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Executive Summary

Our mature programme of activities, designed around checking our auditors' and Certification Body partners' work, ensures high standards of excellence and assures our global reputation as the market leader in brand protection.

Designed to keep pace with changing stakeholder needs, our standards are regularly updated and 2018 saw the review and publication of Issue 8 of our Food Standard. Embedding best practice, BRCGS auditors have identified opportunities of improvement by logging 186,530 nonconformities, allowing them to be corrected and ensuring safer supply chains. Uptake of our global standards continues to grow with over 28,000 audited sites across the world.

Ensuring consistency across the world's largest certification scheme presents a range of challenges. In response, BRCGS has increased investment in compliance and expanded its global team of independent, internationally-respected auditors.

Compliance lies at the heart of all BRCGS activity. To deliver uniformity throughout the organisation, our compliance programme tackles issues using a comprehensive and stringent range of initiatives which, together, form our quality assurance process and drives continuous improvement.

ACHIEVING EXCELLENCE THROUGH OUR COMPREHENSIVE **COMPLIANCE ACTIVITY PROGRAMME**

- Approval system for Certification Bodies to undertake audits on our behalf
- KPI-based performance reviews of Certification Bodies every six months, resulting in publicly available star ratings
- · Office audit programme of Certification Bodies and their global partner offices
- Comprehensive requirements for auditors

- Independent BRCGS compliance visits:
- Audits of certificated sites
- Witness audits of auditors
- Formal sanctions processes, up to and including suspension and withdrawal of approval for Certification Bodies and auditors
- Stakeholder feedback processes to gain your perspective on how well we're doing

The flexible design of our audit structure around six core standards with module add-ons for customer choice continues, with design of further audit modules aiming to reduce the audit burden. Our compliance activity programme is therefore under continual review to ensure it remains fit for purpose under our widening portfolio of global products.

We are continuing our one-day visits to certificated sites which are carried out unannounced in Europe and at short notice in the rest of the world. These are always very valuable because we get a good view of how our scheme is being delivered, as well as emphasising our expectations. Findings from these visits drive improvements across the BRCGS business, including development of our support systems such as training and our BRCGS Professional learning programme.

In the coming year, we will increase the number of Certification Body witness audits. These are independent of the accreditation process and Certification Bodies' own management, and our aim is to measure and report on the expected high calibre of our auditors.

We have also invested heavily in developing our IT systems, in particular BRCGS Insight, which allows improved management oversight. Our databases are an invaluable tool in the design and implementation of our compliance activities, as well as aiding our Certification Body partners.

Should anyone fall below the expected excellence, we have a formal follow-up and sanctions process. This includes visiting our international Certification Bodies to ensure thorough understanding of the standards protocols.

This report is driven by our commitment to promote a culture of transparency, communication and feedback. Our aim is to create more secure supply chains worldwide, while embedding integrity and high standards throughout the retail industry.

Our activities over the past year are explained in further depth with a commentary on the findings over the following pages.

I hope you find our report interesting and useful.



KAREN BETTS Head of Compliance

Brand **Protection**

The rationale for certification against global standards is to demonstrate that your products and services adhere to those regulations, to show they are safe, legal and high quality.

It means you and your teams can be confident in what you are selling and, most importantly, consumers can be confident in what they are buying. And if they are confident in what they are buying from you, they will also be confident in your overarching brand.

COMPLIANCE CREATES CONFIDENCE REPORT 2019

So much for the headline. What really matters is the work behind the certificate. After all, the certificate itself is just a piece of paper.

At BRCGS, we work with and manage our Certification Body partners very closely, to ensure the audits they carry out are of a consistently high level.

Every six months, we examine their performance against strict KPIs, and we insist on very stringent requirements for the auditors. These don't just cover qualifications when auditors start the job. We also insist on on-going training, calibration against tight criteria and witness audits.

We carry out visits to certificated sites to see how well our scheme is operating in the field and undertake witness audits independently of Certification Bodies.

