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General Contract Terms and Conditions

FOR THE VERIFICATION OR VALIDATION OF THE ENVIRONMENTAL PRODUCT DECLARATION

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INTRODUCTION

ICMQ S.p.A. (hereinafter ICMQ) is a certification and inspection body that, operating as an independent body, provides services to organizations requesting verification or validation of Type III Environmental Product Declarations (hereinafter EPDs) for the Program Operators EPDItaly and the International EPD System.

1. Definitions

For all other definitions not contained in these General Terms and Conditions, please refer to the definitions set forth in the UNI EN ISO and UNI CEI EN standards listed in Section 3 and the following terms used in the text.

Environmental aspect: an element of an organization's activities, products, or services that may interact with the environment (ISO 14001);

Corrective actions: all actions that the Organization must take to eliminate the nonconformities identified by ICMQ.

Impact category: a category used to aggregate the results of the inventory phase (Life Cycle Inventory) and express them in terms of potential environmental impact;

Process control: a system for managing the capabilities and competencies implemented by an Organization to perform life cycle assessment calculations in accordance with the relevant PCR, if available, to create an environmental declaration in accordance with the relevant PCR, and to ensure the accurate verification of the relevance of the information reported in environmental declarations [applicable to activities performed for the International EPD System]

Decision-Making Committee: the group of individuals responsible for deciding on the Issuance, Maintenance, Renewal, Suspension, and Revocation of the EPD Declaration/TOOL Qualification Certificate/EPD Process Certificate;

EPD Verification/Validation Opinion: this refers to the document issued to the Organization by ICMQ certifying that the EPD has been verified/validated;

Product EPD: Type III Environmental Declaration prepared based on data for a specific product or similar products manufactured at one or more production sites, or based on a specific service provided at one or more sites. Similar products with differences in impact indicators of less than ±10% may be included in the same EPD using the environmental impacts of a representative product. Similar products with differences in impact indicators of more than ±10% may be included in the same EPD if adequately justified according to the Program Operator's rules.

EPDs with a retailer/distributor (Trader) as the EPD Owner: Environmental Product Declaration issued by a distributor, importer, or authorized representative regarding products manufactured by one or more manufacturers, based on the manufacturer's valid EPD and/or primary data provided by the manufacturer. In such cases, the EPD Owner is responsible for the legitimacy of the data use, the representativeness of the marketed product, and the modeling of processes.

Sector EPD: Type III Environmental Declaration prepared with reference to an average product from multiple companies within a well-defined sector and/or geographic area

EPD Owner: refers to the organization that owns the EPD and is responsible for providing the environmental declaration; this may be one of the following entities:

- a producer of goods acting as a manufacturer, distributor, importer, or authorized representative;

- a service provider (supplier);

- a trade association.

The EPD Owner must:

- be the legal entity bearing legal responsibility for communicating the environmental aspects/impacts of the product covered by the EPD, while respecting the ownership and confidentiality of the information and data contained in the EPD;

- be the entity that, as a producer, places the product on the market under its own name;

- sign the contractual agreement with the verification/validation body (VB) recognized by EPDItaly to carry out the verification/validation activities of the EPD;

- provide the EPD document and related documentation, or the Tool project report and EPD project report (if the EPD is generated by a Tool) to the VO for verification/validation;

- Sign the contractual agreement with EPDItaly regarding EPD publication activities.

Pilot EPD: An EPD for a fictional or real product whose verification enables the qualification of an LCA-TOOL or EPD Process certification;

EPD Process: An organization's management system for generating EPDs for its products without having to submit each EPD for verification by an independent verifier external to the organization (in accordance with the procedures established by the program operator, the International EPD System);

EPD-TOOL: A verified and qualified calculation algorithm that implements an LCA model which directly generates an EPD to determine a product's environmental impacts based on a predetermined database of input data (EPD-TOOL). This type of tool is used by organizations to create specific EPDs for products in their portfolio, consisting of a limited number of components assembled using similar processes (windows, facades).

In addition to generating the LCA study, the EPD-TOOL also enables the preparation of the EPD, developed in accordance with a reference PCR. The product covered by the EPD consists of a combination of component elements contained in a predefined database within the EPD-TOOL. For each of these component elements, the environmental impact values have been predetermined through a specific LCA study. The user of the EPD-TOOL can only select the component elements of the product covered by the EPD that they intend to develop, but cannot in any way modify the component element database or the LCA model used to define the environmental impacts. The EPD-TOOL is verified only once, during the qualification phase. Consequently, the verification of an EPD generated by a qualified EPD-TOOL requires a simplified verification. However, any modification to the LCA model or the component database implemented in the EPD-TOOL requires a new verification. ICMQ performs checks on the EPD-TOOL through biennial periodic audits of the algorithm, following the same procedures as the initial qualification. However, annual spot checks are conducted solely on the generated EPDs.

Verification/Validation Group, Inspector, or Auditor: refers to the individuals appointed by ICMQ to conduct on-site assessments of compliance;

Environmental Impact: any change to the environment, whether negative or beneficial, resulting wholly or partially from an organization's activities, products, or services (ISO 14001);

Life Cycle Assessment (LCA): compilation and evaluation of the inputs, outputs, and potential environmental impacts of a product/service throughout its entire life cycle (ISO 14040)

LCA-TOOL: A verified and qualified calculation algorithm that implements an LCA model (which may directly generate an EPD) to determine the environmental impacts of a product based on a specific set of input data (LCA-TOOL). This type of tool is used by organizations (manufacturers or associations) to create specific EPDs for different products that share identical or very similar production processes, without having to develop a specific LCA study each time. Such LCA-TOOLs are typically developed directly by the organization or by an external supplier (developer), or created by a developer (software house) who then sells or licenses it to the organization. The LCA-TOOL can only be used within a defined scope of application to generate the LCA study for a specific product, and sometimes even the resulting EPD document directly, in accordance with a reference PCR. The LCA-TOOL is designed to allow the user to enter only the raw input data required by the LCA model, pertaining to the specific product for which an EPD is to be created. In particular, the user cannot in any way modify the LCA model implemented in the TOOL. The LCA model of the LCA-TOOL is verified only once, during the qualification phase of the LCA-TOOL. Thus, the verification of an EPD generated by a qualified LCA-TOOL does not require re-verification of the LCA model, but is limited solely to verifying the compliance of other aspects (processes for the correct use of the LCA-TOOL and/or the drafting of the EPD document), in accordance with the provisions of the Program Operator's GPI;

Checklist: this refers to the document prepared by ICMQ and used by ICMQ Auditors to conduct the compliance assessment;

Non-Conformity (NC): refers to the finding issued by the ICMQ auditor during the assessment activities conducted, identifying a deficiency, error, or omission detected.

Non-conformities are classified into a single level or two levels depending on the assessment activity conducted by ICMQ, as described below:

Verification/validation of an EPD

In this case, there is a single level of NC classification, which identifies a deficiency, error, or omission of a requirement specified by the Standard that prevents compliance with the established materiality threshold.

The NC is further classified by type as follows:

- editorial: refers to a deficiency, error, or omission found in the drafting of the EPD document or the LCA Study Report. For example, it may relate to: lack of mandatory data or information, unclear indication of products or system boundaries, lack (even partial) of results, lack of indication of allocation criteria, scenarios, or other necessary information, etc.
- technical: refers to a deficiency, error, or omission related to the correctness of the LCA calculation. For example, this may relate to: system modeling, inventory analysis, calculation of indicators, calculation of additive parameters, data preprocessing, quality of data used, sensitivity analysis, etc.
- General: refers to any other type of deficiency, error, or omission not attributable to the "editorial" or "technical" categories;

Any NC of any type must necessarily be addressed by the Organization and deemed resolved by ICMQ in order for the ICMQ auditor's opinion on the verification to be "positive/satisfactory" or "satisfactory with comment."

The file may not be submitted to the ICMQ Deliberation Committee for the issuance of the audit opinion until the effectiveness of the corrections and corrective actions undertaken by the Organization has been verified for each NC. This may be done by the ICMQ auditor through a final document review or, subsequently, through any supplementary activities (documentary and/or on-site, the latter potentially conducted remotely).
In particular, the organization must submit to ICMQ, within three months, the appropriate documentary evidence of the resolution of each NC, unless it is deemed necessary to conduct additional work.

A non-conformity (NC) is classified as "critical" if the nature of the deficiency, error, or omission identified during the initial document review is such that it must be addressed and resolved by the Organization before the ICMQ auditor conducts the subsequent on-site audit (or, if necessary, a remote audit); otherwise, this activity would be ineffective for the purposes of the required assessment. Examples of a "critical NC" may include: the use of an incorrect PCR, unclear identification of the products to which the EPD refers, unclear definition of the life cycle considered, omission of key components in the LCA study (goal and scope, inventory analysis, assessment of impact indicators, interpretation, and sensitivity analysis), etc.

TOOL/EPD Process Qualification Certificate

There are two levels of non-conformity (NC) for this activity:

Major NC: identifies a deficiency, error, or omission of a requirement specified by the Standard such that the TOOL (LCA or EPD TOOL) cannot be qualified or the EPD management system (EPD Process) cannot be certified.

Examples of major NCs for the qualification of a TOOL may relate to: the definition of the TOOL's scope of application, the completeness or correctness of the TOOL's modeling with respect to the defined scope of application, compliance with the TOOL requirements defined by the EPDItaly Regulation, etc.

Examples of major non-conformities (NC) for an EPD Process may relate to: the definition of the scope of the EPD management system, the completeness or correctness of the steps in the EPD generation process, the correctness of the LCA model used to develop the EPDs, the correctness of the content of the EPD generated by the system, repeated minor non-conformities over time, compliance with the system requirements defined by the IES GPI, etc.

The application cannot be submitted for review by the ICMQ Deliberation Committee for the issuance or renewal of the TOOL qualification certificate or the EPD Process certification until the effectiveness of the corrections and corrective actions undertaken by the Organization has been verified for each non-conformity. This may be done by the ICMQ auditor through the final document review or, subsequently, through a possible supplementary audit (documentary and/or on-site, the latter potentially conducted remotely).
In particular, the organization must submit to ICMQ, within three months, the appropriate documentary evidence of the resolution of each NC, unless a supplementary audit is deemed necessary.

Minor Non-Conformity (NC): identifies a deficiency, error, or omission of a requirement specified by the Standard that is not severe enough to be classified as a Major Non-Conformity (NC), which must be addressed to prevent a potential Major Non-Conformity in the future, but does not require immediate resolution by the Organization as it does not jeopardize the qualification of the TOOL (LCA or EPD TOOL) or the certification of the EPD management system (EPD Process).

Examples of non-conformities (NCs) related to the qualification of a TOOL or the certification of the EPD management system (EPD Process). These may relate to: the accuracy of the Organization's processes for acquiring data entered into the LCA model; unclear definition of the responsibilities of the various parties within the Organization; the accuracy of the methods for preprocessing data to be entered into the LCA model; the accuracy of the process for generating the EPD document based on the LCA study; methods for verifying the Organization's resources for developing EPDs; etc.

For each non-conformity (major or minor), the Organization must submit to ICMQ, no later than 10 days after the audit, the corrective actions related to each non-conformity identified. Until such notification is received, it will not be possible to submit the file to the Deliberation Committee for the issuance, renewal/extension, and maintenance of the TOOL Qualification Certificate and the related Verification Opinion for the pilot EPD (during the issuance phase) or sampled EPD (during the surveillance or renewal phase), or for the certification of the EPD Process. Any longer timeframes must be requested and authorized by ICMQ.

It should be noted that during the review of the GVI's verification activities, ICMQ may:

- request a supplementary audit to assess the effectiveness of the corrections and corrective actions proposed by the Organization to address the nonconformities identified during the verification process

- modify the level of nonconformities or recommendations identified by the GVI during the verification process;

- establish timelines different from those normally required for resolving nonconformities and for the Organization to provide the necessary evidence to address them, depending on the issue highlighted in the nonconformity itself.

Standard: This refers to the set of requirements established by the UNI EN ISO 14025 standard and the UNI EN ISO 14040 family of standards, as well as the PCRs (Product Category Rules) where applicable, and the Program Operator's Regulations to which the EPD refers

Competent Body/Program Operator: refers to the EPD program operator as defined by UNI EN ISO 14025;

Accreditation Body: refers to the sole Accreditation Body ACCREDIA, which operates to examine and verify the competence requirements of verification/validation bodies;

Organization (client): a group of people and resources, with defined responsibilities, authorities, and interrelationships. A term used to indicate the entity that provides a product and/or service and applies for EPD verification/validation, TOOL qualification certification, or EPD Process certification;

Product/Service: the result of the Organization's activities, which

must comply with pre-established specifications that may be national or international technical standards, specifications agreed upon with the Organization or internal to the Organization, or other identified documents;

TOOL Qualification: the method for verifying EPDs generated using a specific calculation algorithm/TOOL [applicable to activities performed for the program operator EPDItaly];

Recommendation: refers to a finding issued by the ICMQ auditor during the assessment activities, consisting of a suggestion for improvement, which the company may or may not choose to address and implement. Failure to address it has no implications for the final outcome of the verification; for EPD verifications/validations concerning construction products, it is not possible to issue findings classified as recommendations;

Product Category Rules (PCR): a document describing the type of information that must be provided in the EPD regarding a product based on a life cycle assessment. The PCRs also define how the provided information is generated;

LCA Report: A report, generally not public, that describes the LCA on which the EPD is based and is subject to verification along with the EPD.

Surveillance: an activity through which ICMQ periodically verifies the continued compliance of the Organization's EPD Process certification and the suitability of the LCA-TOOL or EPD-TOOL;

Corrective Action: This refers to all actions the Organization must take to eliminate the nonconformities identified by ICMQ;

Operational unit: the location where activities related to the manufacture/provision of products/services are carried out and/or where data is collected and processed for the generation of the EPDs subject to verification, or where the TOOL or the EPD Process is applied;

Assessment: action through which ICMQ performs the verification or validation of an EPD, TOOL attestation, or EPD Process certification, to this end ascertaining how the requesting Organization has operated;

Validation: the process of assessing the reasonableness of the assumptions, limitations, and methods underlying an environmental information statement (e.g., EPD) regarding the outcome of future activities;

Verification: the process of evaluating an environmental declaration (e.g., EPD) based on historical data and information to determine whether the declaration is factually correct and compliant with the criteria.

2. Scope of the service and prohibition on consulting

2.1. Scope of the service.

The ICMQ service covers the following activities :

- Verification/validation of a product EPD: this involves assessing the compliance of the Organization's product/service EPD and the related LCA study with the requirements set forth in the UNI EN ISO 14025 and UNI EN ISO 14040 series standards, as well as the applicable PCRs (Product Category Rules) and the Program Operator's Regulations under which the EPD will be published. The verification activities for a product EPD apply whether or not the EPD was issued by TOOL.
- Verification for the certification of an Organization's EPD Process involves examining its compliance with the requirements set forth in the GPI of the International EPD System (IES) program operator, as well as conducting a sample verification of the individual product EPDs generated by the EPD Process, as indicated in the previous point.

2.2. Prohibition on Consulting.

ICMQ, as an independent body, does not provide, either directly or through subcontractors, consulting services to assist Organizations in the development of management systems, in the assessment of product life cycles, or in the preparation of LCAs.

3. Reference documents and technical standards

The following documents are to be considered reference technical standards:

- EN ISO/IEC 17029 (current version) "Conformity assessment – General principles and requirements for bodies providing validation and verification";
- ISO 14065 (current version) "General principles and requirements for bodies validating and verifying environmental information";
- UNI EN ISO 14020 (current version) "Environmental labels and declarations – General principles";
- UNI EN ISO 19011 (current version) "Guidelines for auditing quality and/or environmental management systems";
- UNI EN ISO 14025 (current version) "Environmental labels and declarations – Type III Environmental declarations – Principles and procedures";
- EN 15804:2012+A2:2019+AC:2021 "Sustainability of construction works. Environmental product declarations. Core rules for the product category of construction products"
- ISO 14021:2021, Environmental labels and declarations – Self-declared environmental claims (Type II environmental labeling);
- ISO/DTS 14027, Environmental labels and declarations -- Development of product category rules;
- ISO 14040, Environmental management – Life cycle assessment – Principles and framework;
- ISO 14044, Environmental management – Life cycle assessment – Requirements and guidelines;
- CEN ISO/TS 14071, Environmental management – Life cycle assessment – Critical review processes and reviewer competencies: Additional requirements and guidelines to ISO 14044:2006;
- CEN/TR 15941 Sustainability of construction works. Environmental product declarations. Methodology for selection and use of generic data;
- EN 15942, Sustainability of construction works – Environmental product declarations – Business-to-business communication format;
- EN 16485, Round and sawn timber – Environmental Product Declaration – Product Category Rules for wood and wood-based products for use in construction;
- CEN/TR 16970, Sustainability of construction works — Guidance for the implementation of EN 15804;
- ISO 21930, Sustainability in buildings and civil engineering works — Core rules for the environmental declaration of construction products and services used in any type of construction works;
- Guidance for Product Category Rule Development, PCR Guidance Development Initiative;
- ACCREDIA Regulation RG 01 (current version) for the accreditation of certification bodies;
- EPD GPI (current versions) "General Program Instructions for Environmental Product Declarations (EPD)" [International EPD System];
- EPD GPI (current version) "EPDItaly Program Regulations";
- Applicable EA/IAF Guidelines.
- In the case of certifications issued under accreditation, all provisions set forth in the ACCREDIA regulations, available on the website www.accredia.it, which the organizations undertake to be familiar with and apply;
- Mandatory regulations/laws applicable to the sector and to the Standard for which the assessment is requested;
- The following documents, which have been read and approved, also constitute reference documents:
  a) current fee schedule for verification/validation;
  b) verification/validation application and attachments (where applicable);
  c) these General Terms and Conditions of Contract;
  d) Trademark usage regulations;
  e) Application Guide (where applicable);
  f) specific attachment for the reference standard (if

applicable).

