

Certification Evaluation Report

Roundtable on Sustainable Biomaterials

Agrisoma Biosciences Inc.

SCS Certificate Code-SCS-RSB/PC-0026

Suite 300, 200 Rue Montcalm
Gatineau, QC, J8Y 3B5 Canada
Client Contact
<http://agrisoma.com/>

CERTIFIED	EXPIRATION
16 November 2016	15 November 2021

DATE(S) OF DESK AUDIT
28 November 2017 – 5 December 2017
DATE OF LAST UPDATE
27 March 2018

SCS Contact:

Matthew Rudolf | Manager, Biofuels
+1.919.533.4886 (direct) mrudolf@scsglobalservices.com

SCSglobal
SERVICES
Setting the standard for sustainability™

FOREWORD

SCS Global Services (SCS) is a certification body accredited by the Roundtable on Sustainable Biomaterials (RSB) to conduct evaluations of biofuel operators. Under the RSB/SCS certification system, participating operators meeting international standards of biofuel production can be certified as “sustainable,” thereby permitting the Operator’s use of the RSB endorsement and logo in the marketplace subject to regular RSB/SCS oversight.

SCS deploys interdisciplinary teams of natural resource specialists and other experts all over the world to conduct evaluations of biofuel operations. SCS evaluation teams collect and analyze written materials, conduct interviews with Participating Operator’s staff and key stakeholders, and complete field and office audits of the operation(s) identified in the certification scope. Upon completion of the fact-finding phase of all evaluations, SCS teams determine compliance to the RSB Principles and Criteria.

Please Note: An RSB certificate itself does not constitute evidence that a particular product supplied by the certificate holder is certified to RSB standards. Products offered, shipped or sold by the certificate holder can only be considered covered by the scope of this certificate when the required RSB claim is clearly stated on-product. For more information about the RSB, visit their website at www.rsb.org.

Organization of the Report

This report of the results of our evaluation is divided into two sections. Section A provides the public summary and background information that is required by the Roundtable on Sustainable Biomaterials. This section is made available to the general public and is intended to provide an overview of the evaluation process, the management programs, and policies applied to the Participating Operator, and the results of the evaluation. Section A will be posted on the RSB Participating Operators Database (<http://rsb.org/certification/participating-operators/>). Section B contains more detailed results and information for use by the Participating Operator.

CONTENTS

SECTION A – PUBLIC SUMMARY	4
1.0 GENERAL INFORMATION.....	4
1.1 Operator Information	4
1.1.1 Name and Contact Information.....	4
1.2 Scope of Certificate.....	4
1.3 Standards Used.....	7
1.3.1 Applicable RSB-Accredited Standards.....	7
2.0 EVALUATION PLANNING & PROCESS.....	8
2.1 Documentation Submitted by Operator	8
2.2 Audit Type and Determination.....	8
2.3 Audit Team	8
2.3.1 Determination of Audit Team	8
2.3.2 Audit Team	9
2.4 Evaluation Schedule and Extent of Audit.....	9
2.4.1 Determination of Extent of Audit	9
2.4.2 Evaluation Itinerary and Activities.....	9
2.5 Evaluation of Management System.....	10
2.5.1 Methodology and Strategies Employed.....	10
2.5.2 Capacity of the participating operator to implement its management systems	10
2.5.3 Evaluation of RSB compliance claims and use of RSB trademarks	11
2.6 Stakeholder Consultation Process.....	11
2.6.1 Summary of Stakeholder Comments and Responses from the Team, Where Applicable.....	12
3.0 RISK ASSESSMENT RESULTS.....	12
4.0 RESULTS OF THE EVALUATION.....	12
4.1 Process of Determining Compliance.....	12
4.1.1 Structure of Standard and Degrees of Non-Compliance	12
4.1.2 Interpretations of Major and Minor Non-compliances	12
4.1.3 Major Non-compliances.....	13
4.1.4 Non-compliances and Current Status	13
6.0 CERTIFICATION DECISION	15