It is these additional audits that provide the extra layer of protection. It is our guarantee that the certification process is as thorough as it possibly can be, which is why we have put a lot of resources into this extra layer.

A significant part of our investment into this process has been the implementation of sophisticated data-mining IT that helps us define risk. The technology of BRCGS Insight analyses the vast amount of BRCGS audit data from around the world, to look for trends and identify outlying information that could suggest there is an issue. This provides the basis for candidates for witness audits and visits to certificated sites.

We also use sophisticated sampling to select Certification Bodies, auditors, geographical regions and product areas on which to focus based on risk. The result is a highly efficient auditthe-auditors process that catches any problems before they can jeopardise the integrity of the BRCGS certification process.

The result of this very thorough and resource-heavy work is that a BRCGS certificate means you, your team and your consumers can be totally confident that your brand provides safe, legal and high-quality products and services.

Audited Sites - Global **Distribution**

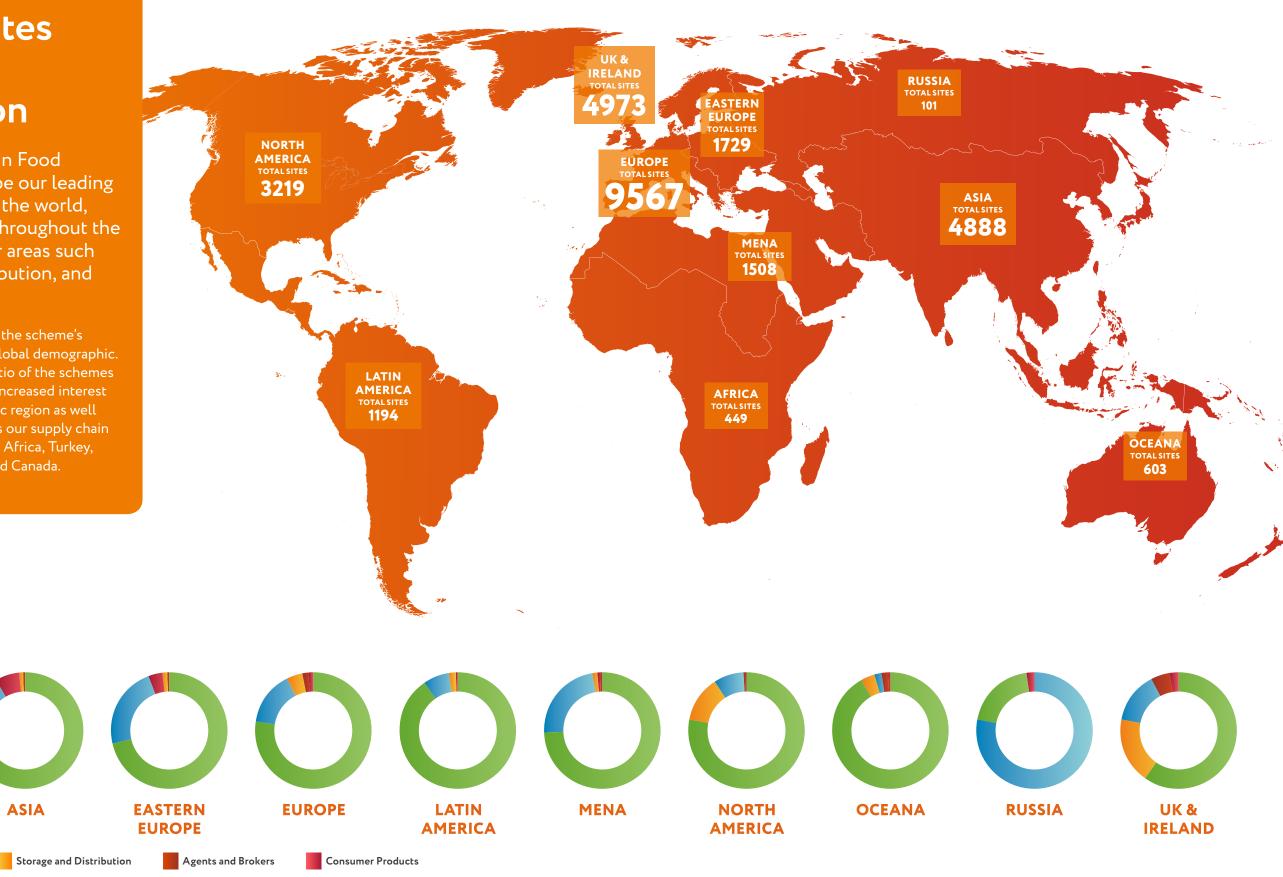
Our global standard in Food Safety continues to be our leading standard throughout the world, driving certification throughout the supply chain to other areas such as Storage and Distribution, and Agents and Brokers.