The Organization undertakes, in any case, to periodically verify, at least once every six months, on the website www.icmq.org (restricted area) whether the above documents have been modified from what was signed at the time of the Verification/Validation Application, and in any case prior to each renewal.

4. Committee for the Safeguarding of Impartiality

A Committee for the Safeguarding of Impartiality, appointed by the ICMQ Board of Directors, oversees the maintenance of impartiality throughout all verification phases. This Committee includes representatives of all parties involved in the verification and operates in accordance with a specific procedure.

5. Duration of the Contract

The contract for the assessment of an EPD is finalized on the date on which ICMQ accepts the EPD verification/validation application and the documents attached to or referenced therein.

Since the activities involved in evaluating an EPD do not include the performance of surveillance verifications, the contract for the evaluation of the EPD will expire upon completion of the ICMQ activities contained therein.

The contract for the product EPD verification/validation service pertains to the performance of a single EPD verification activity. Any multi-year contracts relating to EPD verification/validation activities for the same product are to be considered as contracts for multiple independent activities.

The contract for the qualification of the LCA-TOOL will expire on the expiry date of the issued ICMQ Qualification Certificate.

The contract will be tacitly renewed for the following 5 (five) years, unless one of the parties sends the other a notice of termination by registered letter with return receipt or certified email, 6 (six) months prior to the contract's expiry date.

The contract for the qualification of the EPD-TOOL will expire on the expiry date of the issued ICMQ Qualification Certificate (2 years)

The contract will be tacitly renewed for the following 2 (two) years, unless one of the parties sends the other a notice of termination by registered letter with return receipt or certified email, 6 (six) months prior to the contract's expiry date.

The contract will expire one (1) year after its execution if, due to force majeure beyond ICMQ's control, the EPD Verification/Validation Opinion, the TOOL Qualification Certificate, or the EPD Process Certificate cannot be issued to the Organization within that period, unless the parties have entered into a separate written agreement to extend the contract. In such a case, the Organization shall not be entitled to request a refund of the amounts paid and shall also be required to pay ICMQ all fees due for any work performed by ICMQ during the term of the contract, in accordance with the rates set forth in the Fee Schedule in effect at the time of service, unless otherwise agreed in writing by the parties.

GENERAL NOTE: The publication of new versions of the program operator's regulations (EPDItaly or International EPD System) does not affect the validity of EPD verification/validation activities previously carried out by ICMQ. In the event of any updates to such EPDs during their validity period, ICMQ's activities will be carried out in accordance with the program operator's provisions regarding the EPD.

6. The Parties Involved

The Organization prepares the EPD for a product based on the LCA study, referring to the documents specified in Article 3 of these Regulations.

If the EPD is developed using a TOOL, this may be created directly by the Organization or by an external supplier (developer), or created by a developer (software house) that then sells or licenses it to the Organization.

The Organization is solely responsible for:

- the information contained in the EPD documents and LCA Report;
- for the collection of data and the calculation of environmental impact indicators as specified in the relevant standards (Regulations, PCRs);
- for all claims for compensation, including those related to product liability, that may arise in connection with the use of the EPD, the production and sale of products that reference or use the EPD, and the use of the trademarks of EPD International AB or EPDItaly.

Stakeholders (manufacturers' associations, industrial districts, environmental associations, consumer associations, large retail chains) participate in the process of developing and approving PCRs and may act as promoters and coordinators of initiatives aimed at developing PCRs for product groups of interest to them.

ICMQ is the independent third party that, upon completion of the activities covered by the service, provides its own assurance solely regarding the aspects covered by the service indicated in paragraph2.1 above.

The Accreditation Body carries out the activities of preliminary investigation, verification, and surveillance with regard to the bodies operating in the application of EPD verification/validation schemes and EPD Process certification. The Accreditation Body oversees compliance with the requirements of applicable international and national standards, guidelines, regulations, and additional requirements.

The Program Operator:

- defines and approves the PCRs;
- disseminates information regarding the EPD program;
- registers and publishes EPDs verified or validated by ICMQ.

7. ICMQ's Obligations

The assessment will be conducted by ICMQ for the verification/validation of the EPD, in relation to the product/service, the qualification of the TOOL, or the EPD Process certification, with due diligence. The assessment will be carried out with absolute independence and impartiality. ICMQ's obligation regarding the verification activity is an "obligation of means" and not an "obligation of result." Consequently, ICMQ may issue the Verification/Validation Opinion, the TOOL Qualification Certificate, or the EPD Process Certification only if the documentation prepared by the Organization complies with the Standard and objective evidence is available to support it.

ICMQ is in no way liable or responsible for any failure by third parties to recognize the assessment, nor is it liable for any claims for damages, compensation, or indemnification arising from the failure to meet expectations regarding the Verification/Validation Opinion, TOOL Qualification Certificate, or EPD Process Certification.

7.1. Methods for assessing the conformity of an EPD

The activities carried out by ICMQ may refer to the following cases:

1) EPD generated without the use of a TOOL (standard procedure) for publication in the EPDItaly program and/or the International EPD System.

It should be noted that the activities carried out by ICMQ for the EPDItaly Program Operator may relate to:

- Verification of EPDs in the case of Specific Product EPDs, Average Product EPDs, and Sector EPDs. The first two types may also be developed in accordance with Section 3.2 "Preliminary Validation," Annex 5 of the EPDItaly Regulations "EPDs for actual products with an insufficiently representative database," or Annex 8 of the EPDItaly Regulations "EPDs where the EPD Owner is a retailer/distributor";
- Validation of EPDs in the case of Specific Product EPDs, Average Product EPDs, or in accordance with Section 3.2 "Preliminary Validation," in accordance with Annex 6 of the EPDItaly Regulation, for products not yet manufactured (in the design phase).

It should be noted that the activities carried out by ICMQ for the IES Program Operator may relate to:

- Verification of EPDs in the case of "EPD of a single product from a manufacturer/service provider," "EPD of multiple products from a company" (only for cases "based on the average results of the product group," "based on a representative product," "based on several representative products"), "Sector EPD", "EPD of a product recently on the market", "EPD owned by a trader"

- Validation of EPDs in the case of "EPD of a product not yet on the market".

2) EPD generated using a qualified TOOL: verification of EPDs generated using an algorithm (Tool) such as EPD-TOOL or LCA TOOL, for publication in the EPDItaly program.

The EPD generated by the TOOL may be a Specific Product EPD, an Average Product EPD, or a Sector EPD. The first two types may also be developed in accordance with Section 3.2 "Preliminary Validation" or Annex 5 of the EPDItaly Regulations "EPDs of real products with a database that is not sufficiently representative."

3) EPD generated using the EPD Process for publication in the International EPD System program.

The performance of activities requested that differ from those indicated above will be subject to a specific feasibility assessment by ICMQ.

It is specified that the above-mentioned assessment procedures refer solely to ICMQ's activities regarding the "verification/validation of EPDs" intended for publication on the respective PO's website, and that the use or publication of any document other than the EPD subject to ICMQ's verification/validation—even if related to it—is not to be considered part of ICMQ's verification/validation activities.

7.1.1. Requirements for EPDs generated without the use of a TOOL (standard procedure)

The requirements subject to verification are as follows:

- Legislative compliance;
- Specific EPD requirements

7.1.1.1. Requirements for legislative compliance

ICMQ assumes no responsibility for the legality of the product, its production process, or its supply chain with respect to applicable environmental legislation.

For EPDs under the International EPD System program in accordance with GPI Revision 4.0, verification of the legal compliance of the product or process at the production site(s) related to the EPD is carried out as follows:

- The EPD operational unit must hold a valid ISO 14001 environmental management system certificate.
- In the absence of the certificate referred to in the previous point, by verifying that the organization has procedures in place to identify and update environmental legislation relevant to the processes and products covered by the EPD, with particular attention to the list of materials and chemicals in the product and to the environmental permits for the processes included in the EPD.

For EPDs under the International EPD System program in accordance with GPI Revision 5.0, verification of the legislative compliance of the product or process at the production site(s) related to the EPD is not required.

For EPDs under the EPDItaly program, verification of the legislative compliance of the product or process at the production site(s) related to the EPD is conducted in accordance with the procedures defined by the program operator and involves obtaining a self-declaration from the Organization regarding the product's legislative compliance (on a form provided by ICMQ) and signed by an authorized representative of the Organization.

In the case of sectoral EPDs or average EPDs, which refer to multiple operational units, the verification will be conducted on a sample basis and will be limited to the production unit subject to on-site verification.

Only if explicitly requested by the Organization will an ICMQ auditor conduct a specific on-site verification activity to assess the environmental legislative compliance of the product or process at the production site(s) related to the EPD. In such a case, this activity (of a voluntary nature) will be noted in the EPD Verification Statement.

7.1.1.2. Specific Requirements for the EPD

The EPD document and the related LCA study report must meet the following requirements:

- compliance with the PCR;
- compliance with the ISO 14040 series of standards;
- compliance with the general guidelines of the Type III environmental declaration program;
- that the data assessment includes coverage, accuracy, completeness, representativeness, consistency, reproducibility, sources, and uncertainty;
- plausibility, quality, and accuracy of LCA-based data;
- quality and accuracy of additional environmental information;
- quality and accuracy of supporting information.

7.1.1.2.1. Specific requirements for EPDs published by the International EPD System

The EPD document and the related LCA study report submitted for evaluation in accordance with the requirements set forth in the G.P.I. of the "International EPD System" must be written in English. Versions of the EPD document published in other languages must have the same content and format as the English-language version of the EPD document and be published on the Program Operator's website.

In the case of verifications for the International EPD System program, it is the exclusive responsibility and obligation of the Organization to obtain and include in the EPD document subject to verification/validation the correct registration number obtained in accordance with the procedure defined by the Program Operator.

The Organization must establish internal follow-up procedures to confirm whether the information contained in the EPD remains valid or whether the EPD needs to be updated during its validity period. These procedures must identify the key parameters that may trigger an update, through a sensitivity analysis. The follow-up must be conducted at least once a year and should be performed with a frequency that allows for monitoring any changes.

In the case of verifications for the International EPD System program, the Organization must document the annual follow-up procedures and make them available to ICMQ during the audit for verification purposes.

The Body reserves the right to communicate the results of the activity to the Program Operator.

The procedure should include the methods by which the Organization monitors any significant changes that have occurred:

- in the EPD;
- in the input data;
- in the procurement of raw materials;
- in transportation methods;
- in production processes;
- in product design;
- in environmental legislation.

In the event of substantial changes or deviations from the information defined in the "Product Information" section of the International EPD System's G.P.I. during the EPD's validity period, the EPD will be subject to a review for re-assessment by ICMQ, as indicated in section7.1 .

If, during internal follow-up procedures, significant changes are identified that require an update to the EPD during its validity period (e.g., due to changes in environmental performance exceeding 10%), the Organization must update the EPD in accordance with the International EPD System's G.P.I., requesting that ICMQ initiate a new verification process as specified in the commercial offer signed by the Organization.

The follow-up activity is mandatory for the "EPD of product recently on the market" and "EPD of product not yet on the market" categories. For these two types of EPDs, the Organization is required to declare to ICMQ whether the LCA and EPD based on one year's production data are available. This must be done annually and/or in any case within 1 month of the date of delivery to ICMQ of the updated LCA and EPD. Subsequently, ICMQ will

proceed with a new verification. The Self-Declaration form will be provided by the Body upon completion of the verification/validation process for "EPDs of products not yet/recently on the market."

In the event of an EPD update due solely to editorial changes, it is not necessary to submit the EPD to a new verification/validation process.

The verification of additional economic and social information must confirm the following:

- that the information relates to the product covered by the EPD or to the Organization's methods for managing aspects related to social or economic sustainability (e.g., activities related to supply chain management or social responsibility);
- that the information reported in the EPD corresponds to that contained in a Sustainability Report of the Organization, verified by an independent party, with an indication of the level of assurance;
- that the information reported in the EPD is accompanied by an indication of the source documents and the reference period to which the information pertains.

The minimum additional time required to verify the consistency of the additional economic and social information contained in an EPD shall be 0.25 person-days. ICMQ reserves the right to request additional time depending on the type of social and economic information required.

7.1.1.2.2. Special Requirements for "Trader" Type EPDs

In the case of EPDs where the EPD Owner is a retailer/distributor (Trader), the verification is conducted in accordance with the Program Operator's rules, specifically Annex 8 of the EPDItaly Regulations for the EPDItaly Program Operator, and Section A.9.3 "EPD Owned by a Trader" for the Environdec Program Operator. If the EPD is based on pre-existing EPDs or data from one or more manufacturers, the Verification Team must have access to the manufacturer's technical documentation necessary for verification.

7.1.2. EPDs generated using a tool qualified for publication in the EPDItaly program.

Depending on the type of TOOL used by the Organization, the following two cases may arise:

1) **LCA-TOOL**: if an Organization uses the same LCA calculation model (algorithm/TOOL) to develop EPDs for different but similar products, updating only the input data, it is possible to streamline the verification of these EPDs through a process of verifying and qualifying the TOOL (algorithm) used and subsequently verifying its correct application by the Organization to develop a specific EPD.

By verifying the correctness and effectiveness of the calculation algorithm within its defined scope of application, the verification of EPDs for the various products falling within the tool's scope of application is simplified, as it is not necessary to verify the validity of the previously validated LCA model each time.

The verification of EPDs produced by the TOOL must necessarily be conducted by ICMQ when it has also qualified the LCA-TOOL used to generate them.

2) **EPD-TOOL**: In the case of EPDs generated by EPD-TOOL, since the user of the EPD-TOOL can only select the various configurations of the components making up the product covered by the EPD, these configurations are not verified in detail, either during the assessment phase or during monitoring. However, a Verification Opinion is issued, addressed to the EPD owner, which identifies the scope and boundaries of all EPDs that can be produced by the qualified EPD-TOOL, provided they were verified during the initial qualification phase. This certificate, valid for two years, is subject to renewal through verification of the EPD-TOOL, as indicated in paragraph9.11 , and of the training/monitoring procedures carried out by the EPD owner with respect to the user. Should the tool change or be subject to revision, the EPDs will be issued with reference to an EPD-TOOL different from the original one. The EPDs generated by the tool are verified on a sample basis each year.

The verification of EPDs produced by the TOOL must necessarily be conducted by ICMQ when ICMQ has also qualified the TOOL used for their generation.

7.1.2.1. Requirements for EPDs generated by the LCA-TOOL

The requirements subject to verification are as follows:

a) Use of a qualified LCA-TOOL;

b) Correct application of the organization's processes for using the LCA-TOOL;

c) Legal compliance;

d) Specific EPD requirements;

7.1.2.1.1. Use of a qualified LCA-TOOL

If the LCA-TOOL used by the Organization has already been qualified by ICMQ, the verification will be limited to:

- determining whether the product falls within the scope of the qualified LCA-TOOL;
- verifying whether the version of the TOOL used, as indicated in the EPD , corresponds to the version indicated in its current qualification certificate .

If the LCA-TOOL used by the Organization has not previously been qualified by ICMQ, it must first be qualified, as indicated in section7.1.2.3 .

7.1.2.1.2. Correct application of the Organization's processes for using the LCA-TOOL

The Organization (EPD owner) must define and document tasks and responsibilities for all significant phases of the company's process for creating and publishing an EPD, and for the operational management of these processes, appointing a TOOL Manager who is responsible for liaising with ICMQ.

In particular, the following must be established:

- the competence of the personnel assigned to use the TOOL, through documented training in its use;
- the company's process for creating and publishing an EPD: identification and collection of raw data, entry of data into the TOOL, input of the TOOL's output data to create the EPD document, submission of the EPD document to ICMQ for verification, and submission of the EPD document to the Program Operator for publication;
- the proper management, maintenance, and use of the TOOL: managing access to the TOOL, managing updates, and using the TOOL in various application areas;
- the use of a "Risk-Based Thinking" approach to managing the TOOL, highlighting any critical issues and the corresponding solutions adopted. In particular, the methodology adopted must aim to identify risks, assess their impact, and define the actions necessary to minimize or eliminate them, or to make them compatible with the activities of the EPD owner. The process is proactive and aimed at preventing the occurrence of harmful situations. The ultimate goal of the risk assessment activity is to prioritize the actions to be implemented. Following the risk assessment, the manufacturer must implement specific risk mitigation measures aimed at reducing the risk impact to an acceptable level (tolerable or negligible). If the result indicates an intolerable or undesirable risk, the situation may reveal a residual risk that must be managed through appropriate actions.

