



FSC Chain of Custody Certification Audit Summary Report

Organization:	Cumberland Packaging Ltd		
Address:	Unit 2, Bay 6, Campfield Road Shoeburyness Essex SS3 9BX		
Website:	www.cumberlandpacking.co.uk	Public Company Email	jwatson@cpholdings.co.uk
Standard(s):	FSC-STD-40-004 V3-0 (COC) FSC STD-50-001 V1-2 (Trademark)		Accreditation Body: ASI
Type of Certification:	Single		
Representative:	Mr John Watson	Email Representative:	jwatson@cpholdings.co.uk
Phone no:	01702 298014	Email FSC Trademark:	jwatson@cpholdings.co.uk
Site(s) audited:	Unit 2, Bay 6, Campfield Road Shoeburyness Essex SS3 9BX	Date(s) of Audit(s):	22/03/2018
EA Code:	06	NACE Code:	20.2
Technical Area Code:	6.1	Effective No. of Personnel:	73
Lead Auditor:	Mr Tobin Gordon	Additional Team Member(s):	
Time Allocation (audit man day):	1	Additional Attendees and Roles:	
FSC COC Code:	SGSCH-COC-020143	First Issue Date:	18/04/2017
License Code:	FSC-C135030	Expiry date:	17/04/2022
<p>This report is confidential and distribution is limited to the audit team, client representative and the SGS office.</p> <p>SGS Société Générale de Surveillance SA (Switzerland), Technoparkstrasse 1, CH-8005 Zürich, Switzerland, Email : info.zh@sgs.com.</p>			

1. AUDIT OBJECTIVES

The objectives of this audit were:

- to confirm that the management system conforms with all the requirements of the audit standard;
- to confirm that the organization has effectively implemented the planned management system;
- to confirm that the management system is capable of achieving the organization's policy objectives.

2. SCOPE OF CERTIFICATION

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The purchase of FSC Mix and FSC Recycled sheet board for the manufacture, sale and distribution of FSC Mix and FSC Recycled Corrugated Products (Transfer System).

- Has this scope been amended as a result of this audit? Yes No
- This is a **single COC certification with multiple sites** and an “Appendix for Registration Organizations with Multiple Sites” listing all relevant sites has been established. However, these sites shall not be listed on the certificate. Yes No
- This is a **multi-site** audit and an “Appendix for Registration Organizations with Multiple Sites” listing all relevant sites and/or remote locations has been established (attached) and agreed with the client. Yes No
- This is a **group management** audit and an “Appendix for Registration Organizations with Multiple Sites” listing all relevant sites has been established (attached) and agreed with the client. Yes No
- The company is **outsourcing** processes and an “Appendix with Information about Outsourcings” listing all relevant sub-contactors Yes No
- The company is sourcing **Controlled Wood** and a separate complementary audit report is completed or an “Appendix for Controlled Wood Verification” is attached. Yes No
- The company intends to sell **FSC Controlled Wood** and a FSC Controlled Wood Code must be issued. Yes No
- The company is sourcing **reclaimed material** and an “Appendix with Information about Reclaimed Material” listing all relevant suppliers is attached Yes No

3. SYSTEM UNDER REVIEW

Cumberland Packaging Ltd manufactures corrugated cards products from a single production site in Shoeburyness, Essex.

The purchases and receives corrugated fibreboard from FSC certified suppliers. All inputs are supplied to the company as FSC certified. Input materials as stored on site prior to production.

Production involves bringing sheets together to form profiled and graded corrugated cardboard products that are stored in bulk prior to sales to customers. All production is based on customers’ bespoke purchase requirements.

No products are manufactured for stock.

All purchasing, production and sales are managed using Abaca Systems MIS.