Operating for over 20 years, the scheme's growth reflects a changing global demographic. We see a reduction in the ratio of the schemes in the UK and Europe, with increased interest and growth in the Asia Pacific region as well as accelerated growth across our supply chain assurance products in South Africa, Turkey, China, India, Italy, Poland and Canada.

ASIA

AFRICA

Packaging



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COMPLIANCE CREATES CONFIDENCE REPORT 2019

Our Certification Body Partners

We continue to work with the best partners to deliver excellence.

The majority of Certification Bodies have worked with us for over 10 years and this year we have welcomed a number of new partners. This reflects the changing demographics of audit body partnerships around the world, and the changing needs of our evolving product portfolio.

As the world's largest third-party certification scheme, we are confident we have the resources to offer audits in your chosen region and speciality without compromising on the stringent requirements we demand of our partners.

BRCGS ensures an international presence across all our standards' competences. We work closely with a total of 71 Certification Bodies that all have an in-depth understanding of, and focus on, the BRCGS Standards and their associated modules.

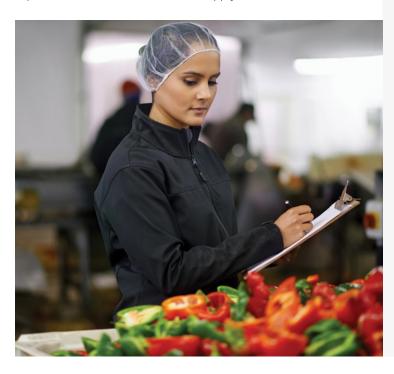


APPROVAL OF CERTIFICATION BODIES

Certification Bodies are ambassadors of BRCGS auditing and are therefore key to safeguarding our reputation.

This year, we undertook a comprehensive review of our recognition process and the contractual requirements that all approved Certification Bodies work to.

We have tightened our controls to ensure a transparent legal framework exists which is traceable directly from the audited client to the Certifying Body, identifying subcontracted processes that may be provided by local partners, for example. We have also put more focus on the annual audit requirements of international Certification Bodies' local partners to ensure robust management oversight and understanding of BRCGS expectations across the entire audit supply chain.



CERTIFICATION TO BRC GLOBAL STANDARDS OFFERED BY 71 CERTIFICATION PARTNERS GLOBALLY

Food Agents and Brokers
Packaging Consumer Products
Storage and Distribution

THE 5 KPI CRITERIA

Auditor Report Quality

We review a sample of audit reports to ensure they conform to our high standards, set by the our users' requirements

Protocol

Data from the BRCGS Directory of each of the 28,000 audits conducted annually is reviewed to ensure they comply with the audit rules, such as the correct duration, and that non-conformities have been correctly actioned

Auditor Management

Certification Bodies shall ensure that each of the 1,800 auditors employed are trained and kept up to date, with protocols such as ensuring auditor rotation at a site every three years

Result Submission

Timely submission of audit outcome to the BRCGS Directory is monitored to ensure stakeholders have access to accurate results

Communication

Effective and timely communication to the BRCGS team regarding issues such as complaint investigation is monitored

We have tightened our controls to ensure a transparent legal framework exists which is traceable directly from the audited client to the Certifying Body.



