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# General Contract Terms and Conditions

## FOR THE VERIFICATION OR VALIDATION OF THE ENVIRONMENTAL PRODUCT DECLARATION

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**FOREWORD**

ICMQ S.p.A. (hereinafter "ICMQ") is a certification and inspection body which, acting as an independent entity, provides requesting organisations with services for the Verification or the Validation of their Type III Environmental Product Declaration (hereinafter EPD) for the EPDItaly Program Operator and International EPD System.

## 1. Definitions

For all other definitions contained in these General Conditions, reference is made to the UNI EN ISO and UNI CEI EN standards listed under point 3, below, and the following terms which are used in the text.

**Environmental aspect**: an aspect of works, products or services of an Organisation that can interact with the environment (ISO 14001);

**Corrective Actions:** all actions that the Organisation needs to take in order to eliminate the Non-Conformities detected by ICMQ.

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

**Process control:** the quality and skills management system put in place by an organisation to carry out the calculations required to assess the life cycle in accordance with the relevant PCR, where appropriate, to create an environmental declaration in accordance with the relevant PCR and to ensure the accurate verification of the relevance of information contained in the environmental declarations [applicable for the activities carried out for the International EPD system]

**Deliberation Committee:** the group of people who will decide on the Issuance, Maintenance, Renewal, Suspension and Revocation of the EPD Declaration/TOOL Qualification Certificate/EPD Process Certificate;

**EPD Verification/Validation Opinion**: the document issued to the Organisation by ICMQ certifying the verification/validation of the EPD;

**Product EPD:** a Type III Environmental Declaration drawn up in reference to the data regarding a specific product or similar products produced in one or more production sites or with reference to a specific service performed in one or more sites. Similar products with differences between impact indicators of less than ± 10% can be presented in the same EPD using the impacts of an environmentally representative product. Similar products with differences between impact indicators of more than ± 10% can be presented in the same EPD but separate columns or tables must be used;

**Sector EPD:** a Type III Environmental Declaration drawn up in reference to an average product of several companies in a well-defined sector and/or geographical area

**EPD Owner:** means the Organisation that owns and is responsible for the EPD; the EPD Owner can be a manufacturer, a service provider, a retailer, or an association of companies;

**EPD Pilot:** EPD of a fictitious or real product whose verification allows the qualification of an LCA-TOOL or the EPD Process certification;

**EPD Process:** Management system of an organisation to generate EPDs of its own products without having to subject each EPD to verification by an independent verifier external to the Organisation (according to the methods established by the International EPD System Programme Operator);

**EPD-TOOL:** A verified and qualified calculation algorithm that implements an LCA model that directly generates an EPD to determine the environmental impacts of a product from a predetermined input data database (EPD-TOOL). This type of tool is used by organisations to enable them to create EPD specifications for products in their portfolio, consisting of a limited number of components assembled according to similar processes (windows, façades).

Not only does the EPD-TOOL generate the LCA study, it also allows the EPD to be prepared, developed in accordance with a reference PCR. The product covered by the EPD consists of a combination of component elements contained in a predefined EPD-TOOL database. 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 choose the compositional elements of the product covered by the EPD and which is to be developed, and cannot, in any way whatsoever, modify the component elements database or the LCA model used to define the environmental impacts. The EPD-TOOL is verified only once during the qualification stage. In this way, verifying an EPD generated by a qualified EPD-TOOL will require a simplified verification. On the other hand, any changes to the LCA model or component database implemented in the EPD-TOOL will require re-verification. Checking of the EPD-tool is carried out by ICMQ with periodic biennial checks on the algorithm, with the same methods as for the first qualification. However, random checks are carried out annually only on the EPDs generated.

**Auditor Group**: persons appointed by ICMQ to carry out on-site assessment of conformity;

**Environmental impact**: any change to the environment, whether adverse or beneficial, wholly or partially resulting from the works, products or services of an Organisation (ISO 14001);

**Life Cycle Assessment (LCA):** compilation and evaluation of the inputs, outputs and potential environmental impacts of a product/service throughout its 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 from a given set of input data (LCA-TOOL). This type of tool is used by organisations (producers or associations) to create EPD specifications for different products, characterised by having identical or very similar production processes, without having to do a specific LCA study each time. Such LCA-TOOLs are normally created by the organisation itself or by an external provider (developer), or created by a developer (software house) who then sells it or licenses it to the Organisation. An LCA-TOOL can only be used within a defined scope of application to generate the LCA study of a specific product, and sometimes also the resulting EPD document itself, in compliance with the reference PCR. The LCA-TOOL is created so that the user only has to enter the primary input data required by the LCA model, referring to the specific product for which an EPD is to be created. The user cannot, in any way whatsoever, modify the LCA model implemented in the TOOL. The LCA model in the LCA-TOOL is tested only once during the LCA-TOOL qualification. In this way, verifying an EPD generated by a qualified LCA-TOOL does not require the verification of the LCA model again, but is limited to only verifying the compliance of other aspects (processes correctly using the LCA-TOOL and/or drafting of the EPD document), in accordance with the Programme Operator's GPI;

**Checklist:** the document prepared by ICMQ and used by ICMQ Auditors to carry out the conformity assessment;

**Non-Conformity (NC):** the finding issued by the ICMQ Auditor during the assessment activities carried out that identifies a deficiency, error or omission found.

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

Verification of an EPD

In this case, there is a single level of classification of the NC, which identifies a deficiency, error or omission of a requirement required by the Standard such as not to allow compliance with the established materiality threshold.

The NC is further distinguished by its typology between:

- 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 be related to a lack of mandatory data or information, unclear indication of products or system boundaries, lack (even partial) of indication of results, lack of indication of allocation criteria, scenarios, or other necessary indications, etc.

- technical: refers to a deficiency, error or omission related to the correctness of the LCA calculation. For example, it can

be related to system modelling, inventory analysis, calculation of indicators, calculation of additive parameters, pre-processing of data, quality of data used, sensitivity analysis, etc.

- general: when it refers to another type of deficiency, error or omission that cannot be traced back to the "editorial" or "technical" type;

An NC of any type must naturally be managed by the Organisation and considered resolved by ICMQ in order for the ICMQ Auditor's opinion on the verification to be "positive".

The file may not be submitted to the ICMQ Deliberation Committee for the issuance of the Verification Opinion until the effectiveness of the corrections and Corrective Actions taken by the Organisation has been verified for each NC. This can be done by the ICMQ Auditor through the final documentary verification or, subsequently, through any additional verification documentary and/or on-site (the latter possibly conducted remotely).
In particular, if it is not deemed necessary to carry out an additional verification the Organisation must send ICMQ the appropriate documentary evidence of the resolution of each NC within three months.

An NC is identified as "critical" if the type of gap, error or omission found in the initial documentary verification is such as to require it to be managed and resolved by the Organisation before the ICMQ Auditor carries out the next on-site verification phase (possibly remotely), as otherwise this activity would not be effective for the purposes of the assessment required. Examples of a "critical NC" can be: the use of an incorrect PCR, the unclear identification of the products to which the EPD refers, the unclear definition of the life cycle considered, the omission of reporting in the LCA study of the its main parts (goal and scope, inventory analysis, evaluation of impact indicators, interpretation and sensitivity analysis), etc.

TOOL/EPD Process Qualification Certificate

For this activity there are two levels of NC:

Major NC: identifies a deficiency, error or omission of a requirement of the Standard which does not allow the qualification of the TOOL (LCA or EPD TOOL) or the certification of the EPD management system (EPD Process).

Examples of major NC for the qualification of a TOOL may be related to definition of the field of application of the TOOL, completeness or correctness of the modelling of the TOOL with respect to the defined field of application, and satisfaction of the requirements of the TOOL defined by the EPDItaly Regulation, etc.

Examples of major NC for an EPD Process may be related to definition of the field of application of the EPD management system, completeness or correctness of the phases of the EPD generation process, correctness of the LCA model used to develop the EPDs, correctness of the content of the EPD generated by the system, minor NC reiterated over time, satisfaction of the system requirements defined by the IES GPI, etc.

The practice cannot be subjected to examination by the ICMQ Deliberation Committee for the issue or renewal of the TOOL Qualification or EPD Process certification, until the effectiveness of the corrections and of the Corrective Actions undertaken by the Organisation has been verified for each NC. This can be done by the ICMQ Auditor through the final documentary verification or, subsequently, through any additional verification documentary and/or on-site (the latter possibly conducted remotely).
In particular, if it is not deemed necessary to carry out an additional verification the Organisation must send ICMQ the appropriate documentary evidence of the resolution of each NC within three months.

Minor NC: identifies a deficiency, error or omission of a requirement required by the Standard such that it cannot be classified as a major NC, which must be managed in order to avoid a possible major NC in the future, but not immediately resolved by the Organisation as it does not jeopardise the qualification of the TOOL (LCA or EPD TOOL) or the certification of the EPD management system (EPD Process).

Examples of a minor NC for the qualification of a TOOL or the certification of the EPD Process may be related to the accuracy of the Organisation's processes for the acquisition of the data introduced in the LCA model, the unclear definition of the responsibilities of the various parties of the Organisation, the accuracy of the methods of pre-processing of the data to be included in the LCA model, the accuracy of the process of generating the EPD document starting from the LCA study, and how to verify company resources for the development of EPDs, etc.

For every NC (major or minor) encountered, the Organisation must send the Corrective Actions regarding each one to ICMQ within and no later than 10 days from the verification. Before receiving this communication it will not be possible to submit the practice to the Deliberation Committee for the issue, renewal/extension and maintenance of the TOOL Qualification Certificate and the related Verification Opinion of the pilot (in the process of being issued) or sampled EPD (being monitored or renewed) or the certification of the EPD Process. Any extensions must be requested and authorised by ICMQ.

It should be noted that, during the review of the Audit Team verification activity, ICMQ can:

- request an additional audit to assess the effectiveness of the correction and Corrective Actions proposed by the Organisation to resolve the non-conformities found in the verification process

- change the level of non-conformities or recommendations highlighted by the Audit Team during the verification process;

- evaluate different time frames from those normally envisaged to resolve non-conformities and for the Organisation to supply useful evidence of their resolution, depending on the issue highlighted in the non-conformity itself.

**Standard:** the set of requirements set out in the UNI EN ISO 14025 Standard and the UNI EN ISO 14040 family, as well as the PCR (Product Category Rules) when present, and the Programme Operator Regulations to which the EPD refers

**Competent body/Programme Operator:** the manager of the EPD programme as defined by UNI EN ISO 14025;

**Accreditation Body:** the Single Accreditation Body ACCREDIA, which operates in order to examine and control the requirements of competence of verification/validation bodies;

**Organisation (client):** a set of people and means, with defined responsibilities, authority and interrelationships. Term used to indicate the entity that provides a product and/or service and applies for EPD Verification/Validation, TOOL Qualification Certificate, EPD Process Certificate;

**Product/Service:** result of the Organisation's activity, which must comply with pre-established specifications which may be national or international technical standards, specifications agreed with the Organisation or internal to the Organisation, or other identified documents;

**TOOL qualification:** method of verifying EPDs that are generated starting from a specific calculation algorithm/TOOL [applicable for activities performed for EPDItaly Programme Operators];

**Recommendation:** the finding issued by the ICMQ Auditor during the assessment conducted which consists of a suggestion for improvement, which the company may or may not choose to manage and implement. Failure to manage has no implications on the final outcome of the verification/validation; for EPD concerning construction products, it is not possible to issue surveys classified as recommendations;

**Product Category Rules (PCR – Product Category Rules):** document that describes the type of information that must be provided in the EPD in reference to a product starting from the life cycle analysis. PCRs also establish how the information given is generated;

**LCA report:** A report, usually not public, which describes the LCA on which the EPD is based and subject to verification together with the EPD.

**Surveillance:** activity through which ICMQ periodically verifies the maintenance of conformity of the certification of the

Organisation's EPD Process and the suitability of the LCA-TOOL or EPD-TOOL;

**Processing:** all the actions that the Organisation will have to adopt in order to eliminate the NCs detected by ICMQ;

**Operating unit:** the location where the activities related to the manufacture/provision of products and/or services are exercised and/or where the data are collected and implemented for the generation of the EPDs under verification, or applicable TOOL or EPD Process;

**Assessment:** action by which ICMQ carries out the verification or validation of an EPD, TOOL certification, EPD Process certification, to this end ascertaining how the requesting Organisation has operated;

**Validation**: process for evaluating the reasonableness of the assumptions, limitations and methods that support an environmental information statement (i.e. EPDabout the outcome of future activities;

**Validation of an EPD:** confirmation of an EPD, through the provision of objective evidence, that the requirements for a specific intended future use or application have been met;

**Verification:** process for evaluating an environmental information statement based on historical data and information to determine if the statement is materially correct and conforms to criteria;

**Verification of an EPD:** confirmation of an EPD, through the provision of objective evidence, that the specified requirements have been met;

For all other definitions not contained in these General Terms and Conditions, please refer to the rules indicated in section 3.

## 2. Subject matter of the service and prohibition of consultancy

### 2.1. Subject matter of the service.

ICMQ's service refers to the following activities:

- Verification of a product EPD: provides for the evaluation of the conformity of the EPD of the Organisation's product/service and of the relative LCA study with the requirements of the UNI EN ISO 14025 and UNI EN ISO 14040 Standards, as well as with the applicable PCR (Product Category Rules) and the Regulation of the Programme Operator in which the EPD is to be published. Verification activities for a product EPD, refer to product EPDs issued either by TOOL or without the use of a TOOL.
- The verification for the certification of an Organisation's EPD Process requires examining its compliance with the requirements indicated by the GPI of the International EPD System (IES) Programme Operator, as well as the random verification conducted on the single product EPDs generated by the EPD Process, as indicated in the previous point.

### 2.2. Prohibition of consultancy.

ICMQ, as an independent body, does not carry out, either directly or through sub-contractors, consulting services to help Organisations in the development of management systems or in the evaluation of the life cycle of products, or in the preparation of LCAs.

## 3. Reference documents and technical standards

The following documents are considered to be the technical Standards of reference:

- EN ISO/IEC 17029 (current version) "Conformity assessment – General principles and requirements for validation and verification bodies";
- 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 on 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, Environmental labels and declarations - Self-declared environmental claims (Type II environmental labelling);
- 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 - Communication format business-to-business;
- 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 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 RG 01 Regulation (current version) for the accreditation of Certification Bodies;
- EPD GPI (current version) “General programme instructions for environmental product declarations EPD” [International EPD System];
- EPD GPI (current version) “EPDItaly Programme Regulations”;
- Applicable EA/IAF Guidelines.
- In the case of Certifications issued under accreditation, all the provisions provided by ACCREDIA regulations, available at www.accredia.it, that Organisations undertake to know 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, are also reference documents:
  a) Rates Table in force for the verification/validation;
  b) Application for Verification and annexes (when applicable);
  c) these General Contract Terms and Conditions;
  d) the regulation regarding use of the Trademark;
  e) Application Guide (where applicable);
  f) the specific attachment for the Standard of reference (if any).

In any event, the Client undertakes to check periodically, i.e. at least every six months, on the website www.icmq.org (reserved area), if the aforementioned documents indicated above have been changed with regard to what was signed when the Application for Verification/validation was submitted, and, in any case, before each renewal.

## 4. Impartiality Committee

The maintenance of impartiality in all phases of the audit is supervised by an Impartiality Committee, appointed by the ICMQ Board of Directors, in which all the parties involved in the audit are represented, operating on the basis of a specific procedure.

## 5. Duration of the Contract

The contract for the evaluation of an EPD is concluded on the date on which ICMQ will carry out the Acceptance of the EPD Verification/Validation Application and the documents connected or referred to therein.

