social compliance certificate for a subcontracted product processing unit/other outsourced service provider if all of the following apply:

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1. The subcontracted product processing unit/other outsourcing organization has a valid social audit evidence/social compliance certificate.
2. The scope of the subcontracted product processing unit audit/certification is the same as GLOBALG.A.P certification and GRASP.
3. Audit/certification includes the organization providing the subcontracted product processing unit/outsourcing activity service provided to the producer applying for GRASP.

12.5 GRASP Compliance System

The GRASP rules specified in this section apply in addition to the GLOBALGAP General Regulations also specified in this procedure.

12.5.1 GRASP Evaluation Results

GRASP compliance level compliance is based on a scoring system result. The GRASP checklist consists of two levels of Principles and Criteria: Major Musts and Minor Musts.

12.5.1.1 Compliance Level Requirements

- Major Musts: 100% compliance with all applicable Major Must criteria is mandatory for all evaluations.
- Minor Musts: 70% compliance with all Minor Must criteria is mandatory in the initial assessment of this GRASP version.
- Minor Musts: 75% compliance with all Minor Must criteria is mandatory in all surveillance and/or subsequent assessments of this GRASP release.

Eligibility rules for family farms with no workers:

- Major Musts: 100% compliance with all applicable Major Must criteria is mandatory for all evaluations.
- Minor Musts: Any non-compliance with Minor Must criteria is considered in the initial assessment of this version of GRASP.
- Minor Musts: 100% compliance with all Minor Must criteria is mandatory in all subsequent and/or surveillance assessments of this GRASP release.

The manufacturer shall comply with the current version of the GLOBALG.A.P general regulations regarding conformity level requirements.

So, 25 Minor Must criteria $\times 0.7 = 25 \times 0.7 = 17.5$, which rounds up to at least 18 Minor Must criteria that must be met. The maximum number of Minor Must criterion non-compliances allowed is 7 (25 – 18 total). Therefore, a manufacturer must have at least 18 Minor Must criteria that are compliant and cannot have more than 7 criteria that are not compliant. If a manufacturer has 17 compliant

Minor Must criteria, this gives a compliance level of 68%, which does not comply with GRASP's minimum compliance level. Note: For example, a score of 69.8% cannot be rounded to 70% (pass percentage).

12.5.2 GRASP Letter of Compliance Decision

The decision to issue the letter of conformity is made by a currently qualified GRASP assessor, other than the person conducting the GRASP assessment, and in accordance with the GLOBALG.A.P general regulations and the rules in this document.

Privacy, data use and data release

The detailed results of the GRASP assessment are shared only with GLOBALG.A.P Information Operations system users in accordance with the terms and conditions in the data access rules.

The compliance letter and results of the GRASP assessment are published in GLOBALG.A.P Information Systems systems only in the following cases:

- a) Documenting the required compliance levels in the scoring system;
- b) GLOBALG.A.P Integrated Farm Assurance certification is available and there is evidence of verification and full compliance with the Principles and Criteria on workers' welfare.

In case the required levels cannot be reached due to non-compliances and the non-compliances cannot be corrected in accordance with GLOBALG.A.P general regulations, the GRASP checklist containing all non-compliances and remaining open corrective actions and relevant explanations are uploaded to GLOBALG.A.P Information Operations systems.

The overall outcome will reflect clear non-compliance or suspension.

For Option 1 without QMS, which requires a declaration that GRASP does not apply, there will be a final assessment report showing that the assessor has verified unemployment during the year prior to the assessment.

The general consequence includes clear non-compliance or suspension.

For the Option 1 Multi-Domain Manufacturer without QMS, which requires a declaration that GRASP does not apply, the unemployment status during the year prior to the assessment is verified by the ETKO GRASP Assessor and evidence of this is noted in the report.

12.5.3 Unannounced recertification audit of primary production sites combined with GRASP assessment

The GRASP program does not require producers to receive unannounced surveillance inspections. However, GRASP requires following GLOBALG.A.P general regulations on audit processes for initial, surveillance and subsequent assessments and is evaluated during the primary

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production unannounced audit of a producer/producer group. In this case, the producer/producer group is informed of the GRASP assessment as soon as the ETKO GRASP Assessor is able to start the primary production unannounced audit.

12.5.4 Non-Compliance and Nonconformity in GRASP

ETKO applies the current GLOBALG.A.P general regulations specified in this procedure regarding producers, producer groups or multi-site producers with a QMS, and also applies the GRAPS rules contained in this procedure in relation to:

- Addressing nonconformities detected during ETKO audit
- Implementation of sanctions (warning, suspension or cancellation)

A suspension or revocation will result in a complete ban on the use of the GRASP compliance letter and any device or documentation associated with GRASP coverage (all products, all sites).