CERTIFICATION BODY KEY PERFORMANCE INDICATORS

BRCGS assesses the Certification Bodies through five KPIs. This is to ensure we only partner with the best-performing, most compliance-orientated organisations. As such, we invest significant resources in data gathering and analysis, to understand the insights the data delivers.

The BRCGS compliance team monitors Certification Bodies' performance every six months. Certification Bodies are formally rated from one to five stars against the KPIs.





CERTIFICATION BODY STAR RATINGS

The star ratings are reflections of Certifications Bodies' head office's overall management of the BRCGS certification scheme, rather than an individual auditor or audit. As part of the review, BRCGS provides detailed the Certification Body's auditing checks audit protocols are met, the Certification Body manages and reviews the quality of comm with clients and BRCGS.

Our rigorous KPI process has ensured t our Certifications Bodies have a four or We maintain transparency by publishin on the BRCGS website.

As part of the ed feedback on g performance, , examines how s its auditors, munication	rated with just two stars. This triggered our formal suspension process, which safeguards the users of our scheme to ensure they can always rely on the quality of audits carried out at certificated sites.
that 94% of or five star rating. ng the results	In the instance of suspension, BRCGS work closely with our Accreditation Body partners to ensure adequate corrective actions are put in place by the Certification Body to lift the suspension. Where Certification Bodies do not meet our requirements, approval is revoked.

SANCTIONS

Following the review of our six monthly

KPIs for all of our global Certification Bodies,

one Certification Body was not performing

to the standard expected and was therefore

6 monthly period	Total CERT bodies	% with 4 and 5 star	5 star	4 star	3 star	2 star	1 star	Not rated
Mar 18 - Sept 18	67	94	41	22	4	0	0	-
Oct 17 - Mar 18	67	87	34	24	7		0	-
Apr - Sept 17	68	93	51	12	3		0	1
Oct - Mar 17	69	93	46	18	3	0	0	2
Jan - June 16	70	96	51	16	2	0	0	1
July - Dec 15	70	96	42	25	2	0	0	1
July - Dec 13	81	91	40	34	7	0	0	0

BRCGS provides detailed feedback on the Certification Body's auditing performance.



AUDITING THE AUDITORS

BRCGS is committed to continually improving our partners' work. We work closely with Certification Bodies and completed a three-year programme of head office audits in 2016.

We also undertake head office audits for new partners and for partners who are operating below the star rating standards we expect. We completed nine head office audits around the globe in 2018.

Over the years we have visited a number of our partners at their global offices to build strong relationships and to ensure we understand the prevailing culture and local business pressures so we can work together in building a strong foundation for BRCGS certification. Having visited 20% of our Certification Body partners in 2017, we updated our operational contractual procedures with all Certification Bodies in 2018.

Our rigorous KPI process has ensured that 94% of our **Certifications Bodies have** a four or five star rating.

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COMPLIANCE CREATES CONFIDENCE REPORT 2019

BRCGS IT Development

As the world's leading brand and consumer protection organisation, BRCGS oversees the safety, legality and quality of a huge volume of products and services. The BRCGS audits therefore provide a rich source of valuable information.

The BRCGS Directory is the official database of all audits conducted against a BRCGS standard. The data is available in two tiers. The public area provides a basic level of information, while the password-protected user area has more detail.

As with any data, collecting and collating it is only the start point. It is the analysis that provides the useful learnings. We have, therefore, worked with Trace One to develop BRCGS Insight, which allows easy comparison of audit performance using a series of dashboards and reports.

BRCGS DIRECTORY AND BRCGS INSIGHT

Reports are tailored to individual needs, allowing BRCGS certificated sites to compare their own audit performance against similar sites across the world, customers to compare the performance of their suppliers. Importantly, it also enables the BRCGS compliance team to monitor the performance of individual Certification Bodies and auditors in relation to specific markets such geographic region or product type.