ICMQ's verification of these requirements takes place when the Organization generates its first EPD using the LCA-TOOL, and typically at the location where the TOOL is used.

The Organization using the LCA-TOOL must, for each EPD following the first one generated by the LCA-TOOL, send ICMQ a notification confirming that there have been no changes to the requirements for the correct application of the TOOL's usage processes.
If, however, changes are present, ICMQ will conduct these verifications again to ensure that the EPDs produced by the Organization remain verifiable.

If the verifications carried out on these aspects are negative, it will not be possible to proceed with the verification of the EPDs generated by the TOOL.

7.1.2.1.3.

The provisions of section 7.1.1.1 apply.

7.1.2.1.4. Specific-EPD Requirements

Since the LCA model was verified with the TOOL's previous qualification, the EPDs can be verified using an optimized procedure, without further verifications regarding the LCA model implemented in the TOOL.

The EPD verification therefore pertains to:

- drafting of the EPD document in accordance with the PCR and the Program Operator's Regulations;
- consistency between the content of the EPD document and the output of the LCA-TOOL results;
- Plausibility check: consistency of the LCA-TOOL's input/output data in terms of mass balance and by comparison with the I/O data of similar products from the same organization;

Following the plausibility check, if anomalous data is found, GVI may conduct a more in-depth document review by requesting additional data or clarifications from the Organization. In significant cases, if necessary, GVI may also request supplementary on-site verifications.

Plausibility checks may be conducted by the GVI based on a document prepared by the Organization and/or through a sample data review based on the LCA-TOOL input/output data provided by the Organization.

For each EPD (with the exception of the first one generated by the LCA-TOOL), the Organization's Legal Representative must declare:

- that the EPD was calculated using a calculation algorithm, for which appropriate identification must be provided to ICMQ;
- that the selection of inventory data is limited and specified in the LCA-TOOL output report;
- that the process for the correct use of the LCA-TOOL has not changed and that defined procedures have been adopted to ensure that the operator cannot modify the calculation algorithm and/or the LCA calculation model implemented in the LCA-TOOL;
- that the data used are actual data.

The Organization must also provide ICMQ, for each EPD:

- the LCA-TOOL input/output data, preferably in the form of a report generated by the LCA-TOOL (if available);
- the mass and energy balance, where it can be extracted from the LCA-TOOL;
- the plausibility check (if prepared) and/or the relevant data requested by the verifier;

Upon completion of the EPD verification activities, ICMQ issues a Verification Opinion.

7.1.2.2. Requirements for EPDs generated by EPD-TOOL

7.1.2.2.1. The requirements subject to verification are as follows:

a) Use of a qualified EPD-TOOL;

b) User training on the correct use of the EPD-TOOL;

c) Compliance with applicable laws;

d) Annual spot-check of generated and published EPDs, conducted via a simplified verification process. The annual verification may be waived only if it is demonstrated that the number of generated EPDs is <=3.

7.1.2.2.2. Use of a qualified EPD-TOOL

If the EPD-TOOL used by the Organization has already been qualified by ICMQ, the verification will be limited to:

- determining whether the product falls within the scope of the qualified EPD-TOOL;
- verifying whether the version of the TOOL used, as indicated in the EPD, corresponds to the version indicated in its current qualification certificate.
;

If the EPD-TOOL used by the Organization has not previously been qualified by ICMQ, it must first be qualified, as indicated in paragraph 7.1.2.3.3

7.1.2.2.3. User training on the correct use of the EPD-TOOL

The owner of the EPD-TOOL must appoint a TOOL Manager, who is responsible for using the EPD-TOOL and liaising with ICMQ.

Since the EPDs generated by the EPD-TOOL are not directly verified, ICMQ must conduct an annual back-office surveillance (except for the initial assessment at the EPD-TOOL owner's premises), during which the tool owner must provide evidence of:

- The number of EPDs issued (if possible);
- the competence of the personnel responsible for using the EPD-TOOL, through documented training provided by the EPD owner to users on the correct use of the tool;
- the proper management, maintenance, and use of the TOOL (management of access to the TOOL, management of updates, and use of the TOOL in various application areas).
- ICMQ's verification of these requirements takes place during the verification of the representative EPDs generated by the EPD-TOOL.

ICMQ will annually sample the generated and published EPDs and perform a simplified verification.

For each sampled and published EPD produced by the qualified algorithm/model, ICMQ performs the following documentary verifications:

- demonstration that the EPD is generated by the qualified calculation model;
- compliance with ISO 14020 and the relevant requirements of ISO 14025;
- compliance with EPDItaly's general instructions;
- compliance with the relevant Product Specification (PCR).

The Organization using the EPD-TOOL to develop EPDs (as the EPD Owner) must notify ICMQ of any changes to user training requirements for the proper use of the EPD-TOOL. In such cases, ICMQ will perform these verifications again to ensure that the EPDs produced by the Organization remain verifiable.

If the verifications carried out on these aspects are negative, it will not be possible to proceed with the verification of the EPDs generated by the EPD-TOOL.

7.1.2.2.4. Verification of Legislative Compliance

The provisions of paragraph7.1.1.1 apply.

7.1.2.3. TOOL Qualification Procedures;

The activities for the qualification of a TOOL are carried out in two consecutive phases:

- TOOL pre-qualification activities;
- Final TOOL qualification activities;

If, during the TOOL qualification process, the ICMQ GVI determines that not all required criteria are fully met, ICMQ will notify the Organization (manufacturer/Software House) to address all identified deficiencies and their root causes.

ICMQ reserves the right to conduct additional visits to perform further verifications.

7.1.2.3.1. Pre-qualification of the TOOL

The Organization (manufacturer/software house) must identify the

TOOL for which it is requesting qualification, providing at least the following information:

- developer's name;
- name of the TOOL;
- version of the TOOL and the calculation algorithm that implements the LCA study.

The Organization (manufacturer/software house) must prepare a manual that describes in detail how the TOOL operates. In particular, the following must be correctly identified:

- the scope of application of the TOOL: PCR and GPI of the relevant Program Operator applied, product type, number of production units, life cycle modules considered in the LCA study, additional environmental parameters (if any) implemented (any limitations on the use of the TOOL related to manufacturing processes, technologies employed, and additional environmental aspects implemented must also be clearly indicated);
- The production process implemented in the TOOL, highlighting any technological or production-related limitations to its use;
- Description of the LCA study model implemented in the TOOL, identifying the I/O flows (including details on cut-offs and allocations, power mix, RSL, end-of-life scenarios, etc.).

If the TOOL also supports the creation of EPDs, it must specify the types that can be generated: product, average, and sector.

Based on this information, ICMQ conducts a document review for the pre-qualification of the TOOL and reports the results to the Organization.

7.1.2.3.2. Final Qualification of the LCA-TOOL

For the qualification of the LCA-TOOL, ICMQ must verify compliance with the TOOL requirements indicated in section7.1.2.3.4 .

Furthermore, ICMQ must also verify the first EPD generated by the LCA-TOOL as indicated in section7.1.1 . The verification of the first EPD issued by the TOOL will include an audit at the site where data is collected, managed, and processed for the development of the EPD, as well as an on-site inspection at the manufacturer's facility to verify the consistency of the production process implemented by the tool.

The LCA-TOOL qualification issued by ICMQ will apply only to those elements within the scope of the LCA-TOOL for which verification of a corresponding EPD could be performed.

Upon successful completion of the verification activities for the qualification of the LCA-TOOL, ICMQ will issue a qualification certificate.

7.1.2.3.3. Final Qualification of the EPD-TOOL

For the qualification of the EPD-TOOL, ICMQ must verify compliance with the TOOL requirements specified in section 7.1.2.3.4.

For the qualification of the EPD-TOOL, ICMQ must perform the following activities in addition to the previous ones:

- verification of the accuracy of the data contained in the component database;
- verification of representative EPDs that can be generated by the EPD-TOOL, the number of which will be defined by ICMQ based on the number of products eligible for EPDs;

The EPD-TOOL qualification issued by ICMQ will apply only to those elements within the scope of the EPD-TOOL for which verification of a representative sample of EPDs could be performed.

Upon successful completion of the EPD-TOOL qualification, ICMQ will issue a qualification certificate.

Any modification to the tool with respect to the LCA model or input data will result in a new verification of the tool and the component database.

7.1.2.3.4. Requirements for the qualification of a TOOL

To qualify a TOOL, the simultaneous presence of the following characteristics must be verified:

a. completeness;
b. correctness;
c. appropriateness;
d. security;
e. integrity.

Whenever there is a change in the elements defining the scope of the TOOL or in the processes that could significantly alter the LCA study, the TOOL must be re-certified by ICMQ.

The verification activity for the qualification of the TOOL is conducted by ICMQ at the manufacturer's/software house's premises and aims to ensure that the TOOL meets all the above requirements.

7.1.2.3.4.1. Completeness Requirement

During the visit, the inspector will verify the availability of the following information in the TOOL:

- Purpose of the study;
- Functional/declared unit;
- Product description
- System boundaries
- Power mix
- Cut-off rules and input data
- Product-level scenarios
- Process and I/O Flow Modeling
- Environmental indicators used
- Additional environmental parameters (if applicable)
- RSL

The TOOL is complete if it contains information on all listed characteristics, where applicable.
If any are missing, a major non-conformity will be issued.

7.1.2.3.4.2. Accuracy requirement

During the visit, the inspector will verify the correctness of the TOOL by:

- the compliance of the LCA model with the relevant PCR;
- the compliance of the LCA with the ISO 14040 series of standards;
- the compliance of the LCA with EPDItaly's general instructions.

The requirement is met if the above activities are successfully completed. Otherwise, a major non-conformity will be issued.

7.1.2.3.4.3. Requirement of Appropriateness

Using a test LCA or EPD (for each scope of application of the TOOL), it must be demonstrated:

- that the EPD is generated by the validated calculation model;
- that the EPD complies with ISO 14020 and the relevant requirements of ISO 14025;
- that the EPD complies with EPDItaly's general instructions;
- that the EPD contains the elements required by the relevant Product Specification (PCR).

If the test LCA or EPD refers to an actual product (in the case of the LCA-TOOL), the following must also be verified:

- that the data assessment includes coverage, accuracy, completeness, representativeness, consistency, reproducibility, sources, and uncertainty;
- the plausibility, quality, and accuracy of LCA-based data;
- the quality and accuracy of additional environmental information (if present);
- the quality and accuracy of supporting information;

- the appropriateness of the EPD (only if the TOOL does not also implement the creation of the EPD document)

The qualification of the TOOL must be performed on all elements defining its scope of application (product type, life cycle modules, any types of EPDs, etc.).

The requirement is met if the above activities are successfully completed. Otherwise, a major non-conformity will be issued.

GENERAL NOTE: In the case of verifications using the LCA tool, the auditor conducts a consistency check on the input data not only for periodic updates but also for similar products to which the tool is applied.

7.1.2.3.4.4. Security Requirement

During the visit, the inspector will verify the security of the TOOL by:

- verifying that the LCA model cannot be modified in terms of the types of inventory data that can be considered;
- verifying that the LCA model cannot be modified with regard to impact indicators and additional environmental aspects;
- verifying that only raw and specific data can be entered (only for LCA-TOOL);
- verifying the presence of a system that allows for the identification of errors in the inputs (WARNING).

The requirement is met if the above activities are completed successfully. Otherwise, a major non-conformity will be issued.

7.1.2.3.4.5. Integrity Requirement

During the visit, the inspector will verify the integrity of the TOOL by:

- the presence of a system that prevents unauthorized access in accordance with the procedures of the Organization using the TOOL.
- Backup systems

The requirement is met if the above activities are successfully completed. Otherwise, a Major Nonconformity will be issued.

7.1.2.4. Requalification of the TOOL

If the Organization intends to make changes to the scope of the previously qualified TOOL, or when such changes are necessary due to updates to the PO Regulations or the reference PCR used by the TOOL, it is necessary to request that ICMQ re-qualify the TOOL.

The steps required to proceed with the TOOL re-qualification process are as follows:

- Submission by the TOOL owner to ICMQ of the document (TOOL manual/report) indicating the changes made to the new version of the TOOL compared to the previous one. To facilitate the verification process, these changes must be highlighted in the text of the document;
- ICMQ verifies the changes made to the TOOL by analyzing the submitted document and conducting an audit (which may also be performed remotely) regarding the TOOL's operation;
- The inspector sends the verification results to ICMQ, which are then brought to the attention of the Deliberation Committee, which decides on the re-qualification of the TOOL;

Regarding the nature of potential changes, the TOOL version identifier for ICMQ qualification purposes will specify, in addition to the TOOL name, the model version. To this end, the TOOL identifier, which will enable its recognition during verification, will be of the format "TOOL name_model version."

Any additional information regarding the version of the database or service pack used may be included at the owner's discretion in the TOOL identifier to track such information, following the format "Tool name_model version [e.g., the version of the GABI or SIMA PRO database]."

If the PCR changes, it may be necessary to re-qualify the TOOL.

A change in the LCA related to the following activities requires a re-qualification of the TOOL:

<u>Definition of the objective and scope</u>

- Selection of the functional unit;

<u>Inventory</u>

- System boundaries;
- Production flow diagram;
- Allocation of impacts;
- Data processing;

<u>Data evaluation</u>

- Classification of impacts according to the reference PCR;
- Characterization, i.e., the quantification of the classification phase. Its purpose is to quantify environmental impacts by means of a classification of weight factors established by an Authority (for example, 1 kg of CO is equivalent to 2 kg of CO2). These elements are variable and do NOT affect the model, but only the output data.

7.1.3. Specific requirements for the Process EPD

All audits for the "Process EPD" are always conducted at the Organization's site where the system operates. For this type of audit, ICMQ will prepare a five-year audit plan for the maintenance and renewal of certification.

ICMQ conducts the verification of the Organization's Process EPD compliance in accordance with the requirements specified in Annex C of ISO 14067.

The conformity assessment also includes the verification of a sample of single-product EPD quantifications generated by the Organization's Process EPD (Pilot Case).

The verification activity is intended to certify an Organization's EPD Process and the continued compliance of that process over a specific three-year period. For this reason, EPD Process certification includes periodic surveillance activities.

Verifications are conducted based on:

a) the documentation related to the EPD Process provided by the Organization;

b) the sample of product EPDs generated by the Organization's EPD Process (Pilot Case);

c) objective evidence provided by the organization to confirm the EPD values.

The Process EPD verification process involves an initial document review, followed by a field verification and a final document review.

An integral part of the EPD Process verifications is the verification of the Pilot Case generated by the Organization's EPD Process. These are conducted based on the EPD prepared by the Organization and the objective evidence provided by the Organization to confirm the assessment performed. The verification process involves an initial document review and subsequent risk analysis by ICMQ, which may be followed by a field audit and/or a final document review. The field audit may be conducted either at the location where the production process is based or where the collection and management of data and information relevant to the EPD take place. ICMQ's decision to conduct the on-site verification for the Pilot Case will be based on the outcome of the document review and the subsequent risk analysis (see section9.3). Specifically, the on-site verification will be conducted if at least one of the following conditions is met:

- the outcome of the risk analysis indicates a higher risk level than that defined by ICMQ;

- during the initial document review, inaccuracies of a nature or magnitude requiring on-site verification were identified (critical issues). In particular, the on-site verification will be conducted in any case where gaps or inconsistencies arise regarding the following aspects:

- the physical consistency between the production site and what is described in the EPD's LCA study;
- the correct collection, tracking, and processing of raw and specific data;

- the reliability of the model developed in the EPD's LCA study.

ICMQ will verify, based on a representative sample and within the timeframes specified by the Standard, that the Organization not only understands and is capable of managing all aspects of the EPD assessment, but also that the values contained therein are supported by objective evidence sufficient to ensure their reliability.

The issuance and maintenance of EPD Process certification does not constitute, on the part of ICMQ, a guarantee of the Organization's compliance with legal obligations. The Organization is solely responsible, both to itself and to third parties, for the proper conduct of its activities and for the compliance of such activities and its products/services with applicable regulations and the expectations of customers and third parties in general, excluding any liability or warranty obligation on the part of ICMQ.

Therefore, the absence of detected non-conformities does not mean that non-conformities related to the Organization's activities and/or its products may not exist

7.1.4. Specific requirements for verifications of additional environmental parameters included in EPDs and of the content of recycled/recovered/by-

In the event that the Organization, during the verification of an EPD, requests the inclusion of additional environmental parameters in the EPD, including the content of recycled/reclaimed/by-product materials for CAM purposes, these will be subject to a specific verification activity as indicated in § 9.13.

The request to include additional environmental information to be verified by ICMQ must be agreed upon with ICMQ during the pre-engagement and engagement phases.

Additional environmental parameters such as the content of recycled/reclaimed/by-product materials may be subject only to EPD verification and not to EPD validation.

All additional environmental information declared in the EPD must comply with the requirements of the relevant Program Operator and, in particular, must be substantiated, verifiable, derived using appropriate methods, specific, accurate, non-misleading, and relevant solely to the products covered by the EPD. The additional environmental parameters will be placed in a specific section of the EPD titled "Additional Environmental Information."