A producer who has received a cancellation will not be accepted for a new GRASP assessment for the period specified in the GLOBALG.A.P general regulations.

Non-compliances and non-conformities of manufacturers without a letter of conformity are recorded in GLOBALG.A.P Information Systems systems and made accessible in accordance with GLOBALG.A.P.'s data access rules.

12.5.5 GRASP Letter of Compliance and Evaluation Cycle

In addition to the current GLOBALG.A.P general regulations and GLOBALG.A.P general add-on rules regarding the certification process, the following GRASP-specific rules apply:

- A GRASP compliance letter will be issued if and only if a valid GLOBALG.A.P Integrated Farm Assurance certificate is available and there is evidence of verification and full compliance with the Principles and Criteria on worker welfare.
- GRASP compliance letter is issued only after the required Major Must and Minor Must levels are reached and documented in GLOBALG.A.P Information Operations systems.
- The GRASP compliance letter is issued for the same legal entity (i.e. producer group/multi-site producer) that holds the valid GLOBALG.A.P Integrated Farm Assurance certificate.
- The evaluation approval cycle is 12 months, subject to any sanctions and extensions in accordance with the described scope.

12.5.6 GRASP Letter of Compliance

The letter of conformity is published through the GLOBALG.A.P Information Processing system in accordance with the current GLOBALG.A.P general regulations and GLOBALG.A.P general add-on rules.

13. Changes in the entrepreneur/producer/producer organization System

The entrepreneur/producer/producer organization will inform ETKO officially in writing in a timely manner in case of any changes, including changes in the production system and processes (such as location changes, additional areas, changes in name, shareholders, scope, etc.). ETKO will evaluate the impact of the changes on certification and whether an additional surveillance control is required. If it is determined that a surveillance control is necessary, the use of the ETKO logo or label by the entrepreneur/producer/producer organization is not allowed until this control is carried out. In this case, the entrepreneur/producer/producer organization will be informed by ETKO. The planning of this control will be done by the ETKO control department manager and the controller, and after the control, the fee will be collected from the entrepreneur.

If there are changes that are limited to the production system and do not affect the certification, or if there are changes in the documentation, these changes will be reviewed by the controller at the next control visit.

NOTE: All changes in production and documentation will be recorded and kept by the entrepreneur/manufacturer/producer organization for the controller.

14. Suspension, Withdrawal and Cancellation of Certificate.

- If non-conformity is detected; Warning, suspension or cancellation sanctions may be imposed.
- If a clear link is established between a manufacturer and a public health outbreak, certification will be suspended while the manufacturer's certification is reviewed.
- When the sanction can only be lifted by ETKO; Manufacturers cannot switch to another certification body until the non-conformity causing the relevant sanction is closed.
- A warning is issued for any detected non-conformance (i.e. non-compliance with CPCC or contractual requirements).
- If a nonconformity is detected during the audit, a warning is given to the manufacturer at the end of the audit. This is a temporary report that may be overridden by the certifier.
- WARNING:
 - In the first inspections; If an individual operator or producer or producer organization does not comply with the 100% Major Must and 95% Minor Must

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control points within 28 days of the initial inspection, a status of “clear non-compliance” will be determined in the GLOBALG.A.P Database. And if the cause of the alert is not resolved within three (3) months, a full audit will be conducted before the certificate is issued.

- In surveillance audits; In the event of non-compliance with Contracts, General Requirements or Major Must, the certificate will be suspended if the non-compliance cannot be closed within 28 days. This period may be shortened depending on the criticality of the nonconformity in terms of worker, environmental and consumer safety. In cases where there is a serious threat to food safety, employee safety, the environment, consumers and/or product integrity (for example, the sale of non-certified products as certified), the certification is immediately suspended. This is communicated with a formal warning letter.

- **SUSPENSION:**

- If the appropriate corrective actions for the nonconformities detected in the audit (surveillance audit) are not communicated to ETKO within 28 days, an immediate suspension is applied.
- Suspension may be applied to one, several or all of the products within the scope of the certificate. A product cannot be partially suspended for a single producer (single or multi-site), meaning the entire product is suspended. If the appropriate corrective action for the nonconformity that is the reason for the suspension is not communicated to ETKO within 12 months, cancellation will be applied.
- During the suspension period, the manufacturer is prohibited from using the GLOBALG.A.P logo/trademark, license/certificate or any other form of documentation that is in any way linked to GLOBALG.A.P in relation to the suspended product.
- Producer; If appropriate corrective action for the relevant non-conformity is forwarded to ETKO within 12 months following the suspension of the

certificate, this evidence may be examined and the relevant sanction may be removed. This review can be performed in the field or at a desk. In case the examination is carried out through on-site examination; The review may be conducted with or without notice, as a full review, or as an evaluation of only the evidence presented.