DATA MANAGEMENT

The BRCGS Directory is the repository of every single audit that is carried out against the BRCGS standards. It is a library of information, built up since 2008, of nearly 250,000 global audits in food safety, packaging, storage and distribution, consumer products, agents and brokers, and retail.

The data is controlled by the Certification Bodies, who administer all changes to site listings, audit documents and certification status information held on the BRCGS Directory. This ensures that supply chain partners can be assured that the data is both accurate and up to date.

The public area of the BRCGS Directory provides information on currently certificated sites, including audit scope and grade, allowing potential suppliers to be selected. It also lists BRCGS approved Certification Bodies.

The private, password-protected, site provides much more detailed data, hosting complete audit reports and certificates, allowing audit owners to share their audit documents with registered retailers, manufacturers and other specifiers. It also describes why and when certification has expired or been withdrawn.

> This is the very first time analytics of this nature have been made available. It really is a revolutionary approach to handling this important data. 11

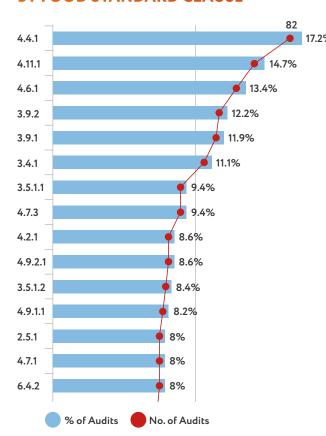


NEW ANALYSIS TOOL - BRCGS INSIGHT

What makes the data in the BRCGS Directory really fly is our BRCGS Insight add-on. BRCGS has invested in upgrades to our IT system to ensure it delivers the greatest benefits and the richest insights.

The result is that the data is analysed and presented so that it is easily benchmarked for each stakeholder need.

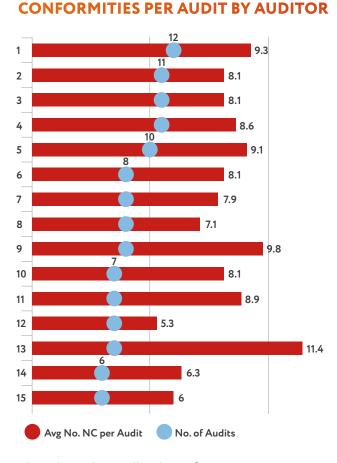
VOLUME OF NON-CONFORMITIES BY FOOD STANDARD CLAUSE



This is the very first time analytics of this nature have been made available. It really is a revolutionary approach to handling this important data.

In an ongoing process to inspire global improvements, BRCGS regularly analyses the data to understand safety issues that affect manufacturers, retailers and consumers. Sites can also analyse their year-on-year performance in a single chart, showing progress from audit to audit and the non-conformities that repeatedly occur. This data highlights

TOP AUDIT VOLUMES AVERAGE NON-



what is being done well and areas for improvement, so it can help sites to prepare even more thoroughly for future audits, ultimately delivering a better result for clients and their consumers.

Insight is a key tool used by BRCGS Compliance team to manage consistency. It measures Certification Body and auditor performance, allowing in-depth management reporting to assess risks and identify auditing inconsistencies that warrant further investigation.

BRCGS Auditing Programme - Site Visits

BRCGS continues to invest significantly in our programme of compliance activities to ensure continued excellence.

BRCGS carries out visits to certificated sites to see how well our scheme is operating. These involve oneday audits of certificated sites to review the auditor's findings and the site's continuing adherence to the requirements of the standard.

GROWING TEAM OF SPECIALISTS

This year we have taken on several more independent auditors to cover all product and process competencies and our growing portfolio of additional modules. We now have a global team of 19. You can meet our compliance auditors virtually here.