Sub Certificate Codes (if applicable) 15

SECTION B – APPENDICES (CONFIDENTIAL) 16

Appendix 1 – Certification Standard Conformance Table 16

Appendix 2 – Results of Evaluation of Operator Management System(s)..... 16

Appendix 3 – List of Stakeholders Consulted 17

 List of Operator Staff Consulted 17

 List of External Stakeholders Consulted..... 17

Appendix 4 – Details of Non-compliances 18

SECTION A – PUBLIC SUMMARY

1.0 GENERAL INFORMATION

1.1 Operator Information

1.1.1 Name and Contact Information

Organization name	Agrisoma Biosciences Inc.		
Operator Number	9239		
Contact person	Mejda Lortie, PhD		
Address	Suite 300	Telephone	(819) 205-7795
	200 Rue Montcalm	Fax	(819) 205-9675
	Gatineau, QC, J8Y 3B5	e-mail	mlortie@agrisoma.com
	Canada	Website	agrisoma.com

1.2 Scope of Certificate

Please select one:	<input checked="" type="checkbox"/> RSB EU RED	<input type="checkbox"/> RSB Global
Please select boxes that apply:	<input type="checkbox"/> Pre-assessment <input type="checkbox"/> Initial Assessment <input type="checkbox"/> Re-certification <input type="checkbox"/> Follow-Up to NCs	<input checked="" type="checkbox"/> 1st Annual Surveillance <input type="checkbox"/> 2nd Annual Surveillance <input type="checkbox"/> 3rd Annual Surveillance <input type="checkbox"/> 4th Annual Surveillance
The scope assessment agrees with the scope under which the operator applied	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
If no, please explain:		
<i>Note: If the scope is different, please contact SCS.</i>		

SITE INFORMATION FOR AGRICULTURAL SITES OR FEEDSTOCK PRODUCTION SITES		
Site Type	<input checked="" type="checkbox"/> Agriculture	<input type="checkbox"/> Forestry
	<input checked="" type="checkbox"/> Biomass Production	<input type="checkbox"/> Other:
Feedstock Produced:	Brassica Carinata seeds	
Current Land Use	Prior Land Use	
<input type="checkbox"/> Biomass Production	<input type="checkbox"/> Biomass Production	
<input checked="" type="checkbox"/> Agriculture	<input checked="" type="checkbox"/> Agriculture	
<input type="checkbox"/> Other:	<input type="checkbox"/> Other:	

Current Employment on Site	Prior Employment on Site			
<input type="checkbox"/> Negligible	<input type="checkbox"/> Negligible			
<input type="checkbox"/> Local Average	<input type="checkbox"/> Local Average			
<input type="checkbox"/> Above Local Average	<input type="checkbox"/> Above Local Average			
<input checked="" type="checkbox"/> Full	<input checked="" type="checkbox"/> Full			
Total workers covered by scope of certification:	90			
Number of women workers	Information not available at time of audit			
Owned/Controlled By:	Family Farms			
Location/City:	Farm in production: Columbia, Alabama			
Total farms included in certification scope	13 in scope Note: Only one farm was in production for the 2016-2017 growing season.			
Geographic location:	Farm/Entity	Location (Lat. - Long.)	Area (ha)	Area Planted (ha)
	Guy Goodson Farms	31.24416, - 85.159802	103.17	12.95
	Bell	31.210258, - 87.280479	14.16	0
	Godwin, S.	30.89458, - 87.190836	384.45	0
	Griffiths	30.450267, - 87.699883	1133.12	0
	Jones	30.486881, - 83.088836	404.69	0
	Murphy	30.507987, - 83.163603	1214.06	0
	Stansel	30.153095, - 82.860434	404.69	0
	Davis	30.999665, - 87.491712	1667.31	0

	Dollar	30.914625, - 84.587727	1618.74	0				
	Forrester	30.898853, -85.04301	728.43	0				
	Madison Farms	30.484154, - 83.401962	647.50	0				
	Tillman	30.573587, - 85.110881	343.98	0				
	Wynn	30.501109, - 83.115331	364.22	0				
NEW Please request shapefiles of all farms								
Were shapefiles of farms requested?		Yes						
Did Operator provide shapefiles of farms included in scope of certification?		No						
Total Area (ha)		9,028.52						
Total Planted Area (ha)		12.95						
Total area set aside for conservation purposes (ha)		None						
Annual Feedstock Production Volume (please specify unit of measurement)		17.69 tons						
Amount sold as RSB certified in last calendar year (tons)		0						
For Biofuels Producers: Please state the GHG emissions occurring at the operator's sites in g CO2eq/dry-ton for raw materials and intermediary products and g CO2eq/MJ for final biofuels (annualized, after allocation) and if applicable, achieved emission savings, and if applicable, explanation for deviation from typical GHG values								
Raw Material:		Brassica Carinata						
Eec	El	Ep	Etd	Eu	Esca	Eccs	Eccr	Ecc
846,990	0	0	0	0	1,163,832	0	0	0
Total Emissions:		-316,842 g CO2eq / dry-ton raw material						
<i>Add more lines as needed</i>								