Critical Control Points	Risk of Mixing	Justification
Document control	<u>Low Risk</u>	<p>Good Control: The company has developed a documented management system with the support of a COC consultant. The management system includes documents procedures covering all applicable FSC requirements.</p> <p>The company provided sample documents to demonstrate compliance with applicable FSC standard requirements.</p> <p>Procedures indicate that all relevant records are maintained for at least 5 years.</p> <p>Relevant personnel within the business have received training for procedures that apply to their responsibilities.</p>

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Purchase / purchase orders	<u>Low Risk</u>	<p>Good Control: The company has four suppliers. All suppliers hold valid FSC COC Certificates that include the FSC Product Type P4.3 Corrugated Fibreboard / FSC Mix.</p> <p>Suppliers have supplied products to the company with valid FSC claims and their applicable COC certificate codes.</p> <p>FSC production is based on bespoke customer orders. FSC inputs are therefore purchased for specific jobs.</p> <p>Purchase records are maintained through Abaca Systems MIS.</p>
Receiving / Storing	<u>Low Risk</u>	<p>Good Control: All inputs are received as FSC certified.</p> <p>All inputs are allocated a product code. The product code details are included in a bar code. The bar code is scanned on arrival and a GRN is electronically issued.</p> <p>The product is then allocated a specific storage area. The storage area is identified by an additional bar code.</p> <p>Any errors or non-conformance issues are automatically raised when the product is scanned.</p> <p>NC issues are automatically forwarded to the Production Manager.</p>
Processing Step 1	<u>Low Risk</u>	<p>Good Control: All manufacturing is based on bespoke purchases. The company does not manufacture for stock.</p> <p>The company uses Abaca Systems MIS to control all production. The MIS was effectively demonstrated at the assessment audit.</p> <p>The customer issues a quote request. An estimate is issued. If accepted, a works order is raised. On completion of the works order and the production process, the works order data is transferred to a delivery note and invoice.</p> <p>All production is based on distinct job orders.</p> <p>The company has unique reference numbers are each separate stage of the production process.</p>
Identification of finished product / Labelling	<u>Low Risk</u>	<p>Good Control: The company has stated that they will potentially use the FSC Mix label on-product. Procedure 11.2 defines the requirements for using the FSC Mix Label.</p> <p>The company has stated that they may use the promotional panel.</p> <p>All logo uses are controlled by the design department.</p> <p>Interviews with personnel confirm that the company understand the requirements for using the FSC logo generator and for submitting all logo use for approval, prior to final print.</p>
Sales documents	<u>Low Risk</u>	<p>Good Control: The company has demonstrated their understanding for including the FSC Mix Credit or FSC Mix 70% claim, and certificate code "SGSCH-COC-020143" on Invoices for certified outputs.</p> <p>Invoices are issued through EDI. PDF "Copy-Invoices" are issued for records purposes.</p> <p>All records for certified outputs are maintained through Abaca Systems MIS.</p>

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Distribution/ delivery	<u>Low Risk</u>	<p>Good Control: The company has demonstrated their understanding for including the FSC Mix Credit or FSC Mix 70% claim, along with a “dummy” certificate code “SGSCH-COC-xxxxxx” on delivery notes for certified outputs.</p> <p>All records for certified outputs will be maintained through Abaca Systems MIS.</p>
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4. CURRENT AUDIT FINDINGS AND CONCLUSIONS

The audit team conducted a process-based audit focusing on significant aspects/risks/objectives required by the standard(s). The audit methods used were interviews, observation of activities and review of documentation and records.

The structure of the audit was in accordance with the audit plan and audit planning matrix included as annexes to this summary report.

The audit team concludes that the organization has has not established and maintained its management system in line with the requirements of the standard and demonstrated the ability of the system to systematically achieve agreed requirements for products or services within the scope and the organization’s policy and objectives.

Number of nonconformities identified: 1 Major 0 Minor

Therefore the audit team recommends that, based on the results of this audit and the system’s demonstrated state of development and maturity, management system certification be:

Granted / Continued / Withheld / Suspended until satisfactory corrective action is completed.

5. PREVIOUS AUDIT RESULTS

The results of the last audit of this system have been reviewed, in particular to assure appropriate correction and corrective action has been implemented to address any nonconformity identified. This review has concluded that:

- Any nonconformity identified during previous audits has been corrected and the corrective action continues to be effective.
- The management system has not adequately addressed nonconformity identified during previous audit activities and the specific issue has been re-defined in the nonconformity section of this report.

