



ORION
ASSESSMENT SERVICES

Personnel Handbook

Policies and Guidelines

Approved:

A handwritten signature in black ink that reads "David Huebel".

David Huebel, P.Eng.
President, Orion Assessment Services

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Revision Index

Revision Date	Description of the Revision
Rev 0 November 16, 2016	Initial Release
Rev 1 November 16, 2016	Grammar Changes
Rev 2 November 21, 2016	Addition of Confidentiality Policy

Part 1 – General

Section 1- ADMINISTRATION

1.1.1 Welcome to Orion Assessment Services

Orion Assessment Services of Canada Inc.(Orion) is a Canadian owned and operated second and third party standards auditing firm. We implement audit programs for corporate, industrial, international and internal standards. Our staff members, both full-time employees, and contractors have been selected on the basis of knowledge, experience, and abilities. You have been hand selected to work as an important team member, and your efforts are part of the overall company synergy to provide first class support to our clients as well as support to their accountants.

If there are any concerns on any issue, please refer the matter to any of the senior company staff, including the President. Your views and inputs are considered important, and we will listen to each and every one of our staff, employees, and contractors alike.

1.1.2 Working Hours

As an audit firm, Orion Assessment Services maintains a dedicated office as well as offers the flexibility of diverse hours for most staff.

The office hours are 8:30 a.m. to 5:00 p.m. Support to other areas of the country that are in different time zones is expected to be of a high standard, although that support can be off-site (e.g. phone calls from other time zones should be answered in real time rather than allowing the call to go to voicemail). Any exceptions should be discussed with the President.

Costing personnel liaise with accountants and client staff, so must be available during customer working hours. There is some flexibility in scheduling working hours, and as long as the staff member provides 40 hours per week of effort, there is flexibility as long as work is performed in an efficient and effective manner.

Technical staff has a high amount of flexibility, as they can work whenever they wish as long as deadlines are achieved, and the client receives excellent communication and support from the technical staff member. Expectations are for a minimum of 40 hours effort per week for employees, while contractors manage their own time.

Overtime is only upon the approval of the President.

1.1.3 Statutory Holidays

As the year draws to the end, the Office Manager will forward a list of key dates to all employees advising statutory holidays which will be observed over the course of the following year. As some of the holidays are provincial, there will be regional disparity on dates designated as holidays. If there are any questions, please contact the Office Manager dcavalcanti@orioncan.com. As a general rule, if the industry is working on a particular day, it is viewed as a normal work day, however, if the industry is not, then it is regarded as a holiday (federal or provincial).

The statutory holidays (subject to change by provincial and federal authorities) include the following:

- New Years Day
- Family Day (ON, Heritage Day – AB, Louis Riel Day – MB, Viola Desmond Day - NS)
- Good Friday
- Victoria Day
- Canada Day
- Civic Holiday
- Labor Day
- Thanksgiving
- Remembrance Day (National except for NB, ON, QC, NS)
- Christmas Day
- Boxing Day (except QC)

1.1.4 Dress Guidelines

Orion Assessment Services objective in establishing a business casual dress code is to allow our employees to work comfortably in the workplace. We still need our staff to project a professional image for our customers, potential employees, and community visitors. Business casual dress is the standard for this dress code. Business casual includes dress shirts and polo shirts, but does not include tee shirts, tank tops or sleeveless shirts of any type, weathered dress articles, patched articles of clothing, tights, or items that would not be worn to a church gathering. Generally, blue jeans are discouraged. However, it is recognized that in some situations (visiting farms), blue jeans are considered the business attire of choice.

No dress code can cover all contingencies so staff must exert a certain amount of judgment in their choice of clothing to wear. The key to success of this initiative is to have the flexibility to dress appropriately and professionally. We are counting on everyone to use good judgment. A good rule of thumb is that if you are not sure, then it is likely that it is not appropriate. If you remain uncertain about acceptable attire for work, please ask your supervisor.

Before visiting a customer or potential customer ascertain the accepted dress code in their organization and attempt to match it with your attire. For example, if the client's dress is button-up shirt and tie, then a dress shirt and tie should be worn by the company representative.