- **SUSPENSION DUE TO MANUFACTURER'S REQUEST:**

- An entrepreneur or producer or producer organization may voluntarily request the suspension of one, some or all of the non-sanctioned products within the scope of the certificate. This may occur if the manufacturer has difficulty complying with the standard and needs time to close any non-conformances.
- This suspension will not delay the renewal date and will not allow the producer to avoid paying registration and other applicable fees.
- The deadline for closing the non-conformity is determined by ETKO and the entrepreneur/producer/producer organization.
- The product status in the GLOBALG.A.P Database for the relevant products is set to “self-declared suspension”.

- **CANCEL:**

- If there is evidence that may cause fraud and/or insecurity or if the appropriate corrective action for the nonconformity that is the reason for suspension is not communicated to ETKO within 12 months, cancellation will be applied.
- The entrepreneur/producer/producer organization whose contract has been cancelled; The use of the GLOBALG.A.P logo/trademark, certification or any other document that may be associated with GLOBALG.A.P is strictly prohibited.
- GLOBALG.A.P certification applications of canceled manufacturers will not be accepted within 12 months from the date of cancellation.

15. Objections and Complaints

If the Entrepreneur/Producer/producer organization wishes to object to any decision of ETKO regarding

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certification, it will apply in writing to info@etko.com.tr by filling out the "Dispute & Objection and Complaint Application Form" on the ETKO website.

16. Privacy

Except for cases required by national laws or accreditation bodies, ETKO will keep confidential the information obtained during the contract and certification process about the entrepreneur/producer/producer organization and will not disclose it to third parties, unless the entrepreneur/producer/producer organization gives written permission for this.

The entrepreneur/producer/producer organization is informed that information will only be shared when required by law and that no information will be shared without the consent of the entrepreneur/producer/producer organization.

The entrepreneur/producer/producer organization accepts the verification and control activities of accreditation bodies by signing a contract with ETKO for certification services at the application stage. If it does not sign, it is not included in the certification process.

In addition, GLOBALG.A.P and ETKO can see all the data in the database in GLOBALG.A.P and can be used for the certification process and sanction procedures. And the certification history of manufacturers included in the database is available to market participants. Minimum and mandatory data publication and other information regarding privacy and data use are specified in the 'GLOBALG.A.P Data Access Rules' on the ETKO website.

17. Postponement and Cancellation

If the payment is not made two weeks before the determined control date, ETKO may cancel the control. In cases where controls are canceled by ETKO or the entrepreneur/producer/producer organization, the following fees are charged:

- If the cancellation of the control is notified more than two weeks from the control day, 15% of the determined total fee and the total expenses incurred (such as flight tickets, visa costs, etc.).
- If the control is canceled within two weeks or less; 50% of the determined total fee and total expenses incurred must be paid to ETKO.

18. Legal Aspects

In case of any dispute that may arise, the courts at the place of production are authorized for individual producers, and the courts at the location of the legal entity (institution) to which it is affiliated are located for group producers.

19. Information Exchange

In case there is an entrepreneur/manufacturer/producer organization working within the same scope with another certification body at the same time, ETKO will exchange information with the other certification body. This is to prevent documentation from being abused.

When necessary, ETKO may also exchange information with competent authorities such as the Ministry, GLOBALGAP, Accreditation body and other certification bodies.

If the entrepreneur/producer/producer organization changes the certification body, the documents and information regarding this change will be notified to the competent authorities by ETKO without delay. ETKO forwards the files, audit reports and nonconformities containing valid information about the entrepreneur/producer/producer organization in question to the new certification body.

Producers, producer organizations and entrepreneurs; Notifies ETKO of any changes made in their legal structures, agricultural activities or production areas within one month at the latest.

Informing ETKO without delay about legal, commercial, structural status or ownership, organization, management, product or production method, Contact address and production locations, significant changes in the quality management system that may affect the adequacy of compliance with the certification conditions.

ETKO checks that the nonconformities specified in the reports of the previous authorized organization of the entrepreneur who transferred to ETKO from another authorized organization have been or are being eliminated by the entrepreneur.

