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INTERNAL AUDIT REPORT – 2025

- A PREPARATION FOR GAFTA'S ANNUAL AUDIT –

Title:	Internal Audit Report
Company under audit:	Pantonelli Kft. 1204 Budapest, Versec u. 9.
Date of Internal Audit:	1 Sep 2025 – 12 Sep 2025
Internal Audit Done By:	Mr. Attila Nagy
Company Representative:	Mr. Zoltan Nabradi (Head of Fumigation)
Next Scheduled Internal Audit	September 2026

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Attila Nagy (Internal Auditor)

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Zoltan Nabradi (Head of Fumigation)

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Introduction

The fumigation operation of the company is annually audited by the Grain and Feed Trade Association (GAFTA). Starting from 2021, Gafta has a new requirement of conducting Internal Audits for all licensed fumigators. Since the fumigator is a small family owned company, the internal audit process is a good opportunity for them to prepare for Gafta's third party audit.

SCHEDULE: This Internal Audit process will take place annually, before Gafta's audit.

SCOPE: The scope of the Internal Audit is to compare the company's operation against Gafta Fumigation Standard V8's requirements.

RESPONSIBILITY: It is the company director's responsibility to review the internal audit's results and do the corrective actions within 2 weeks.

In the following audit spreadsheet, the following signs will show the audit results:

-  Requirement Met
-  Nonconformance
-  Requirement does not apply
-  Key requirement
-  Documentary evidence available

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#	Requirement	Evidence	Result	Non-conf. Reason	Corrective Action
1.	General Obligations and Requirements				
1.1.1 🔑	The fumigator must be a legal entity, or a defined part of a legal entity, which is legally responsible for its fumigation activities.	☐ Fresh company extract • Issued by: Ministry of Justice • Company Reg Nr: 01-09-401275 • Company Reg date: 2022/05/23 ☐ Company pest control permission • Issued by: BP Government Office, Department of Public Health • Perm. Nr: BP-20/NEO/24403-3/2022	●		
1.1.2	Where fumigators operate on multiple sites, in the same country, each site must be part of the same legal entity, follow the same procedures, issue the same certificates and/or reports, with a management system having overall responsibility for the fumigation activities.	The company is operating with one site.	●		
1.1.3 🔑	For a multinational Fumigation company with offices in different countries, each country must hold its own certification to the Gafta Standard and be audited separately.	The company is operating in one country.	●		

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1.1.4 🔑	The Fumigator must have documented operating and management procedures.	operating and management procedures • refers to “Management review” doc • last update: 1 June 2025	●		
1.1.5 🔑	Fumigators must regularly (at least annually) review their management system to ensure continued conformance with procedures and policies, fulfilment of objectives, and identify opportunities for improvement. In particular a management review must consider (but is not limited to): - Internal or external changes relevant to the scope of this Standard - Suitability of operating and management procedures - Outcomes of internal audits, audits against this Standard and any other external/third party audits - Complaints - Customer and personnel feedback - Risk Assessments - Corrective actions, and effectiveness of preventative actions/improvements	Management Review • refers to previous Gafta audit • refers to recent internal audits • last update: 9 Sept 2025	●		

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1.2 	Outlined in this manual are the main areas of importance with respect to fumigation matters relating to combinable crops and animal feed materials and must be read in conjunction with the following manuals / guide notes which address the individual requirements for particular logistical operation / procedures. Fumigators must demonstrate access to the latest version of each publication. • Gafta Fumigation Rules No.132 • Recommendations on the Safe Use of Pesticides in Ships applicable to the Fumigation of Cargo Holds • International Maritime Dangerous Goods (IMDG) – relevant sections • Fumigation product instructions, manufacturer guidance, product datasheets etc • All relevant local legislation and/or regulations.	The following documents are stored in the office:  Gafta Fumigation Standard v8  Gafta Fumigation Standard v8 - what's changed  Gafta No.132 Fumigation Rules  Gafta Fumigation Code of Practice V2  Hungarian Rules & Regulations  Material Safety Sheets & Permissions • currently used fumigant: Magtoxin • Permission issued by: National Food Chain Safety Office			
1.3 	Fumigators and ship owners and their representatives must comply with all the relevant requirements of the country and ports that vessels or cargo spaces are fumigated or ventilated in. ... In addition, any requirements of the country that the ship is flagged to must be adhered to.		—		