While the office setting can be casual because customers don't visit, traveling to see customers, and representing the company in the business community, requires different decisions about attire. Business casual dress is the minimum standard that must be observed when you are representing the company or interacting with customers or potential customers.

Some community events, when you are representing the company, might require more formal dress. These might include trade shows, conferences, training or business development meetings, luncheons, and dinners. Take your cue from other employees who have attended and be observant at the event. Certainly, if you are a speaker at a business event, consider wearing more formal dress vis-à-vis business casual.

Because all casual clothing is not suitable for the office or site visits, these guidelines will help you determine what is appropriate to wear to work. Clothing that works well for the beach, yard work, hiking, dance clubs, exercise sessions, and any form of sport **is not appropriate** for a professional appearance at work; nor should these articles of clothing be worn to any client meetings.

1.1.5 Media Guidelines

No comments or information is to be provided without the express permission from the President.

1.1.6 Social Media Policy

Social Media such as Twitter, Facebook and LinkedIn, etc. have become increasingly popular websites. As many of these track current employment and identify the participant's employer, any postings by an employee reflect on Orion Assessment Services. From a business policy, postings on social media are strongly discouraged, and our company name must not be evident on the poster's profile. Viewing of social media web pages is restricted during normal business hours.

1.1.7 Conflict of Interest / Confidentiality

Our reputation has been earned over several years', however, reputations can be easily tarnished. As an integral part of our engagement letters, we have signed Confidentiality Agreements with our clients – what is seen and discussed there, stays there.

Given we are a third party audit firm, we must at all times, remain clear of real or perceived conflict of interest situations. Independence and impartiality from our audit decisions must be maintained in all cases. This means that if you are involved with an audit or certification review, you cannot consult, train, teach or provide “how to” directions to this audit client. The same rule applies if you have any family ties to the audited organization (e.g. spouse, brothers, cousin, etc..). If you are unclear regarding a situation, please contact the President of Orion. We realize that some of the contractors own their consulting practices, so please ensure all conflict of interest situations are disclosed. Failure to disclose any conflicts of interest will lead to immediate termination. Our rules are very stringent here given Orion could lose its accreditation status if these are identified by ANAB (American National Accreditation Board).

1.1.8 Confidentiality Policy

Orion Assessment Services respects the confidentiality of all information whether documented, expressed verbally or observed. This policy applies to all employees or others that may have access to confidential information, such as contract auditors, internal or external auditors.

Information considered confidential and proprietary includes:

- Audit data (e.g. results of reviewing documents, records, verbal statements by the auditee or observations)
- Staff lists / Customer lists (existing and prospective)

- Data of Customers/Partners/Vendors
- Trade secrets
- Unpublished financial information
- Processes, methods and know-how
- Patents, formulas or new technologies
- Pricing/marketing and other undisclosed strategies or tactics
- Unpublished goals, forecasts or initiatives that are marked as confidential
- Data entrusted to the company by external parties
- Documents, processes or other elements explicitly marked as confidential
- Any other knowledge acquired by employees during their employment

In the course of their employment, employees and contractors will have various levels of authorized access to confidential information so as to conduct their business. When they do so, the following rules strictly apply:

- Information will not be disseminated to anyone outside of the organization;
- The disclosure of information will be limited to those with authorized access and legitimate reason to require that information;
- The information will not be used for the personal benefit or profit of the employee or any other except the company;
- The employee will have access only to the amount and type of information required for the completion of their job responsibilities and no more;
- Information collected during audits reviewing's will be limited to what is necessary to validate the implementation of a particular requirement;
- Employees must limit to a minimum the occasions when they take confidential information out of the office;
- When perusing or sharing information through electronic means, all precautionary safety measures must be in effect;
- Confidential information must not be left unattended or unlocked;
- All copies of confidential documents must be shredded when no longer needed;
- Upon separation of employment all confidential information must be returned or deleted from the employee's electronic devices.

Orion will take measures to ensure that confidential information is well protected. Those measures include but are not limited to:

- Electronic information will be encrypted;
- Computers or portable equipment carrying confidential information must be password protected. Unattended devices must be locked and not accessible;
- Databases will be protected with all available security measures;
- Paper documents will be safely stored and locked (if any);
- Authorization of access will be carefully controlled, usually by senior management;
- Employees and contractors must sign a non-disclosure agreements (NDAs) as a condition of employment.

