



RULEBOOK CLEAR S.R.L.S.B.

Il presente regolamento è di proprietà di Clear S.r.l.S.B. Tale proprietà è tutelata a termini di legge, pertanto il presente documento non può essere riprodotto o reso noto a terzi senza previa autorizzazione scritta da parte di Clear S.r.l.S.B.

Copia originale

Registro revisioni:

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02/09/2024	1	0	Prima emissione Regolamento	RSG	AMM
<i>Distribuzione</i>			<i>Firma:</i>		
(Copia controllata)					
(Copia NON controllata)					

PRESENTATION OF CLEAR S.R.L.S.B.

COMPANY NAME:

Clear S.r.l.S.B.

Registered Office: Largo San Giuseppe 3, 16121, Genova, GE.

Operational Office: Largo San Giuseppe 3, 16121, Genova, GE.

Clear S.r.l.S.B. provides a control and management service for the chain of custody of hemp and cannabis batches, based on Clear's private label certification system standard. The service manages the audit and traceability phases of the entire chain of custody of the product. The process begins with sampling, proceeds with sealing, and concludes with the final analysis and certification. This process is supported by a cutting-edge digital platform, which guarantees real-time traceability and collects all the necessary documentary evidence to certify the compliance and integrity of the certified product.

In carrying out its activities, Clear S.r.l.S.B. operates in compliance with the requirements of ISO/IEC 17021 and its principles:

- Impartiality
- Competence
- Responsibility
- Transparency
- Confidentiality
- Independence
- Promptness and efficiency in responding to complaints
- Risk-based approach

PRESENTATION OF QS QUALITY SERVICES LTD

Company Name: QS Quality Services Ltd

Registered Office: 3, Triq G. Flores, Advance Business Centre, SANTA VENERA, SVR 1950 MALTA

Operational Office: Shop 1 - 493 St. Paul Street, SPB - San Paul Bay, SPB 3416 MALTA

QS Quality Services Ltd is a company founded on the experience of its partners in the field of certification of management systems and products for internationally recognized organizations. QS Quality Services Ltd is accredited by ESYD (Accreditation Body that, through Multilateral Recognition Agreements (MLA), is included in the European accreditation system (EA) and internationally (IAF) according to the international standard ISO/IEC 17021-1:2015 Conformity Assessment – Requirements for Bodies Providing Audit and Certification of Management Systems.

As a Certification Body, QS Quality Services Ltd provides certification services for Management Systems compliance with voluntary standards, respecting the principles of impartiality and independence.

In carrying out its activities, QS Quality Services Ltd operates in compliance with the requirements of ISO/IEC 17021 and its principles:

- Impartiality
- Competence
- Responsibility
- Transparency
- Confidentiality
- Independence
- Promptness and efficiency in responding to complaints
- Risk-based approach

REGULATIONS AND POSSIBLE AMENDMENTS

These regulations are distributed in a controlled form. When sending the offer, the client is notified of the existence of this regulation as a binding clause of the contract and informed on how to access it. The latest version of the regulation is published on the website and is freely accessible. At the client's

request, the regulation may also be distributed via email or post. The regulation is an integral part of the contract; therefore, signing the contract implies acceptance of the regulation.

Any variation due to internal reorganization at Clear S.r.l.S.B. or any regulatory changes concerning the standards and regulations referenced will be communicated to the inspected organizations. After 30 days, if no communication is received, the new revision of the document will take effect. The entry into force will be communicated to the inspected organizations, which will declare their acceptance through the principle of tacit consent. Failure to accept will result in the revocation of the certification by QS according to the procedures outlined in the terms and conditions for the certification of organizations and technical systems attached to the offer and signed by the client.

PURPOSE AND SCOPE OF APPLICATION OF THE REGULATION

The purpose of this Regulation is to contractually regulate the conformity assessment service stipulated by the client organization with Clear S.r.l.S.B. upon signing the Offer.

This Regulation applies to the conformity assessment activities provided by Clear S.r.l.S.B. as requested by the client organization.