WAREHOUSE	
Name	Amkin Storage facility
Type	<input type="checkbox"/> Agriculture Milling and/or Fermentation <input type="checkbox"/> Vegetable oil Extraction

	<input type="checkbox"/> Biofuel Production and/or Distribution <input checked="" type="checkbox"/> Storage or Distribution <input type="checkbox"/> Other, please explain here:
Location/City	Bainbridge, Georgia
Geographic location (<i>Latitude & Longitude</i>)	30.982428, -84.619779
Start date of operations (initial start date)	1 May 2017
Number of processing steps	1 (Storage)
Annual throughput of previous 12 months (<u>Can be moved to appendix if certain information is confidential</u>)	
Feedstock Input (Metric Ton)	
Final/Primary Product Output (Metric Ton)	0
Intermediate/by-product Output (Metric Ton)	0
% output yield compared to input material (total output/total input)	100
Amount sold as RSB certified (tons)	0
Description of Production/Processing Activities: Storage	

1.3 Standards Used

1.3.1 Applicable RSB-Accredited Standards

Title	Version	Date of Finalization
RSB Consolidated RSB EU RED Standard for Traceability of RSB EU RED and EU RED Certified Material (Chain of Custody)	3.5	30 August 2016
RSB-STD-11-001-30-001 EU RED Participating Operators	3.2	2 June 2016
RSB-STD-11-001-60-001 EU RED Standard for Risk Management	3.2	30 August 2016
Consolidated RSB EU RED Procedure on Communications and Claims	3.3	6 Marc 2017
RSB-STD-11-001 Standard for EU market access	3.1	20 March 2017
All standards employed are available on the websites of the Roundtable on Sustainable Biomaterials (http://rsb.org/sustainability/rsb-sustainability-standards/). Standards are also available, upon request, from SCS Global Services (http://www.scsglobalservices.com/).		

2.0 EVALUATION PLANNING & PROCESS

2.1 Documentation Submitted by Operator

RSB Application	RSB Screening Tool
RSB Questionnaire for Self-Risk Assessment	Environmental and Social Management Plan
Agrisoma Procedures on Communications and Claims	BioGrace-Results_RSB_2017_Goodson.xls
Carinata Product Transfer Information (template)	Grain Handling Agreement (template)
Carinata Production Contract (template)	Updated Agrisoma Chain of Custody procedures
Brassica carinata Field Survey Report (template)	SOP (RMP) B. carinata Planter/Seeder, Combine, and Seed Transfer Equipment
Agrisoma SE USA Carinata Management Handbook	Agrisoma Employee Handbook
Lease Agreement, Amkin (handler)	Guy Goodson Farms Contract, Production Report, Survey and Load ticket
Updated farm and storage database	Agrisoma organizational chart

2.2 Audit Type and Determination

The following table summarizes the audit types for RSB Audits:

	Low risk class	Medium risk class	High risk class
Certificate validity	5 years	3 years	2 year
Main audit	Every 5 years	Every 3 years	Every 2 year
Surveillance audit	Annual	Annual	Annual

2.3 Audit Team

2.3.1 Determination of Audit Team

- Desk audits shall always be conducted by at minimum one (1) international lead auditor. The lead auditor appointed may include additional auditors and/or technical experts in the audit team if this is required by the extent of the audit.
- Field audits shall always be led by one (1) international lead auditor.
- The lead auditor appointed shall include at minimum one (1) local auditor in the audit team. The lead auditor appointed may include additional auditors and/or technical experts in the audit team if this is required by the extent of the audit.
- For field audits of participating operators in High Risk class shall always the lead auditor appointed shall appoint at minimum
 - one (1) local auditor and
 - one (1) technical expert on social issues to evaluate compliance with social requirements and the risk of non-compliance due to social issues and

- one (1) technical expert on environmental issues to evaluate compliance with environmental requirements and the risk of non-compliance due to environmental issues.
- The lead auditor appointed may include additional auditors and/or technical experts in the audit team if this is required by the extent of the audit.