Since the evaluation activities of an EPD do not include the execution of surveillance checks, 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 relates to the performance of the single EPD verification activity. Any multi-year contracts relating to EPD verification/validation activities of the same product are to be understood as contracts for multiple independent activities.

The contract qualifying the LCA-TOOL will expire on the expiry date of the ICMQ Qualification Certificate which was issued (5 years).

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

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

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

The contract will instead expire 1 (one) year after its completion, if for reasons of force majeure not dependent on ICMQ the EPD Verification/Validation Opinion or the TOOL Qualification Certificate or EPD Process certificate cannot be issued to the Organisation within this period, unless otherwise agreed in writing between the parties to regulate any extension of the contract. In this case, the Organisation cannot claim a reimbursement for the sums paid and shall pay ICMQ all the fees due for the services, if any, during the validity of the contract itself, in accordance with the Rates Table in effect at the time of the service, except as otherwise agreed in writing by the parties.

GENERAL NOTE: The publication of new versions of the Program Operator GPI (EPDItaly or International EPD System) does not affect the validity of the EPDverification/validation activities previously carried out by ICMQ. The activities of ICMQ in the event of any update of such EPDs during their period of validity will be carried out in accordance with the provisions of the Programme Operators relating to the EPD.

## 6. Parties involved

The Organisation draws up the EPD environmental declaration of a product on the basis of the LCA study, referring to the documents referred to in the Art. 3 of these Regulations.

If the EPD is developed using a TOOL, this can be done directly by the organisation or by an external provider (developer), or by a developer (software house) who then sells or licenses it to the organisation.

The Organisation is responsible solely for:

- the information contained in the EPD documents and LCA Reports;
- data collection and calculation of environmental impact indicators as indicated in the reference Standards (Regulations, PCR);

all claims, including product liability claims, that may arise in connection with your use of the EPD, the manufacture and sale of products that reference or use the EPD, and your use of EPD International trademarks AB or EPDItaly. The parties concerned (producer associations, industrial districts, environmental associations, consumer associations, large distribution chains) take part in the PCR development and approval process and can promote and coordinate initiatives aimed at developing PCRs for the product groups they are interested in.

ICMQ is the independent third party that, at the end of its audits, which are the subject of the service, provides its own guarantee regarding only the aspects covered by the service indicated in the previous section 2.1.

The Accreditation Body carries out investigation, verification and surveillance activities in relation to the bodies operating in the application of the EPD verification/validation schemes and EPD Process certification. The Accreditation Body takes care of all compliance issues with the requirements laid down in Standards, guidelines, regulations and any additional, applicable international and national requirements.

The Programme Operator:

- defines and approves PCRs;
- disseminates information related to the EPD programme;
- records and publishes EPDs verified by ICMQ.

## 7. ICMQ's obligations

The evaluation will be carried out by ICMQ for the verification/validation of the EPD, relating to the product/service or of the Certification of the qualification of the TOOL or EPD Process, with the diligence of a reasonably prudent person. The assessment will be carried out with the utmost independence and impartiality. ICMQ's obligation, in relation to its verification work, is to provide a service and not to achieve an objective. Consequently, ICMQ will be able to issue the Verification/Validation Opinion or the TOOL Qualification Certificate or the EPD Process certification only if the documentation prepared by the Organisation complies with the Standard and objective supporting evidence is available.

ICMQ is in no way responsible or liable for any failure to recognise the evaluation by third parties, nor is it liable for any claims for damages/compensation or compensation claims for failure to recognise expectations with respect to the verification/validation Opinion or TOOL Qualification Certificate or EPD Process certification.

### 7.1. Method of 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 mode) for publication in the EPDItaly programme and/or International EPD System.

For the program operator EPDItaly, it is specified that the activities carried out by ICMQ can be related to:

- EPD Verification in the case of specific product EPD, average Product EPD, Sector EPD. The first two types can also be developed in accordance with Section 3.2 "Preliminary Validation" and with Annex 5 of the EPDItaly Regulation, as "EPDs of real products with an insufficiently representative database";

- EPD Validation in the case of specific product EPD, average Product EPD and in accordance with Section 3.2 "Preliminary Validation" in accordance with Annex 6 of the EPDItaly regulation, for products not yet manufactured (at the design stage).

For the program operator International EPD System, it is specified that the activities carried out by ICMQ can be related to:

- EPD verification in the case of "EPD of a single product from a manufacturer/service provider", "EPD of multiple products from the same company" (only in the case of ""based on the average results of the product group"), Sector EPD and "EPD of product recently on the market"

- EPD validation in the case of "EPD of product not yet on the market".

2) EPD generated through the use of a qualified TOOL: verification activity of EPD generated through the use of an algorithm (Tool) of the EPD-TOOL or LCA TOOL type, for publication in the EPDItaly programme;

The EPD generated by the TOOL can be a specific Product EPD, average Product EPD, Sector EPD. The first two types can also be developed in accordance with Section 3.2 "Preliminary Validation" or Annex 5 of the EPDItaly Regulations "EPDs of real products having insufficiently representative database."

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

The request for activities other than the above will be subject to a specific feasibility assessment by ICMQ.

It should be noted that the assessment methods indicated above refer to the ICMQ activity for the sole activity of

"verification/validation of EPDs" intended for publication on the website of the respective OP and that the use or the publication of any document other than the EPD subject to ICMQ verification/validation cannot be considered part of the verification/validation activities of ICMQ.

#### 7.1.1. Requirements for EPD generated without the use of a TOOL (standard mode)

The requirements subject to verification are:

- Regulatory compliance;
- EPD-specific requirements

##### 7.1.1.1. Requirements for legislative compliance

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

For EPDs related to the International EPD System programme in accordance with GPIs in revision 4.0, the verification of the legislative compliance of the product or process at the production site(s) related to the EPD shall be carried out in accordance with the following procedures:

- presence of a valid ISO 14001 environmental management system certificate for the EPD operational unit.
- In the absence of the certificate referred to in the previous point, through verification that the Organisation has procedures to identify and update the environmental legislation relating to the processes and products of the EPD, with particular attention to the list of materials and chemical substances of the product and environmental authorisations of the processes included in the EPD.

For EPDs related to the International EPD System programme in accordance with GPIs in revision 5.0, the verification of the legislative compliance of the product or process at the production site(s) related to the EPD is not envisaged.

For EPDs relating to the EPDItaly programme, the verification of the legislative conformity of the product or process in the production site(s) relating to the EPD is carried out according to the methods defined by the Programme Operator and involves the acquisition of a self-declaration from part of the Organisation of the legislative conformity relating to the product (in a format prepared by ICMQ) and signed by the entitled representative of the Organisation.

In the case of sector EPD or average EPD, which refers to multiple operating units, the verification will be carried out on a sample basis and will be limited to the production unit subject to the on-site verification

Only if explicitly requested by the Organisation, a specific field verification will be conducted by an ICMQ Auditor to check the environmental legislative compliance of the product or process in the production site(s) relating to the EPD. In this case, this activity (of a voluntary nature) will be indicated on the EPD Verification Opinion.

##### 7.1.1.2. EPD-specific requirements

The EPD document and the related LCA Study Report must meet the following requirements:

- conformity to the PCR;
- compliance with ISO 14040 Standards;
- conformity to the general instructions of the programme for Type III environmental declarations;
- that data assessment includes coverage, accuracy, completeness, representativeness, consistency, reproducibility, sources and uncertainty;
- plausibility, quality and accuracy of data based on the LCA;
- quality and accuracy of additional environmental information;
- quality and accuracy of support information.

###### 7.1.1.2.1. Special 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 of the "International EPD System" IPGs must be written in English. Versions of the EPD published in other languages must have the same content and format as the English version of the EPD document and be published on the Programme Operator's website.

For verifications for the IES programme operator, it is the exclusive task and obligation of the Organisation to acquire and enter in the EPD document subject to verification/validation the correct registration number obtained according to the procedure defined by the programme operator.

The Organisation must establish internal follow-up procedures in order to confirm whether the information contained in the EPD remains valid or whether the EPD needs to be updated during its period of validity. Within the procedures, the main parameters, that might lead to an update by means of a sensitivity analysis, must be identified. Follow-ups must be done at least once a year and must be carried out at a frequency that allows any changes to be monitored.

It is necessary for the Organisation to document and make available on request the annual follow-up procedures.

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

The procedure should include how the Organisation plans to control any significant changes that have occurred:

- in the EPD;
- in the input data;
- in the acquisition of raw materials;
- in the means of transport;
- in the production processes;
- in the product design;
- in environmental legislation.

In the event of substantial changes or deviations in the information defined in the "Product Information" paragraph of the International EPD System GPI during the validity period of the EPD, this will be subject to verification for new evaluation by ICMQ, as indicated in section 7.1.

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

Follow-up activity is mandatory for the “EPD of product recently on the market” and “EPD of product not yet on the market” typology. For these two types of EPDs, it is the Organization's obligation to declare, to ICMQ, whether the LCA and EPD processed on one year's production data are available. This must be done annually and/or in any case within 1 month from the date of delivery to ICMQ of the updated LCA and EPD. Thereafter ICMQ will proceed with a new verification. The template of the Self-Declaration will be provided by the Body at the end of the verification/validation process of “EPDs of product not yet/recently on the market.”

In the case of an update of the EPD for editorial changes only, it is not necessary to subject the EPD to a new verification/validation process.

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 Organisation's methods for managing aspects relating to social or economic sustainability (e.g. activities linked to supply chain management or social responsibility);
- that the information reported in the EPD corresponds to that contained in an Organisation's sustainability report, verified by an independent party, with an indication of the assurance level;
- that the information reported in the EPD is accompanied by the indication of the documents of origin and the period to which the information refers.

The minimum additional durations foreseen for verifying the

correspondence of the additional economic and social information present in an EPD will be 0.25 days/person. ICMQ reserves the right to request any additional durations in relation to the type of social and economic information requested.

#### 7.1.2. EPDs generated using a TOOL qualified for publication in the EPDItaly programme.

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

1) **LCA-TOOL**: in the event that an Organisation uses the same LCA calculation modelling (algorithm/TOOL) to develop EPDs for different but similar products, by updating only the input data, it is possible to optimise the verification of these EPD through a process of verification and qualification of the TOOL (algorithm) used and the subsequent verification of its correct use by the Organisation to develop a specific EPD.

By verifying the correctness and effectiveness of the calculation algorithm to operate in its defined field of application, the verification of the EPDs relating to the various products that fall within the scope of the TOOL is simplified, as it is not necessary to verify the soundness of the previously validated LCA model every time.

Verifying EPDs produced by a TOOL must necessarily be done by ICMQ when it has also qualified the LCA-TOOL used to generate them.

2) **EPD-TOOL**: in the case of EPDs generated by an EPD-TOOL, since the user of the EPD-TOOL only has the ability to choose the different configurations of the component elements of the product covered by the EPD, these are not verified in a timely manner, neither during assessment nor during monitoring. However, a Verification Opinion is issued, addressed to the EPD owner, which identifies the boundary and scope of all the EPDs that can be produced by the qualified EPD-TOOL, if verified in the initial qualification phase. This certificate, which is valid for two years, is subject to renewal, through verification of the tool, as indicated in section 9.11 and how the EPD owner trains/controls the user. If the tool should change or be subject to review, EPDs will be issued that refer to an EPD-tool different from the first one. EPDs generated by the tool are randomly verified each year.

Verifying EPDs produced by a TOOL must necessarily be done by ICMQ when it has also qualified the EPD-TOOL used to generate them.

##### 7.1.2.1. Requirements for EPDs generated by LCA-TOOL

The requirements subject to verification are:

a) Use of a qualified LCA-TOOL;

b) The correct application of the Organisation's processes in the use of the LCA-TOOL;

c) Legislative compliance;

d) EPD-specific requirements;

###### 7.1.2.1.1. Use of a qualified LCA-TOOL

If the LCA-TOOL used by the Organisation is previously already qualified by ICMQ, the verification will be limited to:

- identifying whether the product belongs to the field of application of the qualified LCA-TOOL;
- checking whether the version of the TOOL used is indicated in the EPD corresponds to that indicated on your qualification certificate in force.

If the LCA-TOOL used by the Organisation has not already been qualified by ICMQ, it needs to be preliminarily qualified, as indicated in section 7.1.2.3.

###### 7.1.2.1.2. The correct application of the organisation's processes in the use of the LCA-TOOL

The Organisation (EPD owner) must define and document tasks and responsibilities for all the significant phases of the company process of creating and publishing an EPD, and for the operational management of these processes, appointing a TOOL Manager, who has the task of interfacing with ICMQ.

Specifically, the following needs to be established:

- the abilities and skills of the staff involved in the use of the TOOL, through documented training on its use;
- the Organisation's company process of creating and publishing an EPD: identifying and collecting primary data, implementing data in the TOOL, entering output data in the TOOL to create the EPD document, sending the EPD document to ICMQ for verification, sending the EPD document to the Programme Operator for publication of the EPD;
- the correct management, maintenance and use of the TOOL (managing access to use the TOOL, managing updates, using the TOOL in different fields of application);
- the use of a "Risk-Based Thinking" approach to TOOL management, highlighting any issues and any related solutions adopted. In particular, the methodology adopted must identify the risks, assess their impact and define the actions necessary to minimise or eliminate such risks or to make them compatible with the EPD owner's activities. The process is proactive and aimed at preventing undesirable situations from arising. The ultimate aim of a risk assessment is to prioritise the actions to be taken. Following the risk assessment, the manufacturer must take specific actions to minimise risk, to bring the risk impact to an acceptable (tolerable or negligible) level. If the result gives rise to an intolerable or undesirable risk, the event could highlight a residual risk that will have to be managed with appropriate actions

ICMQ's verification of these requirements takes place at the first EPD generated by the Organisation with the use of the LCA-TOOL, and typically at the place of use of the TOOL itself.

The Organisation that uses the LCA-TOOL, for each EPD subsequent to the first generated by the LCA-TOOL, must send ICMQ a communication relating to the absence of change in the requirements for the correct application of the processes for using the TOOL.
However, if there are variations, ICMQ will carry out these checks again, so that the EPDs produced by the Organisation can be verifiable.
If the checks 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. Verifying legislative compliance

The provisions section 7.1.1.1. apply

###### 7.1.2.1.4. EPD-specific requirements

Since the LCA model has been verified with the previous qualification of the TOOL, the EPDs can be verified with an optimised procedure, without additional checks inherent in the LCA model implemented in the TOOL.

The verification of the EPD is therefore related to:

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

Following the Plausibility check, in the presence of anomalous data, the Audit Team may deepen the documentary verification by requesting further data or clarifications from the Organisation, In the most relevant cases, if necessary, the Audit Team may also request the carrying out of supplementary checks on-site.

Plausibility checks can be carried out by the Audit Team on the basis of a document prepared by the Organisation and/or with a sample data check on the basis of the input/output data of the LCA-TOOL provided by the Organisation.

For each EPD (with the exception of the first generated by the

LCA-TOOL), the Legal Representative of the Organisation must declare:

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

For each EPD, the Organisation must also make available to ICMQ:

- the input/output data of the LCA-TOOL, possibly in the form of a report generated by the LCA-TOOL (if available);
- the mass and energy balance, where it is possible to extrapolate it from the LCA-TOOL;
- the plausibility check (if provided) and/or significant data requested by the verifier;

At the end of the EPD verification activities, ICMQ issues a verification Opinion.

#### 7.1.2.2. Requirements for EPDs generated by the EPD-TOOL

**7.1.2.2.1. The requirements subject to verification are:**

a) Use of a qualified EPD-TOOL;

b) Training users in the correct use of the EPD-TOOL;

c) Legislative compliance;

d) Annual sample check of the EPDs generated.