If it detects a discrepancy or violation that will affect the status of the certified product, ETKO immediately notifies the relevant competent authorities.

The competent authorities in question may, at their discretion, request other information regarding the non-compliance and/or violations.

ETKO publishes the current lists of the good agricultural activities of the entrepreneurs in its control system on its website.

20. GLOBALGAP Information Sharing GG_GR_Rules_for_CBs_v6_0 5.3 & 6.2.2

ETKO, GLOBALG.A.P. Keeps the following information updated in the Information Technology System in accordance with GLOBALG.A.P registration data requirements and GLOBALG.A.P data access rules:

GG_GR_Rules_for_CBs_v6_0 5.3

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- Current status and status history
- Products
- Areas/volumes for each unique producer (legal entity) across all standards and Options (per product), with centralized verification of certificates and letters of conformity by market participants
- Audit and compliance details uploaded to the Audit Online Platform (AOH) in accordance with the Audit Online Platform (AOH) upload rules

When ETKO receives a positive certification decision, the product status is GLOBALG.A.P. It ensures that the certificate is published after it is updated to "certified" in the database systems. GG_GR_Rules_for_CBs_v6_0.5.3

ETKO ensures that as soon as a sanction is issued, the producer's situation is reviewed by GLOBALG.A.P. Ensures that database systems are updated to reflect the current status (ensuring that the time between the issuance of sanctions and the status update in GLOBALG.A.P. Database systems is not more than one business day) GG_GR_Rules_for_CBs_v6_0.5.3

ETKO, GLOBALG.A.P. Ensures that the status of all manufacturers in the database systems is up to date.

GG_GR_Rules_for_CBs_v6_0.5.3 ETKO ensures that information on all audit details (including announced, unannounced and surveillance audits) as well as details for each certificate is instantly accessible. GG_GR_Rules_for_CBs_v6_0.5.3

FoodPLUS GmbH and/or GLOBALG may be subject to this, such as if the certificate holder is facing a complaint regarding food safety, employee welfare (i.e. potentially involved in a foodborne outbreak) or environmental protection, is being tried in a court of law, or has been found by a court to have violated a national or international law. .When a situation that may endanger the reputation and reliability of the A.P standard is detected, the GLOBALG.A.P Secretariat is notified within 24 hours GG_GR_Rules_for_CBs_v6_0.5.3

ETKO shares the current "GLOBALG.A.P data access rules" on its website and informs the manufacturer by publishing news and email notifications in every update. GG_GR_Rules_for_CBs_v6_0.5.3

Data access rules will be defined and signed by the manufacturer during registration with ETKO. The data owner is responsible for ensuring data access and determining its level. However, the data subject may delegate responsibility to other users (e.g. UK). GG_GR_Rules_for_CBs_v6_0.5.3

The manufacturer may provide personal data to trading partners previously authorized by the manufacturer, or the manufacturer may instruct a third party to provide this data. This authorization can be canceled online at any time. Any other access to the manufacturer's personal data is illegal. GG_GR_Rules_for_CBs_v6_0.5.3

21 GLOBALG.A.P. Changing the Certification Body (CB) of the Producer/Producer Group Certified Under GG_GR_Rules_for_CBs_9

21.1 General Rules GG_GR_Rules_for_CBs 9.1

This procedure is GLOBALG.A.P. In any case, including if its regulations contain more stringent conditions than ETKO's regulations, ETKO does not unduly or unfairly restrict the producer/producer group's freedom to choose another Certification Body.

GLOBALG.A.P. GLOBALG.A.P. to ensure that the integrity of the certification is maintained and to ensure that the producer/producer group's certification history is addressed during the review process when the producer/producer group signs a contract with a CB. The process to be followed when the producers/producer groups in the database move from another UK to ETKO or from ETKO to another UK is as follows:

- Producer/Producer Group GLOBALG.A.P. Must be registered in the database
- Existing sanctions, if any, must be lifted before the Producer/Producer Group's transition to the new UK. As an exception, in cases where there are existing sanctions and the certification cycle has ended, the previous CB may lift the unresolved sanction in order to ensure the transition of the producer/producer group to the other CB, provided that the reason for the non-conformity is properly explained to the CB where the transition will be made.
- The existing GGN of the producer or producer group is not changed. Dual registration is not allowed (i.e. a producer or producer group can only have one GGN, even if the same producer or producer group is affiliated with more than one GGN).

If a producer who has already been registered changes CBs or applies to a new CB for certification of a different product, the producer shall communicate the previously assigned unique GLOBALG.A.P. identification number to the new CB. Failure to do so will result in a surcharge fee of €200 to the producer.