2.3.2 Audit Team

Auditor Name:	Robert Earley	Auditor role:	Lead Auditor (International)
<p>Qualifications: Robert is an auditor of RSB and ISCC certifications, and has been trained in ISO 9001:2015 auditing. Additionally, he is currently an expert consultant on UN, EU, charitable foundation and NGO projects focused on sustainable transportation and air pollution. Prior to becoming a consultant, Robert was the Transport Program Manager of Manila-based Clean Air Asia, promoting clean and efficient freight and logistics across Asia, and before that was the Director of the Clean Transportation Program at the Innovation Center for Energy and Transportation (iCET), which developed standards for lifecycle GHG emissions assessment for biofuels in China, and which became the first member of the RSB in China. He is currently on the board of the Beijing Energy Network as well as the China Carbon Forum. Mr. Earley, who has lived in China since 2005 and is fluent in Mandarin Chinese, studied environmental science at the University of Calgary and Urban and Regional Planning at the University of Waterloo in Canada. His coursework at the University of Calgary included impacts of agriculture and conservation in agricultural areas in southern Alberta.</p>			

2.4 Evaluation Schedule and Extent of Audit

2.4.1 Determination of Extent of Audit

Total number of subsidiaries, branch offices, affiliated entities, external third parties contracted or otherwise engaged, operational structures, sites, facilities, processing and production units, and supply chain structures	1 head office, 1 grain elevator, 13 contracted growers of Brassica carinata seeds (1 active farm for the surveillance year).
Participating Operator Risk Class	Low
Disputes or prior Non-compliances	None
Changes in scope since last evaluation	None
Total number of compliance claims	None

2.4.2 Evaluation Itinerary and Activities

Date: 28 November 2017	
Operation(s)/ sites visited	Activities/ notes
Head Office by telephone	Opening meeting
Head Office by telephone	Check list run-through
Date: 5 December 2017	

Operation(s)/ sites visited	Activities/ notes
Head Office by telephone	Closing meeting

2.5 Evaluation of Management System

2.5.1 Methodology and Strategies Employed

SCS deploys interdisciplinary teams with expertise in agriculture, ecology, forestry, social sciences, natural resource economics, and other relevant fields to assess an Operator’s compliance to RSB standards and policies. Evaluation methods include document and record review, implementing sampling strategies to visit a broad number of site and facility types, observation of implementation of management plans and policies, and stakeholder analysis. When there is more than one team member, team members may review parts of the standards based on their background and expertise. On the final day of an evaluation, team members convene to deliberate the findings of the assessment jointly. This involves an analysis of all relevant site observations, stakeholder comments, and reviewed documents and records. Where consensus between team members cannot be achieved due to lack of evidence, conflicting evidence or differences of interpretation of the standards, the team is instructed to report these in the certification decision section.

The SCS Auditor requested audit documents two weeks in advance of the desk audit, and held an opening meeting by telephone on 28 November 2017 with Alex Clayton, VP of Business Development, Scott Loney, Marketing Manager, Mejda Lortie, Director of Regulatory and Rina Cerrato in order to provide an orientation to the desk audit process. Between 28 November 2017 and 5 December 2017, the auditor reviewed documents and periodically requested further documentation. On 5 December, 2017, a closing meeting was held by telephone.

2.5.2 Capacity of the participating operator to implement its management systems

Note: include an overall evaluation of the participating operator’s responsiveness and ability to consistently and effectively implement its management system based on the financial, technical, and human resources available.

The auditor received documentation regarding the one grower of Brassica carinata that was contracted during the year leading up to the audit, as well as the grain handler in Georgia which was used to store grain over the period to understand the participating operator’s management systems and collect information about conformity with relevant RSB EU RED standards. As this was a desk audit, no field visits were undertaken. The auditor found that documentation suggests the management system and practices are consistent with RSB requirements and conform to the contractual requirements defined by Agrisoma Biosciences, Inc.