Confidential information as described above may occasionally have to be disclosed for legitimate reasons, e.g. upon request of a regulatory body or for business purposes. In such cases, a strict

procedure must be followed that includes the explicit consent of parties involved (unless they are faced with criminal charges) and the disclosure of only relevant information and no more.

Disciplinary Consequences

The company places great importance in this policy. Any non-conformity will bring about disciplinary and, possibly, legal action. The company is prepared to terminate any employee who willfully or regularly breaches the confidentiality guidelines for personal profit. Serious offenses such as theft of information, illegal disclosure of sensitive data etc. will be grounds for immediate for-cause dismissal and may also involve legal consequences.

Any unintentional breach of this policy will be thoroughly investigated and will be punished appropriately depending on its magnitude and seriousness.

This policy is binding even after separation of employment

1.1.9 Human Rights

Orion Assessment Services is committed to creating an environment which consistently attracts and retains the best talent available that can function as an overall team participant. The company is also committed to equal opportunity and an environment free of discrimination regardless of religion, race and ancestry, place of origin, gender, sexual orientation, marital status, age, disability, or workplace disagreements at a prior place of employment.

1.1.10 Harassment Policy

Orion Assessment Services is committed to providing a work environment in which all workers are treated with respect and dignity. Workplace harassment will not be tolerated from any person in the workplace including customers, clients, other employers, employees and members of the public, as applicable.

Workplace harassment means engaging in the course of vexatious comment or conduct against a worker in a workplace that is known or ought reasonably to be known to be unwelcome or workplace sexual harassment.

Workplace sexual harassment means:

- a) *engaging in the course of vexatious comment or conduct against a worker at a place of work because of sex, sexual orientation, gender identity or gender expression, where the course of comment or conduct is known or ought reasonably to be known to be unwelcome, or*
- b) *making a sexual solicitation or advance where the person making the solicitation or advance is in a position to confer, grant or deny a benefit or advancement to the worker and the person knows or ought reasonably to know that the solicitation or advance is unwelcome;*

Reasonable action taken by the employer or supervisor relating to the management and direction of workers or the workplace is not workplace harassment.

Workers are encouraged to report any incidents of workplace harassment to the President.

Management will investigate and deal with all complaints or incidents of workplace harassment in a fair, respectful and timely manner. Information provided about an incident, or about a complaint will not be disclosed except as necessary to protect workers, to investigate the complaint or incident, to take corrective action or as otherwise required by law.

Managers, supervisors, and workers are expected to adhere to this policy and will be held responsible by the employer for not following it. Workers are not to be penalized or disciplined for reporting an incident or for participating in an investigation involving workplace harassment.

If a worker needs further assistance, he or she may contact the President or the Office Manager.

1.1.11 Violence in the Workplace Policy

The management of Orion Assessment Services is committed to the prevention of workplace violence and is ultimately responsible for worker health and safety. We will take whatever steps are reasonable to protect our workers from workplace violence from all sources.

Violent behavior in the workplace is unacceptable from anyone. This policy applies to staff members, contractor auditors, visitors, suppliers, and clients. Everyone is expected to uphold this policy and to work together to prevent workplace violence.

There is a workplace violence program that implements this policy. It includes measures and procedures to protect workers from workplace violence, a means of summoning immediate assistance and a process for workers to report incidents, or raise concerns.

Orion as the employer will ensure this policy and the supporting program are implemented and maintained. All staff members and contractors will receive appropriate information and instruction on the contents of the policy and program.

Managers will adhere to this policy and the supporting program. Managers are responsible for ensuring that measures and procedures are followed by workers and that workers have the information they need to protect themselves.

Every worker must work in compliance with this policy and the supporting program. All workers are encouraged to raise any concerns about workplace violence and to report any violent incidents or threats. These concerns must be brought to the attention of the President. All discussion will remain strictly confidential to encourage a forum for concerns to be raised.

Management pledges to investigate and deal with all incidents and complaints of workplace violence in a fair and timely manner, respecting the privacy of all concerned as much as possible.