**7.1.2.2.2. Use of a qualified EPD-TOOL**

If the EPD-TOOL used by the Organisation is previously already qualified by ICMQ, the verification will be limited to:

- identifying whether the product belongs to the field of application of the qualified EPD-TOOL;
- checking whether the version of the TOOL used in the EPD corresponds to that indicated on your qualification certificate in force.
;

If the EPD-TOOL used by the Organisation has not already been qualified by ICMQ, it needs to be preliminarily qualified, as indicated in section 7.1.2.3.3.

**7.1.2.2.3. Training users on the correct use of the EPD-TOOL**

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

As the EPDs generated by the EPD-TOOL are not directly verified, back-office monitoring (except for the first assessment at the EPD-TOOL owner's premises) must be performed annually by ICMQ, where the tool owner will need to provide evidence of:

- the number of EPDs issued (if possible);
- the abilities and skills of the EPD-TOOL user staff, through documented training of users by the EPD owner on the correct use of the tool;
- the correct management, maintenance and use of the TOOL (managing access to use the TOOL, managing updates, using the TOOL in different fields of application).
- ICMQ's verification of these requirements is done in compliance with verifying the representative EPDs generated by the EPD-TOOL.

ICMQ will sample the generated and published EPDs on an annual basis and will perform a simplified verification of them.

For each sampled and published EPD produced by the qualified algorithm/model, ICMQ will carry out the following documentary checks:

- demonstration that the EPD was 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 reference PCR.

The Organisation that uses the EPD-TOOL to develop EPDs (as EPD Owner) must send ICMQ communication relating to the change in user training requirements for the correct use of the EPD-TOOL. In this case, ICMQ will carry out these checks again, so that the EPDs produced by the Organisation can be verifiable.

If the checks 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. Verifying legislative compliance**

The provisions of section 7.1.1.1 are applicable.

**7.1.2.3. TOOL Qualification methods;**

The activities to qualify a TOOL are done in two consecutive stages:

- Pre-qualification activities for the TOOL;
- Final qualification activities for the TOOL;

If, in the course of the activity for the qualification of the TOOL, the ICMQ Audit Team ascertains that all the requirements of the TOOL are not fully complied with, ICMQ will notify the Organisation (manufacturer/Software House) that it should eliminate all the deficiencies found and the causes that generated them.

ICMQ reserves the right to perform additional verifications.

**7.1.2.3.1. TOOL pre-qualification**

The Organisation (manufacturer/software house) must identify the TOOL for which qualification has been requested, by at least the following elements:

- the name of the developer;
- the name of the TOOL;
- the version of the TOOL and the calculation algorithm implementing the LCA study.

The Organisation (manufacturer/software house) must prepare a manual describing the detailed operation of the TOOL. Specifically, the following must be properly identified:

- the TOOL's field of application: the reference Programme Operator's PCR and GPI which have been applied, the type of product, the number of production units, the life cycle modules considered in the LCA study, the additional environmental parameters (if any) implemented (any limitations in the use of the TOOL related to the production processes, technologies used, additional environmental aspects implemented must also be clearly indicated);
- The production process implemented in the TOOL with any technological or production limitations to its use must be clearly highlighted;
- A description of the LCA study model implemented in the TOOL with the I/O flows identified (including indications regarding cut-offs and allocations, power mixes, RSL, end-of-life scenarios, etc.) must be provided.

If the TOOL also implements the creation of the EPD document, it must indicate the types that can be developed: product, media, sector.

Based on this information, ICMQ performs a documentary verification activity for the pre-qualification of the TOOL and returns the results to the Organisation.

#### 7.1.2.3.2. Final LCA-TOOL qualification

In qualifying the LCA-TOOL ICMQ needs to its compliance with the requirements indicated in section 7.1.2.3.4.

Furthermore, it is also necessary for ICMQ to carry out the verification activity of the first EPD generated by the LCA-TOOL indicated in section7.1.1. The validation activity for the first EPD issued by the TOOL will include an audit at the site where data is collected, managed and processed to develop the EPD and an inspection of the manufacturer's plant to verify the consistency of the production process implemented by the tool.

The qualification of the LCA-TOOL issued by ICMQ will refer only to the elements of its field of application for which the verification of a relevant EPD could be carried out.

Having successfully completed the verification activities to qualify the LCA-TOOL, ICMQ will issue a qualification certificate.

#### 7.1.2.3.3. Final EPD-TOOL qualification

In qualifying the EPD-TOOL, ICMQ needs to verify its compliance with the requirements indicated in section 7.1.2.3.4.

When qualifying the EPD-TOOL, ICMQ also needs to perform, in addition to the previous ones, the following activities:

- checking the correctness of the data contained in the component database;
- verifying those EPDs that are representative of the ones that can be generated by the EPD-TOOL whose number will be defined by ICMQ in relation to the number of products that can be covered by the EPDs;

The EPD-TOOL qualification issued by ICMQ will only refer to those elements of its field of application for which the validation of the representative sample of EPDs could be carried out.

Having successfully completed the EPD-TOOL qualification, ICMQ will issue a qualification certificate.

Any changes to the instrument, with respect to the LCA model or the input data, will require the instrument and the component database to be verified once more.

#### 7.1.2.3.4. Requirements for qualifying 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 which define the TOOL's field of application or in the processes that could significantly alter the LCA study, the TOOL must be re-qualified by ICMQ.

The verification activity to qualify the TOOL is done by ICMQ at the manufacturer's/software house's location and aims to verify that the TOOL meets all the requirements listed above.

##### 7.1.2.3.4.1. Completeness requirement

During the visit the Auditor will check the availability in the TOOL of the following information:

- The purpose of the study;
- The functional/declared unit;
- Product description
- The system boundaries
- The power mix
- The cut-off rules and input data
- The product level scenarios
- Modelling of the process and I/O streams
- The environmental indicators used
- Additional environmental parameters (if any)
- RSL

The TOOL is complete if it contains information on all the characteristics listed, where applicable.
Otherwise, a Major Non-Conformity will be issued.

##### 7.1.2.3.4.2. Correctness requirement

During the visit, the Auditor will verify the correctness of the TOOL by means of:

- the LCA model's compliance with the reference PCR;
- the LCA's compliance with the ISO 14040 series Standards;
- the LCA's compliance with EPDItaly's general instructions.

The requirement is met if the activities given above are successfully completed. Otherwise a major NC will be issued.

##### 7.1.2.3.4.3. Appropriateness requirement

By means of a test LCA or EPD (for each field of application for the TOOL's use), it must be clearly shown:

- that the EPD has been 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 reference PCR.

If the test LCA or EPD refers to an actual product (in the case of an LCA-TOOL), it also necessary to verify:

- the assessment of the data includes coverage, accuracy, completeness, representativeness, consistency, reproducibility, sources and uncertainty;
- the plausibility, quality and accuracy of the LCA-based data;
- of the quality and accuracy of the additional environmental information (if any);
- the quality and accuracy of the supporting information.
- the appropriateness of the EPD (only if the TOOL does not also implement the creation of the EPD document)

Qualifying the TOOL must be done on all the elements that define its field of application (type of product, life cycle modules, possible types of EPD, etc.).

The requirement is met if the activities given above are successfully completed. Otherwise a major NC will be issued.

GENERAL NOTE: In the case of LCA tool checks, the consistency check on the input data is carried out by the Auditor not only on periodic updates, but also on similar products on which the tool is applied.

##### 7.1.2.3.4.4. Security requirement

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

- verifying that the LCA model cannot be altered in terms of the type of inventory data that can be considered;
- verifying that the LCA model of the impact indicators and additional environmental aspects cannot be changed;
- verifying that only primary data can be entered (only for an LCA-TOOL);
- verifying the presence of a system that can detect errors in the inputs (WARNING).

The requirement is met if the activities given above are successfully completed. Otherwise a major NC will be issued.

##### 7.1.2.3.4.5. Integrity requirement

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

- the presence of a system that prevents unauthorised access in compliance with the Organisation's procedures regarding the use of the TOOL.
- Back-up systems

The requirement is met if the activities given above are successfully completed. Otherwise a major NC will be issued.

#### 7.1.2.4. Re-qualifying the tool

In the event that the Organisation intends to make changes to the previously qualified field of application of the TOOL, or when such changes become necessary to update the reference PCR used by the TOOL, it is necessary to request ICMQ to requalify the TOOL.

The activities envisaged when proceeding with the process to re-qualify a tool are:

- Sending, 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 verification, these changes need to be highlighted in the text of the document;
- Verification by ICMQ of the changes made to the TOOL, through analysis of the document sent and audit (also possible remotely) relating to the functioning of the TOOL itself;
- The Auditor sends the result of the verification to ICMQ. This is then brought to the attention of the Deliberation Committee that decides on whether to re-qualify the TOOL;

With regard to the nature of the potential changes, the tool version identifier, required by ICMQ for qualification purposes, will identify the model version, in addition to the tool name. To this end, tool identification, which will allow it to be recognised during the verification process, will be of the form “Tool_model_version name”.

Any further indications regarding the version of the DB or Service Pack used may be inserted at the discretion of the owner in the TOOL identifier to keep track of such information, respecting the following method “Tool name_model version” [for example the version of the GABI Database or SIMA PRO] .

There is no need to re-check the tool when changing characterisation factors or fuel mixes, as they do not affect or modify the structure and model of the environmental impact calculation algorithm.

As the PCR changes, it may be necessary to requalify the TOOL.

A change in the LCA relating to the following activities will require the TOOL to be re-qualified:

<u>Definition of the objective and field of application</u>

- Choice of functional unit;

<u>Inventory</u>

- System boundaries;
- Production flow chart;
- Impact allocation;
- Data processing;

<u>Data assessment</u>

- Classification of impacts according to the reference PCR;
- Characterisation, i.e. the quantification of the classification stage. Its purpose is to quantify the environmental impacts by means of a weight factor classification established by an Authority (e.g. CO is equivalent to 2 kg of CO2). These elements are variables and do NOT affect the model, but only the output data.

If we were to analyse the LCA stages, a change in the following activities would not require the tool to be re-qualified:

- Collecting data (referring to materials, transport and energy, products and gases released into the air, water or soil). Data can be primary (from direct surveys) or generic/secondary (from literature/databases/EPDs) or unselected generic (from estimates and average values);
- Normalisation. The normalisation factors are established by CML or TRACI and, as regards EN 15804, are established by ANNEX C. A change in the CML or TRACI factors does not require the tool to be re-qualified.

### 7.1.3. Special requirements for the EPD Process

All the checks for the “EPD Process” are at all times done at the Organisation’s site where the system operates. For this type of verification, ICMQ will prepare a five-year verification plan for maintaining and renewing the certification.

The verification of conformity of the Organisation's EPD Process is implemented by ICMQ with reference to the requirements indicated in Annex C of ISO 14067 standard.

Verification of compliance also involves the verification of a sample of single product EPD quantifications generated by the Organisation's EPD Process (Pilot Case).

Verification is understood as an activity aimed at certifying the EPD Process of an Organisation and the continuation of its compliance over a specific three-year time frame. For this reason, certification of the EPD Process involves periodic surveillance activity.

The checks are carried out on the basis of:

a) the documentation relating to the EPD Process made available by the Organisation;

b) the product EPD sample generated by the Organisation's Process EPD (Pilot Case);

c) objective evidence made available by the Organisation to confirm the values in the EPD.

The EPD verification process includes an initial document review, followed by an on-site verification and a final document verification.

An integral part of the EPD Process verifications is the checking of the Pilot Case generated by the Organisation’s EPD Process. These are carried out on the basis of the EPD prepared by the Organisation, and the objective evidence made available by the same to confirm the assessment carried out. The verification process includes an initial documentary review and a subsequent risk analysis by ICMQ, which may be followed by an on-site audit and/or a final documentary review. The on-site verification can be done either at the place where the production process is located or where the collection and management of data and information useful to the EPD is carried out. The decision by ICMQ to carry out an on-site verification in relation to the Pilot Case will be made on the basis of the outcome of the documentary verification and the subsequent risk analysis (see section 9.3). Specifically, the on-site verification will be done if at least one of the following conditions is met:

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

- inaccuracies are found during the initial documentary verification of such a type or magnitude as to require an on-site activity (critical impediments). Specifically, the on-site verification will, in any case, be carried out where gaps or inconsistencies are found with regard to the following aspects:

- the physical coherence between the production site and what is described in the EPD LCA study;
- the correct collection, tracking and possible processing of primary data;
- the reliability of the model developed in the LCA study of the EPD.

On the basis of a significant sampling and within the times established by the Standard, ICMQ will verify that the Organisation not only knows and is able to manage all aspects of the EPD assessment, but that the values contained therein are supported by objective evidence such as to ensure its reliability.

The issue and maintenance of the EPD Process certification does not constitute a guarantee by ICMQ that the Organisation complies with its legal obligations. The Organisation is exclusively responsible, both towards itself and third parties, for the due performance of its activities and for the compliance thereof and the compliance of its products/services with the applicable regulations and with its client’s expectations and those of any third party in general, excluding any liability towards, or guarantee by, ICMQ.

Therefore, the lack of NCs does not rule out the presence of non-

conformities in the Organisation's activities and/or its products.

#### 7.1.4. Special requirements for testing environmental parameters, additives included in EPDs and recycled/recycled/by-product content.

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

The request for the inclusion of additional environmental information to be verified by ICMQ must be agreed with ICMQ in the pre-engagement and engagement phase.

Additive environmental parameters such as recycled/recovered/subproduct content may be the subject of the EPD verification activity only and not EPD validation.

All additional environmental information declared in the EPD must comply with the requirements of the relevant Programme Operator and, in particular, must be substantiated, verifiable, obtained by appropriate methods, specific, accurate, not misleading and pertinent only to the products covered by the EPD. The additive environmental parameters will be placed in a specific section of the EPD called "Additional Environmental Information".

#### 7.1.4.1. Specifications on the verification activity in relation to the type of evidence of the content of recycled/recovered/by-product

##### 7.1.4.1.1. Specifications in the event that the content of recycled/recovered/by-product material is demonstrated without recourse to a product certification

ICMQ may issue the EPD Verification Opinion containing indications relating to the recycled/recovered/by-product content, only if the following requirements have been positively verified:

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

b. The declared value shows the percentages of recycled/recovered/by-product content (if any). The total recycled content may also be broken down as pre-consumer and post-consumer recycled material. Where one of the components is not declared, it must be identified by the acronym "n.p.d";

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

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

e. The EPD shall indicate the method used to determine the recycled/recovered/by-product content, which shall refer to a method recognized by a specific Regulation/Disciplinary for product certification of recycled or recovered or by-product material content recognized by Accredia (or other accreditation body signatory to Mutual Recognition agreements) as a programme for the accreditation of Certification Bodies in accordance with UNI CEI EN ISO/IEC 17065 (e.g. ICMQ's CP DOC 262 Regulations, UNI-PdR 88-20, Remade in Italy Guidelines, Plastica Seconda Vita (Plastic Second Life) Guidelines, etc.);

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

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

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

i. The traceability of incoming materials in the manufacturing process and control of their qualification by means of appropriate documentary evidence according to the specific Regulation/Disciplinary;

j. Sample checks of the product's production evidence gave proof of the consistency between the value declared in the EPD and that obtained at the end of the manufacturing process.

The Organisation must indicate to ICMQ, prior to verification (through the Application for Verification or other specific communication), whether the declaration of recycled/recycled/by-product content performance was also made for the purpose of demonstrating the requirements of the Minimum Environmental Criteria (MEC). In this case, the method used must refer to one of the recycled/recycled/by-product content product certification programmes accredited by Accredia (e.g. ICMQ's CP DOC 262 Regulations, UNI-PdR 88-20, Remade in Italy, Plastica Seconda Vita, etc.) .