REFERENCE DOCUMENTS AND STANDARDS, TERMS, DEFINITIONS, ABBREVIATIONS

The standards and reference documents for drafting this regulation are as follows:

ISO/IEC 17021-1:2015 Conformity Assessment – Requirements for Bodies Providing Audit and Certification of Management Systems

ISO/IEC TS 17021-2 – Conformity Assessment – Requirements for Bodies Providing Audit and Certification of Management Systems – Part 2: Competence Requirements for Environmental Management Systems

ISO/IEC TS 17021-3 – Conformity Assessment – Requirements for Bodies Providing Audit and Certification of Management Systems – Part 3: Competence Requirements for Quality Management Systems

ISO/IEC TS 17021-10 – Conformity Assessment – Requirements for Bodies Providing Audit and Certification of Management Systems – Part 10: Competence Requirements for Occupational Health and Safety Management Systems

The list above includes only the standards, laws, and regulations directly aimed at defining the general requirements of the management system and the overall certification process. For the full list of references with all applicable standards, laws, and regulations implemented by Clear S.r.l.S.B. for defining management procedures and the operational system, please refer to the specific rules for each standard.

The terms and definitions in the following standards apply in this regulation: EN ISO/IEC 17000.

RESPONSIBILITIES

The responsibilities and roles of the parties involved in the certification process (Clear and the client organization) are defined in this regulation, as well as in the terms and conditions document for the certification of organizations and technical systems signed by the parties at the time of contract definition.

It is specified that it is the responsibility of the client organization to:

- Ensure compliance with certification requirements;
- Apply legislative requirements related to the design, implementation, and operation of the activities subject to assessment;
- Fulfill obligations arising from professional activities and any contractual commitments made with their clients.

Companies that have obtained certification must comply with legal obligations related to products, processes, and services provided and the contractual commitments made with their clients. Certified companies are entirely responsible for damages caused to third parties by their activities. No responsibility can be attributed to Clear.

Clear is responsible for evaluating the objective evidence necessary and sufficient to issue a positive or negative opinion regarding the issuance of certification. Clear does not assume any obligation regarding the outcome of the conformity assessment. Clear takes no responsibility for what has not been verified or made available by the client organization.

Auditors employed by Clear are part of the inspection body qualified by the Evaluation Committee according to the requirements set out in ISO/IEC 17021 and ISO 19011 standards. The responsibilities of the auditors are defined in the collaboration contract signed with Clear and its related annexes.

Regarding the responsibilities of Clear's internal staff, depending on the roles they hold, they are defined and signed by the personnel in the job description.

CLEAR'S COMMITMENTS AND DUTIES

Clear is committed to performing the service described in this regulation with diligence, impartiality, and confidentiality. The management conditions of the service offered are defined in the terms and conditions document available on the website.

Clear **DOES NOT PROVIDE CONSULTANCY SERVICES**, except for the standard information and/or assistance provided to certified organizations or those in the certification process.

To ensure complete impartiality and freedom from bias and conflicts of interest among the staff involved in its activities, Clear has drawn up a risk analysis document outlining the findings and justifying the conclusions reached and the solutions adopted, updating it whenever necessary.

Clear is responsible for ensuring that inspection activities are not assigned to individuals or companies that have provided consultancy services—or engaged in activities presenting conflicts of interest—at the organizations undergoing inspection. To this end, when signing the contract with the client organization, Clear requests, among the necessary information for the certification of management systems, the name of any consultant used to prepare the system to be certified.

CONFIDENTIALITY

Clear undertakes to maintain the confidentiality of acquired data in accordance with current law and to manage the security of the acquired data.

Clear commits to maintaining the confidentiality of both internal and external personnel.

Auditors, upon signing the collaboration contract with Clear, sign a declaration as a binding commitment to treat all information related to partner companies and clients with strict confidentiality.

Clear also has auditors sign an information document on the processing of their data, in which they are required to sign:

- A commitment to confidentiality in managing data relating to clients and Clear;
- A commitment to immediately inform Clear of any conflicts or inability to guarantee impartiality or competence in performing their duties assigned during the collaboration period.

Regarding the client organization, at the time of contract signing, Clear sends a Data Privacy Notice to inform the client about how Clear manages the confidentiality of their data.

Regarding Clear employees/collaborators, they sign a declaration committing to respect the principles of confidentiality and impartiality.

Clear requests that employees and collaborators of partners also sign a confidentiality and impartiality clause and comply with Clear's regulations and principles.

Signing the certification contract implies that Clear is authorized to list the names of organizations that have obtained certification on the publicly available list of certified organizations on its website. Clear is required to communicate the names of certified organizations to the relevant authorities.