6. AUDIT FINDINGS

The audit team conducted a process-based audit focusing on significant aspects/risks/objectives. The audit methods used were interviews, observation of activities and review of documentation and records.

The chain of custody system documentation demonstrated conformity with the requirements of the audit standard and provided sufficient structure to support implementation and maintenance of the management system. Yes No

The organization has demonstrated effective implementation and maintenance of its chain of custody system. Yes No

Throughout the audit process, the chain of custody system demonstrated overall conformance with the requirements of the audit standard. Yes No

Has the Organization taken possession of certified material? Yes No

Note: If the answer is “no” at the stage of the Initial Audit, the organisation shall notify SGS as soon as eligible input stock is available or the production of FSC-certified material has started. In case any relevant

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nonconformities have been issued as a result of this audit, SGS will need to carry out a site visit within 3 months.

FSC Trademark use is accurate and in accordance with appropriate standard and guidance. N/A Yes No

Certification claims relating to SGS certification marks are accurate and in accordance with appropriate guidance N/A Yes No

The organization received complaints, disputes or allegations relating compliance with any applicable aspect of the relevant FSC certification standards (details to be discussed in section 9). Yes No

7. SIGNIFICANT AUDIT TRAILS FOLLOWED

The specific processes, activities and functions reviewed are detailed in the Audit Planning Matrix and the Audit Plan. Details of collected evidence and audit trail of this audit are presented in the separate FSC-COC-checklist.

8. NONCONFORMITIES

Nonconformity	N° <u>1</u> of <u>1</u>	<input checked="" type="checkbox"/> Major	<input type="checkbox"/> Minor	<input type="checkbox"/> False Claim
Department / Function:	FSC Trademark Use	Standard Ref.:	FSC-STD-50-001V2.1 1.16	
Document Ref.:	Company Website	Issue / Rev. Status:	1 Open	
Details of Nonconformity:	<p>The company's use of the Acronym FSC on the company's website does not comply with FSC Requirements.</p> <p>http://www.cumberlandpackaging.co.uk/FSC_Chain_of_custody.php</p>			

Nonconformities detailed here shall be addressed through the organization's corrective action process, in accordance with the relevant corrective action requirements of the audit standard, including actions to analyse the cause of the nonconformity and prevent recurrence, and complete records maintained.

- Corrective actions to **address identified major nonconformities shall be carried out immediately including a cause analysis, and** SGS notified of the actions taken within 30 days. An SGS auditor will perform a **follow up visit** within 90 days to confirm the actions taken, evaluate their effectiveness, and determine whether certification can be granted or continued.
- Corrective actions to address identified major nonconformities shall be carried out immediately including a cause analysis, and **records with supporting evidence sent to the SGS auditor** for close-out within 90 days.

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- Corrective Actions to address identified minor non conformities including a cause analysis, shall be documented on an action plan and sent by the client to the auditor within 90 days for review. If the actions are deemed to be satisfactory they shall be followed up within 12 months.
- Corrective Actions to address identified minor nonconformities including a cause analysis, have been detailed on an action plan and the intended action reviewed by the Auditor, deemed to be satisfactory and shall be followed up within 12 months.
- Appropriate cause analysis and immediate corrective and preventative action taken in response to each nonconformity as required.

Note: For initial, re-certification and extension audits – recommendation for certification cannot be made unless check box 4 or 5 is completed. For re-certification audits the time scales indicated may need to be reduced in order to ensure re-certification prior to expiry of current certification.

Note: Within 12 months, the SGS audit team will follow up on identified minor nonconformities to confirm the effectiveness of the corrective actions taken.

9. GENERAL OBSERVATIONS & OPPORTUNITIES FOR IMPROVEMENT & COMPLAINTS RECEIVED BY THE ORGANIZATION

No Observation – 22/03/2018

No complaints received relating to FSC Products.