Stating compliance with ISO 14021 alone is not considered sufficient to indicate the method adopted.

Please note that in verifying the recycled/recovered/by-product content, determined by applying a method defined by a certification programme, the Audit Team shall follow the verification procedures set out in same, with respect to and limited to the requirements set out above from g) to j).

If the reference period of the data used to define the value of the recycled/recovered/by-product content is different from the reference period of the data used to define the calculation of the LCA impact indicators, this must be explicitly stated in the EPD, and the Audit Team must assess its suitability as regards the representativeness of the results declared and subject to verification.

The verification activity by the Audit Team may be carried out on site (remotely or in person depending on the provisions of IO 10) or, alternatively, through documentary checks conducted in the back office, in agreement with the Organisation.

##### 7.1.4.1.2. Specifications where the content of recycled/recovered/by-product material is demonstrated through product certification

In the event that the content of recycled/recovered/by-product material is demonstrated by the Organisation through a valid product certification issued by a third-party certification body accredited according to the UNI CEI EN ISO/IEC 17065 standard, the Audit Team verifies compliance only with the requirements from point a) to point f) indicated in section 7.1.4.1.1.

With regard to compliance with the requirements referred to in points b) and f), this will be achieved by returning the identification of the products and values in the EPD, as indicated in the product certificate in question.

Furthermore, the EPD must give the identification code of the product certificate supplied, the certification body that issued it, and the expiry date of the certificate.

The Organisation must provide the Audit Team with a copy of the certificate, and the latter must send it to ICMQ together with the required verification documents.

The Organisation must indicate to ICMQ, prior to verification (through the Application for Verification or other specific communication), whether the declaration of recycled/recycled/by-product content performance was also made for the purpose of demonstrating the requirements of the Minimum Environmental Criteria (CAM). In the latter case, it is necessary for the product certification provided as evidence to refer to a product certification of the recycled/recovered/by-product content accredited by Accredia (e.g. ICMQ's CP DOC 262 Regulations, UNI-PdR 88-20, Remade in Italy, Plastica Second Life, etc.) or a validation of a self-declared environmental assertion compliant with the ISO 14021 Standard in force as of 4-12-2022. The certifications must be issued by a certification body accredited according to the UNI CEI EN ISO/IEC 17065 Standard.

If the reference period of the data used to define the value of the recycled/recovered/by-product content is different from the reference period of the data used to define the calculation of the LCA impact indicators, this must be explicitly stated in the EPD, and the Audit Team must assess its suitability as regards the representativeness of the results declared and subject to

verification.

Verification by the Audit Team will be carried in the back office out by means of documents.

#### 7.1.4.2. Specifications on the verification activity in relation to the type of EPD

##### 7.1.4.2.1. Verification in the case of a new EPD (standard or generated with the use of qualified LCA-TOOL)

The verification activities carried out by the appointed Audit Team are those indicated in the cases present in section 7.1.4.1.

In the event that the EPD is created through the use of an LCA-TOOL that also implements the calculation of the value of the recycled/recovered/by-product content, verification of the requirement on the correct calculation method adopted (see point g of section 7.1.4.1.1) will be carried out only upon qualification of the LCA-TOOL and it will not be necessary to carry it out again in the verification of new EPDs generated with use of the previously qualified LCA-TOOL.

##### 7.1.4.2.2. Verification in the case of a new version of the EPD previously verified (standard or generated with the use of a qualified LCA-TOOL) for updating/integration of the value of the recycled/recovered material/by-product content

The verification methods required are further distinguished depending on the following cases:

*1. Recycled/recovered/by-product content data reference period different from the data reference period used to define the LCA impact indicators*

The appointed Audit Team carries out the verification activities based on the cases envisaged in section 7.1.4.1.

In the case of an EPD generated through the use of LCA-TOOL, any possible modification made to the methodology for calculating the recycled/recovered/by-product content implemented in the Tool also requires verification and qualification of a new version of the LCA-TOOL, the minimum duration of which will be 0.25 days/person.

In the case of a new version of the EPD previously verified, issued by the Organisation only for the update/integration of the content value of recycled/recovered/by-product and demonstrated solely through a product certification, the verification is conducted as indicated in section 7.1.4.1.2.

*2. Reference period of the recycled/recovered material/by-product content data coincides (even only partially) with the data reference period used to define the LCA impact indicators.*

The verification activities carried out by the appointed Audit Team are those indicated in the cases present in section 7.1.4.1.

In addition, the Audit Team verifies that the Organisation has checked and documented any variation in the LCA impact indicators due to the updating of data that are common (e.g. BOM) to the calculation of the recycled/recovered/by-product content.

If variations > ±10% of at least 1 of the LCA impact indicators are found, the Audit Team will also verify the updating of the LCA and the EPD document, which the Organisation must prepare and provide to ICMQ.

In the case of EPD generated through the use of LCA-TOOL, any possible modification made to the methodology for calculating the recycled/recovered/by-product content implemented in the Tool also requires the specific verification and qualification of a new version of the LCA-TOOL.

In the case of a new version of the EPD previously verified, issued by the Organisation only for the update/integration of the content value of recycled/recovered/by-product and demonstrated solely through a product certification, the verification is conducted as indicated in section 7.1.4.1.2.

### 7.2. ICMQ Auditor

ICMQ undertakes to appoint only Auditors who have been previously qualified and chosen on the basis of their experience in the field of verification and their technical knowledge in relation to the activities for which the Organisation requires the verification/validation/certification/attestation, as well as on the basis of the requirements established by ICMQ.

The Audit Teams can be made up of "single evaluators" (Auditors) or "multiple evaluators". In the Audit Teams the member responsible for coordinating and directing the audit is called the “Lead Auditor” and constitutes the interface with the Organisation receiving the verification/validation.

For the assessment, ICMQ may use both its own employees and external collaborators who act in the name and on behalf of ICMQ and who are suitably qualified to perform the assessment. Auditors may occasionally be accompanied by observer-Auditors, appointed by ICMQ or by an Accreditation and/or Qualification Body, who must be allowed to take part in the audit without interfering with it.

ICMQ informs the Organisation of the names of the Auditors in charge of the verification/validation.

Within 5 calendar days, the Organisation may reject one or more Auditors proposed by ICMQ. The reason for that rejection must be provided in writing. If the reasons are valid, ICMQ will propose new Auditors.

In the event of an on-site audit, the Auditors will contact the Organisation to agree on the date of the audit and to establish any logistical organisation.

Should an Auditor, for serious reasons (e.g. illness, injury, etc.), be prevented from carrying out the audit, or should the Auditor have no choice but to interrupt it, ICMQ may appoint a substitute in agreement with the Organisation.

The aforementioned Auditors are contractually required to fulfil all ICMQ’s duties and obligations, including complying with those regulating independence, conflicts of interest and processing personal data.

### 7.3. Trade Secrets and Confidentiality

All data and information concerning the Organisation, of which ICMQ becomes aware in carrying out the activities subject to these General Terms and Conditions, are confidential. Access thereto is regulated by a specific ICMQ procedure that imposes a confidentiality obligation on Auditors and on the ICMQ personnel engaged in the validation process.

The personnel of the Accreditation Body who, during the granting and/or maintenance of ICMQ accreditation, become aware of information relating to the certifying or certified Organisation, either at ICMQ or directly at the headquarters of the Organisation, are also bound to professional secrecy.

ICMQ will disclose to all parties concerned any information held thereby within the limits and in the cases laid down by any provision of law.

### 7.4. Issuing and maintaining certificates

#### 7.4.1. EPD verification/validation Opinion requirements

The verification/validation Opinion of the product or sector EPD confirms that the LCA study and the EPD prepared by the Organisation comply with the reference Standard and that sufficient objective evidence exists and has been verified to guarantee its credibility and reliability according to the defined guarantee level.

Please remember that validation assesses the reasonableness of the assumptions, limitations and methods underlying the claim and not directly the reliability of the claim subject to validation. Therefore, the level of assurance should be limited only to the methodologies, assumptions and limitations used. In the case of validation, therefore, no assurance can be expressed on the final data, as the claim is related to future activities.

The verification/validation Opinion is issued for each EPD and will report:

- the type of EPD (product or sector) and its document identification references (version and date of issue);
- the references of the Organisation that issued the EPD, coinciding with the EPD Owner (company name and registered office address);
- the products to which the EPD refers and the related CPC code;
- the references of the operational unit to which the EPD refers (address);
- the Standard in relation to which the conformity assessment was

carried out;

- the Programme Operator to whom the EPD is destined;

- the references of the LCA study relating to the EPD and some information such as life cycle, type of data (historical) and data reference period;

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

Regarding the opinion, this will be expressed in accordance with the provisions of the Programme Operator scheme Regulations (EPDItaly or IES System). In the absence of specific indications from the Programme Operator, the methods established by the EPDItaly Programme Operator (which provides for a "positive" or "negative" opinion) will be applied for reasons of uniformity.

The verification Opinion of a sector EPD will also indicate all the organisations/operational units that participated in the data collection.

The attestation of an EPD verification/validation declaration developed as Preliminary Validation, provided for the EPDItaly PO only, explicitly contains this information.

The attestation of an EPD Verification Opinion developed through the use of a TOOL will also contain the references of the previously qualified LCA/EPD-TOOL for which the checks referred to in the previous section have also been successfully completed as per section 7.1.2).

Only in the case of EPD-TOOL does the attached certificate identify all the possible configurations of products for which an EPD can be issued. This certificate is monitored on an annual basis by sampling the EPDs generated at random.

#### 7.4.2. Requirements for EPD Process certification

The EPD Process certificate certifies that the Organisation's process management system for the creation of EPDs complies with the requirements of the Standard, the PCR and GPI of the applicable IES Programme Operator.

The issuing of the EPD Process certificate does not involve ICMQ issuing a verification opinion of the Pilot EPDs verified to evaluate the effectiveness of the system.

ICMQ will be able to issue the "EPD Process" certificate to the Organisation only if the following have been positively verified:

a. the skills of the Organisation to draw up an EPD in accordance with the reference PCR;
b. the Process EPD procedures implemented for the creation of an EPD;
c. at least one EPD drawn up using the Organisation's EPD Process in compliance with ISO 14025 and the reference PCR, according to the procedures described in section 7.1.1.

#### 7.4.3. Requirements for TOOL Certificate of Qualification

ICMQ may issue the Certificate of qualification of a TOOL (LCA/EPD-TOOL) when the checks referred to in the previous section are successfully completed. 7.1.2.3. and the TOOL is suitable for generating product/service EPDs in its defined field of application.

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

The TOOL qualification activity is carried out by ICMQ interfacing with the organisation that developed the TOOL (e.g. manufacturer or software house) and aims to ensure that the TOOL is suitable for generating EPDs.

The qualification certificate for the Tool is in the name of the Organisation that developed the Tool (EPD Owner or software house).

### 7.5. Limits and Liability

ICMQ is expressly exempted from liability:

a) For its assessment of the EPD prepared by the Organisation where the latter does not provide certain information (including documents) and/or provides incomplete information and/or where the information provided does not match the actual situation;

b) For defects of products/services supplied by the Organisation to third parties, including issues related to product liability;

c) For the Organisation's correct performance of the activity and its compliance as well as that of its products/services with the applicable environmental and non-environmental regulations and the expectations of clients and third parties in general;

d) For the request and publication on the Programme Operator's website International EPD System of the EPD being evaluated.

e) Relating to the acceptance or otherwise of the EPD document by a contracting authority or any other entity, in order to establish the suitability of the product covered by the EPD to what is required of it.

The issuance of the EPD Verification/validation Opinion does not constitute a guarantee by ICMQ of compliance with legal obligations by the Organisation.

The Organisation is exclusively responsible, both towards itself and third parties, for the due performance of its activities and for the compliance thereof and the compliance of its products/services with the non-applicable environmental regulations and with its clients' expectations and those of any third party in general, excluding any liability towards, or guarantee by, ICMQ.

Therefore, the absence of NCs detected in ICMQ's assessment does not mean that there may not be any other anomalies relating to the product, site or Organisation subject to the EPD assessed by ICMQ.

### 7.6. Digitisation of EPDs

ICMQ, manager of the EPDItaly Programme, with the help of the Organisation digitises the environmental data deriving from the EPDs compliant with EN 15804, verified and published in the EPDItaly Programme, as part of an international agreement agreed in the Eco Platform.

The digitisation process means that not only environmental data but also other information contained in the EPD documents, published on the website www.epditaly.it, can be shared in a machine-readable format. Should given information required for digitisation not be included in the EPD validated by ICMQ, it shall be specifically requested by ICMQ prior to publication on EPDItaly.

The digital format means that the data can be easily read and processed by LCA calculation programmes, thus optimising the sharing of information contained in EPDs.

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

In any case, the Organisation (as EPD Owner) is accountable for the data contained in the digitised EPDs, holding also the exclusive right to change the same.

For the EPDs verified and published by the IES Programme Operator, ICMQ will not carry out any digitisation operations on the verified EPDs. This operation, if required, is the responsibility of the Organisation. The content of EPDs published in a *machine-readable* format must correspond to the content of the EPD. Responsibility for the data present in the digitised EPDs lies with the Organisation (as EPD Owner), which, moreover, holds the exclusive right to modify them.

## 8. Obligations of the Organisation

### 8.1. Delivery of contractual documents

The Organisation is obliged to submit to ICMQ all the documents required under the contract and/or the Application for Verification/Validation of the EPD Assessment. Failure or partial

receipt of such documentation will mean that ICMQ cannot start or complete the evaluation process.

### 8.2. Obligation of collaboration and workplace safety during audits

The Organisation undertakes to provide maximum collaboration to ICMQ for the conduct of any on-site audits, and in particular shall:

a) ensure the Auditors have access to the premises (its own or a third party's) where the work related to the products covered by the EPD verification/validation is carried out, notifying the Auditors, before such access, of any specific risks pertinent to the environment in which they are to operate and the prevention and emergency measures adopted in relation to the activities in addition to providing them with all the necessary Personal Protective Equipment in compliance with applicable laws regarding workplace health and safety;

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

c) during the verification, the ICMQ Audit Team must be able to view the LCA model developed within any software (e.g. Simapro or Gabi) used for the calculation of the EPD, in order to be able to assess the correctness of the choices made for the calculation of the EPD. It is not possible to conclude an EPD verification successfully without having been able to verify, including under the guidance of the staff responsible for the project, what has been achieved within the software;

d) guarantee the presence of necessary staff;

e) if the Organisation requires its own external consultant to participate in the audits, it will ask ICMQ for authorisation. Any such consultant may attend at the audits only as an observer and may not interfere.

The obligations cited above also apply vis-à-vis:

- any Auditors of the Accreditation and/or Qualification Bodies, who operate for the needs of maintaining the accreditation and/or qualification of ICMQ and which the Organisation is required to accept when requested.
- any observers of the audits sent by ICMQ to monitor its Auditors or to train the observers themselves, and who the Organisation is required to accommodate whenever requested.

### 8.3. Obligation to maintain compliance.

the Organisation undertakes to comply and remain compliant over time with all international, national or local mandatory requirements (laws, regulations, etc.) applicable to its products and services covered by the verified EPD environmental declaration, to the sites where their production takes place, or applicable to the Organisation subject to the Process EPD certification

Once the EPD has been assessed by ICMQ, the Organisation is required to keep its EPD compliant with the requirements of the Standard.

The Organisation must inform ICMQ of any fact that may change the validity of the opinion expressed with the Verification/validation opinion issued.