COMPLIANCE SITE VISITS

- 10 Latin America
- 19 North America
- **57** Europe
- 8 MENA
- 30 Asia Pacific
- 3 South Africa
- **35** UK

We visited sites in 33 different countries. 57% in Europe were unannounced, and 43% across the rest of the world took place at short notice. These visits are handled directly by BRCGS, though Certification Body representatives are always invited and attended on 90% of occasions.

80% of our Certification Bodies were involved in 162 compliance visits in 2018, a significant increase of the previous year. These reflect the audit volume of our standards:



Once audited, the sites have to correct any identified nonconformities to ensure they retain their certificated status. Certification Bodies will also receive an audit report with areas requiring improvement.

As a result of these site visits, one certificate was withdrawn by the Certification Body in 2018, and one site had their certificate suspended pending further action.

The top 10 non-conformities that have been raised across compliance visits to food sites were:

Rank	Requirement	Clause	Saturation
1	Internal Audits	3.4	32.7%
2	Housekeeping & Hygiene	4.11	30%
3	Door Condition	4.4.9	28%
4	Verify HACCP Flow Diagram	2.6	23.6%
5	Walls Condition	4.4.1	20.9%
6	Traceability	3.9	20%
7	Procedure for Glass handling	4.9.3	18.18%
8	Management Objectives	1.1.2	17.27%
9	Temporary Repairs	4.7.3	16.36%
10	Equipment Maintenance	4.7	15.45%



CONTINUAL IMPROVEMENT

Compliance visits are designed to drive improvements in the auditors' and Certification Bodies' work. Results of the visits which are scheduled on a risk basis form part of the KPIs for Certification Bodies.

Certificates and Reports you can trust

BRCGS has highly structured requirements for audit reporting of third-party certification. Review of the Certification Bodies' work, through onsite reviews and comparisons to the audit report, ensures accurate and descriptive audit reports. Our aim is provide readers with the information they need to understand the layout, fabrication and controls in place at the site. In addition, to ensure the accuracy about the products and services covered by the certification scope.

Ensuring sites operate to high standards

A BRCGS audit identifies areas for improvement through the non-conformity system. Our compliance visits check Certification Bodies' work to ensure the audit has been robust, and that BRCGS auditors have interpreted the standard requirements correctly and raised appropriate non-conformities. The sites can challenge any non-conformities through a formal appeal process, however appeals run at under 0.05% of the audits undertaken, emphasising the high calibre of auditors.

Consistent Audits undertaken to Protocol

The BRCGS protocols have been developed by global teams of experienced stakeholders to ensure the rules contribute to effective audits. Compliance visits therefore focus on ensuring Certification Bodies have complied with all our protocol requirements. Areas of focus are:

- Evidence of compliance to audit duration to ensure the client has received a sufficient audit
- Validating that the site has received timely and correct information during the audit process so they can fully engage for a successful and efficient audit outcome

Our Auditors

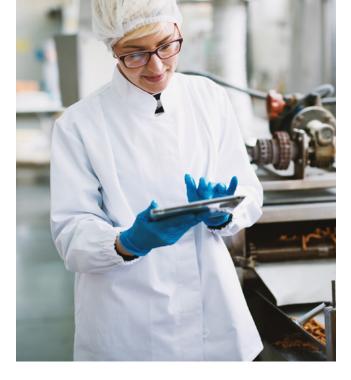
As one of the leading and most respected auditing organisations in the industry, BRCGS is proud of its work safeguarding product and retail standards for manufacturers, retailers and, most importantly, consumers. Auditors ensure consistency and quality, and are instrumental in embedding safety throughout the supply chain.

We believe we have some of the best auditors in the world. We have rigorous auditor requirements both for initial approval and continual registration.

CONTINUAL ASSESSMENT

Witness audits form an important role in confirming auditors are able to apply their expertise and knowledge, and that they possess the personal characteristics expected of a skilled auditor: ethical, logical, analytical, calm and able to communicate with personnel at all levels.