10. OPENING AND CLOSING MEETING ATTENDANCE RECORD

Name	Position	Opening	Closing
John Watson	MD	X	X
Raj Bhardwaj	COC Consultant	X	X
Sean Buckle	Abaca Systems Ltd	X	X
Tobin Gordon	Lead Auditor	X	X
Ian Stubbles	Compliance Officer	x	x

11. CERTIFICATION DECISION

Based on the results presented in this report and of probable additional findings presented in the follow up audit report a positive certification decision has been taken:

Date	Justification	Authorised by:
	<input type="checkbox"/> Initial audit <input type="checkbox"/> Re-certification <input type="checkbox"/> Surveillance/Change of Scope	

Based on the results presented in this report and of probable additional findings presented in the follow up audit report the certificate has been suspended or withdrawn.

Date	Suspension/Withdrawal	Justification	Authorised by:
	<input type="checkbox"/> Suspension <input type="checkbox"/> Withdrawal	<input type="checkbox"/> Due to false claims and/or fraud <input type="checkbox"/> Other non-conformities not closed in time <input type="checkbox"/> Other reasons:	

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APPENDIX WITH INFORMATION ABOUT PRODUCT GROUPS, SALES AND FSC FEES

1. Certified Product Groups

Input Product Type [1]	Category [2]	Output Product Type [1]	Species [3]	Primary Activity [4]	System [5]	Output Category [6]	No
P4.3 Corrugated Fibreboard	FSC Mix and FSC Recycled	P5.1 Corrugated Paper Packaging	NA	Secondary Processor	Transfer	FSC Mix and FSC Recycled	1

Information published in the FSC Database www.fsc-info.org (grey background):

[1] According to FSC-STD-40-004a - FSC Product Type Classification. Provide number and name.

[2] FSC 100%, FSC Mix, FSC Recycled, FSC Controlled Wood, Controlled Wood, Pre-Consumer Reclaimed Material or Post-Consumer Reclaimed Material.

[3] Scientific and common name.

[4] Options according to the FSC-Database are: Logging, primary processor, secondary processor, trader with physical possession, trader without physical possession, wholesaler, printer, publisher, retailer.

[5] Transfer, Credit or Percentage System.

[6] FSC 100%, FSC Mix, FSC Recycled, FSC Controlled Wood.

2. Purchases and Sales

Information on FSC-certified input and sold volumes based on the organization's annual volume summary is provided in the COC-part of the Checklist clause 4.4. SGS has to inform FSC about organizations that reported no FSC sales since the previous evaluation.

The organization did not report any FSC sales since the previous evaluation.

3. FSC AAF Accreditation and Administration Fees

The following table reflect the AAF classes for year 2018. The AAF Policy will be reviewed annually and revised to remain consistent with any new FSC strategy and/or policy or account for inflation according to the global inflation rate of the previous year.

Class	Annual Turnover in USD	Single COC	Multisite COC	Trader single	Trader Multisite
1	< 200'000	<input type="checkbox"/> USD 72	<input type="checkbox"/> USD 72	<input type="checkbox"/> USD 28	<input type="checkbox"/> USD 28
2	200'000 – 1'000'000	<input type="checkbox"/> USD 296	<input type="checkbox"/> USD 296	<input type="checkbox"/> USD 110	<input type="checkbox"/> USD 110
3	> 1 – 5 Million	<input type="checkbox"/> USD 580	<input type="checkbox"/> USD 580	<input type="checkbox"/> USD 219	<input type="checkbox"/> USD 329
4	> 5 – 25 Million	<input checked="" type="checkbox"/> USD 1'170	<input type="checkbox"/> USD 1'170	<input type="checkbox"/> USD 437	<input type="checkbox"/> USD 437
5	> 25 – 100 Million	<input type="checkbox"/> USD 2'055	<input type="checkbox"/> USD 2'055	<input type="checkbox"/> USD 733	<input type="checkbox"/> USD 733
6	> 100 – 500 Million	<input type="checkbox"/> USD 4'372	<input type="checkbox"/> USD 5'138	<input type="checkbox"/> USD 1'094	<input type="checkbox"/> USD 1'202
7	> 500 – 1'000 Million	<input type="checkbox"/> USD 7'324	<input type="checkbox"/> USD 10'930	<input type="checkbox"/> USD 2'186	<input type="checkbox"/> USD 2'296
8	> 1'000 – 2'000 Million	<input type="checkbox"/> USD 10'275	<input type="checkbox"/> USD 21'860	<input type="checkbox"/> USD 4'372	<input type="checkbox"/> USD 4'646
9	> 2'000 – 3'000 Million	<input type="checkbox"/> USD 16'396	<input type="checkbox"/> USD 32'790	<input type="checkbox"/> USD 5'466	<input type="checkbox"/> USD 6'558
10	> 3'000 – 5'000 Million	<input type="checkbox"/> USD 21'131	<input type="checkbox"/> USD 42'262	<input type="checkbox"/> USD 7'396	<input type="checkbox"/> USD 8'452
10+	> 5'000 Million	<input type="checkbox"/> USD 31'697	<input type="checkbox"/> USD 52'828	<input type="checkbox"/> USD 10'566	<input type="checkbox"/> USD 12'679