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1.4 	The fumigation products used must be applied strictly in accordance with the manufacturer's instructions, calibrations and safety precautions on the label, and records retained.	 Material Safety Sheets & Permissions  Magtoxin product label • As per the fumigation reports and dosage calculations (based on Permission Documents / Fumigant Labels), this criteria is always met.			
1.5	The fumigation products used must be used in accordance with the approval in the country where the fumigation is being conducted.	It is ensured by the use of Hungarian material safety sheets and permissions.			
1.6	In order for Fumigators to perform their activities, precise instructions are needed from their principals at the time of receiving the order.	The Head of Fumigation is personally present during all fumigation jobs.			
1.7	The Fumigator should advise their principal of the requirement to employ a Fumigator at discharge or other agreed safe anchorage point. The principals (i.e. the seller and/or the buyer or receiver) are responsible for appointing a fumigator at discharge or other agreed safe anchorage point as agreed in the contract for the goods.				

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1.8 	Fumigators must nominate a suitably experienced person as a Technical/File Manager who shall be the responsible person for receiving instructions from a 2.1 principal and who shall be responsible for forwarding the appropriate instructions to the Fumigator-in-Charge. The Technical/File Manager must be a permanent employee responsible for ensuring that sufficient information has been received to enable the Fumigator-in-Charge to satisfactorily carry out their duties.	 Org chart document - last update: 31 July 2025 2 new licensed fumigators added - As a small company, the Technical manager is the Director of the company			
1.9	For in-transit fumigation the fumigator should ensure the nomination specifies who is responsible for the provision of RPE on board the vessel. (Refer also to point 10.1.8)				
1.10 	A Fumigator must only contract out operations which it has been appointed to carry out to another Fumigation company certified under the Gafta Standard for Fumigation and/or from the Gafta Approved Register of Fumigators (excepting the recommendation in Section 14).	There are no sub-contractors of the company.			
2.	Complaints Procedure				

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2.1 	The Fumigator must have a documented procedure for handling complaints. This procedure must include systems for: • The prompt documentation and investigation of complaints • The prompt feedback to the complainant with findings • Deciding on internal actions required to prevent re-occurrence • Identifying trends and feeding into management review.	 Complaints procedure • last update: 1 June 2024 • refers to Complaints Log • refers to Management Review  Complaints log • contains no complaints this year			
3.	Insurance				
3.1 	Fumigators must demonstrate that they have adequate and appropriate insurance in place to cover any claims which may arise as a result of liability in respect of their operations.	 Scanned Insurance Certificate • Bond number: 20023875 • Company: K&H Biztosító Zrt. • Insured up to 20M HUF			
4.	Risk Assessment				

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4.1 	Fumigators must have a risk assessment in place that identifies and controls any hazards or risks that negatively impact their ability to carry out their services. Hazards and risks to the following must be considered: equipment, resources, personnel, confidentiality/information security, external influences, explosion, fire, food/feed safety, intoxication, personnel exposure and poisoning.	 Risk Assessment, 5 chapters - last update: 1 June 2024 - valid till: 2027  Risk Assessment, Gafta Extension - last update: 22 Aug 2024 - This annex is needed to cover the management of additional risks not required by Hungarian regulations but required by Gafta: food and feed safety, information security, confidentiality, extreme weather conditions.			
5.	Internal Audit				
5.1 	A documented internal auditing procedure must be in place, which reviews processes and verifies they are followed correctly and consistently and identifies opportunities for improvement.	 Internal Audit Procedure - last update: 1 Aug 2022 - refers to Internal Audit Log - refers to Internal Audit Report			

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5.2	Internal audits must be carried out for all activities against the documented operating and management procedures and this Standard as a minimum. They must be completed at least annually at each site and in addition to the 3rd party audits carried out for this Standard.	- Internal Audit Log 2025 - Contains 2025 annual internal audit - Internal Audit Report 2025 - Reviews processes against Gafta Standard v8			
5.3	The audit programme must include the frequency, methods, responsibilities, planning requirements and reporting, and must take into consideration the importance of the activities concerned, changes affecting activities or services, and the results of previous audits.	Internal Audit Procedure			
5.4	Where possible, internal audits must be undertaken in such a way that the person undertaking the internal audit is not auditing their own work. Internal audits can be carried out by suitably competent external 3rd party.	- Internal Auditor Certificate - Internal Auditor is a third party - Cert. issued by: GAFTA - Issue Date: 16 February 2022			
5.5	Internal audits must include work carried out by sub-contractors.	There are no subcontractors.			