7.1.4.1. Specifications regarding the verification activity in relation to the type of evidence ( ) of recycled/reclaimed/by-product content

7.1.4.1.1. Specifications in cases where the content of recycled/reclaimed/by-product material is demonstrated without recourse to product certification

ICMQ may issue the EPD Verification Opinion, containing information regarding the recycled/reclaimed/by-product content, only if the following requirements have been successfully verified:

a. The declared value of the recycled/reclaimed/by-product content refers solely to the products covered by the EPD. If values are declared for only some of the products covered by the EPD, this must be clearly indicated;

b. The declared value indicates the percentages of recycled/reclaimed/by-product content (if present). It is optional to also indicate the breakdown of the total recycled content between the two fractions of pre-consumer and post-consumer recycled material. Where one of the components is not declared, it must be identified with the acronym "n.p.d";

c. If the EPD relates to more than one production unit, the declared value of the recycled/reclaimed/by-product content must explicitly indicate which production unit it refers to;

d. The EPD does not contain claims regarding the product's compliance with a Minimum Environmental Criterion (CAM);

e. The EPD specifies the methodology used to determine the recycled/reclaimed/by-product content, which must refer to a method recognized by Accredia (or another accreditation body that is a signatory to Mutual Recognition Agreements) for the accreditation of certification bodies in accordance with the UNI CEI EN ISO/IEC 17065 standard (e.g., ICMQ Regulation CP DOC 262, UNI-PdR 88-20, Remade in Italy Specifications, Second Life Plastic Specifications, etc.);

f. The identification of the products and the declared values is correct;

g. The calculation method applied to determine the value of the recycled/recovered/by-product content is correct (mass balance calculation to determine the value of the recycled/recovered/by-product content);

h. The calculation of the declared value of the recycled/reclaimed/by-product content of the product is correct and consistent with the product's composition formula;

i. The traceability of materials entering the manufacturing process and the verification of their qualification are correctly carried out using the appropriate documentary evidence referred to in the specific Regulation/Specifications;

j. Random checks of the product's production records have confirmed consistency between the value declared in the EPD and that obtained at the end of the manufacturing process.

The Organization must inform ICMQ prior to the verification (via the verification application or other specific communication) whether the declaration of performance regarding the recycled/recovered/by-product content was also made for the purpose of demonstrating compliance with the requirements of the Minimum Environmental Criteria (CAM). In the latter case, the methodology used must refer to one of the product certification schemes for recycled/reclaimed/by-product content accredited by Accredia (e.g., ICMQ Regulation CP DOC 262, UNI-PdR 88-20, Remade in Italy, Plastica Seconda Vita, etc.).

A statement of compliance with ISO 14021 alone is not considered sufficient in itself to indicate the methodology adopted.

Please note that when verifying the content of recycled/reclaimed/by-product materials—determined by applying a methodology defined by a certification scheme—the GVI will follow the verification procedures set forth in that scheme, specifically and solely with regard to the requirements listed above in points g) through j).

If the reference period of the data used to determine the recycled/reclaimed/by-product content differs from the reference period of the data used to calculate the LCA impact indicators, this must be explicitly stated in the EPD, and the GVI must assess its suitability regarding the representativeness of the declared and verified results.

The verification activity by the GVI may be carried out on-site (remotely or in person, depending on the provisions of IO 10) or, alternatively, through document reviews conducted in the back office, in agreement with the Organization.

7.1.4.1.2. Specifications in cases where the content of recycled/reclaimed/by-product material is demonstrated through product certification

In cases where the content of recycled/reclaimed/by-product material is demonstrated by the Organization through a valid product certification issued by a third-party certification body accredited according to the UNI CEI EN ISO/IEC 17065 standard, the GVI verifies compliance only with the requirements from point a) to point f) indicated in paragraph7.1.4.1.1 .

Regarding compliance with the requirements under points b) and f), these will be met by including in the EPD the identification of the products and the values, as indicated in the relevant product certificate and in accordance with Annex 7 of the EPDItaly Regulation.

Furthermore, the EPD must include: the identification code of the product certificate provided, the certification body that issued it, and the certificate's expiry date.

The Organization must provide the GVI with a copy of the certificate, and the GVI must forward it to ICMQ together with the required verification documents.

The Organization must inform ICMQ prior to the verification (through the verification application or by other specific communication) whether the declaration of performance regarding the recycled/reclaimed/by-product content was also made for the purpose of demonstrating compliance with the requirements of the Minimum Environmental Criteria (CAM). In the latter case, the product certification provided as evidence must refer to a product certification for recycled/reclaimed/by-product content accredited by Accredia (e.g., ICMQ Regulation CP DOC 262, UNI-PdR 88-20, Remade in Italy, Plastica Seconda Vita, etc.) or to a validation of a

self-declared environmental claim compliant with ISO 14021 as of December 4, 2022. Certifications must be issued by a certification body accredited according to UNI CEI EN ISO/IEC 17065.

If the reference period of the data used to define the value of the recycled/reclaimed/by-product content differs from the reference period of the data used to calculate the LCA impact indicators, this must be explicitly stated in the EPD, and the GVI must assess its suitability regarding the representativeness of the declared and verified results.

The verification activity by the GVI will be carried out on a documentary basis in the back office.

7.1.4.2. Verification Specifications Based on EPD Type

7.1.4.2.1. Verification for new EPDs (standard or generated using a qualified LCA-TOOL)

The verification activities performed by the appointed GVI are those indicated in the case studies in section7.1.4.1 .

In the event that the EPD is created using an LCA-TOOL that also calculates the value of recycled/recovered/by-product content, the verification of the requirement regarding the correct calculation method adopted (see point g. of section7.1.4.1.1) will be performed only at the time of the LCA-TOOL's qualification and will not need to be repeated during verifications of new EPDs generated using a previously qualified LCA-TOOL.

7.1.4.2.2. Verification in the case of a new version of a previously verified EPD (standard or generated using a qualified LCA-TOOL) for updating/supplementing the value of recycled/reclaimed/by-product content

The verification procedures are further differentiated according to the following cases:

1. The reference period for data on recycled/reclaimed/by-product content differs from the reference period for data used to define LCA impact indicators

The appointed GVI performs the verification activities based on the cases outlined in paragraph7.1.4.1 .

In the case of an EPD generated using the LCA-TOOL, any changes made to the methodology for calculating the recycled/reclaimed/by-product content implemented in the Tool also require the verification and qualification of a new version of the LCA-TOOL, for which the minimum verification duration shall be 0.25 person-days.

In the case of a new version of a previously verified EPD, issued by the Organization solely for the purpose of updating/supplementing the recycled/reclaimed/by-product content value and demonstrated solely through product certification, the verification is conducted in accordance with the provisions of paragraph7.1.4.1.2 .

2. The reference period for data on the recycled/reclaimed/by-product content must coincide (even if only partially) with the reference period for the data used to define the LCA impact indicators.

The verification activities performed by the appointed GVI are those indicated in the case studies in paragraph7.1.4.1 .

In addition, GVI verifies that the Organization has monitored and documented any changes in the LCA impact indicators resulting from updates to data that are common (e.g., BOM) to the calculation of recycled/reclaimed/by-product content.

If changes of > ±10% are found in at least one of the LCA impact indicators, GVI will also verify the update of the LCA and the EPD document, which the Organization must prepare and provide to ICMQ.

In the case of an EPD generated using the LCA-TOOL, any changes made to the methodology for calculating the recycled/reclaimed/by-product content implemented in the Tool also require the specific verification and qualification of a new version of the LCA-TOOL.

In the case of a new version of a previously verified EPD, issued by the Organization solely for the purpose of updating/supplementing the recycled/reclaimed/by-product content value and demonstrated solely through product certification, the verification is conducted in accordance with the provisions of paragraph7.1.4.1.2 .

7.2. ICMQ Auditors

ICMQ undertakes to assign the performance of assessment activities only to Auditors who have been previously qualified and selected based on their experience in the field of verification and certification and their technical knowledge regarding the activities for which the Organization requests verification/validation/certification/attestation, as well as based on the requirements established by ICMQ.

Inspection Verification/Validation Teams may consist of "single assessors" (Auditors) or "multiple assessors"; within Inspection Verification Teams, the member responsible for coordinating and directing the inspection is called the "GVI Lead Auditor" and serves as the interface with the Organization undergoing the inspection.

For the assessment, ICMQ may utilize both its own employees and external collaborators, who act in the name and on behalf of ICMQ and possess the necessary qualifications required to perform such an assessment. Occasionally, auditors may be accompanied by observer auditors appointed by either ICMQ or the Accreditation and/or Authorization Bodies, who must be able to participate in the audit without interfering with it.

ICMQ shall notify the Organization of the names of the Auditors assigned to the verification/validation.

The Organization may, within 5 calendar days, reject one or more Auditors proposed by ICMQ. The reason for such a rejection must be provided in writing. If valid reasons are provided, ICMQ will propose new Auditors.

In the case of an on-site audit, the Auditors will contact the Organization to agree on the audit date and to arrange any necessary logistics.

In the event that an auditor is unable to proceed with the audit or must interrupt it during its execution for serious reasons (such as illness, injury, etc.), ICMQ may appoint a substitute, in agreement with the Organization.

The aforementioned Auditors are contractually bound to comply with all duties and obligations of ICMQ, including those regarding independence, conflicts of interest, and the processing of personal data.

7.3. Confidentiality and Proprietary Information

All data and information regarding the Organization that ICMQ becomes aware of in the course of performing the activities covered by these General Terms and Conditions are confidential. Access to such information is governed by a specific ICMQ procedure, which imposes a confidentiality obligation on the Auditors and all ICMQ personnel involved in the assessment process.

Similarly, staff of the Accreditation Body who, during the process of granting and/or maintaining ICMQ's accreditation, become aware of information regarding the Organization—whether through certification or as a certified entity—at ICMQ or directly at the Organization's premises, are bound by professional secrecy.

ICMQ will provide the relevant parties with all information in its possession within the limits and in the cases where this is required by any applicable law.

7.4. Issuance and Maintenance of Certificates

7.4.1. Requirements for the EPD Verification/Validation Statement

The verification/validation report for a product or sector EPD certifies that the LCA study and the EPD prepared by the organization comply with the relevant standard and that there is sufficient objective evidence—which has been verified—to ensure their credibility and reliability in accordance with the defined assurance level. Please note that validation assesses the reasonableness of the assumptions, limitations, and methods underlying the declaration and not directly the reliability of the claim subject to validation. Therefore, the assurance level must be limited solely to the methodologies, assumptions, and limitations used. In the case of validation, therefore, it is not possible to provide any assurance regarding the final data, as the declaration pertains to future activities.

The verification/validation opinion is issued for each EPD and will

state:

- the type of EPD (product or sector) and its document identification details (version and date of issue);

- the details of the organization that issued the EPD, which is the EPD Owner (company name and registered office address);

- the products to which the EPD refers and the corresponding CPC code;

- the details of the operational unit to which the EPD refers (address);

- the standard against which the conformity assessment was performed;

- the program operator for whom the EPD is intended;

- details of the LCA study related to the EPD and certain information: life cycle, type of data (historical), data reference period;

- information on the verification/validation activity: opinion, level of assurance as defined, materiality threshold, limitations, and reservations;

Regarding the opinion, this will be expressed in accordance with the provisions of the Program Operator's scheme regulations. For the EPDItaly scheme, two types of opinion are provided for: "positive" or "negative." In the absence of specific instructions from the Program Operator, the terms "Satisfactory," "Satisfactory with comments," and "Unsatisfactory" will apply to the IES scheme.

An "Satisfactory with Comments" opinion will be issued if, during the EPD assessment process for the IES scheme, the GVI identified a "critical NC" or, alternatively, a technical or general "NC" deemed particularly significant by the RGVI.

In such cases, the comment accompanying the opinion will briefly outline the reasons that led to a satisfactory opinion as a result of changes made to the declaration initially submitted for evaluation.

The verification opinion for a sectoral EPD will also list all the organizations/operational units that participated in the data collection.

The certificate of an EPD verification/validation opinion developed as a Preliminary Validation, intended solely for the EPDItaly PO, explicitly contains this information.

The certificate for an EPD verification opinion developed using a TOOL will also include the references of the previously qualified LCA/EPD-TOOL for which the verifications referred to in the preceding paragraph have also been successfully completed (7.1.2).

Only in the case of the EPD-TOOL does the certificate identify, in an annex, all possible product configurations for which an EPD may be issued. This certificate is monitored annually through a sample verification of the generated EPDs.

7.4.2. Requirements for EPD Process Certification Statements

The EPD Process certificate attests that the Organization's process management system for creating EPDs complies with the requirements of the Standard, as well as the applicable PCRs and GPIs of the IES program operator.

The issuance of the EPD Process certificate does not entail the issuance by ICMQ of a Verification Opinion on the pilot EPDs verified to assess the effectiveness of the system.

ICMQ may issue the "EPD Process" certificate to the Organization only if the following have been successfully verified:

a. the Organization's competence to prepare an EPD in accordance with the relevant PCR;

b. the EPD Process procedures implemented for the preparation of an EPD;

c. at least one EPD prepared using the Organization's EPD Process in accordance with ISO 14025 and the relevant PCR, following the procedures described in Section7.1.1 .

7.4.3. Requirements for TOOL Qualification Certificates

ICMQ may issue a TOOL Qualification Certificate (LCA/EPD-TOOL) once the verifications referred to in the preceding paragraph 7.1.2.3 have been successfully completed, and the TOOL is suitable for generating product/service EPDs within its defined scope of application.

Whenever there is a change in raw materials, recipes, equipment, or processes that could significantly alter the LCA study, the TOOL must be re-verified.

The TOOL qualification process is conducted by ICMQ in collaboration with the organization that develops the TOOL (e.g., manufacturer or software house) and aims to verify that the TOOL is suitable for generating EPDs.

The TOOL qualification certificate is issued in the name of the organization that develops the TOOL (EPD Owner or software house).

7.5. Limitations and Liability

ICMQ is expressly exempt from any liability:

a) For its assessment of the EPD prepared by the Organization in the event that the latter fails to provide certain information (including documents) and/or provides incomplete information and/or in the event that the information provided does not correspond to the actual situation;

b) For defects in products/services provided by the Organization to third parties, including cases covered under liability for defective products;

c) The proper conduct of the Organization's activities and its compliance, as well as that of its products and services, with applicable environmental and non-environmental regulations, and with the expectations of customers and third parties in general;

d) The request for and publication on the program operator's website International EPD System of the EPD subject to evaluation;

e) Regarding the acceptance or rejection of the EPD document by a contracting authority or any other entity, in order to determine the suitability of the product covered by the EPD to the requirements set forth therein;

f) In the event that a request for a verification and/or validation process regarding an Environmental Product Declaration (EPD) is accepted by ICMQ within six (6) months prior to the expiry date of the applicable Product Category Rules (PCR) referenced by the EPD. In this case, since the verification/validation process involves activities to be carried out by the requesting organization (handling findings, updating documents, receiving clarifications) whose timelines are not under ICMQ's control, it is not possible to guarantee that ICMQ's activities will be completed within the PCR's validity period. Consequently, ICMQ cannot be held liable in any way either for the failure to successfully complete the verification or validation activity by the PCR's expiry date, or for the timing of approval and publication by the Program Operator.

The issuance of the EPD verification/validation opinion does not constitute, on the part of ICMQ, a guarantee of the Organization's compliance with legal obligations.

The Organization is solely responsible, both to itself and to third parties, for the proper conduct of its activities and for the compliance of such activities and its products/services with applicable environmental and non-environmental regulations and with the expectations of customers and third parties in general, excluding any liability or warranty obligation on the part of ICMQ.

Therefore, the absence of non-conformities identified during ICMQ's assessment does not mean that other potential anomalies related to the product, site, or Organization covered by the EPD assessed by ICMQ may not exist.

7.6. Digitization of EPDs

ICMQ, the administrator of the EPDItaly Program, with the assistance of the Organization, digitizes the environmental data derived from EPDs compliant with EN 15804, verified and published in the EPDItaly Program, as part of an international agreement established within the Eco Platform.

The digitization process enables the sharing not only of environmental data but also of other information contained in the EPD documentation, published on the website www.epditaly.it, in a *machine-readable* format. Should certain information required for digitization be missing from the EPD verified by ICMQ, ICMQ will specifically request this information prior to publication on EPDItaly.

The digital format allows for easy reading and processing of the data by LCA calculation programs, thereby enabling the optimization of information sharing contained in the EPDs.

The Organization therefore consents to the publication, in digital form, of the data contained in the EPDs by ICMQ on the website www.epditaly.it and authorizes ICMQ to share such data via the website or other means.

Responsibility for the data contained in the digitized EPDs remains with the Organization (as the EPD Owner), which also retains the exclusive right to modify such data.

For EPDs verified and published by the program operator, IES ICMQ will not perform any digitization of the verified EPDs. If requested, this operation is the responsibility of the Organization. The content of EPDs published in a *machine-readable* format must correspond to the content of the EPD. Responsibility for the data contained in the digitized EPDs lies with the Organization (as the EPD Owner), which, moreover, holds the exclusive right to modify them.

8. Obligations of the Organization as the EPD

8.1. Submission of Contractual Documents

The Organization is required to submit to ICMQ all documents specified in the contract and/or in the Verification/Validation Application for the evaluation of the EPD. Failure to receive or partial receipt of such documentation will prevent ICMQ from initiating or completing the evaluation process.