The Agrisoma Biosciences management system was assessed and found to be appropriate for operations performed at headquarters. Company policies are described in the Employee Handbook. The document provides employees with a brief summary of Agrisoma’s operating policies, guidelines and

standards. Employees are directed to contact their supervisor for additional information when required. Policies and expectations for conformity with RSB standards are communicated to growers in a “Carinata Production Contract”. Requirements for grain handlers are communicated in a separate “Grain Handling Agreement”.

The Agrisoma employee handbook contains information on employee relations and conduct, employee practices and benefits, and safety and security policies. In particular, the employee handbook contains the following information:

- Confidentiality: Any communication of confidential information outside the company requires prior approval of management and/or confidential agreements may be required.
- Conflict resolution: Agrisoma has a dispute resolution process for investigating, documenting and recommending solutions in dispute situations.
- Safety: Agrisoma follows the National Research Council guidelines for safety. All accidents and injuries at work, no matter how minor, must be reported to the Supervisor. Agrisoma has dedicated First Aide Attendants on site.
- Emergency policies: Agrisoma follows the emergency and biohazardous procedures set out by the safety committee of the National Research Council Plant Biotechnology Institute.

Agrisoma is managed by seed and transportation industry veterans. Executive leadership is comprised of a chief executive officer, four vice presidents, and one department director. Top management reports to a board of directors.

2.5.3 Evaluation of RSB compliance claims and use of RSB trademarks

Type (compliance claim, trademark use)	Description	Findings
No RSB compliance claims made		

2.6 Stakeholder Consultation Process

In accordance with SCS and RSB protocols, consultation with key stakeholders is an integral component of the evaluation process. Stakeholder consultation takes place prior to, concurrent with, and following field evaluations. The primary purpose of such consultation is to solicit input from affected parties as to the strengths and weaknesses of the Participating Operator’s management system and operations, relative to the standard, and the nature of the interaction between the company and the surrounding communities.

Principal stakeholder groups are identified based upon the certification scope of the participating operator.

Stakeholder consultation activities are organized according to the requirements of the RSB. The table below summarizes the major comments received from stakeholders and the assessment team’s response. Where a stakeholder comment has triggered a subsequent investigation during the evaluation, the corresponding follow-up action and conclusions from SCS are noted below.

2.6.1 Summary of Stakeholder Comments and Responses from the Team, Where Applicable

No Stakeholder comments were taken as part of the desk audit. Review of documents did not indicate need to make additional inquiries to stakeholders.

3.0 RISK ASSESSMENT RESULTS

Based on the most recent self-risk assessment (no older than 3 months from the audit date) the PO’s risk assessment results are:	Corresponding risk class (low, medium, high):
1	Low

4.0 RESULTS OF THE EVALUATION

4.1 Process of Determining Compliance

4.1.1 Structure of Standard and Degrees of Non-Compliance

RSB-accredited biofuel standards consist of a three-level hierarchy: the principle, the criteria that correspond to that principle, and then the performance indicators that elaborate upon each criterion. Consistent with SCS Sustainable Biofuels Program evaluation protocols, the team collectively determines whether or not the subject operation is in compliance with every applicable indicator of the relevant sustainable biofuel standard. Each non-compliance must be evaluated to determine whether it constitutes a major or minor non-compliance at the level of the associated criterion or sub-criterion. Not all indicators are equally important, and there is no simple numerical formula to determine whether an operation is in non-compliance. The team therefore must use their collective judgment to assess each criterion and determine if the Operator is in compliance. If the Operator is determined to be in non-compliance at the criterion level, then at least one of the applicable indicators must be in major non-compliance.

4.1.2 Interpretations of Major and Minor Non-compliances

Major Non-compliances, either alone or in combination with non-compliances of other applicable indicators, result (or are likely to result) in a fundamental failure to achieve the objectives of the relevant RSB Criterion. These non-compliances must be resolved or closed out before a certificate can be awarded. If Major NCs arise after an operation is certified, the timeframe for correcting these non-

compliances is typically no more than three months. Certification is contingent on the operator’s response to the NCs within the stipulated time frame.

Minor Non-compliances are typically limited in scale or can be characterized as an unusual lapse in the system. Most minor NCs are the result of a non-conformance at the indicator-level. Non-compliances must be closed out within a specified time period of award of the certificate.