Groups: Special calculation applies. Provide summarised turnover of all group members in USD:

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Audit Plan

Organisation:	Cumberland Packaging Ltd		
Address:	Unit 2, Bay 6, Campfield Road Shoeburyness Essex SS3 9BX		
Visit Number:	2	Actual Visit Date:	22/03/2018
Visit Due by Date:	18/04/2019	For auditor information only	
Lead Auditor:	Mr Tobin Gordon		
Team Members:			
Standard:	FSC-STD-40-004 V3-0		
Audit Language:	English		
Audit Scope:	The purchase of FSC Mix and FSC Recycled sheet board for the manufacture, sale and distribution of FSC Mix and FSC Recycled Corrugated Products (Transfer System).		

Audit objectives: To confirm that the management system has been established and implemented in accordance with the requirements of the audit standard.

Date	Time	Auditor	Area / Department / Process / Function	Key Contact
			FSC	
22/03/18	09:00	Tobin Gordon	Office – Opening Meeting	John Watson
	09:15	“	Office – Public Summary Review	“
	09:45	“	Office – System/Procedure/Training/Records Review	“
	12:30		Lunch	
	13:00	“	Office – Purchasing/Supplier Control	“
	13:45	“	Warehouse/Storage Area – Material Receipt/Segregation	“
	14:30	“	Office – Material Balances/Volume Summaries	“
	15:00	“	Office/Despatch – Sales/Deliveries	“
	15:45	“	Office– Trademark Use	“
	16:15	“	Closing Meeting	“

Notes to Client:

- Times are approximate and will be confirmed at the opening meeting prior to commencement of the audit.
- SGS auditors reserve the right to change or add to the elements listed before or during the audit depending on the results of on-site investigation.
- A private place for preparation, review and conferencing is requested for the auditor's use.
- Please provide a light working lunch on-site each audit day.
- Your contract with SGS is an integral part of this audit plan and details confidentiality arrangements, audit scope, information on follow up activities and any special reporting requirements.

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Audit Plan – Next Visit

Organisation:	Cumberland Packaging Ltd		
Address:	Unit 2, Bay 6, Campfield Road Shoeburyness Essex SS3 9BX		
Visit Number:	3	Actual Visit Date:	TBC
Visit Due by Date:	18/04/2019	For auditor information only	
Lead Auditor:	TBC		
Team Members:	N/A		
Standard:	FSC-STD-40-004 V3-0		
Audit Language:	English		
Audit Scope:	The purchase of FSC Mix and FSC Recycled sheet board for the manufacture, sale and distribution of FSC Mix and FSC Recycled Corrugated Products (Transfer System).		

Audit objectives: To confirm that the management system has been established and implemented in accordance with the requirements of the audit standard.