1.1.12 Health and Safety Policy

The Orion Health and Safety Policy is as follows:

Orion Assessment Services of Canada Inc. recognizes that the strength of our company is the combined efforts of our staff, employees, and contractors. As such, we understand the value of the health and safety for our team.

As part of our commitment to provide our staff with a safe work environment, we will make every effort to prevent injury and ill health by:

- *Identifying hazards and risks associated with our activities;*
- *Taking the appropriate actions to control, eliminate or minimize these hazards or risks;*
- *Complying with all legislative requirements (i.e. Occupational Health & Safety Act);*

As an audit firm, our auditors spend most of their time at our client's facilities. We ensure our staff and contractors abide by the Health and Safety program requirements for our client's and make every effort to ensure they are understood in advance and reaffirmed before starting their activities.

Our continuous improvement efforts will ensure we strive to achieve our goal of an injury and accident-free workplace.

From the staff member's perspective, each person must protect their own health and safety by working in compliance with the law and with safe work practices. It is in the best interests of all to consider health and safety in all of our activities. If at a client's facility, it is each staff member's responsibility to comply with their rules at all times (if they are stricter than our policies). All injuries that occur at work, including those of a minor nature, must be reported to the Office Manager immediately.

Every member should take additional precautions in the winter period and consider travel preparations (full tank of gas, emergency supplies, charged cell phone batteries, etc.). If the weather is forecasted to be stormy, perhaps the wisest decision would be to contact the client and reschedule the effort.

Disregard or willful violations of this Policy by staff at any level may be considered cause for disciplinary action in accordance with the company's policies.

We trust that all of you will participate in Orion Assessment Services' commitment to make safety a way of life.

1.1.13 Drug and Alcohol Policy

Our policy is to protect both the firm and the employee/contractor and is based on reasonable workplace practices from a variety of Canadian firms. The policy is:

No worker shall distribute, possess, consume or use alcohol or illegal drugs in any company workplace or while representing Orion Assessment Services.

No worker shall report to work or be at work under the influence of alcohol or drugs that may or will affect their ability to work safely.

No worker shall misuse prescription or non-prescription drugs while at work. If a worker is taking a prescription or non-prescription drug for which there is a potential unsafe side effect, he or she has an obligation to modify work schedules (work from home) or arrange a leave of absence – in this case, the modified work schedule should be discussed with the President or applicable VP so that alternate arrangements can be made.

The issue of taking alcohol with, or before, a client visit can be a sensitive topic. As a general rule, alcohol consumption during the day is not endorsed, and no alcohol should be consumed at lunch time if client meetings are scheduled for the afternoon. If partaking of a company social event, or dinner with client staff, moderate consumption of alcohol may be in good taste. Above all, use your discretion to maintain generally accepted business decorum. Since moderate consumption is the key, it is the staff member's responsibility to ensure they are below the local legal limit with respect to alcohol intake.

1.1.14 Computers, Emails, and Pornography Issues

A common sense approach can keep all staff in safe territory. Orion Assessment Services will provide employees with the necessary equipment to do your job, while current CRA expectations are that Contractors supply their own equipment. Details of equipment and whether it is preferable to be a contractor or employee is discussed early in the negotiations of joining Orion Assessment Services (Contractors can have multiple revenue lines, while employees are expected to work solely for Orion Assessment Services). Supplied equipment should be used primarily for business purposes, although very occasional personal use is understandable under certain strict requirements:

- There is zero tolerance towards using company equipment to access, view, download, file, or forward to another address any pornography
- Absolutely zero jokes, videos, racial, sexist, pornography are to be placed on company equipment (even innocent files can obstruct normal computer operations due to the large file sizes, so our policy is 'ZERO').
- Orion emails are to not to be used for non-work related communications

Warning: Many client firms have a service to scan their employee computers for pornography, racist, or hate literature. As our policy is a zero tolerance to any of these infractions, please be advised that any reported cases of our equipment being involved or the use of Orion emails or emails provided by a Orion Assessment Services staff member is grounds for immediate severance of our business relationship (dismissal for cause). Please govern yourselves accordingly and consider this ample warning of the consequences of this type of action.