- Before the transition of the producer/producer group is accepted, a sublicense and certification agreement is signed with the producer/producer group and the registration process is completed. The transfer of producers/producer groups to another CB may occur when the current certificate of the producer or producer group expires and there is no binding service contract between the producer/producer group and the previous CB. And the producer/producer group can apply for certification in another CB for the next certification cycle. If the producer/producer group wants to move to another CB before the

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certificate validity period expires, the validity period of the producer/producer group's current certificate may be shortened by the previous CB, but it will always be in agreement with the producer and in coordination with the accepting CB to prevent gaps in the certification.

- If the signing date of the 'GLOBALG.AP Sublicense and Certification Agreement' and the "Audit Date" are after the expiry of the validity period of the certificate issued by the previous CB, there will be a period when the producer/producer group does not have a valid certificate. However, if the signing date of the 'GLOBALG.AP Sublicense and Certification Agreement' and the "Audit Date" are before the expiry of the validity period of the certificate issued by the previous CB, the certification decision can be taken as soon as the current certificate expires. In this case, there will be no gap in the certification cycle of the producer/producer group. If the certification decision is made after the certificate issued by the previous CB expires, there will be a gap in the certification process of the producer/producer group, even if the signing date of the 'GLOBALG.AP Sublicense and Certification Agreement' and the "Audit Date" are before the expiry date of the certificate. The previous CB remains responsible until its certificate expires. During the validity of the certificate issued by the previous CB, the new CB informs the previous CB so that it can carry out appropriate follow-up regarding the non-conformities it detects.

- The producer/producer group can sign a 'GLOBALG.A.P Sublicense and Certification Agreement' with the new CB while under contract with the previous CB. The 'GLOBALG.A.P Sublicense and Certification Agreement' signed by the new BK, however, is based on the fact that the previous BK has transferred the GGN of the producer/producer group to GLOBALG.A.P. It becomes binding after transferring it to the new BK in the database.

- During the process of changing the CB, the registration of the products to the Database may not be completed before the audit and the certification decision may not be taken within 28 days after the audit/closing of non-conformities.

21.2 Transition to Another Certification Body during the extension of certificate validity GG_GR_Rules_for_CBs 9.2

If an extension of validity is available, the manufacturer cannot change the certification body for 12 months after the original certificate validity date.

If the certification body to which the transition is intended to be made does not request termination from the previous certification body before the audit is accepted, the manufacturer's transition to the new certification body will not be possible and the original certificate will be certified by this previous certification body for 12 months after the validity date (CB cannot make changes). The exception to this issue applies only if the previous certification body explicitly requests the termination of the extension and notifies the GLOBALGAP Secretariat to transfer the unique GLOBALGAP Number to the certification body to which the transition is intended. The GLOBALGAP Secretariat only processes transfer requests from the previous certification body. The authority to release a customer with a valid contract belongs entirely to the certification body with which the valid contract in question has been signed.

If the transfer is accepted, the validity period of the certificate issued by the new certification body to which the transfer is made is calculated by subtracting the validity period of the certificate issued by the previous certification body from 12 months.

22 GLOBALGAP Burden of Proof GG_GR_Rules_for_Individual Producers 7.1 &

GG_GR_Rules_for_Producer Groups and Multisite Producers with QMS 7.1

In the event of information about a GLOBALG.A.P certificate holder that may have a potential impact on certification status communicated to the GLOBALG.A.P Secretariat, it is the responsibility of the certificate holder and ETKO to verify the claim and provide evidence of compliance with the relevant GLOBALG.A.P standards.

ETKO may conduct additional announced or unannounced CB inspections or on-site visits to investigate complaints.

ETKO reports the relevant findings and measures taken to the GLOBALG.A.P Secretariat within the specified period.

If the certificate holder and ETKO fail to provide the required proof of compliance within the period defined by the GLOBALG.A.P Secretariat, they will be subject to sanctions according to the sanction procedures described in the GLOBALG.A.P General Regulations.

If the evidence includes laboratory analysis, accredited laboratories (ISO/IEC 17025) and independent sampling (according to the rules set out in the relevant Principles and criteria) will be involved.

The certificate holder is facing a complaint or has been prosecuted in a court of law, or has been found by a court to have violated a national or international law, relating to food safety, employee welfare, or environmental protection, and these actions are in violation of FoodPLUS GmbH and/or the GLOBALG.A.P standard. If there is a risk of jeopardizing its reputation and reliability, the certificate holder will inform ETKO within 24 hours.

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