The Organisation undertakes to request that the Programme Operator publish the EPD which obtained the Verification/validation Opinion.

The Organisation undertakes to keep its Process EPD certified in compliance with the requirements of the Standard throughout the validity period of the Certificate. The certified Organisation shall promptly identify the Corrective Actions necessary to remedy any infringement of the Standard.

The Organisation undertakes to keep its qualified TOOL compliant with the requirements of the Standard throughout the period of validity of the Certificate. The Organisation shall promptly identify the Corrective Actions necessary to remedy any infraction of the Standard.

### 8.4. Changes to the products, services, processes being evaluated. Organisation-related changes. Prejudicial events

**A) Changes to products, services, processes, type and value of and impact indicators**

The Organisation whose EPD has obtained a Verification/validation Opinion is obliged to communicate this to ICMQ:

a) substantial alterations to the product (materials, dimensions, etc.) with potential changes in impacts;
b) substantial changes in the process (internal to the Organisation or to a supplier) with potential changes in impacts;
c) any changes in the TOOL/calculation model of the environmental impacts (when used);
d) any other change (including in the input data) that produces a variation in the EPD's environmental indicators to the extent indicated by the Programme Operator's GPI;
e) inclusion of new environmental parameters in addition to the EPD.

If the Organisation intends to make changes to the EPD document already subject to a Verification/validation Opinion, it must request it in writing from ICMQ.
For graphic and/or editorial changes, ICMQ may agree without the need to initiate a new EPD verification/validation process.
On the other hand, for changes inherent, or with repercussions on, the environmental impact value of an indicator, regardless of whether it 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 Organisation cannot modify the verified EPD without communicating it to ICMQ.

An Organisation that has obtained a Process EPD certification has the obligation to communicate to ICMQ:

a) changes to the field of application of the certified EPD Process (types of product/service, production units, reference PCR) for the development of the EPD;
b) substantial changes to the certified EPD Process, such as database or allocation procedures for the development of EPD Communications;
c) changes in the EPD calculation TOOL/model.

The Organisation must accept ICMQ's decision.

Documentation regarding the changes must be submitted to ICMQ which will carry out all the verifications in order to decide whether a documentary or even an on-site verification is necessary

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

**B) Organisation-related changes.** In the event that changes occur (or are about to occur) with respect to the Organisation, they will be classified into:

a) Relevant changes: purely by way of example and not limited to: business interruption, suspension of activity for a period of more than three months, transfer of one or more production units, transfer of all the activity to another legal entity, transfer or lease of the business unit producing the products covered by the EPD, participation in a merger and/or incorporation, change in Tax Code/Company Register number, significant change in the number of employees, significant change in the organisational structure and management team (change of managers with key roles, personnel with decision-making powers or technical personnel). In all these cases, ICMQ will have the right to request a new documentary examination and/or a new audit and/or a new Application for Verification, at the expense of the Organisation, which undertakes to accept this decision;

b) Non-Significant Changes: by way of example but not limited to: change of name or company name, change of legal nature (e.g. from general partnership to limited liability

company), change of the address of the registered office, change of VAT number, etc. In all these cases, ICMQ will issue a new Verification/validation opinion containing the required changes, with costs to be borne by the Organisation.

**C) Prejudicial events.** If a deed of protest has been issued against the Organisation or if the Organisation is placed under liquidation or is subject to executive and/or insolvency procedures, it shall notify ICMQ within 15 (fifteen) days of the event by registered letter with return receipt or certified email.

### 8.5. Obligation to pay compensation

The Organisation undertakes to pay the remuneration (fees, dues and any other expenses) for the activity carried out by ICMQ also in the event of failure to issue the verification/validation Opinion/TOOL Qualification Certificate/EPD Process certification due to the verified and objectively documented absence of conformity requirements. In fact, ICMQ carries out its entire service both in the case of issuing the Verification/validation Opinion/TOOL Qualification Certificate/EPD Process certification and in the opposite case, and therefore cannot make the payment of amounts due to it depend on a fact beyond its will.

The Organisation must comply with the payment methods and the rates in force at the time the activities are carried out, which are indicated in the Rates Table in force. Annual changes in rates are announced by publishing the Rates Table in the reserved area of the ICMQ website.

The Organisation is obliged to pay the maintenance fee for the EPD Process Certificate or TOOL Qualification Certificate annually, no later than January 31st of each year.

In the case of a late payment, the Organisation will pay ICMQ default interest, in compliance with Italian Legislative Decree No. 231/2002, and any legal fees for debt collection.

The Organisation undertakes to pay ICMQ the fees for the Examination/Acceptance of the Application for EPD Verification/Validation, and for the Issuance and Maintenance (if applicable) of the declaration of verification/TOOL Qualification Certificate/EPD Process certification as indicated in the Rates Table and according to the payment methods specified therein, unless otherwise agreed in writing between the parties.

The above fees include ICMQ's costs for the management of the assessment practice, while the fees (and reimbursement of out-of-pocket expenses) corresponding to audits are not included. These which will be charged according to the estimate accepted by the Organisation and, in the case of items not provided for in the estimate, according to the Rates Table in force at the time of the audit.

For the fees of any additional inspection and for the fee for the reissue of the Verification/validation Opinion/TOOL Qualification Certificate/EPD Process certification, as well as for the tariff of any other service provided by ICMQ, reference will be made to the Rates Table in force at the time of the request.

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

### 8.6. Interruption of the verification

If an audit that has already been scheduled cannot be started or has to be interrupted for reasons attributable to the Organisation (such as the unavailability of objective evidence to support the contents of the EPD analysis, unavailability of the corporate functions involved in the audit, etc.), the latter is in any case obliged to pay ICMQ the amount equal to the total cost of the assessor's engagement, including expenses.

### 8.7. Obligation to manage complaints

The Organisation shall:

a) maintain a record of all complaints of which it becomes aware relating to the EPD, the TOOL and the EPD Process being evaluated by ICMQ;
b) adopt and execute the appropriate corrective actions in the event that additional checks or in-depth investigations are necessary on EPDs 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/validation opinion issued; as a result of such complaints, or deficiencies found in the products or services falling within the scope of the ICMQ assessment, any corrective actions must be carried out according to the timing established by the GPIs of the relevant Programme Operator; unless otherwise agreed, the maximum period for the execution of a corrective action, following verified and published EPD reports, is 6 months;
c) document and record the actions taken;
d) make available both the complaint records and the documentation relating to the actions taken and the results obtained, to ICMQ Auditors;
e) accept, following a complaint, any unannounced audit that may be deemed necessary by ICMQ and/or the ICMQ accreditation body. In this case, unlike in the previous paragraph. Auditors cannot be recused.

## 9. Verification/validation process of an EPD/TOOL qualification/EPD Process certification

Organisations that intend to request the verification/validation service of an EPD/TOOL qualification/EPD Process certification can contact ICMQ, in particular its commercial area, through the various channels made available (telephone, email, website).

All organisations that operate with the supply of goods or services can request the EPD verification/validation by ICMQ /TOOL qualification/EPD Process certification.

ICMQ carries out the verification/validation process of the EPD/TOOL qualification/EPD Process certification requested in compliance with what may be specifically provided for by the Regulations of the Programme Operator to which the EPD/subject of verification refers.

For the activities performed, it is specified that:

- the EPD verification/ TOOL qualification/ EPD certification process required is managed and carried out by ICMQ in order to:

  - return the only “reasonable” level of assurance with reference to the methodologies, assumptions and limitations used, and on the value of the final environmental impacts,

  - adopt a quantitative level of materiality in the verification, with a “materiality threshold” of 0%

- the validation process of a required EPD is managed and implemented by ICMQ in order to:

- Returning only the “reasonable” level of assurance with reference only to the methodologies, assumptions and limitations used, but not referring to the value of the final environmental impacts,

- The adoption of a quantitative level of materiality in validation, with a “materiality threshold” of 0%.

These elements are clearly indicated to the Organisation in the offer and Application for EPD Verification and are in no way modifiable by the Organisation.

The EPD verification/validation process /qualification of a TOOL/EPD Process includes the following phases:

a) Pre-engagement
b) Engagement
c) Planning
d) Implementation of the verification
e) Review
f) Decision and issue of the EPD Verification/validation Opinion/TOOL Qualification Certificate/EPD Process Certificate;
g) Facts discovered after issuing the EPD Verification/verification Opinion /TOOL Qualification Certificate/EPD Process Certificate;
h) Handling of appeals and grievances
i) Recordings
j) Management of maintaining 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/EPD Process Certificate;

l) Management of additional and/or extraordinary checks for changes to the EPD Verification/validation Opinion/TOOL Qualification Certificate/EPD Process Certificate

### 9.1. Pre-engagement

Following the expression of interest by the Organisation, ICMQ requests some information on the subject of the verification/validation, including the date on which the necessary documents will be available for the Audit Team to start the activities.

The Organisation is required to provide ICMQ with this information in a correct, complete and timely manner, by filling in the appropriate forms provided by ICMQ (Form 115).

On the basis of this information, ICMQ formulates a commercial offer according to predefined criteria, in which the technical verification activities and the operating methods and the relative durations for their execution are identified. The offer is sent to the Organisation together with the Application for EPD Verification/validation form.

It should be noted that this offer does not in itself constitute the assignment (contract) between ICMQ and the Organisation, as this is finalised only following the Acceptance of the Application for EPD Verification/validation.

The Organisation signs the offer and sends it to ICMQ, together with the completed form of the Application for EPD Verification.

ICMQ's Planning Manager carries out the Review of the Application for EPD Verification/validation, verifying:

- the operational feasibility of carrying out the activity on the basis of the date of receipt of the necessary documents indicated by the Organisation.
- consistency between the offer and the information provided by the Organisation;

Based on the outcome of the Review:

a) in the presence of operational feasibility and complete coherence: accepts the Organisation's Application for EPD Verification/validation, confirming the commercial offer already signed;

b) in the presence of operational feasibility, but of partial consistency: investigates and acquires from the Organisation any new or different information with respect to that initially provided, and on the basis of these reviews the offer to request a new signature from the Organisation, which is a condition preventing the acceptance of the Application for EPD Verification/validation submitted;

c) in the absence of an operational or technical feasibility to carry out the requested service due to the new or different information acquired compared to that initially provided referred to in the previous point b) or if there are other reasons such as to justify the decision: reject the Organisation's Application for EPD Verification/validation.

There are also preconditions that prevent the acceptance of the Application for EPD Verification/validation:

- the failure of the Organisation to submit the Application for EPD Verification/validation;
- failure to pay the contractually agreed charges;

### 9.2. Engagement

The assignment between ICMQ and the Organisation ends when ICMQ sends the letter of Acceptance of the Application for EPD Verification/validation to the Organisation. This is done by the ICMQ Planning Manager, who reports the reference to the offer signed by the Organisation, following the outcome of the second phase of the Review in the Pre-Assignment phase.

The Acceptance will also indicate:

- the name and contact details of the ICMQ Project Manager in charge of the certification process and contact person for the Organisation;
- the name, references and roles of the Auditors making up the Audit Team appointed by ICMQ to carry out the verification activity following verification/validation of the necessary competence and independence requirements. The Organisation may formulate to ICMQ, within the time and in the manner indicated in the same letter of Acceptance, a reasoned objection regarding the presence of one or more members of the identified Audit Team. ICMQ will manage the Organisation's request by providing feedback and, if it deems it necessary, will identify different persons for the Audit Team;

Only after the Acceptance of the Application for EPD Verification/validation can the planning and execution of the verification/validation activities by ICMQ's Audit Team begin.

### 9.3. Planning the verification/validation

Following the Acceptance of the Application for EPD Verification/validation, the Lead Auditor prepares and sends the verification/validation Plan (Programme) to the Organisation, based on the information received from the Organisation (through Form 115) and the contractually defined durations for the execution of the activity.

The Verification/validation Plan indicates the different phases of ICMQ's assessment activity, provides a description and information relating to its execution, indicates the contractual durations provided for and identifies the timing of its execution, in relation to the date of receipt of the documentation necessary to start the audits.

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 with the use of 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 Documentary Verification: starts following the acceptance of the Application for Verification/validation;

b) On-site verification: planned by the Lead Auditor with the Organisation at the end of the previous initial documentary verification phase, corresponding to the delivery to the Organisation of the outcome of the initial documentary verification, except in the case in which critical non-conformities (NCs) have emerged in this phase. In this case, this verification is planned following the submission of evidence to the Lead Auditor for the management of critical NCs and only if these are considered by the Lead Auditor to be all positively resolved. Planning of the verification is confirmed by the Audit Team sending the Organisation the Outline Plan of the on-site verification

c) Final documentary verification: carried out following the submission by the Organisation to the Lead Auditor of the management and supporting evidence to demonstrate the resolution of all the findings that emerged in the verification process. The outcome of this phase and of the opinion of the Lead Auditor on the outcome of the verification carried out is transmitted by the Lead Auditor only to the ICMQ Project Manager

The verification of an EPD generated with the use of a Tool (LCA-TOOL or EPD-TOOL) subsequent to the first is performed according to a Verification Programme consisting of the following phases:

a) Initial Documentary Verification: starts following the acceptance of the Application for Verification;

b) Final documentary verification: carried out following the submission by the Organisation to the Lead Auditor of the management and supporting evidence to demonstrate the resolution of all the findings that emerged in the previous phase of the verification process. The outcome of this phase and of the opinion of the Lead Auditor on the outcome of the verification carried out is transmitted by the Lead Auditor only to the ICMQ Project Manager.

Following receipt of the documents sent by the Organisation necessary for the execution of the EPD verification/validation, the Lead Auditor of ICMQ prepares a strategic analysis and risk assessment of the EPD verification/validation activity. This analysis takes into account various factors, which may lead to inaccuracies in the EPD verification/validation activity (complexity of the system examined, methods of acquisition and control of primary data by the Organisation, verification experience, etc.).

On the basis of the outcome of this analysis, the Lead Auditor identifies the most relevant phases and processes, drawing up an Evidence Collection Plan (Sampling Plan) relating to these processes, for the verification of the quality of the primary and/or secondary data used, which will have to be taken into account in the future planned field verification/validation activity. Furthermore, the outcome of the risk analysis constitutes an element for establishing the possibility of carrying out on-site checks in fully remote mode or even in person, in compliance with the provisions of the Programme Operator's Regulation (GPI) and the criteria defined by the specific ICMQ procedures.

If, at this stage or at any time during the assessment process, the analysis of the documents provided reveals new or different elements from those initially provided by the Organisation, such as to have repercussions on the planning of the activities, on the expected durations or on the risk analysis carried out, ICMQ may request that the Organisation carry out furher activities in addition to those already contracted to carry out the activity, the acceptance of which is necessary for the continuation of the activity. Following such acceptance, ICMQ's Lead Auditor will update the Verification/validation Plan and send it to the Organisation and ICMQ.

### 9.4. Implementation of the verification

EPD verification activities are conducted by the Audit Team according to the phases set out in the Verification/validation Plan.

Verification/validation activity is carried out by the Audit Team both by documentary means in the back office, and on-site, in person or remotely, depending on compliance with the criteria set out in the specific ICMQ procedures.

The activities carried out by the Audit Team shall at least allow sufficient data and information to be obtained to assess compliance with the requirements set out in section 7.1 and related sub-sections, depending on the type of activity required.

The elements for the verification are collected and reported by the Audit Team through specific verification reports, checklists, and specific forms distinct for the different types of EPD checks. Where the EPD verification/validation activity includes on-site verification, the Audit Report and the form for recording evidence of the on-site verification are also used.