With respect to computer software, our policy is that no programs should be added to a company computer without the written permission of the IT co-ordinator or the President. This policy is necessary as some software programs interfere and conflict with other business software necessary for the conduct of client services. Your co-operation is appreciated as computer downtime can be extensive for virus contamination or software conflicts.

The telephone lines must remain open for business calls to service our clients. Employees are requested to keep personal calls to a minimum - incoming and outgoing - with the exception of emergency calls. No long distance calls which are not strictly business-related are to be made on company phones.

1.1.15 Setting up Orion Assessment Services Emails

Concurrently we have a Microsoft Exchange Server for our office emails. To set up your email account from Orion Assessment Services so that the emails can be received and sent on your computer, contact the Project Manager at info@orioncan.com for current instructions.

1.1.16 Parking

Parking charges are only reimbursable if they were incurred during the conduct of support to client effort, or on company business. If parking charges were so incurred, provide the details on the expense account.

1.1.17 Expenses and Repayment

Expenses incurred in support of client service or on company business are to be identified on the Orion Expense Report or a similar report with the same information. A blank expense report is available on the Auditor Portal.

Do not include time on an expenses report as this should be separate invoice. Expense forms should be provided to accounting@orioncan.com. Expenses can be submitted electronically, but a hard copy of receipts for meals, etc. must be mailed or dropped off as CRA expects to see the original invoices when Orion Assessment Services reimburses any personnel for expenses incur. For full-time staff, expense reports submitted by the 15th of each month will be paid on the last day of the month. Alternatively, expenses submitted after the 15th and before the last day of the month will be paid on the 15th of the following month. Reimbursement can be done by cheque or direct deposit.

Section 2 – Auditing

1.2.1 Scheduling

Scheduling audits according to Orion requirements is critical. Not following these requirements can have an impact on our accreditation requirements (e.g. ANAB) or put us in a potential legal situation where certification is a requirement for business. (e.g. food safety / obtaining a DLI number for schools or programs).

Every auditor is provided with a Scheduling Report and/or an initial Evaluator Assignment Letter. Both of these provide the details necessary for an auditor to schedule their assignment according to the “Due Date”. Auditors are required to firm up a date with a client and notify Orion at least two months in advance of the scheduled audit date. Any scheduling issues must be communicated to the Project Manager (e.g. client wishes to schedule their audit later than the due date or cancel). Once the date has been established, an audit plan must be sent to the client. This plan should be a minimum of two weeks in advance of the audit. Please refer to Orion’s Operations Manual.

Note:

In preparation for an audit, you must ensure you have current revision levels of the documentation. The documentation can be found on the Auditor Portal or via Orion US system. If incorrect versions are used, you will either be asked to correct the form or Orion will correct it for you. If the issue repeats, Orion will fix and deduct the time from your daily rate (if contractor).

1.2.2 Auditing

All audits must be conducted following Orion's Operations Manual.

1.2.3 Post Audit Submissions

Post Audit submissions are conducted in accordance with Orion's Operations Manual.

Note:

- 1) All audit submissions must be made to Orion no later than 5 business days from the last day of the audit. This must include all the required audit documentation along with expenses related to the client.
- 2) All submissions must be complete and on the corrected revision levels of forms

1.2.4 Technical Report Reviews

All reports are subject to review. This review will ensure:

- Appropriate technical content and objective evidence have been submitted;
- Grammar, spelling, reading comprehension and formatting are correct;
- Current forms are used etc..

We realize that auditors are constantly travelling, but when clarifications are requested, please respond right away to avoid further delays.

We will make every effort to work with you to improve your documentation submissions, however, if issues persist, we will give priority to other auditors when assigning files.

1.2.5 Continued Professional Development

The goal of every staff member or contractor should be to advance their technical knowledge and capabilities with respect to standards or sector competencies. Staff members will undergo an annual review to for performance to identify new training opportunities. Given contractors are engaged contractors based on their background, certifications, competencies, feedback from technical review and clients we encourage you to continually improve your capabilities in these areas.