8.2. Obligation to Cooperate and Ensure Workplace Safety During Verifications

The Organization undertakes to provide full cooperation to ICMQ for the conduct of any on-site audits, and in particular must:

a) facilitate access for ICMQ GVI Auditors to the premises (whether owned by the Organization or third parties) where activities related to the products subject to EPD verification/validation are carried out, by reporting, prior to such access, any specific risks present in the environment where ICMQ Auditors are to operate, along with the preventive and emergency measures adopted in relation to its activities, as well as providing ICMQ Auditors with all necessary Personal Protective Equipment and anything else required in accordance with applicable workplace safety laws;

b) facilitate access to all information necessary (including documents) for the assessment, ensuring its completeness and accuracy;

c) during the audit, the ICMQ GVI must be able to review the LCA model developed within any software (e.g., Simapro or Gabi) used to calculate the EPD, in order to assess the correctness of the choices made for the EPD calculation. It is not possible to conclude an EPD audit with a positive outcome without having been able to verify, even under the guidance of the project management staff, what has been implemented within the software;

d)

e) if the EPD is based on data, information, or documentation from one or more manufacturers, the Organization guarantees that it is fully authorized to use such materials for the purposes of drafting and verifying the EPD and that it has obtained the necessary authorizations to make them available to the Verification Team. To this end, the Organization undertakes to guarantee the Verification Team access to the necessary technical documentation, including the contract between the parties in which authorization to use the data is also stated, the manufacturer's EPD, the related LCA Report, and, where requested by the Program Operator or the verifier, restricted access to the LCA model. If such access is not sufficiently guaranteed to allow for verification, ICMQ may suspend or terminate the process with a negative outcome. The Organization also guarantees the traceability and identity of the product covered by the EPD with respect to the data provided. ensure the presence of the necessary personnel;

f) if the Organization wishes for one of its external consultants to participate in the audits, it must request authorization from ICMQ; such a consultant may attend the verification only as an observer and may not interfere.

The above obligations also apply to:

- any auditors from Accreditation and/or Authorization Bodies, who operate to ensure the maintenance of ICMQ's accreditation and/or authorization and whom the Organization is required to accommodate when requested.
- any audit observers sent by ICMQ for the purpose of monitoring its own auditors or for the training of the observers themselves, whom the Organization is required to accommodate when requested.

8.3. Obligation to maintain compliance.

The Organization commits to complying with, and maintaining compliance over time, all mandatory requirements (laws, regulations, etc.)—whether international, national, or local—that apply to its products and services covered by the verified EPD, to the sites where they are produced, or to the Organization covered by the Process EPD certification

Once the EPD has been evaluated by ICMQ, the Organization is required to maintain its EPD in compliance with the requirements of the Standard.

The Organization must inform ICMQ of any fact that could affect the validity of the opinion expressed in the verification/validation opinion issued.

The Organization undertakes to request the Program Operator to publish the EPD that has obtained the verification/validation opinion.

The Organization undertakes to maintain its certified EPD Process in compliance with the requirements of the Standard throughout the entire validity period of the Certificate. The certified organization must promptly identify the Corrective Actions necessary to remedy any non-compliance with the Standard.

The Organization undertakes to maintain its qualified TOOL in compliance with the requirements of the Standard throughout the entire validity period of the Certificate. The Organization must promptly identify the Corrective Actions necessary to remedy any non-compliance with the Standard.

8.4. Changes to the products, services, and processes under evaluation. Changes related to the Organization. Adverse events and

A) Changes to products, services, processes, and the type and values of impact indicators

The Organization whose EPD has obtained a Verification/Validation Opinion is required to notify ICMQ of:

a) substantial changes to the product (materials, dimensions, etc.) with potential changes in impacts;
b) substantial changes to the process (within the Organization or at a supplier) with potential changes in impacts;
c) changes to the TOOL/model used to calculate environmental impacts (when used);
d) any other changes (including in input data) that result in a change in the EPD's environmental indicators to the extent specified by the Program Operator's GPI;
e) addition of new environmental parameters to the EPD.

If the Organization intends to make changes to the EPD document that has already been subject to a verification/validation opinion, it must request this from ICMQ in writing.
For graphical and/or editorial changes, ICMQ may approve the changes without the need to initiate a new EPD verification process.
Conversely, for changes that affect—or have an impact on—the environmental impact value of an indicator, regardless of whether

the new value is worse or better than the previous one, ICMQ will initiate a new process for the verification/validation of the updated EPD.
In any case, the Organization may not modify the verified/validated EPD without notifying ICMQ.

An Organization that has obtained Process EPD certification is required to notify ICMQ of:

a) changes to the scope of the certified Process EPD (product/service types, production units, reference PCRs) for the development of the EPD;
b) substantial changes to the certified EPD Process, such as the database or allocation procedures for developing EPD Statements;
c) changes to the EPD calculation tool/model.

The Organization must accept ICMQ's decision.

Documentation of the changes must be submitted to ICMQ, which conducts all necessary verifications to determine whether a document review or on-site verification is required

An EPD remains valid, following verification, for a period of five years, after which it must undergo a review and new verification. An EPD must be reviewed and updated when necessary to adapt its content to changes in technology or other circumstances that could affect its content and accuracy.
If the EPD is not modified, it will remain published until its natural expiry, without further verification by ICMQ.

B) Changes Regarding the Organization. In the event that changes occur (or are about to occur) regarding the Organization, these will be classified as:

a) Significant Changes: by way of example and without limitation, these include: cessation of operations; suspension of operations for a period exceeding three months, relocation of one or more production units, transfer of the entire business to another legal entity, sale or lease of the business unit producing the products covered by the EPD, participation in a corporate merger and/or consolidation, change in Tax ID/Company Registration Number, significant change in the number of employees, significant changes in the organizational structure and management (change of executives in key roles, personnel with decision-making authority, or technical staff). In all these cases, ICMQ shall have the right to request a new document review and/or a new audit and/or a new Audit Application, with costs borne by the Organization, which undertakes to accept such decision;

b) Non-Significant Changes: by way of example and without limitation, these include: a change in the name or business name, a change in legal status (e.g., from a general partnership to a limited liability company), a change in the address of the registered office, a change in the VAT number, etc. In all these cases, ICMQ will issue a new verification/validation opinion containing the requested changes, with costs borne by the Organization.

C) Adverse Events. Should the Organization be subject to a protest, placed in liquidation, or subject to enforcement and/or insolvency proceedings, it must notify ICMQ of such fact within 15 (fifteen) days of the event, via registered letter with return receipt or certified email.

8.5. Obligation to Pay Fees

The Organization undertakes to pay the fees (rates, charges, and any other expenses) for the services performed by ICMQ even in the event of failure to issue the Verification/Validation Opinion, Tool Qualification Certificate, or EPD Process Certification due to the absence of compliance requirements, as verified and objectively documented. In fact, ICMQ performs its services in full whether or not the Verification/Validation Opinion, Tool Qualification Certificate, or EPD Process Certification is issued, and therefore cannot make payment of its fees contingent upon a circumstance beyond its control.

The Organization is required to comply with the payment terms and fees in effect at the time the activity is performed, as set forth in the current Fee Schedule. Annual changes to the fees are notified through the publication of the Fee Schedule in the restricted area of the ICMQ website.

The Organization is required to pay the annual maintenance fee for the EPD Process Certificate or TOOL Qualification Certificate no later than January 31 of each year.

In the event of late payment, the Organization shall pay ICMQ late payment interest pursuant to Legislative Decree No. 231/2002, as well as any legal fees incurred in the collection of the debt.

The Organization undertakes to pay ICMQ the fees for the Examination/Acceptance of the EPD Verification/Validation Application, and for the Issuance and Maintenance (if applicable) of the Verification/Validation Opinion/TOOL Qualification Certificate/EPD Process Certification in accordance with the Fee Schedule and the payment methods specified therein, unless otherwise agreed in writing between the parties.

The fees indicated above include ICMQ's costs for managing the assessment process, while they do not include the fees (and reimbursement of out-of-pocket expenses) corresponding to audits, which will be charged according to the estimate accepted by the Organization and, in the case of items not covered by the estimate, according to the Price List in effect at the time of the verification.

For the fees of any additional inspection and for the fee for the reissuance of the Verification/Validation Opinion/TOOL Qualification Certificate/EPD Process Certification, as well as for the fee for any other service provided by ICMQ, reference shall be made to the Price List in effect at the time of the request.

For EPD verifications published by the International EPD System, advance payment of the fee is preferred as a further guarantee of independence between the verifier and the EPD owner.

8.6. Interruption of the verification

If a scheduled verification cannot be initiated or must be interrupted for reasons attributable to the Organization (such as, for example, the lack of objective evidence supporting the content of the EPD analysis, the unavailability of the company departments involved in the EPD assessment, etc.), the latter is nevertheless required to pay ICMQ an amount equal to the total cost of the assessor's engagement, including expenses.

8.7. Complaint Management Obligation

The Organization must:

a) maintain a record of all complaints brought to its attention regarding the EPD, the TOOL, and the EPD Process subject to evaluation by ICMQ;
b) Adopt and implement appropriate corrective actions in cases where additional verifications or further investigations are required regarding EPDs that were previously subject to a verification/validation opinion by ICMQ, ; such actions may be requested following reports received by ICMQ or when ICMQ becomes aware of facts after the verification opinion has been issued, ; following such complaints, or deficiencies identified in products or services falling within the scope of ICMQ's assessment , any corrective actions must be carried out in accordance with the timelines established by the GPI of the relevant Program Operator; unless otherwise agreed, the maximum period allowed for the implementation of a corrective action, following reports regarding verified and published EPDs, is 6 months;
c) document and record the actions taken;
d) make available to ICMQ auditors both the records of complaints and the documentation regarding the actions taken and the results obtained;
e) accept, following complaints, any unannounced audits decided by ICMQ and/or ICMQ's accreditation body. In this case, unlike what is indicated in the previous paragraph, auditors cannot be recused.

9. Verification/Validation Process for an EPD/TOOL Qualification/EPD Process Certification

Organizations wishing to request the verification/validation service for an EPD/TOOL qualification/EPD Process certification may contact ICMQ, specifically its sales department, through the various channels made available (phone, email, website).

All organizations involved in the supply of goods or services may request verification/validation of an EPD/TOOL qualification/EPD Process certification from ICMQ.

ICMQ performs the verification/validation process for the requested EPD, TOOL qualification, or EPD Process certification in

accordance with any specific provisions set forth in the Program Operator's Regulations to which the EPD under verification pertains.

Regarding the activities carried out, it is specified that:

- the verification process for the requested EPD/EPD Process certification is managed and carried out by ICMQ in order to:
  - provide only a "reasonable" level of assurance with regard to the methodologies, assumptions, and limitations used, and the value of the final environmental impacts;
  - adopt a quantitative materiality level in the verification, with a "materiality threshold of 0%."
- The validation process for a requested EPD is managed and carried out by ICMQ in order to:
  - Provide only a "reasonable" level of assurance with reference solely to the methodologies, assumptions, and limitations used, but not regarding the value of the final environmental impacts;
  - Adopt a quantitative materiality level in the validation, with a "materiality threshold of 0%."

These elements are clearly specified to the Organization in the EPD verification proposal and request and cannot be modified by the Organization in any way.

The process for verifying/validating an EPD or certifying a TOOL/EPD Process includes the following steps:

a) Pre-assignment
b) Assignment
c) Planning
d) Conducting the verification/validation
e) Review
f) Decision and issuance of the EPD Verification/Validation Opinion/TOOL Qualification Certificate/EPD Process Certificate;
g) Facts discovered after the issuance of the EPD Verification/Validation Opinion/TOOL Qualification Certificate/EPD Process Certificate;
h) Handling of appeals and complaints
i) Records
j) Management of the maintenance of the EPD Verification/Validation Opinion/TOOL Qualification Certificate/EPD Process Certificate;
k) Management of the renewal of the EPD Verification/Validation Opinion, TOOL Qualification Certificate, or EPD Process Certificate;
l) Management of supplementary and/or extraordinary verifications for modifications to the EPD Verification/Validation Opinion, TOOL Qualification Certificate, or EPD Process Certificate

9.1. Pre-engagement

Following the Organization's expression of interest, ICMQ requests certain information regarding the subject of the verification/validation, including the date on which the necessary documents will be available so that the GVI can commence activities.

The Organization is required to provide ICMQ with this information accurately, completely, and in a timely manner by completing the appropriate forms provided by ICMQ (Form 115).

Based on this information, ICMQ prepares a commercial offer according to predefined criteria, which identifies the technical verification activities, the operational procedures, and the respective durations for their execution. The offer is sent to the Organization together with the EPD Verification/Validation Application form.

It should be noted that this offer does not in itself constitute the engagement (contract) between ICMQ nd the Organization, as this is finalized only following the Acceptance of the EPD Verification/Validation Application.

The Organization signs the offer and sends it to ICMQ, together with the completed EPD Verification/Validation Application form.

The ICMQ Planning Manager conducts the review of the EPD verification/validation application, verifying:

- the operational feasibility of carrying out the activity based on the date of receipt of the necessary documents indicated by the Organization;
- the consistency between the proposal and the information provided by the Organization.

Based on the outcome of the review:

a) if operational feasibility and full consistency are present: accepts the Organization's EPD verification/validation application, confirming the commercial offer already signed;

b) if operational feasibility exists but consistency is only partial: it will investigate and obtain from the Organization any new or different information compared to that initially provided, and based on this, revise the offer to request a new signature from the Organization, which is a prerequisite for accepting the submitted EPD verification/validation application;

c) in the absence of operational or technical feasibility to perform the requested service due to new or different information obtained compared to that initially provided, as referred to in point b) above, or if there are other reasons justifying the decision: it rejects the Organization's EPD verification/validation application.

The following are also preconditions precluding acceptance of the EPD verification/validation application:

- the Organization's failure to submit the EPD verification/validation application;
- failure to pay the contractually stipulated fees;

9.2. Assignment

The engagement between ICMQ and the Organization is finalized upon ICMQ's sending to the Organization of the letter of Acceptance of the EPD Verification/Validation Application, issued by the ICMQ Planning Manager, which references the offer signed by the Organization, following the outcome of the Pre-engagement Review.

The Acceptance shall also indicate:

- the name and contact information of the ICMQ Project Manager assigned to the certification process and acting as the point of contact for the Organization;
- the names, contact information, and roles of the auditors comprising the Verification/Validation Team (VVT) appointed by ICMQ to conduct the verification/validation activities following a review of the necessary competence and independence requirements. The Organization may submit to ICMQ, within the timeframes and in the manner specified in the Acceptance Letter, a reasoned objection regarding the presence of one or more members of the identified Verification/Validation Team. ICMQ will address the Organization's request by providing feedback, and if deemed necessary, will identify alternative members for the VVT;

Only following the acceptance of the EPD verification/validation application will the planning and execution of the verification/validation by the ICMQ GVI commence.

9.3. /Validation Audit Planning

Following acceptance of the EPD verification/validation application, the Head of the Verification/Validation Inspection Team (RGVI or Lead Auditor) prepares and sends the verification/validation plan (schedule) to the Organization, based on the information received from the Organization (via Form 115) and the contractually defined timeframes for carrying out the activity.

The verification/validation plan outlines the various phases of ICMQ's assessment activity, provides a description of each phase and details regarding their execution, specifies the contractually agreed timeframes, and identifies the execution schedule based on the date of receipt of the documentation required to initiate the activities.

For the verification/validation of an EPD generated without the use of a Tool (standard verification/validation), or for the verification of a first EPD generated using a Tool (LCA-TOOL or EPD-TOOL), or for the certification of the EPD process, the Verification Plan

consists of the following phases:

a) Initial document review: initiated following acceptance of the verification/validation application;

b) On-site audit: This is scheduled by the RGVI in coordination with the Organization upon completion of the initial document review phase, at the time the results of the initial document review are delivered to the Organization, unless critical nonconformities (NCs) were identified during that phase. In such cases, this audit is scheduled after the Organization submits evidence to the RGVI regarding the resolution of critical NCs, and only if the RGVI deems all of them to have been successfully resolved. The audit schedule is confirmed when the RGVI sends the Organization the preliminary plan for the on-site audit

c) Final Document Review: conducted after the Organization submits to the RGVI the management actions and supporting evidence demonstrating the resolution of all findings identified during the process. The outcome of this phase and the RGVI's opinion regarding the results of the conducted review are transmitted by the RGVI solely to the ICMQ Project Manager

The verification of an EPD generated using a tool (LCA-TOOL or EPD-TOOL) following the first one is carried out according to a verification program consisting of the following phases:

a) Initial document review: initiated following acceptance of the verification request;

b) Final document review: conducted after the Organization submits to the RGVI the management actions and supporting evidence to demonstrate the resolution of all issues identified in the previous phase of the verification process. The outcome of this phase and the RGVI's opinion regarding the results of the verification are communicated by the RGVI exclusively to the ICMQ Project Manager.

Upon receipt of the documents sent by the Organization necessary for conducting the EPD verification/validation, the ICMQ RGVI prepares a strategic analysis and risk assessment of the EPD verification/validation activity. This analysis takes into account various factors that could lead to inaccuracies in the EPD verification/validation activity (complexity of the system under review, methods used by the Organization to collect and control raw and specific data, verification experience, etc.).