In the case of EPD verification/validation relating to more than one production site, ICMQ defines a sampling of the verified UPs that takes into account:

- number of sites subject to the EPD Verification/validation Request;
- complexity of the production processes subject to the EPD Verification/validation Request;
- the additional environmental aspects related to the production processes covered by the EPD Verification/validation Request;
- the presence of ISO 14001 certification;
- the level of homogeneity between production sites (for example as regards raw materials, type of facility, etc.).

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

The process consists of the following phases:

Initial documentary verification

This is performed in the back-office by ICMQ's Audit Team.

It consists of evaluating the conformity of the EPD document and the LCA Study Report (LCA analysis) to the requirements indicated in section 7.1.1.

At the end of this activity, the Lead Auditor draws up the Verification Report which reports on the outcome of the documentary checks and any NCs that have emerged (also indicating whether they are of a general, technical or editorial nature), and highlighting which ones are classified as critical and must be resolved as a preventive measure to any other further verification activity in the field, and which ones can be resolved later, but still before the verification process is completed.

It may also contain recommendations, in relation to which the Organisation may, at its own discretion, choose whether or not to implement them, and consequently propose Corrective Actions.

The Verification Report is sent by the Lead Auditor to the Organisation, which must manage the NCs identified, indicating the Corrective Actions taken, their timing, and providing adequate documentary evidence to allow the Audit Team to assess whether they can be considered decisive for the NC identified.

This verification phase is carried out on all EPD documents subject to ICMQ activity, without any sampling of the documents submitted

On-site verification

The on-site verification phase is carried out both at the data collection centre and with an inspection at the operational unit.

It aims to:

- verify, on a sample basis, the quality requirements of the primary and secondary data used in the LCA Study Report and in the EPD;
- verify the correct use of the characterisation factors and methods for calculating the environmental impact indicators used in the LCA Study Report;
- establish that the calculation model implemented for the LCA study is effectively representative of the processes that actually occur in the operational unit.

In the event that the object of the EPD is a service, the inspection will take place at the site where the service is currently carried out by the Organisation.

On-site checks are agreed by the Audit Team with the Organisation and confirmed by sending the Outline Plan to the Organisation at least 5 days before the scheduled date of the verification. ICMQ reserves the right to submit to the Organisation the costs of the on-site verification if the Organisation refuses, without valid reasons, to allow the Audit Team to carry out the planned verification.

In the general plan, the Lead Auditor indicates the need to interact with the developer of the LCA Study Report, or to consult particular types of documentary evidence.

For the on-site verification to be carried out, the Organisation must ensure that:

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

The operational phase of the on-site verification is:

- preceded by an initial meeting in which the Lead Auditor presents the Audit Team, explains the audit method and provides any explanations and clarifications;
- followed by a closing meeting in which the Lead Auditor illustrates the results of the audit, which are reported in an Audit Report. All observations recorded by the Audit Team, in the form of a recommendation or NC, are submitted to the Organisation, which countersigns the Audit Report for information. The Organisation has the possibility to express any reservations on the findings indicated or on the activity carried out by the Audit Team.

Both meetings must be attended by the contact person of the Organisation that deals with the development of the LCA, or persons delegated by him or her.

At the end of this activity, the Lead Auditor draws up the verification/validation Report which reports on the outcome of the on-site checks and any NCs that have emerged (also indicating whether they are of a general, technical or editorial nature).

The verification/validation report may also contain recommendations (except for EPDs involving construction products), in relation to which the Organisation may, at its own discretion, choose whether or not to implement them, and consequently propose Corrective Actions.
The Verification/validation Report is sent by the Lead Auditor to the Organisation, which must manage the NCs identified,

indicating the Corrective Actions taken, their timing, and providing adequate documentary evidence to allow the Audit Team to assess whether they can be considered decisive for the NC identified.

Final documentary verification

This activity consists of the back-office verification by the Audit Team of the documents (EPD, LCA Study Report and any other supplementary documents identified by the Audit Team) reviewed and transmitted by the Organisation in order to manage all the NCs that emerged in the (initial documentary and/or on-site) verification and not yet resolved.
The EPD Product Verification/validation Opinion cannot be issued until all the non-conformities that have emerged have been correctly managed by the Organisation and the non-conformities considered have been overcome by the Audit Team.
At the end of this activity, the Lead Auditor draws up the Verification/validation Report on the outcome of the management of the NCs and Recommendations by the Organisation and indicates the final opinion by the Audit Team regarding the outcome of the activity conducted.

The Verification/validation Report is sent by the Lead Auditor to ICMQ, together with other specific documents reporting the audit carried out by the Audit Team, in order to be submitted for review by ICMQ and only subsequently transmitted to the Organisation as the final outcome of the verification activity conducted by the Audit Team.

### 9.4.2. Checks of an EPD generated by a qualified TOOL

This consists in the verification of the requirements indicated in the above section 7.1.2.

The process consists of the following phases:

Initial documentary verification

This is carried out in the back-office by ICMQ's Audit Team.

At the end of this activity, the Lead Auditor draws up the Verification Report which reports on the outcome of the documentary checks and any NCs that have emerged (also indicating whether they are of a general, technical or editorial nature), and highlighting which ones are classified as critical and must be resolved as a preventive measure to any other further verification activity in the field, and which ones can be resolved later, but still before the verification process is completed.

It may also contain recommendations, in relation to which the Organisation may, at its own discretion, choose whether or not to implement them, and consequently propose Corrective Actions.
The Verification Report is sent by the Lead Auditor to the Organisation, which must manage the identified NCs, indicating the Corrective Actions taken, their timing, and providing adequate documentary evidence to allow the Audit Team to assess whether they can be considered decisive for the NC identified

Final documentary verification

This is carried out in the back-office by ICMQ's Audit Team.

This activity consists of the back-office verification by the Audit Team of the documents (EPD, LCA Study Report and any other supplementary documents identified by the Audit Team) reviewed and transmitted by the Organisation in order to manage all the NCs that emerged in the (initial documentary) verification and not yet resolved.
The EPD Product Verification Opinion cannot be issued until all the non-conformities that have emerged have been correctly managed by the Organisation and the non-conformities considered overcome by the Audit Team.
At the end of this activity, the Lead Auditor draws up the Verification Report on the outcome of the management of the NCs and Recommendations by the Organisation and indicates the final opinion by the Audit Team regarding the outcome of the verification activity conducted.

The Verification Report is sent by the Lead Auditor to ICMQ, together with other specific documents reporting the audit carried out by the Audit Team, in order to be submitted for review by ICMQ and only subsequently transmitted to the Organisation as the final outcome of the verification activity conducted by the Audit Team.

The Product EPD Verification Opinion relating to the EPD generated by the TOOL, subsequent to the first, cannot be issued until all the non-conformities that have emerged relating to this EPD have been correctly managed by the Organisation and the non-conformities have been overcome.

In the event that the TOOL used has not already been previously qualified, it is necessary for the Audit Team to conduct the checks for the qualification of the TOOL, by means of a specific procedure, which provides for the simultaneous verification of the first EPD generated by the TOOL (Pilot EPD) conducted according to the process indicated in section 9.4.1.
The process for the qualification of the TOOL involves the following two phases:

Verification for pre-qualification of the TOOL
This is carried out by the Audit Team through document verification activities on the TOOL Manual and on-site verification activities conducted remotely at the TOOL developer's website.

It consists in assessing the compliance of the TOOL with the requirements indicated in section 7.1.2.3.1 for Pre-Qualification.

This activity is conducted simultaneously with the initial document verification activities of the Pilot EPD.

At the end of these checks, the Lead Auditor draws up the Verification Report for the qualification of the TOOL, which reports any NCs for the Pre-Qualification of the TOOL (also indicating whether they are of a higher or lower level).

Checks for final qualification of the TOOL

This consists in assessing the compliance of the TOOL with the requirements indicated in section 7.1.2.3.2 for Pre-Qualification.

It is carried out by the Audit Team through documentary verification activities following the outcome of the on-site verification of the Pilot EPD and the verification of the requirements for the correct application of the processes for the use of the TOOL by the Organisation indicated in section 7.1.2.1.2.
At the end of these checks, the Lead Auditor draws up the Verification Report for the qualification of the TOOL, which reports any NCs for the final Qualification of the TOOL (also indicating whether they are of a higher or lower level).

The Organisation must manage the identified NCs, indicating the Corrective Actions taken, their timing, and providing adequate documentary evidence to allow the Audit Team to assess whether they can be considered decisive for all the NCs encountered.

The Verification Report for the qualification of the TOOL is sent by the Lead Auditor to ICMQ, together with other specific documents that report on the verification carried out by the Audit Team, in order to be submitted for the Review of ICMQ and only subsequently transmitted to the Organisation as the final outcome of the verification activity conducted by the Audit Team.

Together with this report for the qualification of the TOOL, the Lead Auditor will also issue the Verification Report of the Pilot EPD.

The Product EPD Verification Opinion relating to the Pilot EPD generated by the TOOL cannot be issued until all the NCs that emerged relating to these Pilot EPDs have been correctly managed by the Organisation and non-conformities have been overcome. A precondition for the issuance of the EPD Verification opinion is the positive outcome of the checks for the qualification of the TOOL.

The TOOL Qualification Certificate cannot be issued until all the NCs related to the checks for the qualification of the TOOL have been correctly managed by the Organisation and have been overcome. A precondition for the qualification of the TOOL is the positive outcome of the checks on the Pilot EPD.

### 9.4.3. EPD Process certification checks

This consists in the verification of the requirements indicated in the above section 7.1.3.

The process consists of the following phases:

Initial documentary verification

This is carried out in the back-office by ICMQ's Audit Team.

The Audit Report reports any NCs (also indicating whether they

are of a major or minor level) that emerged in the evaluation of the documentation that defines the Organisation's EPD Process and the NCs (identifying whether they are of a general, technical or editorial nature) that emerged from the evaluation of the EPD document and the LCA Study Report of each Pilot EPD, conducted in accordance with the provisions of section 7.1.1, highlighting which are classified as critical and must be resolved prior to any other further verification activity on-site, and which can instead be resolved subsequently, but in any case before completing the verification process

It may also contain recommendations, which the Organisation may, at its own discretion, choose whether or not to implement, and consequently propose corrective actions.
The Verification Report is sent by the Lead Auditor to the Organisation, which must manage the identified NCs, indicating the Corrective Actions taken, their timing, and providing adequate documentary evidence to allow the Audit Team to assess whether they can be considered decisive for the NC identified.

On-site verification

The on-site verification phase is carried out both at the data collection centre and with an inspection at the operational unit.

Every assessment on how on-site audits are carried out (where to carry them out, including in the case of multiple production sites) will be taken by ICMQ in consideration of the three previous points.

Specifically, the on-site verification will be carried out where:

- the risk analysis shows that a certain level of risk defined by ICMQ has been exceeded;
- inaccuracies are found during the initial documentary verification of such a type or magnitude as to require an on-site activity (critical impediments);
- there have been significant changes in the EPD compared to previous verifications, apparently not justifiable;
- there have been significant changes in how data is managed at a specific site;
- the system boundaries have changed.

The purpose of the verification is to:

- control the primary data collection process , tracing them from their raw source, through any subsequent processing;
- randomly verify the quality requirements of the primary and secondary data used in the LCA Study Report of each Pilot EPD;
- ensure the correct use of the characterisation factors and calculation methods of the environmental impact indicators used in the LCA Study Report of the Pilot EPDs;
- ensure 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.
- Checks on the effective application of the procedures and methods defined for the EPD Process by the Organisation.

If the subject of the EPD is a service, the on-site verification activity will in any case be planned, including a visit to the site where the service is currently carried out by the Organisation.
The implementation of this verification activity on-site (inspection) will be made explicit in the service offer sent to the Client.

On-site checks are agreed by the Audit Team with the Organisation and confirmed by sending the Outline Plan to the Organisation at least 5 days before the scheduled date of the verification. ICMQ reserves the right to submit to the Organisation the costs of the on-site verification if the Organisation refuses, without valid reasons, to allow the Audit Team to carry out the planned verification.

In the general plan, the Lead Auditor indicates the need to interact with the developer of the LCA Study Report, or to consult particular types of documentary evidence.

For the on-site verification to be carried out, the Organisation must ensure that:

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

The operational phase of the on-site verification is:

- preceded by an initial meeting in which the Lead Auditor presents the Audit Team, explains the audit method and provides any explanations and clarifications;
- followed by a closing meeting in which the Lead Auditor illustrates the results of the audit, which are reported in an Audit Report. All observations recorded by the Audit Team, in the form of a recommendation or NC, are submitted to the Organisation, which countersigns the Audit Report for information. The Organisation has the possibility to express any reservations on the findings indicated or on the verification activity carried out by the Audit Team.

Both meetings must be attended by the contact person of the Organisation that deals with the development of the EPD, or persons delegated by him or her.

The outcome of the verification may contain higher or lower levels of NCs. It may also contain recommendations, in relation to which the Organisation may, at its own discretion, choose whether or not to implement, and consequently propose corrective actions.
Within 10 days of the conclusion of the audit, the Organisation must submit to ICMQ the proposals for correction to the NCs highlighted, regardless of their level, and present within 1 month of the on-site audit (unless otherwise agreed with ICMQ) the relevant evidence (EP Study Report, EPD Process Documentation and/or further required documentation) to assess their successful outcome.

Final documentary verification

This activity consists of the back-office verification by the Audit Team of the documents (EPDs, LCA Study Reports and any other supplementary documents identified by the Audit Team) reviewed and transmitted by the Organisation in order to overcome all the NCs that emerged in the verification activity previously conducted (initial and/or field documents) and not yet resolved.
The EPD Process certification cannot be issued until all the NCs that have emerged have been correctly managed by the Organisation and have been overcome.
At the end of this activity, the Lead Auditor draws up the Verification Report on the outcome of the management of the NCs and Recommendations by the Organisation and indicates the final opinion by the Audit Team regarding the outcome of the verification activity conducted.

The Verification Report is sent by the Lead Auditor to ICMQ, together with other specific documents reporting the audit carried out by the Audit Team, in order to be submitted for review by ICMQ and only subsequently transmitted to the Organisation as the final outcome of the verification activity conducted by the Audit Team.

### 9.5. Review

At the end of the Audit Team's verification/validation provided for in the Verification/validation Plan, the Lead Auditor sends the outcome of the audits conducted to ICMQ. ICMQ carries out a review of the Verification/validation Report sent through the Project Manager as an independent party who did not participate in the assignment and verification of the Audit Team, in order to confirm:

- that all verification/validation activities have been completed by the Audit Team in accordance with the verification/validation plan;
- that the evidence of the activities carried out by the Audit Team is sufficient and appropriate to allow the decision by the Deliberation Committee;
- that the NCs that emerged during the verification process were all managed and considered to have been positively resolved by the Audit Team.

In the event that it is necessary, ICMQ requests clarification from the Audit Team regarding the activity carried out. If it is necessary to go deeper into some aspects of the process ICMQ may decide to carry out an additional investigation, consisting of a documentary verification or an additional on-site visit, before submitting the file to the Deliberation Committee.

The file cannot be proposed to the ICMQ Deliberation Committee for the granting of the EPD Verification/validation Opinion/EPD Process certification/TOOL Qualification Certificate until there is evidence, at documentary level or through a supplementary audit, of the effectiveness of the corrections and Corrective Actions for each NC (for EPD checks) or for those classified as major NCs (for checks of the EPD Process or TOOL Qualification Certificate).

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### 9.6. Decision and issue of the EPD Verification/validation Opinion /TOOL Qualification Certificate/EPD Process Certificate;

The Deliberation Committee examines the request for the EPD Verification/validation Opinion/TOOL Qualification Certificate/EPD Process Certificate and expresses its decision whether to grant it or not.