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5.6	Internal audit reports should include objective evidence to show compliance with the audit criteria.	Internal Audit Report 2025	●		
5.7 🔑	The person responsible for overall control of the fumigation operations must ensure non-conformances raised through internal audit and any 3rd party audits (such as audits to this Standard) are rectified within specified timescales and implement suitable preventative action to avoid recurrence.	Internal Audit Procedure Internal Audit Report 2025 • both contain the required time window of “two weeks” for addressing non-conformances	●		
6.	Records and Record Keeping				
6.1 🔑	Internally produced records must be signed by the person carrying out the task or activity.	All documents are properly signed.	●		
6.2 🔑	Records must be legible and kept in suitable conditions that allow ready retrieval and prevent deterioration.	Paper documents and online documents are kept in proper office conditions.	●		
6.3	Records must be kept for a minimum of seven years unless there are additional requirements.		●		

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6.4 	The Fumigator must only report actual and true findings.				
7.	Health and Safety Regulations for Employees				
7.1 	The Fumigator must comply with all relevant local and national Health and Safety Regulations of the country in which it is operating with regard to its employees and any other operatives under its control.	 Annual Medical Checkup Log 2025  Annual Medical Papers 2025 • exam date: 22 Feb 2025 • issued by: Dr. Jeno Dancso  Work safety training included in all employee's individual training records			
7.2 	Fumigators must wear the appropriate Personal Protective Equipment. The items provided must be appropriate to the activities being performed, must be in good order and within any applicable validity period or expiry date. Records must be retained for the issuance and receipt of such equipment to/by Fumigators.	 PPE sign sheet for each employee • issued on 6 May 2025			

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7.3	Where Fumigators are asked to perform their duties in an environment or in conditions deemed by them to be dangerous or unsafe, they should refuse to undertake said duties or operations until such time as the conditions are made safe to their satisfaction. Where a Fumigator refuses to perform an activity or operation due to concerns regarding safety they must immediately notify the principal accordingly.	Part of Work safety training			
8.	Equipment				
8.1 	Equipment must be fit for the purpose for which it is used and maintained and serviced to manufacturers' specifications or tolerances. Maintenance and servicing schedules must be recorded.	Inventory 2025 • refers to maintenance log • refers to calibration log / report • refers to PPE maintenance schedules			
8.2	Manufacturers' operating instructions or in-house procedures must be available.	Operating instructions • available for foggers, sprayers, gas detector, PPE mask & filters			

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8.3 	Equipment must be checked before use on a regular basis.	 PPE maintenance schedules • general rules for mask / filter maintenance • filled in for 3M 7500 half mask and 3M-A2B2E2K2P3 filter • also part of work safety training			
8.4 	Equipment must be calibrated where appropriate according to the manufacturers' instructions or in-house procedures, and records kept. Calibration adjustments must only be undertaken by authorised and trained personnel.	 Calibration report for 1 device • date: 12 Aug 2025 • valid till: 9 Feb 2026  Calibration log 2025 • 1 device, calibrated every 6 months			
9.	Training				
9.1	Competence: The Fumigation company must define and document (for example in a job description) the responsibilities and competency requirements for each employee, including (but not limited to) education, training, experience, technical knowledge and skills.	 Roles and Responsibilities • last update: 1 Jun 2024			

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9.2	Where available, Fumigators should be a member of the national or regional professional trade association/ body applicable to fumigation operations.	 MEGE website (link / screenshot) • Zoltan is a member of MEGE (Hungarian Association of Licensed Fumigators) • List of members available on their website			
9.3 	Fumigation technicians must be trained (or operating under a qualified technician) and licensed (or equivalent permit/document) to the requirements of the country where the fumigation or ventilation activities are conducted.	 Valid Fumigator Licenses (3) • Mr. Zoltan Nabradi License Nr: S/1925820/22 (valid till 2027) • Mr. Sandor Tamas License Nr: S/1981577/22 (valid till 2027) • Ms. Panna Nabradi License Nr: S/1981596/22 (valid till 2027)  Detia Degesh Certificate • issued in 2018 • issued for Mr. Zoltan Nabradi			
9.4 	Training programmes must be regular and updated as appropriate.	 Employee Training Procedure • refers to mentoring period • refers to individual tr. programmes • refers to performance reviews • last updated: 20 Sept 2023			