Based on the outcome of this analysis, the RGVI identifies the most relevant phases and processes, developing an Evidence Collection Plan (Sampling Plan) related to these processes to verify the quality of the data used (raw and specific and/or secondary/generic), which must be addressed in the future on-site verification/validation activities. Furthermore, the outcome of the risk analysis serves as a basis for determining whether on-site verifications can be conducted entirely remotely or in person, in accordance with the provisions of the Program Operator's Regulations (GPI) and the criteria defined by ICMQ's specific procedures.

If, at this stage or at any time during the evaluation process, the analysis of the documents provided reveals new elements or elements different from those initially provided by the Organization, such as to affect the planning of activities, the expected durations, or the risk analysis performed, ICMQ may request that the Organization perform additional activities to those already contracted, the acceptance of which is necessary for the process to continue. Following such acceptance, ICMQ's RGVI will update the Verification/Validation Plan and send it to the Organization and to ICMQ.

9.4. Conducting the verification

EPD verification activities are conducted by the GVI in accordance with the phases outlined in the Verification/Validation Plan.

Verification/validation activities are conducted by the GVI both through document review in the back office and in the field, either in person or remotely, in accordance with the criteria set forth in the specific ICMQ procedures.

The activities conducted by the GVI must, at a minimum, allow for the collection of sufficient data and information to assess compliance with the requirements defined in Section7.1 and its sub-sections, depending on the type of activity requested.

The elements for verification are collected and reported by the GVI through specific verification reports, checklists, and distinct forms tailored to the different types of EPD verifications. Where on-site verification is required as part of the EPD verification/validation activity, the audit report and the form for recording on-site verification evidence are also used.

In the case of EPD verification/validation involving multiple production sites, ICMQ defines a sampling of the verified production units that takes into account:

- the number of sites covered by the EPD;
- the complexity of the production processes covered by the EPD;
- additional environmental aspects related to the production processes covered by the EPD;
- the presence of ISO 14001 certification;
- the level of homogeneity among the production sites (for example, regarding raw materials, plant types, etc.).

9.4.1. Verification/validation of an EPD generated without the use of a TOOL (standard procedure)

The process consists of the following steps:

Initial document review

This is performed in-house by ICMQ's GVI.

It consists of assessing the compliance of the EPD document and the LCA study report (LCA analysis) with the requirements specified in section7.1.1 .

Upon completion of this activity, the RGVI drafts the Verification Report, which details the outcome of the document reviews and any Non-conformities (NCs) identified (also indicating whether they are of a general, technical, or editorial nature), and highlighting which are classified as critical and must be resolved prior to any further on-site verification activities, and which can instead be resolved later, but in any case before the completion of the verification process.

The Report may also contain Recommendations, which the Organization may, at its discretion, choose to address or not, and consequently propose corrective actions.
The verification report is sent by the RGVI to the Organization, which must address the identified Non-Conformities (NCs), indicating the corrective actions taken, their timelines, and providing adequate documentary evidence to allow the GVI to assess whether these actions can be considered sufficient to resolve the reported NC.

This verification phase is conducted on all EPD documents covered by the activity, without any sampling of the submitted documents

On-site Verification

The field verification phase is conducted both at the data collection center and through an on-site inspection at the operational unit.

Its purpose is to:

- conduct spot checks on the quality requirements of the raw, specific, and generic/secondary data used in the LCA study report and the EPD,
- the correct use of characterization factors, as specified in the latest version published by the JRC for use in EPDs, in accordance with EN 15804+A2, and of the methods for calculating environmental impact indicators used in the LCA Study Report,
- that the calculation model implemented for the LCA study is effectively representative of the processes actually occurring at the operational site.

If the subject of the EPD is a service, the on-site inspection will take place at the location where the service is currently provided by the Organization.

Field verifications are agreed upon by the RGVI with the Organization and confirmed by sending the Preliminary Plan to the Organization at least 5 days prior to the scheduled verification date. ICMQ reserves the right to charge the Organization for the costs of the field verification should the Organization refuse, without valid justification, to allow the GVI to carry out the planned verification.

In the Preliminary Plan, the RGVI indicates the need to interact with

the developer of the LCA study report or to consult specific types of documentary evidence.

To conduct the on-site verification, the Organization must ensure that:

- the GVI is guaranteed safe access to all areas of the site;
- all documents and records relevant to the verification are made available to the GVI;
- the GVI is assisted during the verification, including with any necessary logistical support.

The operational phase of the on-site audit is:

- preceded by an initial meeting in which the RGVI introduces the audit team, explains how the audit will be conducted, and provides any necessary clarifications and details;
- followed by a closing meeting in which the RGVI presents the results of the verification, which are documented in an Audit Report. All observations recorded by the GVI, whether in the form of recommendations or non-conformities, are presented to the Organization, which countersigns the Audit Report for acknowledgment. The Organization has the opportunity to express any reservations regarding the findings or the activities conducted by the GVI.

The Organization's representative responsible for LCA development, or persons delegated by them, must be present at both meetings.

Upon completion of this activity, the RGVI prepares the EPD Verification/Validation Report, which details the outcome of the on-site activities and any Non-conformities (NC) identified (also indicating whether they are of a general, technical, or editorial nature).

The verification/validation report may also contain Recommendations (with the exception of EPDs concerning construction products), which the Organization may, at its discretion, choose to address or not, and consequently propose corrective actions.
The verification/validation report is sent by the RGVI to the Organization, which must address the identified NCs, indicating the corrective actions taken, their timelines, and providing adequate documentary evidence to allow the GVI to assess whether they can be considered sufficient to resolve the NC in question .

Final Document Review

This activity consists of a back-office verification by the GVI of the documents (EPD, LCA study report, and any other supplementary documents identified by the GVI) that have been revised and submitted by the Organization in order to address all non-conformities identified during the verification process (initial document review and/or on-site verification) and not yet resolved.
The Product EPD Verification Statement cannot be issued until all identified non-conformities have been properly addressed by the Organization and the non-conformities have been deemed resolved by GVI.
Upon completion of this activity, the RGVI prepares the verification/validation report, which details the organization's handling of the Corrective Actions and Recommendations and states the GVI's final opinion regarding the outcome of the activity conducted.

The verification/validation report is sent by the RGVI to ICMQ, along with other specific documents detailing the work performed by the GVI, in order to be reviewed by ICMQ and only subsequently forwarded to the Organization as the final outcome of the verification activity conducted by the GVI.

9.4.2. Verifications of an EPD generated by a qualified TOOL

This consists of verifying the requirements indicated in the previous paragraph7.1.2 .

The verification and validation of EPDs generated by an EPD/LCA-Tool may only be conducted by the Verification Body (OdV/V) that carried out the qualification of the EPD/LCA-Tool.

The process consists of the following steps:

Initial Document Review

This is carried out in the back office by the ICMQ GVI.

Upon completion of this activity, the RGVI drafts the Verification Report, which details the outcome of the document reviews and any Non-conformities (NC) identified (also indicating whether they are of a general, technical, or editorial nature), and highlighting which are classified as critical and must be resolved prior to any further on-site verification activities, and which may instead be resolved later, but in any case before the completion of the verification process.

The Report may also contain Recommendations, which the Organization may, at its discretion, choose to address or not, and consequently propose corrective actions.
The verification report is sent by the RGVI to the Organization, which must address the identified non-conformities (NCs), indicating the corrective actions taken, their timelines, and providing adequate documentary evidence to allow the GVI to assess whether these actions can be considered sufficient to resolve the reported NC

Final Document Review

This is carried out in the back office by ICMQ's GVI.

This activity consists of the GVI's back-office verification of the documents (EPD, LCA study report, and any other supplementary documents identified by the GVI) that have been revised and submitted by the Organization in order to address all non-conformities identified during the verification activity (initial document review) and not yet resolved.
The Product EPD Verification Opinion cannot be issued until all identified non-conformities have been properly addressed by the Organization and the non-conformities are considered resolved by the GVI.
Upon completion of this activity, the RGVI prepares the verification report, which details the outcome of the Organization's management of the non-conformities and recommendations and states the GVI's final opinion regarding the outcome of the verification activity conducted.

The verification report is sent by the RGVI to ICMQ, together with other specific documents detailing the verification performed by the GVI, in order to be submitted for review by ICMQ and only subsequently forwarded to the Organization as the final outcome of the verification activity conducted by the GVI.

The Product EPD Verification Opinion regarding the EPD generated by the TOOL, following the first one, cannot be issued until all non-conformities identified regarding this EPD have been properly addressed by the Organization and the non-conformities have been resolved.

In the event that the TOOL used has not already been previously qualified, the GVI must conduct the verifications for the qualification of the TOOL, through a specific procedure, which also includes the simultaneous verification of the first EPD generated by the TOOL (pilot EPD) conducted according to the process indicated in paragraph9.4.1 .
The procedure for the qualification of the TOOL consists of the following two phases:

TOOL Pre-qualification Verification
This is performed by the GVI through a document review of the TOOL Manual and a remote field verification conducted at the TOOL developer's site.

It consists of assessing the TOOL's compliance with the requirements specified in Section7.1.2.3.1 for Pre-Qualification.

This activity is conducted concurrently with the initial document verification activities for the pilot EPD.

Upon completion of these verifications, the RGVI prepares the Verification Report for the TOOL's qualification, which documents any Non-conformities (NC) for the TOOL's Pre-qualification (also indicating whether they are major or minor).

Verifications for the final qualification of the TOOL

This consists of assessing the TOOL's compliance with the requirements specified in Section7.1.2.3.2 for Qualification.

It is performed by the GVI through document verification following the outcome of the field verification of the pilot EPD and the verification of the requirements for the correct application of the TOOL usage processes by the Organization as indicated in

par.7.1.2.1.2 .
Upon completion of these verifications, the RGVI drafts the Verification Report for the TOOL qualification, which documents any Non-conformities (NC) for the final TOOL qualification (also indicating whether they are major or minor).

The Organization must address the identified NCs, indicating the corrective actions taken, their timelines, and providing adequate documentary evidence to allow the GVI to assess whether these actions can be considered sufficient to resolve all the NCs identified.

The verification report for the TOOL qualification is sent by the RGVI to ICMQ, together with other specific documents detailing the verification performed by the GVI, in order to be submitted for review by ICMQ and only subsequently forwarded to the Organization as the final outcome of the verification activity conducted by the GVI.

Along with this report for the qualification of the TOOL, the RGVI will also issue the Verification Report for the pilot EPD.

The Product EPD Verification Opinion relating to the pilot EPD generated by the TOOL cannot be issued until all non-conformities identified regarding this pilot EPD have been properly addressed by the Organization and the non-conformities have been resolved. A prerequisite for the issuance of the EPD Verification Opinion is the successful outcome of the verifications for the qualification of the TOOL.

The TOOL Qualification Certificate cannot be issued until all non-conformities related to the TOOL qualification verifications have been properly addressed by the Organization and the non-conformities have been resolved. A prerequisite for the TOOL's qualification is the successful outcome of the verifications on the pilot EPD .

9.4.3. Verifications for EPD Process Certification

This consists of verifying the requirements indicated in the previous paragraph7.1.3 .

The process consists of the following phases:

Initial Document Review

It is carried out in the back office by ICMQ's GVI.

The verification report documents any nonconformities (NCs) (including whether they are major or minor) identified during the assessment of the documentation defining the Organization's EPD Process, as well as the NCs (identifying whether they are of a general, technical, or editorial nature) identified during the evaluation of the EPD document and the LCA study report for each Pilot EPD, conducted in accordance with the provisions of paragraph7.1.1 , highlighting which are classified as critical and must be resolved prior to any further on-site verification activities, and which may instead be resolved at a later stage, but in any case before the completion of the verification process

Furthermore, the Report may also contain Recommendations, which the Organization may, at its discretion, choose to address or not, and consequently propose corrective actions.
The document verification report is sent by the RGVI to the Organization, which must address the identified non-conformities (NCs), indicating the corrective actions taken, their timelines, and providing adequate documentary evidence to allow the GVI to assess whether these actions can be considered sufficient to resolve the reported NC.

On-site verification

The on-site verification phase is conducted both at the data collection center and through an on-site inspection at the operational unit.

Any decision regarding the conduct of on-site verifications (where to perform them, including in the case of multiple production sites) will be made by ICMQ in consideration of the preceding points.

In particular, the on-site verification will be conducted where:

- the risk analysis indicates that a specific risk level defined by ICMQ has been exceeded;
- during the initial document review, inaccuracies of a nature or magnitude requiring on-site verification were identified (critical issues);
- there have been significant changes in the EPD compared to previous verifications, which appear to be unjustifiable;
- significant changes have occurred in data management at a specific site;
- the system boundaries have changed.

The purpose of the verification is to:

- verify the process of collecting and processing raw and specific data, tracing it from its raw source through a ing all subsequent processing steps;
- verify, on a sample basis, the quality requirements of the raw, specific, and generic data used in the LCA study report for each pilot EPD;
- verify the correct use of characterization factors and methods for calculating environmental impact indicators used in the LCA study report of the pilot EPDs;
- that the calculation model implemented for the LCA study of the pilot EPDs is effectively representative of the processes that actually occur in the operational unit.
- Verifications of the effective application of the procedures and methods defined for the EPD Process by the Organization.

In the event that the subject of the EPD is a service, the on-site verification activity will still be planned, including an on-site inspection at the location where the service is currently provided by the Organization.
The conduct of this on-site verification activity (site visit) will be specified in the service proposal sent to the Organization.

Field verifications are agreed upon by the RGVI with the Organization and confirmed by sending the Preliminary Plan to the Organization at least 5 days prior to the scheduled verification date. ICMQ reserves the right to charge the Organization for the costs of the field verification if the Organization refuses, without valid justification, to allow the GVI to carry out the planned verification.

In the Preliminary Plan, the RGVI indicates the need to interact with the developer of the LCA study report or to consult specific types of documentary evidence.

To conduct the on-site verification, the Organization must ensure that:

- the GVI is guaranteed safe access to all areas of the site;
- all documents and records relevant to the verification are made available to the GVI;
- the GVI is assisted during the verification, including with any necessary logistical support.

The operational phase of the on-site verification is:

- preceded by an initial meeting in which the RGVI introduces the audit team, explains how the audit will be conducted, and provides any necessary clarifications and details;
- followed by a closing meeting in which the RGVI presents the audit findings, which are documented in an Audit Report. All observations recorded by the GVI, whether in the form of recommendations or non-conformities, are presented to the Organization, which countersigns the Audit Report for acknowledgment. The Organization has the opportunity to express any reservations regarding the findings noted or the audit activities conducted by the GVI.

The Organization's representative responsible for developing the EPD, or persons delegated by them, must be present at both meetings.

The outcome of the verification activity may include major or minor nonconformities. Additionally, it may also include Recommendations, which the Organization may, at its discretion, choose to address or not, and consequently propose corrective actions.
The Organization must submit to ICMQ, within 10 days of the conclusion of the audit, proposals for correcting the identified non-conformities, regardless of their level, and submit within 1 month of the on-site audit (unless otherwise agreed with ICMQ) the relevant evidence (EPD Study Report, EPD Process Documentation, and/or any additional documentation requested) to assess their resolution.

Final Document Review

This activity consists of a back-office review by the GVI of the documents (EPD document, LCA Study Report, and any other supplementary documents identified by the GVI) revised and submitted by the Organization to address all non-conformities identified during the previously conducted verification activities (initial document review and/or on-site audit) that have not yet been resolved.
The EPD Process certification cannot be issued until all identified non-conformities have been properly addressed by the Organization and the non-conformities have been resolved.
Upon completion of this activity, the RGVI prepares the audit report detailing the outcome of the Organization's management of the non-conformities and recommendations and indicates the GVI's final assessment regarding the outcome of the audit conducted.

The audit report is sent by the RGVI to ICMQ, along with other specific documents detailing the audit performed by the GVI, in order to be submitted for review by ICMQ and only subsequently forwarded to the Organization as the final outcome of the audit conducted by the GVI.

9.5. Review

Upon completion of the GVI's verification/validation activities as set forth in the Verification/Validation Plan, the RGVI sends the results of the verifications conducted to ICMQ. ICMQ reviews the verification/validation report submitted through the Project Manager, who acts as an independent party not involved in the GVI's assignment and verification activities, in order to confirm:

- that all verification/validation activities have been completed by the GVI in accordance with the verification/validation plan;
- that the evidence of the activities carried out by the GVI is sufficient and appropriate to allow the Decision-Making Committee to make a decision;
- that all non-conformities (NCs) identified during the verification process have been addressed and considered resolved by the GVI.

If necessary, ICMQ requests clarification from the GVI regarding the work performed. Should it be necessary to investigate certain aspects of the work in greater depth, ICMQ may decide to conduct a supplementary investigation, consisting of a document review or an additional on-site visit, before submitting the case to the Deliberation Committee.

The application cannot be submitted to the ICMQ Committee ( ) for the issuance of the EPD Verification/Validation Opinion, EPD Process Certification, or TOOL Qualification Certificate ( ) until there is evidence—either through documentation or a supplementary audit—of the effectiveness of the corrections and corrective actions for each non-conformity (for EPD verifications) or for those classified as major non-conformities (for EPD Process verifications or TOOL Qualification Certificates).