Clear is committed to informing the client of any withdrawal, suspension, or revocation of accreditation and to supporting the client during the transition to another Certification Body (CaB). Clear is in no way responsible for any damages caused by the revocation or suspension of accreditation.

Further obligations of Clear are defined in the terms and conditions document for the certification of organizations and technical systems attached to the offer and forming an integral part of the contract with the client.

CLIENT'S RIGHTS AND DUTIES

The client has the right to:

- Use the obtained certification for advertising purposes in any way deemed appropriate, but always limited to the scope and limits of the certification obtained and as prescribed by this Regulation;
- Submit an official complaint or request an official meeting with management if they notice any discrepancies in the application of this Regulation by Clear S.r.l.S.B., either in the certification process through the inspection personnel or technical-administrative personnel, or in the application of general principles of fairness, impartiality, and transparency declared by Clear S.r.l.S.B.

The client has the duty to:

- Ensure, at the time of the certification request, the correct communication of volumes and required details of the batches to be inspected during the contractual phase. Clear S.r.l.S.B. will be responsible for verifying their suitability;
- Declare their commitment to maintaining compliance for the entire duration of the contract;
- Respect the contractual terms agreed with Clear, of which this regulation is an integral part;
- Guarantee access to information and documents relevant to the definition of the contract's subject matter to Clear personnel and collaborators, ensuring proper verification activities and meeting deadlines as agreed.

The client must make available, during audits, any documents requested that are necessary for the Inspection Group (GVI) to issue the certification without omitting any information. It is the client's responsibility to ensure the completeness, truthfulness, and accuracy of the information provided.

The client must allow the inspection personnel access to sites, operational production/service activities, any outsourcing activities, or suppliers to verify all the relevant system processes effectively and thoroughly.

The client must maintain a copy of the documentation related to its batches available to the GVI and keep a record of all complaints and corrective actions taken.

The client must provide safe access for Clear personnel and collaborators to places where activities are carried out, or documents subject to assessment are located.

The client must accept the outcome of the conformity assessment activities and Clear's consequent decision.

The client must resolve any Non-Conformities (NC) identified during the assessment visit according to the agreed times and methods.

The client must allow additional assessment visits if deemed necessary to verify the resolution of serious or numerous NCs or following communications or complaints received by Clear regarding the

contract, which may cast doubt on compliance with basic requirements. These additional assessments will be at the client's expense.

The client must declare that it is certified exclusively for the activities for which the certificate was issued.

The client must not use the certificate of conformity, the mark, or other forms of communication or declarations in a misleading way or in a manner that may cause damage, discredit, or a loss of trust in Clear (see point 8 of this Regulation).

The client must not imply that the certification covers activities outside the scope for which the certification was granted.

In case of suspension, revocation, or withdrawal of certification, the client organization must immediately cease using promotional materials referring to the certification and return the original certificate and the mark. In the event of a reduction in the scope of certification, the client organization must immediately correct the promotional materials.

The client must immediately inform Clear of any discrepancies identified by control authorities, legal proceedings, final criminal convictions, ongoing criminal proceedings of any kind, suspension, or revocation of authorizations, licenses, etc., related to the contract's subject. The client must accept and comply with any subsequent decisions by Clear, such as requests for additional information or further assessment.

The client must allow unannounced visits to already certified client organizations if necessary, for example, in the case of complaints, changes, or as a follow-up action for clients whose certification has been suspended. In such cases, Clear will notify certified clients in advance of the basic conditions for conducting unannounced visits and appoint the GVI, paying particular attention due to the client's inability to reject the audit team members.

The client must notify Clear of any changes that may call into question or affect the client's ability to maintain compliance with the reference standards of the obtained certification (e.g., change of ownership, company name, location of certified sites, etc.) (see point 9 of this Regulation).

The client must define procedures and responsibilities for handling complaints related to products/services that fall within the requested certification scope. Records of complaints and related Corrective Actions (CA) must be kept and made accessible to auditors during the assessment visit.

The client organization is also obligated to accept, during the assessment visit and without incurring additional costs, the presence of:

- Observers or inspectors from the Accreditation Body whose presence aims to verify that the assessment activities conducted by Clear comply with accreditation requirements. The presence of these individuals and their roles may occur without prior notification or may be communicated to the client in advance with short notice by Clear;
- Trainee assessors.

A refusal by the client organization equals the suspension of the certification process.

Additional client obligations are defined in the document relating to terms and conditions attached to the offer and forming an integral part of the contract with the client.