4.1.3 Major Non-compliances

<input checked="" type="checkbox"/>	No major NCs were issued to the Operator during the evaluation. Any minor CARs from previous surveillance audits have been reviewed and closed prior to the issuance of a certificate.
<input type="checkbox"/>	Major NCs were issued to the Operator during the evaluation, which have all been closed to the satisfaction of the audit team and meet the requirements of the standards. Any minor CARs from previous surveillance audits have been reviewed and closed prior to the issuance of a certificate.
<input type="checkbox"/>	Major NCs were issued to the Operator during the evaluation and the Operator has not yet satisfactorily closed all major NCs.

4.1.4 Non-compliances and Current Status


Instructions:

- Initial certification audit: list all Non-conformities and Opportunities for Improvement issued during this audit.
- Surveillance/Recertification: list status of minor NCs that were not closed in previous audit, then list new NCs/OFIs issued during this audit.

Summary of Non-compliances and Current Status				
Non-compliance Number	Type of Non-compliance	Relevant RSB Standard & Indicator No.	Summary of Finding and Evidence Collected	Status of Non-compliance (Open/Closed)
2016-01	Minor	RSB-STD 11-001-30-001 1.4.1	<p>Contracts with growers and grain handlers did not fully meet the requirements of paragraph 1.4.1: Grain handler’s contract did not “specifically refer to the commitment of the groups, people and structures listed in 1.3.2 above to put in place and comply with RSB standards and procedures”.</p> <p>Update: Agrisoma has updated its template contract for grain</p>	Closed

			handlers to specifically refer to the groups, people and structures listed in 1.3.2 above to put in place and comply with RSB standards and procedures.	
2016-06	Minor	RSB-STD-11-001 Standard access V 3.0	<p>2007 study by Gasol et al. and a 2016 Canadian National Research Council LCA Report have been provided as the basis for an emissions saving credit from soil carbon accumulation. While this has been accepted as preliminary evidence Agrisoma will need to have growers conduct soil carbon testing of fields that have planted the crop to ensure that the extent of carbon fixation in the soil is as claimed.</p> <p>Update: Carbon fixation will take several years before it is measurable. Agrisoma's agronomist monitors this situation. In the Sustainability Questionnaire filled in by Guy Goodson Farms for 2016-2017, it is noted that the farm conducts annual soil sampling.</p>	Closed
2017-01	Minor	RSB Requirement for shape files and number of female workers in scope	Shape files and number of female workers were not available at the time of the audit.	Open
2017-02	Opportunity for Improvement	RSB-STD 11-001-30-001 v.3.2, 1.5	As Agrisoma's operations grow in complexity, it will be necessary to ensure a more robust management system (quality management, risk management) system is in place. This can be achieved by augmenting controls relating to its compliance with RSB standards and requirements and ensuring records are managed in an organized and timely manner.	Open

6.0 CERTIFICATION DECISION

Certification Recommendation		
For Surveillance Audits: Operator is to continue as an RSB certified Participating Operator subject to the minor non-compliances stated in Section 4.2.5.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
The SCS evaluation team makes the above recommendation for certification based on the full and proper execution of the SCS Responsible Biofuels Program evaluation protocols. If certification is recommended, the Operator has satisfactorily demonstrated the following without exception:		
Operator has addressed any Major NC(s) assigned during the evaluation.	Yes <input type="checkbox"/> No <input type="checkbox"/> No Major NCs issued <input checked="" type="checkbox"/>	
Operator has demonstrated that their system of management is capable of ensuring that all of the requirements of the applicable standards are met over the sites and facilities covered by the scope of the evaluation.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
Operator has demonstrated that the described system of management is being implemented consistently over the sites and facilities covered by the scope of the certificate.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
Comments and/or details of any issue which was difficult and/or impossible to evaluate:		
To be completed by Certification Decision-Making Entity	Technical Review by: If different to decision-maker	Inna Kitaychik, Matthew Rudolf
	Certification decision:	Continued certification under the RSB standards
	Certification decision by:	Matthew Rudolf 
	Date of decision: For initial or continued certification	3/28/18
	Surveillance schedule:	2 nd Surveillance to take place in November 2018. Notes:

Sub Certificate Codes (if applicable)

Legal Entity/Operational Site	Sub-Certificate Code