BRCGS requires Certification Bodies to deliver annual calibration webinars and Continual Professional Development training to their auditors to ensure they stay up to date with industry developments. All Certification Bodies attend our annual conference, either in Europe or the United States, and cascade the information of our continuing strategies to all personnel. This is supplemented by our regular technical bulletins.



ALL OUR AUDITORS HAVE A NUMBER OF YEARS' WORK **EXPERIENCE RELATED TO** THEIR MAIN QUALIFICATION **DISCIPLINE AND HAVE:**

- formal qualifications in auditing
- · formal qualification in Hazard Analysis (HACCP)
- completed our mandatory training courses
- · the right experience of the particular product and its associated technologies



FOCUS ON WITNESS AUDITS

Witness auditing has always been a key part of BRCGS requirements to ensure auditing skills are assessed every two years. Witness audits are also undertaken by Accreditation Bodies as part of the process for continual accreditation. Historically, however, there has been no specific format or expectations for Certification Bodies, or a system to measure improvement in performance.

Building on the collaborative discussion Certification Scheme owners had with GFSI. BRCGS has undertaken a review of our witness audit requirements. Much resource and expense are required in organising these audits because they involve both Certification Bodies and audited sites. Therefore, we updated the requirements with the aim of reducing the burden of repetition while seeking to improve consistency.

Our auditors demonstrate a range of skills and knowledge across the standard requirements and category competence, as well as the appropriate personal behaviour, audit leadership, critical thinking, problem solving and root cause analysis skills.

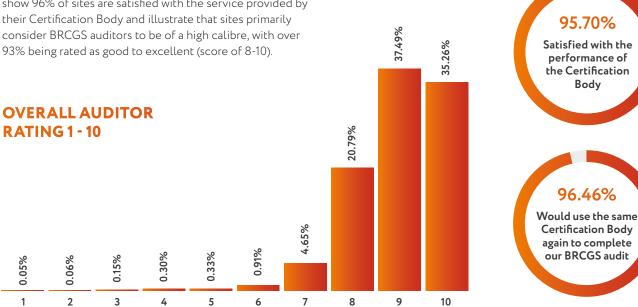
With the update of Food Issue 8, we have taken the opportunity to update our guidelines on audit techniques and emphasise these skills in mandatory training courses.

Witness assessment itself is a skill and BRCGS has set the requirements for those auditors that can undertake this important role. That includes mandatory training developed by BRCGS to ensure consistency in outcome. We have also developed standard reporting formats.

STAKEHOLDER FEEDBACK

BRCGS has a number of routes to gain feedback on audit performance, including collaboration with specifiers, surveys by audited sites, complaints, as well as BRCGS' own compliance activities.

As part of our programme to gain insight into the performance of its Certification Bodies, we send feedback surveys to audited sites. These help uphold excellence and compliance throughout the organisation. The survey results show 96% of sites are satisfied with the service provided by their Certification Body and illustrate that sites primarily consider BRCGS auditors to be of a high calibre, with over 93% being rated as good to excellent (score of 8-10).



Sites primarily consider **BRCGS** auditors to be of a high calibre, with over 93% being rated as good to excellent (score of 8-10).

COMPLIANCE CREATES CONFIDENCE REPORT 2019

BRCGS Support and Professional Development

The BRCGS Academy is the central provider of training on the BRCGS standards.

We have an experienced and knowledgeable team dedicated to creating and delivering interactive courses that enable delegates to consolidate and apply their learning about the requirements and implementation of the standards.

The comprehensive range of training courses, delivered by Approved Training Providers, ensure auditors, Certification Bodies, sites and manufacturers have the most complete information and training to audit or implement the standards.

BRCGS Academy courses provide unparalleled insight, as all training materials are developed in close collaboration with the BRCGS technical team who write the standards, so it is straight from the source. This ensures all the key and up-to-date messages are included in the sessions, and we always aspire to deliver them in a way that is both engaging and memorable.

Our trainees gain a full understanding of the wider context behind each standard.

Training course tutors are highly experienced practitioners with in-depth knowledge of the BRCGS standards.