A supplementary investigation may be requested by the Deliberation Committee. Where deemed useful, the Deliberation Committee may contact the Organisation before giving its final opinion.

The decision of the Deliberation Committee is communicated to the Organisation and:

a) if positive, the EPD Verification/validation Opinion/TOOL Qualification Certificate/EPD Process Certificate relating to the subject matter of the verification/validation is issued. Subsequently, ICMQ registers the Organisation in the appropriate Register. This Register will be published and/or publicised according to the forms and methods established by ICMQ. Furthermore, the information relating to the EPD Verification/validation Opinion/TOOL Qualification Certificate/EPD Process Certificate can be transmitted, when requested, to the parties entitled.

b) if negative, the EPD Verification/validation Opinion/TOOL Qualification Certificate/EPD Process Certificate will not be issued and the Organisation will be notified of the method for continuing the verification process (for example with an additional visit).

The Organisation may appeal against the decision of ICMQ and the Deliberation Committee in the manner provided for in these General Terms and Conditions.

Following the granting of the Verification/validation Opinion by the Deliberation Committee, and within two months of the same, ICMQ carries out a systematic check of the publication on the Programme Operator's website of the version of the verified/validated EPD document.

In the event that the check reveals that the EPD has not been published, ICMQ will evaluate any actions to be taken regarding the validity of the Verification/validation Opinion.

### 9.7. Facts discovered after issuing the EPD Verification/validation Opinion/TOOL Qualification Certificate/EPD Process Certificate;

If facts are made known to ICMQ that could affect the validity of the EPD Verification/validation Opinion/TOOL Qualification Certificate/EPD Process Certificate issued, then following analysis of what has been learned, and if it deems it necessary, ICMQ will communicate the matter to the Organisation and the Programme Operator of the EPD in question. It will also initiate a process in order to identify the appropriate actions to be taken, including discussing the case with the Organisation and with the Auditor of the Audit Team that previously conducted the audit. Following the identification of the reasons, ICMQ will request the Organisation to review the EPD/TOOL/EPD Process to subject it to verification by ICMQ, for the purpose of a new issue of the EPD Verification/validation Opinion/TOOL Qualification Certificate/EPD Process Certificate or for its possible suspension or revocation, as provided for by these General Terms and Conditions. If the revision of the EPD/TOOL/EPD Process is not started according to the timing set out by the PO or according to the period agreed with the Organisation, ICMQ reserves the right to request the removal of the EPD definitively.

ICMQ is not liable in the event that the client refuses to carry out in-depth analysis, integration of verification and corrective actions on the EPD document, and subsequent republication on IES, where necessary, or if these activities are not carried out according to the timing indicated by the programme operator, for reasons beyond the control of ICMQ.

ICMQ is not liable for actions by the Programme Operator in the event that the latter finds improper use of the EPD document following verification/validation by ICMQ.

### 9.8. Handling of appeals and grievances

The Organisation may appeal against the decisions and resolutions taken by ICMQ in accordance with the procedures set forth in these General Terms and Conditions.

### 9.9. Recordings

ICMQ undertakes to maintain and manage records relating to all activities of the verification process described in section 9 and related sub-sections, for all services regulated in this document.

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

### 9.10. Management of maintaining the EPD Verification/validation Opinion/TOOL Qualification Certificate/EPD Process Certificate

The verification/validation Opinion of an EPD has no expiration date and its duration is unlimited. It is not, therefore, subject to any periodic verification for its maintenance.

The EPD Process Certificate has a duration of one years.

The EPD Process Certificate retains its validity provided that the annual periodic audits done by ICMQ on the control system for the data collection process and the definition of the Organisation's EPD confirm that the requirements that led to the initial certification are still valid (see section 7.1.3).

The ICMQ activities will be conducted with the same verification methods envisaged for the issue of an EPD Process Certificate, with the only difference being that the checks of the Pilot Cases produced by the EPD Process are replaced by checks on the EPD, chosen on a sample basis by ICMQ, among those carried out within the EPD Process during the period since the previous surveillance/verification.

At the end of the Certificate's period of validity, the Organisation's system is subject to a renewal verification by ICMQ in accordance with the procedures defined in section 9.11.

The qualification of the LCA-TOOL, without any changes to the elements that define the TOOL's field of application, will have a duration of 5 years, at the end of which it will have to be re-verified in accordance with the provisions of section9.11.

The qualification of the EPD-TOOL, without any changes to the elements that define the TOOL's field of application, will have a duration of 2 years, at the end of which it will have to be re-verified in accordance with the provisions of section9.11.

If the Organisation holding the LCA-TOOL or EPD TOOL Qualification Certificate makes changes to one or more of the elements that define the TOOL's field of application, it must immediately notify ICMQ and request an offer to qualify the new version of the TOOL. ICMQ will prepare a specific offer to carry out the checks for the new qualification as provided for in section7.1.2.3.

### 9.11. Management of the renewal of the EPD Verification/validation Opinion/TOOL Qualification Certificate/EPD Process Certificate

The verification/validation Opinion of an EPD has no expiration date and its duration is unlimited. It is not, therefore, subject to any verification for its renewal.

At the end of the validity period of the EPD Process Certificate/TOOL Qualification Certificate, ICMQ will carry out a renewal verification, using the same verification methods

envisaged, in different cases, for the release of a new EPD Process Certificate /TOOL Qualification Certificate, indicated in section 7.1 and following sub-sections. with the only difference being that the checks on the Pilot Cases produced by the EPD Process are replaced by checks on the EPD, chosen on a sample basis by ICMQ, among those carried out within the EPD Process during the period since the previous surveillance/verification.

### 9.12. Management of additional and/or extraordinary checks for changes to the EPD Verification/validation Opinion/TOOL Qualification Certificate/EPD Process Certificate

The Verification/validation Opinion of an EPD may not be subject to change of any kind.

When the EPD referred to in the Verification/validation Opinion is subject to changes of any kind (e.g. to update the values of environmental impact indicators, to adapt its contents to changes in technology, to changes in the product, in the production process or in any significant element, which may lead to a change in the LCA model and its impacts, to changes in the Additional Environmental Parameters, adaptation to new versions of PCR or Programme Operator Regulation, etc.), it must be subject to a new verification/validation process to obtain a new Verification/validation Opinion.

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

If, following the Organization's follow-up procedures, an update of the EPD previously verified and published on the Programme Operator International EPD System is required, it will be possible to submit the EPD to 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 include the involvement of ICMQ, as defined in Section 7.1.1.2.1.

In the case of Program Operator International EPD System's "EPD of product not yet on the market," which has previously undergone a validation process, or Program Operator International EPD System's "EPD of product recently on the market," which has previously undergone a verification process, it will be necessary to update and resubmit the EPD for verification when one year's worth of data from the production of the product covered by the EPD becomes available. At the end of the verification process, a new EPD verification/validation declaration is issued.

In the event that the Organisation intends to adapt or extend the scope of application of the Certificate of Qualification of one of its TOOLS or the EPD Process Certificate, it must submit a specific request for quotation to ICMQ, whose verification will be defined in relation to the type of modification made or extension requested.

Until the required adjustment or extension is obtained, the Organisation may not use the ICMQ logo.

#### 9.12.1. Supplementary and/or extraordinary verifications

Additional audits, or with less than annual periodicity, may be requested by ICMQ if, as a result of the verification activity of the Audit Team and the Review, there are still significant NCs that have not been resolved by the Organisation. These checks will be charged to the Organisation according to the Rates Table in force on the date on which the checks are carried out.
In addition, if ICMQ receives complaints or reports that cast doubt on the continuation of the conditions for which the EPD Verification/validation Opinion/TOOL Qualification Certificate/EPD Process Certificate was initially issued by ICMQ, ICMQ will have the right to carry out an extraordinary inspection in order to verify the continued compliance with the reference Standard. These reports can also be made by Accreditation and/or Qualification Bodies and, in this case, the staff from these Bodies may accompany ICMQ Auditors.
Extraordinary visits may take place without prior notice. In the event of refusal of the Organisation to let ICMQ carry out these activities, the validity of the EPD Verification/validation Opinion/TOOL Qualification Certificate/EPD Process Certificate may be suspended immediately.
The costs of the visits are at all times borne by the Organisation, except in the case of extraordinary audits in which no NCs emerge.

### 9.13. Definition of Audit Time

The Auditor engagement days, expressed in person days, are defined according to:

- the type of verification (assessment, monitoring, renewal, extension);
- the company size and type of processes/products/services subject to verification/validation;
- EPD type (product, media, sector) and number of EPDs to be verified/validated;
- the number of sites covered by the EPD;
- the TOOL type (LCA-TOOL or EPD-TOOL)
- the number of additional environmental parameters.

Planning of the checks and the commitment in person days for each company/Organisation can be consulted in the reserved area of the website www.icmq.org.

## 10. Validity of the EPD Verification/validation Opinion/EPD Process Certificate/TOOL Qualification Certificate

Without prejudice to what is indicated in 9.10, the validity of the EPD Process Certificate or the TOOL Qualification Certificate is subject to the passing of periodic surveillance checks.

Conversely, the validity of the Verification/validation Opinion of an EPD is not subject to periodic surveillance checks.

The validity also ceases when ICMQ assesses the lack of conformity verified during the certification granting phase.

In such cases ICMQ may give rise to a suspension or revocation of the EPD Verification/validation Opinion/EPD Process Certification or the TOOL Qualification Certificate.

## 11. Use of the EPD Verification/validation Opinion/EPD Process Certificate/TOOL Qualification Certificate and the ICMQ marks

The Organisation is granted a license to use the ICMQ trademark, with the right to use it in technical and advertising documentation, but within the limits of the provisions of the specific Regulations for the use of the DOC 05 trademark.

In the event of improper use of the EPD Verification/validation Opinion/EPD Process Certificate/TOOL Qualification Certificate and the trademark mentioned above, ICMQ asks the Organisation to cease this practice immediately, with the right to adopt a measure of suspension or revocation of the EPD Verification/validation Opinion EPD Process Certificate/TOOL Qualification Certificate, based on the severity of the behaviour.

The Organisation in possession of the EPD Verification/validation Opinion /EPD Process Certificate/TOOL Qualification Certificate must immediately cease using it and the above-mentioned trademark in cases of suspension, revocation and renunciation, as well as in the event of termination of the contract .

In the event that the Organisation does not correctly use the EPD Verification/validation Opinion/EPD Process Certificate/TOOL Qualification Certificate and/or the mark indicated above, it will be obliged to pay a penalty in favour of ICMQ quantified in Euro 500.00 (five hundred euro) for each single violation and Euro 100.00 (one hundred euro) for each day of delay in complying with these obligations, without prejudice to the right to claim for any further damages. ICMQ reserves the right to take any legal action, to publicise such action in magazines or newspapers, and to communicate it to the Competent Authorities.

## 12. Public disclosure of the EPD Verification/validation Opinion/EPD Process Certificate/TOOL Qualification Certificate

The Organisation authorises ICMQ to keep updated, publish and/or advertise (also on the website www.icmq.org) the list of client companies, their EPD Verification/validation Opinions/TOOL Qualification Certificates/EPD Process certificates, also in digital format, so that their existence and their validity status can be verified. ICMQ will also communicate this information to the

Accreditation Body (Accredia) and to any other authorised party that makes an appropriate request and, where necessary, on the ICMQ Newsletter and website.

## 13. Suspension of the EPD Verification/validation Opinion/EPD Process Certificate/TOOL Qualification Certificate

ICMQ will 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 the EPD process Certification this can also be detected following the checks envisaged for the surveillance of the certificate.

More generally, ICMQ may, for a certain period of time, suspend the validity of the EPD Verification/validation Opinion/EPD Process Certificate/TOOL Qualification Certificate in the following exemplary cases:

a) suspension of the Organisation's production activities by order of the Judicial Authority;

b) failure by the Organisation, within the established timeframe, to take Corrective Actions aimed at eliminating the NCs detected, including during audits;

c) ineffectiveness of the Corrective Actions implemented by the Organisation as they do not guarantee the correct management of the data and information contained in the EPD;

d) failure by the Organisation to adapt the verification within the established time frames following changes to the Standard;

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

f) non-acceptance by the Organisation of the audits established under these General Terms and Conditions and indicated as necessary by ICMQ;

g) refusal of the Organisation without valid reasons to accept the Auditors appointed by ICMQ, the evaluators of the Accreditation and/or Qualification Bodies and the Observers;

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

i) breach by the Organisation of an obligation envisaged by these General Terms and Conditions, including non-payment of an invoice within the fixed terms.

j) if the Organisation receives protests or is placed into liquidation or subjected to enforcement and/or insolvency procedures.

ICMQ will notify the Organisation of the suspension of the EPD Verification/validation Opinion/EPD Process Certificate/TOOL Qualification Certificate by registered letter with acknowledgement of receipt or certified e-mail, indicating the duration of such suspension, as well as the conditions under which the suspension may be revoked. During the suspension period the Organisation will not be able to use the EPD Verification/validation Opinion/EPD Process Certificate/ TOOL Qualification Certificate, nor the connected EPD. In the case of violation of this obligation, the EPD Verification/validation Opinion/EPD Process Certificate/TOOL Qualification Certificate will be revoked. In particular, the Organisation must inform its customers (potential and current) and its suppliers in the event that the EPD Verification/validation Opinion/EPD Process Certificate/TOOL Qualification Certificate is decisive in order to acquire or maintain a contract/ supply.

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

The Organisation may request the suspension of the EPD Verification/validation Opinion/EPD Process Certificate/TOOL Qualification Certificate if it intends to suspend the production of its products/services falling within the scope of the EPD Verification/validation Opinion/EPD Process Certificate/Certificate of TOOL qualification, for any reason, and for a significant period of time (over three months), or transfer the production unit(s). In this 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 with the Organisation which, however, cannot exceed 1 (one) year.

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

When the reasons for the suspension of the EPD Verification/validation Opinion/EPD Process Certificate/TOOL Qualification Certificate no longer exist, ICMQ will communicate to the Organisation the reactivation of the same.

The duration of the suspension of the ICMQ EPD Verification/validation Opinion/EPD Process Certificate/TOOL Qualification Certificate will take effect from the day on which the Organisation receives communication of the suspension. During the suspension period, the Organisation remains obliged to pay the annual maintenance fee established by the Rates Table (if provided for in the contract).

At the end of the suspension period, ICMQ has the right to carry out an additional inspection, with costs borne by the Organisation, to ensure that the conditions exist for the reactivation of the EPD Verification/validation Opinion/EPD Process Certificate/TOOL Qualification Certificate. If the outcome of this verification 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 Organisation in writing of the outcome of the verification.

## 14. Revocation and Renunciation of the EPD Verification/validation Opinion/EPD Process Certificate/TOOL Qualification Certificate

### 14.1. Revocation

ICMQ will order the revocation of the EPD Verification/validation Opinion/EPD Process Certificate/TOOL Qualification Certificate in the most serious cases of violation of these General Contract Terms and Conditions and/or of the reference Standard. In particular, ICMQ will revoke the EPD Verification/validation Opinion/EPD Process Certificate/TOOL Qualification Certificate mentioned above in the following exemplary cases:

a) serious NCs detected in the course of monitoring/renewal audits, confirmed by a formal opinion from the Deliberation Committee;

b) continuation of the reasons that led to the suspension of the EPD Verification/validation Opinion/EPD Process Certificate/TOOL Qualification Certificate, without the Organisation having implemented the Corrective Actions in the pre-established period;

c) repeated non-compliance with the obligations assumed toward ICMQ to remedy any detected and reported failures;

d) voluntary suspension of the activity covered by the EPD Verification/validation Opinion/EPD Process Certificate/TOOL Qualification Certificate for a period of time 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) definitive interruption or transfer of the activities linked to the products reported in the EPD Verification/validation Opinion/EPD Process Certificate/TOOL Qualification Certificate;

f) if the Organisation receives protests or is placed into liquidation or subjected to enforcement procedures;

g) should the Organisation be subjected to any insolvency proceedings and the receiver (or commissioner) does not declare, in time to keep the EPD Verification/validation Opinion/EPD Process Certificate/TOOL Qualification Certificate valid, to take over in place of the insolvent party;

h) final sentence against the Client (*res judicata*) in judicial proceedings (including arbitration proceedings) for facts concerning non-compliance with the conditions set out in the Standard;

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

j) the Organisation fails to fulfil the economic conditions (Art. 9.5 of these General Contract Terms and Conditions) for more than 30 (thirty) days, running from the formal notice to comply sent by ICMQ to the Organisation itself.