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9.5 🔑	Written training programmes must be implemented and include the following stages: • Induction period • Supervised/mentored working period with experienced operators Continued training to remain up to date with changing technology, methods, legislation etc.	📅 Individual Training Programmes 2025 • available for 2 fumigators and 1 pest control expert	●		
9.6 🔑	Individual training records must be kept for each employee.		●		
9.7 🔑	The requirement to attend or receive training must take into account the ability, experience and other qualifications held by each employee and shall be appropriate to their activities.	There are two roles in the company (fumigator, pest control) – this criteria is met properly during the trainings.	●		
9.8 🔑	Regular performance reviews must be completed for all employees. This must be completed at least annually, but more frequently as required. Performance reviews must include a combination of on-site observations, interviews, self-assessment and other techniques to assess performance. Performance reviews must be used to identify training needs.	📅 Performance review sheets 2025 • available for 2 fumigators and 1 pest control expert	●		

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9.9 🔑	Training must cover at least, but not limited to, the following areas of activity: • All relevant codes and regulations including, but not limited to, those listed in Section 1 – General Obligations and Requirements • The requirements of the Gafta Standard for Fumigation • The applicable Gafta Contract terms and Gafta Rules • Health and Safety requirements • Fumigants and products used by the Fumigator	It is part of the Training Programme. See 9.5	●		
9.10	Personnel who carry out internal audits must be trained to do so.	📄 Internal Auditor Certificate • Cert. issued by: GAFTA • Issue Date: 16 February 2022	●		
10.	– DOES NOT APPLY – In-transit Fumigation of Bulk and Bagged Cargo in Ships' Holds with Phosphine				
11.	– DOES NOT APPLY – In-Port Fumigation using Methyl Bromide or Sulfuryl Fluoride				
12.	– DOES NOT APPLY – Fumigation of Freight Containers				
13.	Store and Silo Fumigation				

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13.1 	The Fumigator must carry out a safety assessment of the store/silo to be treated. This must consider potential areas of gas leakage, such as ducting on the floor or via the walls. A report of findings and any recommendations must be made in writing to all relevant parties. The recommendations made must have been performed prior to fumigation.	 Fumigation Report  Unsealing report The results of the Safety Assessment is recorded both in the Fumigation Report / Unsealing Report. This document is filled in for every fumigation.			
13.2 	The Fumigator must ensure, using appropriate signage and security (locks etc), that the premises are declared out of bounds to personnel and public for the duration of the fumigation.	 Warning Sign  Precautions For each fumigation, warning sticker signs are put on doors. Precautions are communicated in both verbal and written form for the customers.			
13.3	The Fumigator should recommend any equipment (such as temperature probes and other monitoring equipment) within the commodity has been removed prior to fumigation to prevent any damage to the equipment. (This does not apply to sulfuryl fluoride).	Part of the safety assessment process.			
13.4 	The Fumigator must ensure that the store/silo is clearly marked with appropriate warning signs stating the type of fumigant used and the date applied, and all other details as required by the relevant local authorities.	See: 13.2			

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13.5 🔑	The Fumigator must ensure the agreed formulation of fumigant is used at the correct dosage to comply with the contractual requirements, and records retained. The Fumigator must advise the appropriate efficacy criteria in relation to the required minimum effective dosage, method of treatment and exposure time. Guidance criteria are available in a number of guide notes and handbooks. Other National Plant Protection Organisation requirements may apply. To ensure an even distribution of the fumigant in the commodity a powered circulation system is recommended.	 Fumigation Report The Fumigation Report contains the dosage used for each fumigation job. Dosage calculation is based on the Permission Documents / Fumigant Labels.			
13.6 🔑	After the required exposure time, the Fumigator must safely ventilate and test the store/silo. The Fumigator can then issue a 'certificate confirming presence of harmful concentrations of fumigant is below Threshold Limit Value' (TLV).	 Unsealing report The Unsealing Report contains explicitly: "The measured level of PH3 (phosphine) is: 0.00 ppm (under TLV)"			
14.	– DOES NOT APPLY – Degassing/Venting during in-transit fumigation with phosphine				