COURSE CREATION

Our priority at the BRCGS Academy is to ensure the BRCGS standards are implemented correctly and uniformly across the world. The BRCGS standards are complex technical documents with a high volume of information making clear, professional training in their implementation paramount.

We provide a range of training courses with the objective of making sure auditors, Certification Bodies, sites and manufacturers have the very best information and training to apply the BRCGS standards throughout their businesses.

Our understanding of the BRCGS standards does not just come from writing them. We also audit them, giving us a deep understanding of the areas people struggle with in applying the BRCGS standards in their businesses. That means we have the knowledge and experience to adjust our training courses to make sure these areas are clear.

On top of that, our training course tutors are highly experienced practitioners with in-depth knowledge of the BRCGS standards.

We draw on our industry expertise and knowledge, as well as feedback from our network of Approved Training Partners, Certification Bodies, retailers and clients, to enhance our training courses. BRCGS Academy classroom-based training always includes interactive exercises and activities to give delegates the opportunity to learn from other practitioners within their industry. Whether face-to-face or e-learning, our material is of the highest quality, and carefully tailored to each audience. It enables auditors to audit the standard effectively, and sites to implement the requirements successfully.

The culmination of all this is that at BRCGS Academy we provide an enhanced level of training. We can explain the rationale behind each element of the BRCGS standards. Our trainees gain a full understanding of the wider context behind each standard, enabling them to make more informed and better, decisions. And we are experts at delivering that information in a way that's both engaging and memorable.



BRCGS BOOKSHOP

The BRCGS Bookshop enables registered users to order printed copies of the BRCGS standards, interpretation guidelines and many other BRCGS publications, other products such as the Food Safety Culture Excellence assessment module and digital products from Trace One – Insight.

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BR@S Bookshop

BRCGS PARTICIPATE

BRCGS Participate is an online information platform for BRCGS certificated sites and Delivery Partners. The site provides exclusive access to all BRCGS publications, webinars, case studies, white papers and reports. It offers the most convenient and flexible way to access all the content produced by BRCGS.

brcgsparticipate.com



BRCGS PROFESSIONAL

We have introduced BRCGS Professional to help develop individuals to effectively manage the standards at site level. This is a learning programme with international recognition for the key skills and knowledge essential for Product Safety Management.

Gaining certification as a BRCGS Professional demonstrates that you have an enhanced understanding of product safety management. It enables you to apply skills to reduce risks associated with product safety. Importantly, it gives you licence to provide a greater contribution as part of the brand protection team your company needs, thereby increasing the value of your work and raising your status as a valuable employee.

And because BRCGS is the world's leading provider of GFSI-recognised standards, following BRCGS Academy training, our trainees are fully-equipped to manage any GFSI-recognised standard in their business, and are able to implement or manage product safety systems.

Email **professional@brcgs.com** to find out more

BR@S Professional





Feedback, Complaints and Comments

BRCGS encourages feedback, complaints and comments. In fact, we believe success is partly achieved through the knowledge that complaints provide valuable insight for the organisation to investigate further. To ensure integrity, all complaints are entirely confidential.

When BRCGS receives a complaint, it is assessed and the appropriate action is taken. This can include:

- investigation by the Certification Body, which may include a site visit;
- investigation and follow-up by BRCGS, which may include further training by the Certification Body;
- · contacting the site via BRCGS, to gain further information;
- · a site visit by BRCGS, with any non-conformities followed up by the Certifying Body; and
- a witness audit of the relevant auditor, conducted by BRCGS.

Complaints are always investigated and followed-up to confirm sites' BRCGS certification status. The origin of the complaint is never divulged to sites.

If you wish to get in touch with BRCGS please use the contact form at brcgs.com

or email us at tellus@brcgs.com



CHICAGO LONDON NEW DELHI

SHANGHAI

TORONTO

T: +44 (0)20 3931 8150 **E**: enquiries@brcgs.com

brcgs.com