ICMQ will notify the Organisation 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 will notify the revocation of the EPD Verification/validation Opinion/EPD Process Certificate/TOOL Qualification Certificate to the competent bodies (EPDItaly, Accredia, etc.).

After receiving the revocation notice, the Organisation is required:

a) o return to ICMQ the original of the EPD Verification/validation Opinion/EPD Process Certificate/TOOL Qualification Certificate within 7 (seven) days of receipt of such communication, by means of a registered letter in which it is declared that it has fulfilled the obligations specified in letters b), c) and d) below;

b) immediately refrain from using copies and/or reproductions of the EPD Verification/validation Opinion/EPD Process Certificate/ revoked TOOL Qualification Certificate and the related EPD;

c) immediately remove any reference to the revoked EPD Verification/validation Opinion/EPD Process Certificate/TOOL Qualification Certificate from letterheads, faxes and emails), business cards, technical and advertising documentation (including company internet domain and any internet domains of associations to which it belongs);

d) immediately communicate this news to its clients and suppliers in the same way in which the release of the EPD Verification/validation Opinion/EPD Process Certificate/TOOL Qualification Certificate was communicated .

The Organisation has the burden of demonstrating that it has fulfilled the aforesaid obligations in writing. Witness evidence is therefore not admitted.

In the event that the Organisation fails to fulfil the specific obligations referred to above, it will pay a penalty in favour of ICMQ of Euro 500.00 (five hundred euro) for each breach and Euro 100.00 (one hundred euro) for each day of delay in complying with these obligations.

Following that revocation, ICMQ will:

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

b) delete the Organisation from the "Register of Certified Companies" in possession of the EPD Verification/validation Opinion/EPD Process Certificate/TOOL Qualification Certificate and publish this revocation by any means;

c) refuse the instruction of a new request for EPD Verification/validation Opinion/EPD Process Certificate/TOOL Qualification Certificate of the Organisation before the Organisation has actually removed the causes that led to such revocation.

ICMQ shall have the right to publish the revocation of ICMQ's 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 will not entitle the Organisation to any reimbursement of the fees and/or quotas paid for any reason, since these will be withheld as a penalty and/or for the payment of those fees which have accrued in the meantime.

The Organisation is in any case required to pay the maintenance fees for the entire current calendar year at the time of revocation of the EPD Verification/validation Opinion/EPD Process Certificate/TOOL Qualification Certificate when contractually required.

**14.2. Renunciation of the EPD Verification/validation Opinion/ EPD Process Certificate/TOOL Qualification Certificate**

The Organisation may renounce the EPD Verification/validation Opinion/EPD Process Certificate/TOOL Qualification Certificate with effect prior to its natural expiry (if applicable), by sending a registered letter with return receipt or 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, informing ICMQ of the cancellation with a minimum notice of six months;

b) in case of cessation of the activity relating to the products or the production unit for which the EPD Verification/validation Opinion/EPD Process Certificate/TOOL Qualification Certificate had been obtained ;

c) if changes are made to the Standard and the Organisation cannot or does not intend to adjust to the new specifications;

d) where the Organisation does not plan on accepting a change to the rates established by ICMQ for its services and such a change is 10% (ten percent) higher than that established in these General Terms and Conditions;

e) if major corporate changes and/or changes to the Organisation's legal status have been made.

In the cases indicated in letters c) and d), above, the Organisation must send a written notice of its waiver to ICMQ within thirty days from receiving notice of such changes.

In any case, the renunciation will take effect:

- from the date of the Organisation'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;
- from the first day of the month following the month scheduled for the execution of the surveillance audit for the EPD Process Certificate/TOOL Qualification Certificate , if the next planned audit is a surveillance audit and the Organisation does not intend to take such an audit.

ICMQ will communicate to the Organisation, by registered mail or certified email, the date of expiration of the validity of the EPD Verification/validation Opinion/EPD Process Certificate/TOOL Qualification Certificate.

ICMQ will notify the renunciation of the EPD Verification/validation Opinion/EPD Process Certificate/TOOL Qualification Certificate to the competent bodies (EPDItaly, Accredia, etc.).

Starting from the date of expiry of the EPD Verification/validation Opinion/EPD Process Certificate / TOOL Qualification Certificate, the Organisation will have the obligation to:

a) return to ICMQ the original of the EPD Verification/validation Opinion/EPD Process Certificate/TOOL Qualification Certificate within 7 (seven) days of receipt of such communication, by means of a registered letter in which it is declared that it has fulfilled the obligations specified in letters b), c) and d) below;
b) refrain from using copies and/or reproductions of the renounced EPD Verification/validation Opinion/EPD Process Certificate/TOOL Qualification Certificate and the associated EPD;
c) delete any reference to the EPD Verification/validation Opinion/EPD Process Certificate/TOOL Qualification Certificate renounced from letterheads (letters, faxes and emails), business cards, technical and advertising documentation (including company internet domain and any internet domains of associations to which it belongs);
d) communicate this news to its clients and suppliers in the same way in which the release of the EPD Verification/validation Opinion/EPD Process Certificate/TOOL Qualification Certificate was communicated .

The Organisation must prove that it has fulfilled the aforementioned obligations in writing and, therefore, witness evidence is not permitted.

In the event that the Organisation fails to fulfil the specific obligations referred to above, it will pay a penalty in favour of ICMQ of Euro 500.00 (five hundred euro) for each breach and

Euro 100.00 (one hundred euro) for each day of delay in complying with these obligations.

On the date of expiry of the EPD Verification/validation Opinion/EPD Process Certificate/TOOL Qualification Certificate, ICMQ will:

- cancel the EPD Verification/validation Opinion/EPD Process Certificate/TOOL Qualification Certificate;
- delete the Organisation from the "Register of Certified Companies" in possession of the EPD Verification/validation Opinion/EPD Process Certificate/TOOL Qualification Certificate and publish this renunciation by any means;

The renunciation of the EPD Verification/validation Opinion/EPD Process Certificate/TOOL Qualification Certificate will not entitle the Organisation to any reimbursement of the fees and/or quotas paid for any reason, since these will be withheld as a penalty and/or for the payment of those fees which have accrued in the meantime.

The Organisation is in any case required to pay the maintenance tariffs for the entire current calendar year at the time of renouncing the EPD Verification/validation Opinion/EPD Process Certificate/TOOL Qualification Certificate (if provided for in the contract).

In the event that the renunciation of the EPD Verification/validation Opinion is communicated with less notice than the deadline set out in letter a) and the Organisation obtains an EPD Verification/validation Opinion/EPD Process Certificate/TOOL Qualification Certificate from another certification body within 18 (eighteen) months of such renunciation, it is also obliged 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 Organisation renounces the EPD Verification/validation Opinion/EPD Process Certificate/TOOL Qualification Certificate due to changes to the above-mentioned Rates Table, the fees of the Rates Table prior to the changes will be applied during the notice period.

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

The Organisation may let the EPD Process Certificate/TOOL Qualification Certificate expire without renewing it. In the event of non-renewal and consequent expiry of the same, ICMQ may notify the Programme Operators and, in general, the competent bodies.

ICMQ will notify the Organisation, by registered mail with acknowledgement of receipt or certified email, of the date of forfeiture of the validity of the EPD Process Certificate/TOOL Qualification Certificate.

Starting from the date of expiry of the EPD Process Certificate/TOOL Qualification Certificate, the Organisation will have the obligation to:

a) return to ICMQ the original of the EPD Process Certificate/TOOL Qualification Certificate within 7 (seven) days of receipt of such communication, by means of a registered letter in which it is declared that it has fulfilled the obligations specified in letters b), c) and d) below;

b) refrain from using copies and/or reproductions of the renounced EPD Process Certificate/TOOL Qualification Certificate and the associated EPD;

c) delete any reference to the expired EPD Tool Certificate/TOOL Qualification Certificate from letterheads (letters, faxes and emails), business cards, technical and advertising documentation (including the company internet domain and any internet domains of associations to which it belongs);

d) communicate this news to its clients and suppliers in the same way as the issue of the EPD Process Certificate/TOOL Qualification Certificate was communicated.

The Organisation must prove that it has fulfilled the aforementioned obligations in writing and, therefore, witness evidence is not permitted.

In the event that the Organisation fails to fulfil the specific obligations referred to above, it will pay a penalty in favour of ICMQ of Euro 500.00 (five hundred euro) for each breach and Euro 100.00 (one hundred euro) for each day of delay in complying with these obligations.

On the date of expiration of the EPD Process Certificate/TOOL Qualification Certificate, ICMQ will:

- cancel the EPD Process Certificate/TOOL Qualification Certificate;
- delete the Organisation from the "Register of Certified Companies" in possession of the EPD Process Certificate/TOOL Qualification Certificate and publish such renunciation by any means.

The expiry of the EPD Process Certificate/TOOL Qualification Certificate will not entitle the Organisation to any refund of the fees and/or fees paid for any reason, which will be withheld as a penalty and/or to eliminate the obligation to pay those accrued in the meantime.

In any case, the Organisation is required to pay the maintenance fees for the entire current calendar year at the time of expiry of the EPD Process Certificate/TOOL Qualification Certificate.

## 16. Terminating 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) renunciation of the EPD Verification/validation Opinion/EPD Process Certificate/TOOL Qualification Certificate;

c) expiry of the EPD Process Certificate/TOOL Qualification Certificate;

d) a serious breach of these General Terms and Conditions and of their Attachments, including failure to pay an invoice for more than 30 (thirty) days from receiving the formal letter requiring compliance sent by ICMQ;

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

Changes to assessment requirements may occur due to:

– changes to regulations and reference documents;

– changes to these General Contract Terms and Conditions.

In the first case, the information is provided by means of a communication from the regulatory and/or accreditation bodies and the ICMQ newsletter.

In the second, ICMQ will provide information by certified email to Organisations holding an EPD Verification/validation Opinion/EPD Process Certificate/TOOL Qualification Certificate and/or Organisations in the process of obtaining one, making information available in the reserved client area of the site www.icmq.org. ICMQ will also define the date from which the changes will come into effect, providing a reasonable period of time for Organisations to adapt to the new requirements.

Organisations that do not intend to adapt their EPD Verification/validation Opinion/EPD Process Certificate/TOOL Qualification Certificate to the changes in the reference regulations or release conditions may renounce it as long as they communicate this to ICMQ according to the methods indicated in the Art. 14.2 of this document.

In the event of changes to the reference Standards, ICMQ reserves the right to verify the conformity of the adequacy of the EPD Verification/validation Opinion/EPD Process Certificate/TOOL Qualification Certificate issued to the Organisation with the new requirements of the legislation.

The costs for any audits are borne by the Organisation to which the EPD Verification/validation Opinion/EPD Process Certificate/TOOL Qualification Certificate was issued.

## 18. Third party liability

ICMQ is only liable for damages caused by intentional acts or gross negligence and in any case within the limits set out below.

The Organisation accepts that, in the event of a breach by ICMQ, it may be compensated for any damage up to the maximum sum of the total amount due to ICMQ for the entire term of the publication contract. Any failure to discharge a duty that is

attributable to force majeure, unforeseeable circumstances or strikes, does not amount to a breach by ICMQ.

ICMQ is insured against damages to property and people and damages to assets, having taken adequate insurance with a leading insurance company.

### 19. Appeals

The Organisation may submit a reasoned appeal against the ICMQ decisions referred to in the Art. 10.6, illustrating the reasons for its dissent by registered letter with return receipt or by certified email, under penalty of forfeiture, within thirty days from the communication of that decision.

Within three months of receiving an appeal, ICMQ will give its final decision.

If the appeal is rejected, any costs for appeal-related activities will be charged to the Organisation.

### 20. Complaints and Grievances

Disputes and complaints concerning both the activities of ICMQ and that of the Organisation may be addressed to ICMQ, as well as by the Organisation itself, also by third parties who may refer to these General Contract Terms and Conditions available on the www.icmq.orgwebsite. The description of the complaints and grievances process is given to those applying therefor.

### 21. Privacy

Pursuant to EU Regulation 2016/679 and domestic legislation on the matter, the Client hereby authorises ICMQ spa to process the personal data of the natural persons subject - directly or indirectly through third parties - to processing relating to the requirements connected to and/or related to, in any way, this Regulation. The Controller is ICMQ Spa. Comprehensive information is available on the home page of the website, www.icmq.it.

### 22. Copyright

ICMQ is the owner of the copyright on all documents (Application Guides and Checklists) provided to the Organisation. The Organisation can only use these documents within the scope of the contract with ICMQ. The Organisation may not photocopy, reproduce or publish such documents, not even in part, without the prior written consent of ICMQ.

### 23. Disputes - Arbitration

#### 23.1. Arbitration

The parties intend to derogate from ordinary Courts, so that any dispute that might arise between them in relation to the validity, interpretation and execution of these General Conditions will be settled by arbitration in accordance with the Regulations of the Arbitration Chamber of Milan and in accordance with the provisions of law on the merits of the dispute. The Arbitration Board will be made up of a sole arbitrator appointed in accordance with the said Regulations. The arbitration proceedings will take place in Milan.

In the event of a dispute, the plaintiff's lawyer shall file the request for arbitration including also the request to appoint the arbitrator by the Court of Arbitration, also submitting a copy of this request to the defendant by registered letter with return receipt or by certified email. The defendant's lawyer shall file a statement of defence within 45 (forty-five) days of receiving the request for arbitration from the General Secretariat, sending a copy of this statement to the plaintiff's lawyer by registered letter with return receipt or by certified email. For any other statements, the deadline for filing shall be no less than 45 (forty-five) days from the statement or from the previous hearing. The lawyers will be sent all communications relating to the proceedings, including the notification of the award.

The award will be issued within 180 days of the arbitrator's formal acceptance of his/her appointment, subject to any extensions granted in writing by both parties and subject to the arbitrator's right to extend the deadline automatically, for no more than 180 days, if this is required for investigation purposes. The holiday period for suspension of legal deadlines shall be applied under the terms of the arbitration procedure.

The award will be final, conclusive and binding on the parties, who expressly waive the right to challenge the award; therefore, the parties undertake to comply with its content and to abide thereby immediately and, in any case, within and no later than the essential deadline of 10 (ten) days from communication of the award. Otherwise, the defaulting party will pay to the other party a penalty of Euro 100.00 for each day of delay.

#### 23.2. Judicial Authority

ICMQ expressly reserves the right to bring an action before the Judicial Authority of the Court in Milan as an alternative to the arbitration proceedings referred to above, both in the case of disputes relating to the payment of any amounts due under these General Conditions and for precautionary procedures (and other procedures reserved to the Courts). The Organisation may not raise any objection in the event of opposition to the injunction in order 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 counter-claim) must be raised in the arbitration proceedings mentioned above.