Date	Time	Auditor	Area / Department / Process / Function	Key Contact
			FSC	
TBC	09:00	TBC	Office – Opening Meeting	John Watson
	09:15	“	Office – Public Summary Review	“
	09:45	“	Office – System/Procedure/Training/Records Review	“
	12:30		Lunch	
	13:00	“	Office – Purchasing/Supplier Control	“
	13:45	“	Warehouse/Storage Area – Material Receipt/Segregation	“
	14:30	“	Office – Material Balances/Volume Summaries	“
	15:00	“	Office/Despatch – Sales/Deliveries	“
	15:45	“	Office– Trademark Use	“
	16:15	“	Closing Meeting	“

Notes to Client:

- Times are approximate and will be confirmed at the opening meeting prior to commencement of the audit.
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Audit Planning Matrix

			Visits:	V1	V2	V3	V4	V5	V1R
			Dates:	05&06/01/17	22/03/18	Apr 19	Apr 20	Apr 21	Apr 22
Area / Department / Process / Function	ASPECTS, RISKS, OBJECTIVES,	Clauses	Auditor(s):						
COC Standard	FSC-STD-40-004 v3			V2.1	V3.0	V3.0	V3.0	V3.0	V3.0
Part I: Universal Requirements	CoC management system, material sourcing, material handling, FSC material and products records, sales, compliance with timber legality legislation	1, 2, 3, 4, 5, 6 <i>(1, 2, 3, 4, 5, 6) (FSC-STD-40-005 v2-1: 15, annex 4)</i>		X	X	O	O	O	O
Part II: Control of FSC Claims	Establishment of product groups for the control of FSC claims	7		X	X	O	O	O	O
	Transfer system, Percentage system, Credit system	8 (7) and/or 9 (8) and/or 10 (9)		X	X	O	O	O	O
Part III: Supplementary Requirements	FSC labeling requirements Use of FSC Trademarks	11 (10, 11) + FSC-STD-50-001 v1-2: 1.1, 1.16, 4.5, 7.1		X	X NC-01 Maj Open	O	O	O	O
	Outsourcing	12 (12)		NA	NA	NA	NA	NA	NA
Part IV: Eligibility Criteria for Single, Multisite, and Group CoC Certification	Eligibility for single CoC certification, Eligibility for multi-site CoC certification, Eligibility for group CoC certification	13 or 14 or 15		X	X	O	O	O	O

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Contract Data Information Return Form

Company Name:	Cumberland Packaging Ltd		
Auditor Name:	Mr Tobin Gordon	Date	22/03/18
Additional Team Members:			
I confirm that the audit team have completed the relevant Technical Area Qualification Form(s) for the Technical Area Code(s) listed on the page 2 of this report.			Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>

Certificate Details:

Please note the details given below will appear on the certificate issued to the client.

I have confirmed the below with client and any changes have been made to this data.

Certificate Number	Standard	AC Body	Full Site Address
GB17/872824	FSC-STD-40-004 v3.0	ASI	Unit 2, Bay 6, Campfield Road, Shoeburyness, Essex, SS3 9BX, GB

NB. This section will be blank if this is for an Initial visit.

	Yes	No
Has the level of integration changed since the last audit?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Has the scope changed since the last audit?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
I confirm that I have verified the EAC/NACE/TAC shown on page 2 of this report to be correct and accurately reflect the client's scope of certification.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
It was necessary for me to change the EAC/NACE/TAC on page 2 of this report	<input type="checkbox"/>	<input checked="" type="checkbox"/>
It was necessary for me to change the number of employees on page 2 of this report	<input type="checkbox"/>	<input checked="" type="checkbox"/>
It was necessary for me to change the company name on Page 2 of this report	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Administration Details:

• *Please complete*

Provisional date for next visit (To be filled in by SGS Employees only)			
FUA Required? (If yes, give units and date)	Yes <input checked="" type="checkbox"/> Date: 22/05/18	No <input type="checkbox"/>	
Additional comments			
Client email address confirmed as	jwatson@cpholdings.co.uk		

No of Duplicate Certificates	x	No of Van Stickers (Colour on White)	x	No of Van Stickers (Colour on Clear)	x
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Client Details:

• *Only record contact detail changes below, otherwise leave blank*

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Telephone No	
Fax No	
Contact Name	
Position	
Website	
Invoicing Address	

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