9.6. Decision and issuance of the EPD Verification/Validation Opinion/TOOL Qualification Certificate/EPD Process Certificate;

The Deliberation Committee reviews the request for an EPD Verification/Validation Opinion/TOOL Qualification Certificate/EPD Process Certificate and issues its decision on whether to grant it.

The Deliberation Committee may request additional information. If deemed necessary, the Deliberation Committee may consult the Organization before making a final decision.

The Decision-Making Committee's decision is communicated to the Organization, and:

a) if positive, the EPD Verification/Validation Opinion/TOOL Qualification Certificate/EPD Process Certificate relating to the subject of the verification/validation is issued. Subsequently, ICMQ registers the Organization in a dedicated Registry. This Registry will be published and/or publicized in the forms and manner established by ICMQ. Furthermore, information regarding the EPD Verification/Validation Opinion/TOOL Qualification Certificate/EPD Process Certificate may be provided, upon request, to authorized parties.

b) If the outcome is negative, the EPD Verification/Validation Opinion/TOOL Qualification Certificate/EPD Process Certificate will not be issued, and the Organization will be informed of the procedure for continuing the verification process (e.g., with an additional visit).

The Organization may appeal the decision of ICMQ and the Deliberation Committee in accordance with the procedures set forth in these General Terms and Conditions.

Following the issuance of the Verification/Validation Opinion by the Deliberation Committee and within two months thereof, ICMQ conducts a systematic check to verify that the verified/validated version of the EPD document has been published on the Program Operator's website.

If the check reveals that the EPD has not been published, ICMQ will assess any actions to be taken regarding the validity of the verification/validation opinion.

9.7. Facts discovered after the issuance of the EPD Verification/Validation Opinion, TOOL Qualification Certificate, or EPD Process Certificate;

Should facts come to the attention of ICMQ that could affect the validity of the issued EPD Verification/Validation Opinion, TOOL Qualification Certificate, or EPD Process Certificate, ICMQ, following an analysis of the information received, will, if deemed necessary, notify the organization and the program operator of the EPD in question and initiate a process to identify the appropriate actions to be taken, including discussing the matter with the organization and with the auditor from its GVI who previously conducted the verification. Once the reasons have been identified, ICMQ will request that the Organization revise the EPD/TOOL/EPD Process to submit it for verification by ICMQ, for the purpose of reissuing the EPD Verification/Validation Opinion/TOOL Qualification Certificate/EPD Process Certificate or for its possible suspension or revocation, in accordance with the provisions of these General Terms and Conditions. If the review of the EPD/TOOL/EPD Process is not initiated within the timeframe set forth in the PO or within the period agreed upon with the Organization, ICMQ reserves the right to request the permanent removal of the EPD.

ICMQ shall not be liable if the client refuses to carry out the in-depth analysis, verification, and corrective actions on the EPD document, and subsequent republication on IES, where necessary, or if such activities are not carried out within the timeframes indicated by the Program Operator, for reasons beyond ICMQ's control.

ICMQ shall not be liable for actions taken by the Program Operator should the latter identify improper use of the EPD document following verification/validation by ICMQ.

9.8. Handling of Appeals and Complaints

The Organization may file appeals regarding decisions and resolutions made by ICMQ in accordance with the procedures set forth in these General Terms and Conditions.

9.9. Records

ICMQ undertakes to maintain and manage records relating to all activities of the verification process described in Section9 and its sub-sections, for all services governed by this document.

Records are managed and stored by ICMQ in a secure and confidential manner, including their transport, transmission, or transfer.

9.10. Management of the Maintenance of the EPD Verification/Validation Opinion/TOOL Qualification Certificate/EPD Process Certificate

The EPD Verification/Validation Opinion has no expiry date, and its duration is unlimited. Therefore, it is not subject to any periodic verification for its maintenance.

The EPD Process Certificate is valid for 1 year. However, the certificate may be issued with a validity period of 5 years, provided that the Organization holding the certificate undergoes the mandatory annual periodic verification by ICMQ.

The EPD Process Certificate remains valid provided that the annual periodic audits by ICMQ of the Organization's data collection and EPD definition process control system confirm that the requirements that led to the initial certification are still met (see

section7.1.3).

ICMQ's activities will be conducted in the same manner as the verification process required for the issuance of an EPD Process Certification, with the sole difference that the verifications of Pilot Cases produced by the EPD Process are replaced by verifications of EPDs selected at random by ICMQ from among those created within the EPD Process during the period since the previous surveillance/verification. At the end of the certificate's validity period, the Organization's system is subject to a renewal verification by ICMQ in accordance with the procedures defined in section9.11 .

The qualification of the LCA-TOOL Certificate, provided that no changes have been made to the elements defining the scope of application of the TOOL and provided that the validity date of the reference PCR or Sub-PCR has not been exceeded, also taking into account the relevant transition periods , shall be valid for 5 years, at the end of which it must be verified again in accordance with the provisions of paragraph9.11 .
The qualification of the EPD-TOOL Certificate, provided that no changes have been made to the elements defining the scope of the TOOL and without exceeding the validity date of the reference PCR or Sub-PCR, while also considering the relevant transition periods, shall be valid for 5 years, after which it must be re-verified in accordance with the provisions of paragraph9.11 .
If the Organization holding the LCA-TOOL or EPD-TOOL Qualification Certificate makes changes to one or more elements defining the scope of the TOOL, it must immediately notify ICMQ and request a quote for the qualification of the new version of the TOOL. ICMQ will provide a specific quote to perform the verifications for the new qualification in accordance with the provisions of par.7.1.2.3 .

9.11. Management of the Renewal of the EPD Verification Opinion/TOOL Qualification Certificate/EPD Process Certificate

The EPD Verification/Validation Opinion has no expiry date and is valid indefinitely. Therefore, it is not subject to any verification for renewal.

At the end of the validity period of the EPD Process Certificate/TOOL Qualification Certificate, ICMQ will perform a renewal verification, conducted in the same manner as the verifications required, in the various cases, for the issuance of a new EPD Process Certificate/TOOL Qualification Certificate, as indicated in paragraph7.1 and the following subparagraphs. The only difference is that the verifications of Pilot Cases produced by the EPD Process are replaced by verifications of EPDs, selected at random by ICMQ from those produced within the EPD Process during the period since the previous surveillance/verification.

9.12. Management of supplementary and/or extraordinary verifications for amendments to the EPD Verification/Validation Opinion/TOOL Qualification Certificate/EPD Process Certificate

The EPD Verification/Validation Opinion may not be subject to any modification whatsoever.

When the EPD referred to in the verification/validation opinion is subject to changes of any kind (e.g., updates to the values of environmental impact indicators, adjustments to its content to reflect changes in technology, due to changes to the product, the production process, or any significant element that may result in a variation of the LCA model and its associated impacts, due to changes in additional Environmental Parameters, adaptation to new versions of the PCR or the program operator's regulations, etc.), it must undergo a new verification/validation process to obtain a new Verification/Validation Opinion.

In any case, whenever the Organization intends to modify and republish an EPD previously subject to a verification/validation opinion, the Organization must submit the modified EPD to a new verification/validation process to obtain a new verification/validation opinion.

If, following the Organization's follow-up procedures, an update to the previously verified and published EPD on the Program Operator International EPD System is necessary, it will be possible to submit the EPD for a new verification.

In the case of "EPD of product not yet on the market" and "EPD of product recently on the market," the Organization's follow-up procedures require the involvement of ICMQ, as defined in Paragraph 7.1.1.2.1.

In the case of an "EPD of a product not yet on the market" from the Program Operator International EPD System, previously subjected to a validation process, , or an "EPD of a product recently on the market" from the Program Operator International EPD System, previously subjected to a verification process, , it will be necessary to update and submit the EPD for a new verification when data covering one year of production of the product covered by the EPD becomes available. Upon completion of the verification process, a new EPD Verification Opinion is issued.

If the Organization intends to adjust or extend the scope of the Qualification Certificate for one of its TOOLS or the EPD Process Certificate, it must submit a specific request for a quote to ICMQ, whose verification activities will be defined based on the type of modification made or extension requested.

Until the requested adjustment or extension is obtained, the Organization may not use the ICMQ logo.

9.12.1. Supplementary and/or Special Audits

Supplementary audits, or those conducted at intervals shorter than once a year, may be requested by ICMQ if, following the GVI audit and the surveillance audit, significant nonconformities remain unresolved by the Organization. Such audits will be billed to the Organization based on the fee schedule in effect on the date the audits are conducted.
Furthermore, should ICMQ receive complaints or reports that cast doubt on whether the conditions under which ICMQ initially issued the EPD Verification/Validation Opinion, the TOOL Qualification Certificate, or the EPD Process Certification are still met, ICMQ shall have the right to conduct an extraordinary inspection to verify continued compliance with the relevant standard. Such reports may also be received from Accreditation and/or Authorization Bodies, and in such cases, personnel from those Bodies may accompany the ICMQ Inspector.
Special visits may be conducted without prior notice. Should the Organization refuse to allow ICMQ to carry out such activities, the validity of the EPD Verification/Validation Opinion, the TOOL Qualification Certificate, or the EPD Process Certification may be suspended immediately.
The costs of the visits are always borne by the Organization, except in the case of unscheduled audits where no non-conformities are found.

9.13. Definition of Audit Time

The number of auditor days required, expressed in man-days, is determined by ICMQ based on:

- type of audit (assessment, surveillance, renewal, extension);
- company size and type of processes/products/services subject to audit/validation;
- EPD type (product, average, sector) and number of EPDs to be audited/validated;
- Number of sites covered by the EPD;
- Type of TOOL (LCA-TOOL or EPD-TOOL)
- Number of additional environmental parameters.

The verification schedule and the man-days required for each company/organization can be viewed in the members-only area of the website www.icmq.org.

10. Validity of the EPD Verification/Validation Opinion, EPD Process Certificate, or TOOL Qualification Certificate

Subject to the provisions at9.10 , the validity of the EPD Process Certificate or the TOOL Qualification Certificate is contingent upon passing periodic surveillance audits.

The validity of the EPD Verification/Validation Opinion, however, is not subject to periodic surveillance audits.

Validity also ceases when ICMQ determines that the compliance verified during the granting phase no longer exists.

In such cases, ICMQ may suspend or revoke the EPD Verification/Validation Opinion, EPD Process Certification, or TOOL Qualification Certificate.

11. I Use of the EPD Verification/Validation Opinion, EPD

Process Certificate, TOOL Qualification Certificate, and ICMQ Trademarks

The Organization is granted a license to use the ICMQ trademark, with the right to use it in technical and promotional documentation, but within the limits set forth in the specific Regulations for the Use of the Trademark DOC 05.

In the event of improper use of the EPD Verification/Validation Opinion, EPD Process Certificate, TOOL Qualification Certificate, and the aforementioned trademark, ICMQ requires the Organization to immediately cease such practice, with the right to suspend or revoke the EPD Verification/Validation Opinion, EPD Process Certificate, or TOOL Qualification Certificate, depending on the severity of the conduct.

The Organization holding the EPD Verification/Validation Opinion/EPD Process Certificate/TOOL Qualification Certificate must immediately cease using the same and the aforementioned mark in cases of suspension, revocation, and withdrawal, as well as in the event of contract termination.

Should the Organization fail to use the EPD Verification/Validation Opinion/EPD Process Certificate/TOOL Qualification Certificate and/or the aforementioned trademark, it shall be obligated to pay a penalty to ICMQ in the amount of €500.00 (five hundred) for each individual violation and €100.00 (one hundred) for each day of delay in complying with such obligations, without prejudice to any greater damages. ICMQ reserves the right to take any legal action, as well as the right to publicize the matter in periodicals or newspapers, in addition to notifying the Competent Authorities.

12. Public Disclosure of the EPD Verification/Validation Opinion/EPD Process Certificate/TOOL Qualification Certificate

The Organization authorizes ICMQ to maintain, publish, and/or publicize (including on the website www.icmq.org) the List of client companies, their EPD Verification/Validation Statements/TOOL Qualification Certificates/EPD Process Certificates, including in digital format, so that their existence and validity status may be verified. ICMQ will also communicate this information to the Accreditation Body (Accredia) and to any other authorized party that makes a proper request, and where necessary in the ICMQ Newsletter and on the ICMQ website.

13. r Suspension of the EPD Verification/Validation Opinion/EPD Process Certificate/TOOL Qualification Certificate

ICMQ shall have the right to suspend the EPD Verification/Validation Opinion/EPD Process Certificate/TOOL Qualification Certificate in all cases where there is a situation of serious non-compliance with the requirements of the reference standard.

For EPD Process Certification, this may also be identified following the audits conducted for certificate surveillance.

More generally, ICMQ may suspend, for a specific period of time, the validity of the EPD Verification/Validation Opinion, EPD Process Certificate, or TOOL Qualification Certificate in the following illustrative cases:

a) suspension of the Organization's production activities by order of a judicial authority;

b) the Organization's failure to implement, within the established timeframes, corrective actions aimed at eliminating the nonconformities identified, including those identified during audits;

c) ineffectiveness of the corrective actions implemented by the Organization, as they do not ensure the proper management of the data and information contained in the EPD;

d) failure by the Organization to adapt the verification within the established timeframe following changes to the Standard;

e) if the Organization makes changes to the product and/or process and/or the TOOL and/or any EPD without reporting such changes to ICMQ;

f) failure by the Organization to accept the audits established by these General Conditions and indicated as necessary by ICMQ;

g) refusal by the Organization to receive the Auditors appointed by ICMQ, the assessors of the Accreditation and/or Authorization Bodies, and the Observers without valid justification;

h) irregularities on the part of the Organization regarding the use of the EPD Verification/Validation Opinion, EPD Process Certificate, TOOL Qualification Certificate, and/or trademarks owned by ICMQ and the accreditation bodies;

i) breach by the Organization of an obligation set forth in these General Terms and Conditions, including failure to pay an invoice within the established terms.

j) if the Organization is subject to protest, placed in liquidation, or subject to enforcement and/or insolvency proceedings.

ICMQ shall notify the Organization of the suspension of the EPD Verification/Validation Opinion/EPD Process Certificate/TOOL Qualification Certificate by registered letter with return receipt or certified email, indicating the duration of such suspension, as well as the conditions under which the suspension may be revoked. During the suspension period, the Organization may not use the EPD Verification/Validation Opinion/EPD Process Certificate/TOOL Qualification Certificate, nor the associated EPD. In the event of a breach of this obligation, the EPD Verification/Validation Opinion/EPD Process Certificate/TOOL Qualification Certificate will be revoked. In particular, the Organization must inform its customers (potential and current) and its suppliers if the EPD Verification/Validation Statement/EPD Process Certificate/TOOL Qualification Certificate is a determining factor in acquiring or maintaining a contract or supply agreement.

ICMQ will notify the competent bodies (EPDItaly, Accredia, etc.) of the suspension of the EPD Verification/Validation Opinion, EPD Process Certificate, or TOOL Qualification Certificate.

The Organization may request the suspension of the EPD Verification/Validation Statement, EPD Process Certificate, or TOOL Qualification Certificate if it intends to suspend the production of its products or services covered by the scope of the EPD Verification/Validation Statement, EPD Process Certificate, or TOOL Qualification Certificate, for any reason, and for a significant period of time (more than three months), or transfers the production unit(s). In such a case, ICMQ has the right to grant the suspension of the EPD Verification/Validation Opinion/EPD Process Certificate/TOOL Qualification Certificate for the period of time agreed upon with the Organization, which, however, may not exceed 1 (one) year.

ICMQ shall have the right to publish the suspension of the EPD Verification/Validation Opinion/EPD Process Certificate/ICMQ TOOL Qualification Certificate by any means.

Once the reasons for the suspension of the EPD Verification/Validation Opinion/EPD Process Certificate/TOOL Qualification Certificate no longer apply, ICMQ will notify the Organization of its reactivation.

The duration of the suspension of the ICMQ EPD Verification/Validation Opinion/EPD Process Certificate/TOOL Qualification Certificate shall commence on the day the Organization receives the suspension notice. During the suspension period, the Organization remains obligated to pay the annual maintenance fee established in the Fee Schedule (if provided for in the contract).

At the end of the suspension period, ICMQ reserves the right to conduct an additional inspection, at the Organization's expense, to ensure that the conditions for reactivating the EPD Verification/Validation Opinion/EPD Process Certificate/TOOL Qualification Certificate are met. If the outcome of this audit is positive, the EPD Verification/Validation Opinion/EPD Process Certificate/TOOL Qualification Certificate is reactivated. Otherwise, ICMQ may order the revocation of the EPD Verification/Validation Opinion/EPD Process Certificate/TOOL Qualification Certificate. In both cases, ICMQ notifies the Organization in writing of the outcome of the verification.