1.2.6 Policies / Procedures / Work Instructions and Forms

All documents used with Orion can be found or referenced in the Auditor Portal located our web-site www.orioncan.com. During your initial training you will be provided an orientation to this portal. The most recent version of all documents can be accessed through the portal. Orion will not accept the use of obsolete documents. The Operations Manual provides an overview of the documentation structure used at Orion.

1.2.7 Back-up of Computer Data

Contractors should have their own backup devices as they do not have access to the server. Recognizing that all hard drives or storage media will fail, it is simply a good practice to back the computer up daily. Having to go back to the client for data already provided (interviews and documents) is not only embarrassing, but it can also potentially create a loss of trust and respect. Full-time staff uses an internal cloud based system, so all documentation is backed up continually.

PART II – Employee Policies

2.1 Pay

Pay and expenses are directly deposited into the bank account on the 15th and the last working day of each month, while expenses are deposited on the last day of the month if the expense form has been provided by the 22nd. Arrangements for direct deposit are to be made by contact Accounting at accounting@orioncan.com.

2.2 Vacation and Availability

Each employee receives vacation, as per their contract, per year in addition to the statutory holidays. We encourage you to make use of your vacation days as it gives you time away from work. There are some guidelines as to when the vacation time should be taken so that the vacation time benefits both the individual and the firm:

- The summer months (July and August) along with December and early January tend to be our slower season so if possible we ask that you use some of your vacation time during these periods.
- The office will remain open during the Christmas and New Year's holidays, with at least minimum staff coverage required for each department.

If there is a special circumstance that makes planning difficult, please discuss with the President to determine if alternate arrangements can be made.

One key point is that vacation is to be used in the year that it is earned (January to December). Vacation entitlements are not carried forward. Only in extenuating circumstances is it possible to combine vacation entitlements and ONLY with the agreement of the President. Suitable cases would be summer school or occasional family visits to one's country of birth.

Vacation requests are to be requested from your supervisor and confirmation of approval is to be forwarded to the Project Manager who will enter into the vacation calendar and track the vacation days.

2.3 Dental and Doctors Visits

Due to the flexible working hours, personal care requirements should be arranged outside the 40 hour work week. Where ever possible, schedule the visits either first or the last thing in the day to minimize the disruption. Personal care appointments should never take more than 2 hours out of the workday.

2.4 Learning and Growth

Expanding one's knowledge and skills should be a critical element of any professional. Specific training that can benefit your personal development as well as benefit the firm is encouraged. For this type of training, some costs will be reimbursed. On a case by case basis, the following guidelines are provided:

- Identified as desirable and necessary to fulfill a company requirement – all the tuition will be reimbursed, and up to half the time to complete tutorials and lessons may be on company time. It is expected that at least 50% of the time to undertake the training will be provided by the employee.
- Some benefit to the firm, but mostly the benefit is for the individual – 50% of the tuition will be reimbursed after successful completion of the course. All the time must be provided by the individual or hours made up to ensure 40 hours worked on company business.
- No benefit to the firm – No repayment and no time adjustments will be made.

If there is any training required, discuss with any of the senior management to determine what category the training would be considered.

PART III – Contractor Policies

3.1 Invoicing

During the initial development of the business relationship, a rate is agreed upon as defined in the Subcontractor Agreement.

When a new client is engaged, an Evaluator Assignment will be issued to the auditor with all assignment details including allotted time, billable, and non-billable expenses.

After the client has been certified, a scheduling report is emailed to all auditors twice per month which includes all scheduling details plus a link to pull up the Evaluator Assignment letter. If you are not sure about what has been approved, please contact the Project Manager for clarification.

All auditors must submit any expenses with the report to Orion no later than five business days after completion of the assignment.

All invoices are paid net 30 days from the date of invoicing.

3.2 Availability / Assignment or Work

New clients are signed on a continuous basis. Auditors are assigned based on skills, competency, reporting performance, proximity to the client, and availability. We encourage you to keep us informed of updates to your competencies or other relevant information as this may open up other assignment opportunities.

Once work has been assigned, it is expected that the client will be serviced in a timely and efficient manner. In some cases, we have been awarded the engagement because of a perceived lack of service from the prior service provider, and we do not wish to repeat their mistake.