14. l Revocation and Withdrawal of the EPD Verification/Validation Opinion/EPD Process Certificate/TOOL Qualification Certificate

14.1. Revocation

ICMQ shall revoke the EPD Verification/Validation Opinion/EPD Process Certificate/TOOL Qualification Certificate in the most serious cases of violation of these General Terms and Conditions and/or the Reference Standard. In particular, ICMQ will revoke the

EPD Verification/Validation Opinion/EPD Process Certificate/TOOL Qualification Certificate mentioned above in the following illustrative cases:

a) serious nonconformities identified during a surveillance or renewal audit and confirmed by a formal opinion issued by the Decision-Making Committee;

b) persistence of the reasons that led to the suspension of the EPD Verification/Validation Opinion, EPD Process Certificate, or TOOL Qualification Certificate, without the Organization having implemented corrective actions within the established timeframe;

c) repeated failure to comply with commitments made to ICMQ to remedy the deficiencies identified and reported;

d) voluntary suspension of the activity covered by the EPD Verification/Validation Opinion/EPD Process Certificate/TOOL Qualification Certificate for a period exceeding 6 months, or transfer of a production unit to which the EPD Verification/Validation Opinion/EPD Process Certificate/TOOL Qualification Certificate refers, without having promptly informed ICMQ;

e) permanent cessation or transfer of activities related to the products listed in the EPD Verification/Validation Opinion/EPD Process Certificate/TOOL Qualification Certificate;

f) if the Organization is subject to a protest, placed in liquidation, or subject to enforcement proceedings;

g) if the Organization were to be subject to any insolvency proceedings and the bankruptcy trustee (or receiver) failed to declare, in a timely manner to maintain the validity of the EPD Verification/Validation Opinion/EPD Process Certificate/TOOL Qualification Certificate, that they would assume the place of the bankrupt party;

h) a final and binding judgment in a legal proceeding (including arbitration) regarding facts pertaining to non-compliance with the requirements set forth in the Standard;

i) serious irregularities regarding the use of the EPD Verification/Validation Opinion/EPD Process Certificate/TOOL Qualification Certificate and/or trademarks owned by ICMQ;

j) failure by the Organization to comply with the financial conditions set forth in Article 9.5 of these General Terms and Conditions of Contract for more than 30 (thirty) days following the formal notice sent by ICMQ to the Organization.

ICMQ shall notify the Organization of the revocation of the EPD Verification/Validation Opinion/EPD Process Certificate/TOOL Qualification Certificate by registered letter with return receipt or certified email.

ICMQ shall notify the competent bodies (EPDItaly, Accredia, etc.) of the revocation of the EPD Verification/Validation Opinion, EPD Process Certificate, or TOOL Qualification Certificate.

Upon receiving notice of such revocation, the Organization shall be required to:

a) immediately cease using copies and/or reproductions of the revoked EPD Verification/Validation Opinion, EPD Process Certificate, or TOOL Qualification Certificate, as well as the related EPD;

b) immediately remove all references to the revoked EPD Verification/Validation Opinion, EPD Process Certificate, or TOOL Qualification Certificate from letterhead (including letters, faxes, and emails), business cards, technical documentation, and advertising materials (including the company's website and any websites of associations to which it belongs);

c) immediately notify its customers and suppliers of this news using the same methods by which the issuance of the EPD Verification/Validation Opinion/EPD Process Certificate/TOOL Qualification Certificate was communicated.

The Organization shall bear the burden of proving in writing that it has complied with the above requirements; therefore, oral testimony will not be accepted.

Should the Organization fail to comply with the specific obligations outlined above, it shall be required to pay a penalty to ICMQ in the amount of €500.00 (five hundred) for each individual violation and €100.00 (one hundred) for each day of delay in complying with such obligations.

In the event of such revocation, ICMQ shall:

a) cancel the EPD Verification/Validation Opinion/EPD Process Certificate/TOOL Qualification Certificate;

b) remove the Organization from the "Register of Certified Companies" holding an EPD Verification/Validation Opinion/EPD Process Certificate/TOOL Qualification Certificate and publish such revocation by any means;

c) refuse to process a new application for an EPD Verification/Validation Opinion, EPD Process Certificate, or TOOL Qualification Certificate for the Organization until the Organization has effectively addressed the causes that led to such revocation.

ICMQ shall have the right to publish the revocation of the ICMQ EPD Verification/Validation Opinion/EPD Process Certificate/TOOL Qualification Certificate by any means.

The revocation of the EPD Verification/Validation Opinion/EPD Process Certificate/TOOL Qualification Certificate shall not entitle the Organization to any refund of fees and/or charges paid for any reason, which shall be retained as a penalty, nor shall it relieve the Organization of the obligation to pay those that have accrued in the meantime.

The Organization is, however, required to pay the maintenance fees for the entire calendar year in progress at the time of revocation of the EPD Verification/Validation Opinion/EPD Process Certificate/TOOL Qualification Certificate when contractually provided for.

14.2. 's Withdrawal of the EPD Verification/Validation Opinion / EPD Process Certificate / TOOL Qualification Certificate

The Organization may renounce the EPD Verification/Validation Opinion, EPD Process Certificate, or TOOL Qualification Certificate prior to its natural expiry date (if applicable) by sending a registered letter with return receipt or a certified email in the following cases:

a) when it no longer intends to maintain the EPD Verification/Validation Opinion/EPD Process Certificate/TOOL Qualification Certificate, by formally notifying ICMQ with a minimum of six months' notice;

b) in the event of cessation of activities related to the products or production unit for which the EPD Verification/Validation Opinion/EPD Process Certificate/TOOL Qualification Certificate was obtained;

c) when changes have been made to the Standard and the Organization is unable or unwilling to comply with the new specifications;

d) in the event that it does not intend to accept the change imposed by ICMQ regarding its fees and such change exceeds 10% (ten percent) of what is agreed upon in these General Terms and Conditions;

e) when substantial corporate changes and/or changes to the company name have occurred.

In the cases referred to in subparagraphs (c) and (d) above, the Organization must notify ICMQ in writing of its withdrawal within thirty days of receiving notification of such changes.

In any case, the withdrawal shall take effect:

- from the date of the Organization's request in the case of the EPD Verification/Validation Opinion;
- from the expiry of the EPD Process Certificate/TOOL Qualification Certificate contract if the next scheduled audit is a renewal audit;
- from the first day of the month following the one scheduled for the surveillance audit for the EPD Process Certificate/TOOL Qualification Certificate, if the next scheduled audit is a surveillance audit and the Organization does not intend to undergo said audit.

ICMQ will notify the Organization, via registered mail with return receipt or certified email, of the date on which the validity of the EPD Verification/Validation Opinion/EPD Process Certificate/TOOL Qualification Certificate expires.

ICMQ will notify the competent bodies (EPDItaly, Accredia, etc.) of

the withdrawal of the EPD Verification/Validation Opinion/EPD Process Certificate/TOOL Qualification Certificate.

As of the expiry date of the EPD Verification/Validation Opinion/EPD Process Certificate/TOOL Qualification Certificate, the Organization shall be required to:

a) refrain from using copies and/or reproductions of the EPD Verification/Validation Opinion/EPD Process Certificate/TOOL Qualification Certificate that has been withdrawn, as well as the associated EPD;
b) remove all references to the EPD Verification/Validation Opinion/EPD Process Certificate/TOOL Qualification Certificate that has been waived from letterhead (including letters, faxes, and emails), business cards, technical and advertising materials (including the company's website domain and any website domains of associations to which it belongs);
c) notify its customers and suppliers of this news in the same manner in which the issuance of the EPD Verification/Validation Opinion, EPD Process Certificate, or TOOL Qualification Certificate was previously communicated.

The Organization shall bear the burden of proving in writing that it has fulfilled the above obligations; therefore, oral testimony will not be accepted.

Should the Organization fail to comply with the specific obligations outlined above, it shall be required to pay a penalty to ICMQ in the amount of €500.00 (five hundred) for each individual violation and €100.00 (one hundred) for each day of delay in complying with such obligations.

Upon the expiry of the EPD Verification/Validation Opinion/EPD Process Certificate/TOOL Qualification Certificate, ICMQ shall:

- cancel the EPD Verification/Validation Opinion/EPD Process Certificate/TOOL Qualification Certificate;
- remove the Organization from the "Register of Certified Companies" holding the EPD Verification/Validation Opinion/EPD Process Certificate/TOOL Qualification Certificate and publish such withdrawal by any means;

Withdrawal of the EPD Verification/Validation Opinion/EPD Process Certificate/TOOL Qualification Certificate shall not entitle the Organization to any refund of fees and/or charges paid for any reason, which shall be retained as a penalty, nor shall it relieve the Organization of the obligation to pay those that have accrued in the meantime.

The Organization is, however, required to pay the maintenance fees for the entire calendar year in progress at the time of the withdrawal of the EPD Verification/Validation Opinion/EPD Process Certificate/TOOL Qualification Certificate (if provided for in the contract).

In the event that the withdrawal from the EPD Verification/Validation Opinion is communicated with less than the notice period specified in letter a) and the Organization obtains an EPD Verification/Validation Opinion/EPD Process Certificate/TOOL Qualification Certificate from another certification body within 18 (eighteen) months of such withdrawal, it is also obligated to pay ICMQ a penalty equal to the compensation due to the latter until the natural expiry of the EPD Verification/Validation Opinion/EPD Process Certificate/TOOL Qualification Certificate.

In the event that the Organization waives the EPD Verification/Validation Opinion/EPD Process Certificate/TOOL Qualification Certificate due to changes to the Price List mentioned above, the fees from the Price List prior to the changes shall apply during the notice period.

15. Expiry of the EPD Process Certificate/TOOL Qualification Certificate

The Organization may allow the EPD Process Certificate/TOOL Qualification Certificate to expire without renewing it. In the event of non-renewal and the consequent expiry of the certificate, ICMQ may notify the Program Operators and, in general, the competent authorities.

ICMQ will notify the Organization, via certified mail with return receipt or certified email, of the expiry date of the EPD Process Certificate/TOOL Qualification Certificate.

As of the expiry date of the EPD Process Certificate/TOOL Qualification Certificate, the Organization shall be required to:

a) refrain from using copies and/or reproductions of the surrendered EPD Process Certificate/TOOL Qualification Certificate and the associated EPD;
b) remove all references to the expired EPD Process Certificate/TOOL Qualification Certificate from letterhead (including letters, faxes, and emails), business cards, technical and promotional materials (including the company's website domain and any website domains of associations to which it belongs);
c) notify its customers and suppliers of this information using the same methods by which the issuance of the EPD Process Certificate/TOOL Qualification Certificate was originally communicated.

The Organization shall bear the burden of proving in writing that it has fulfilled the above obligations; therefore, oral testimony will not be accepted.

Should the Organization fail to comply with the specific obligations set forth above, it shall be required to pay a penalty to ICMQ in the amount of €500.00 (five hundred) for each individual violation and €100.00 (one hundred) for each day of delay in complying with such obligations.

Upon the expiry of the EPD Process Certificate/TOOL Qualification Certificate, ICMQ shall:

- cancel the EPD Process Certificate/TOOL Qualification Certificate;
- remove the Organization from the "Register of Certified Companies" holding an EPD Process Certificate/TOOL Qualification Certificate and publish such revocation by any means.

The expiry of the EPD Process Certificate/TOOL Qualification Certificate shall not entitle the Organization to any refund of fees and/or charges paid for any reason, which shall be retained as a penalty, nor shall it relieve the Organization of the obligation to pay those that have accrued in the meantime.

The Organization is, however, required to pay the maintenance fees for the entire calendar year in progress at the time of the expiry of the EPD Process Certificate/TOOL Qualification Certificate.

16. Termination of the Contract

The contract is terminated *ipso iure* in the following cases:

a) revocation of the EPD Verification/Validation Opinion/EPD Process Certificate/TOOL Qualification Certificate;
b) withdrawal of the EPD Verification/Validation Opinion/EPD Process Certificate/TOOL Qualification Certificate;
c) expiry of the EPD Process Certificate/TOOL Qualification Certificate;
d) material breach of these General Terms and Conditions and their Annexes, including failure to pay an invoice for more than 30 (thirty) days following receipt of the formal notice sent by ICMQ;

17. Changes to the Standard and to these General Contract Terms and Conditions

Changes to the assessment requirements may occur due to:

– changes to regulations and reference documents;

– changes to these General Terms and Conditions.

In the first case, information is provided through communications from the standard-setting and/or accreditation bodies and via the ICMQ newsletter.

In the second case, ICMQ will promptly notify organizations holding an EPD Verification/Validation Opinion, EPD Process Certificate, or TOOL Qualification Certificate—or those in the process of obtaining them—via certified email (PEC), making the document available in the customer portal on the website www.icmq.org; and will set the date on which the changes will take effect, allowing a reasonable period of time for Organizations to comply with the new requirements.

Organizations that do not intend to adapt their EPD Verification/Validation Opinion/EPD Process Certificate/TOOL Qualification Certificate to changes in the reference standards or issuance conditions may waive them provided they notify ICMQ in accordance with the procedures set forth in Article 14.2 of this

document.

In the event of changes to the reference standards, ICMQ reserves the right to verify the compliance and adequacy of the EPD Verification/Validation Opinion/EPD Process Certificate/TOOL Qualification Certificate issued to the Organization with the new legislative requirements.

The costs of any audits shall be borne by the Organization to which the EPD Verification/Validation Opinion/EPD Process Certificate/TOOL Qualification Certificate was issued.

18. Civil Liability

ICMQ shall be liable exclusively in the event of damages caused by willful misconduct or gross negligence and, in any case, within the limits set forth below.

The Organization agrees that, in the event of a breach by ICMQ, it may be compensated for any and all damages up to a maximum amount equal to the total due to ICMQ for the entire duration of the contract. Failure to perform due to force majeure, unforeseeable circumstances, or strikes shall not constitute a breach by ICMQ.

ICMQ is insured for damage to property or persons as well as for financial loss with adequate insurance coverage provided by a leading insurance company.

19. Appeals

The Organization may file a reasoned appeal against ICMQ's decisions referred to in Article 10.6 by setting forth, via registered letter with return receipt or certified email, under penalty of forfeiture within thirty days of notification of such decision, the reasons for its disagreement.

Within three months of receiving the appeal, ICMQ must issue its final decision.

If the appeal is denied, any costs incurred in connection with the appeal shall be borne by the Organization.

20. Disputes and Complaints

Disputes and complaints regarding both ICMQ's activities and those of the Organization may be addressed to ICMQ not only by the Organization itself but also by third parties, who may refer to these General Terms and Conditions of Contract available on the websites , www.icmq.org, and . A description of the process for handling disputes and complaints is provided upon request.

21. Privacy

Pursuant to EU Regulation 2016/679 and national privacy laws, the Client hereby authorizes ICMQ spa to process the personal data of natural persons, whether directly or indirectly through third parties, in connection with obligations in any way related to and/or associated with this document. The Data Controller is ICMQ Spa. The full privacy policy is available on the homepage of the website www.icmq.it.

22. Copyright

ICMQ holds the copyright to all documents (Application Guides and Checklists) provided to the Organization. The Organization may therefore use these documents exclusively within the scope of the contract entered into with ICMQ. The Organization is not permitted to photocopy, reproduce, or publish these documents, even in part, without prior written authorization from ICMQ.

23. Disputes – Arbitration

23.1. Arbitration

The parties agree to waive the jurisdiction of the ordinary courts; consequently, any dispute that may arise between them regarding the validity, interpretation, and enforcement of these General Terms and Conditions shall be resolved by formal arbitration in accordance with the Rules of the Milan Chamber of Arbitration and in accordance with the applicable laws regarding the merits of the dispute. The Arbitral Tribunal shall consist of a sole arbitrator appointed in accordance with said Rules. The arbitration shall be held in Milan.

In the event of a dispute, the plaintiff's attorney shall file the request for arbitration, which shall also include a request for the appointment of the arbitrator by the Milan Chamber of Arbitration, and shall send a copy of such request to the defendant by registered mail with return receipt or certified email. The defendant's attorney must file the answer within 45 (forty-five) days of receipt of the request for arbitration by the General Secretariat, and must send a copy of said answer to the plaintiff's attorney via registered mail with return receipt or certified email. For any subsequent briefs, the filing deadline shall not be less than 45 (forty-five) days from the previous brief or hearing. The attorneys shall be the recipients of all communications relating to the proceedings, including the notification of the award.

The award must be issued within 180 days from the date of the arbitrator's formal acceptance of the appointment, subject to any extensions granted in writing by both parties and subject to the arbitrator's own authority to extend the deadline ex officio by up to an additional 180 days, should this be necessary for investigative purposes. The suspension of judicial deadlines during court recesses shall apply to the deadlines of the arbitration proceedings.

The award shall be final, conclusive, and binding on the parties, who hereby expressly waive any right to appeal, and therefore undertake to comply with its content by conforming to the operative part of said award immediately, and in any event no later than the mandatory deadline of 10 (ten) days from the date on which the award is communicated to them. Otherwise, the defaulting party shall pay the other party a penalty of €100.00 (one hundred) for each day of delay.

23.2. Judicial Authority

ICMQ expressly reserves the right to bring proceedings before the Judicial Authority of the Court of Milan as an alternative to the arbitration referred to above, both for disputes relating to the payment of fees due to it pursuant to these General Terms and Conditions and for interim relief proceedings (and others reserved to the court). The Organization, in any opposition proceedings against the injunction, may not raise objections to avoid or delay the performance due, except in the sole case of payment of such fees. Any other objection (objection in the technical sense and counterclaim) must be raised in the arbitration proceedings referred to above.